



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Consultation on a new Fuel Poverty Strategy for Northern Ireland

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Foyle Women's
Information



Network

Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities Consultation on a new Fuel Poverty Strategy for Northern Ireland.

We know from our research work that women often bear the brunt of poverty in their homes as we have detailed in Section 2.0 of this response. Women often act as the shock absorbers of poverty going without heat, food and other essentials to protect their children and family members when money is tight. The same can be seen with energy costs, women will stay in cold homes through the day, only using heating when their families are at home and will prioritise the use of hot water for their children/family members.

Our research shows that women are struggling with the costs of the most essential items including food and energy bills. Without help they are very vulnerable to fuel poverty and the detrimental health impacts of fuel poverty.

1.5 We wish to endorse the response made by the Women's Policy Group of which we are a member and the responses made by the Fuel Poverty Coalition (FPC) and National Energy Action NI (NEA NI). We fully endorse their responses and urge the Department to take their evidence fully into consideration.

1.6 We want to particularly endorse this comment from the FPC as an overarching response to this consultation and key to the success of a Fuel Poverty Strategy for Northern Ireland:

“the FPC welcomes the draft strategy’s key objectives, proposed outcomes, and actions but is disappointed by the absence of specific, measurable targets – especially a clear target for reducing fuel poverty. We also urge for the finalised strategy to be backed by comprehensive funding and a detailed action plan for effective implementation.”

2.0 General Information

The most recent official figures for fuel poverty in Northern Ireland are based on the 2016 House Condition Survey and sets the rate at 22%. However, polling by LucidTalk on behalf of National Energy Action NI (NEA NI)² found that 40% of households in Northern Ireland were in fuel poverty. This polling also showed:

- 70% of households have already cut down on their central heating;
- 27% of households said they went without heating (oil/gas) or electricity at a point during the last 24 months because they could not afford the costs of energy;
- 11% of households say they are currently in debt, or have been in debt in the last 24 months, to their energy supplier;
- 22% of respondents had to borrow money to pay for their energy use;
- 31% of respondents say that they or a member of their household's health and wellbeing has been impacted by the rising energy prices and the cost of living. For people in the private rented sector the figure jumps to 56%;
- 44% of respondents say that their quality of life has been impacted by rising costs;
- 57% of respondents were worried about paying for their energy costs.

People who experience fuel poverty face significant detrimental impacts including on their mental and physical health. This contributes to the strain on already overstretched public services. Women feel the impacts more severely as they try and shield others especially children from the impacts of poverty.

“Sometimes you struggle between turning the heating on and feeding the children. As a mother you’d go without to make sure the kids have what they need. I’ve made dinner sometimes and there hasn’t been enough for everyone so I’ve lied and said it’s alright I’ve eaten so that I can try and make it stretch.”

² LucidTalk — NEA NI: September 2024 – Northern Ireland (NI) Attitudinal Poll
https://www.nea.org.uk/publications/lucidtalk-nea-ni-september-2024-northern-ireland-ni-attitudinal-poll/?_gl=1*1vatpl*_up*MQ..*_ga*MTcyMDcyNTYxMi4xNzM5NDUzMjc5*_ga_VGRVTFGMVL*MTczOTQ1MzI3OC4xLjEuMTczOTQ1MzIxNS4wLjAuMA..

While it is important to see a Fuel Poverty Strategy for Northern Ireland it must not work in isolation from other Strategies. It must work with and sit alongside an **Anti-Poverty Strategy for Northern Ireland**. It is not possible to address the issue of fuel poverty without looking at the factors contributing to it. There is a greater need to tackle poverty in the round through investing in social security benefits, childcare, social care, working against low pay and poor quality work, etc. We support the calls from the Anti-Poverty Strategy Group for an *“overarching, comprehensive Anti-Poverty Strategy based on objective need which is evidence based and takes a rights based approach.....The Strategy should be fully resourced.....Cross-departmental responsibility, delivery and accountability should be a key feature of the strategy. The Strategy should include and interconnect NI Executive policies on addressing poverty.”*³

“This is a very welcome Strategy but it needs to feed into the Energy Strategy and an Anti-Poverty Strategy – it needs to be done alongside these and cross-departmentally – this needs to happen.”

“Poverty is poverty – compartmentalising it is dangerous – it needs to be done in conjunction with an Anti-Poverty Strategy – tackle poverty through good jobs, better social security – it all needs to be linked.”

It is important to remember as part of this consultation process that **every winter 290 people die in Northern Ireland due to cold homes.**⁴ The Fuel Poverty Strategy is about real people and the impacts of fuel poverty on their lives and this must be central to efforts to reduce it.

“Strategies are strategies but we need to remember that we are dealing with real people and that must not be forgotten.”

³ https://www.barnardos.org.uk/sites/default/files/uploads/Anti-Poverty_BriefingPaper_D3.pdf

⁴ <https://www.nea.org.uk/northern-ireland/>

2.1 Women and Fuel Poverty

We wish to highlight a range of reasons why women are more likely to experience poverty including fuel poverty:

- Women are have been more impacted by welfare reform policies;
- Women are more likely to be in receipt of social security benefits;
- Women have longer life expectancy;
- Women are more likely to be in low-paid, part-time and insecure work keeping their incomes lower over their lifetimes;
- Women are more likely to provide care either for children or other family members limiting their ability to undertake paid work;
- Women are more likely to have to make up for cuts to public services through unpaid work;
- Pension wealth for women is much lower than men and women are less likely to have retirement savings than men.

All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

As highlighted by the Gender Equality Strategy Expert Panel Report⁵ there are strong links between low income, unemployment and fuel poverty. The expert panel report referred to data from the House Condition Survey 2016, which is now badly out of date, but it does indicate that more female households are likely to be in fuel poverty – 31% of households with a female household reference person are in fuel poverty compared to 16% of households with a male household reference person.

2.2 Poverty in Northern Ireland

Nearly 1 in 5 people in Northern Ireland are living in poverty, as 18% (approximately 349,000) people are considered to be in relative poverty and 14% (approximately 271,000) are considered to be in absolute poverty. In relation to child poverty, 24%

⁵ Report from the Gender Equality Strategy Expert Advisory Panel, published by the Department for Communities, March 2021
[Report from the Gender Equality Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk)

of children (approximately 109,000) live in relative poverty and 19% of children (approximately 86,000) live in absolute poverty. The increase of relative child poverty from 18% in 2022 to 24% in 2023 indicates a worrying trend.⁶

A Northern Ireland Audit Office report into Child Poverty in Northern Ireland⁷ found there has been little sustained improvement in child poverty levels since 2016 and that this means that these children are more likely to have poorer health, educational and wellbeing outcomes than their more well-off peers. It also stated that child poverty brings a considerable cost to the public purse, with the estimated annual cost of child poverty between £825 million and £1 billion annually.

Women are generally more likely than men to live in poverty across their lifetimes and lone parents are even more vulnerable to poverty (Census figures show that 93% of lone parents are women). In Northern Ireland the family type at the highest risk of being in relative poverty was 'single with children' at 38%.⁸

One in four unpaid carers in Northern Ireland (25%) are living in poverty – significantly more than Northern Ireland's non-carer population (16%) and higher than the carer poverty rate across the UK (23%). This means around 55,000 unpaid carers are living in poverty.⁹ Providing unpaid care is a gendered issue with women more likely to provide this care. Nearly 60% of unpaid carers are women and women have a 70% chance of providing care in their adult life and are more likely to care early in their life.¹⁰ Nationally statistics show that by the time they are aged 46, half of women have been a carer.¹¹

⁶ https://datavis.nisra.gov.uk/communities/PII_report_2223.html#Poverty_Measures

⁷ Child Poverty in Northern Ireland, NI Audit Office, March 2024

<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

⁸ https://datavis.nisra.gov.uk/communities/PII_report_2223.html

⁹ The experiences of poverty among unpaid carers in Northern Ireland, Carer Poverty Commission, August 2023

<https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

¹⁰ Career or Care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

¹¹ Will I care? The likelihood of being a carer in adult life, CarersUK, November 2019

http://www.carersuk.org/images/News_campaigns/CarersRightsDay_Nov19_FINAL.pdf

“I am a carer for my husband and he has to be kept warm it doesn’t matter what, I have to keep the heat on. He has a very low immune system and I have to make sure he’s kept warm and fed well. The cold weather brings him down. We had to have the heating on 24/7 regardless of the price. We had to have 3 fills of oil during the Winter - £900 a time. There are things you just have to do.”

“Times I would be changing the bed every other day due to my husband’s sweating. In terms of your electricity costs I just have to go with it. These are the things that other people don’t realise when you’re a carer. You’re doing without other things to pay for the things you have to pay for.”

“I care for my mother who is 84 and immobile. Her heating has had to be on more and it is taking way more money for gas than it did trying to keep her warm enough. She has a hospital bed (she needs it because it’s adjustable), a hoist, an electric cushion to stop her getting bedsores. All these extra electric things are running as well all day every day. Her electricity has really soared as well not just in terms of how much it is used but in the cost of it as well it’s crazy. I’m trying to take her out an odd time for a wee break and change of scene but the money’s just not there for it anymore. I have access to accessible transport and they’re great, I pay £2.50 for it. But it’s taking that much now for the basics. I’m trying to buy in things to give her some variety and choice but even with that I’m having to be cautious what I’m buying as the money’s just not there.”

“My elderly parents live with me, my mother is paralysed and I have to have the heat on constantly as she is always freezing – this has had a massive impact on my gas bill.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

Food banks in the Trussell Trust network in Northern Ireland distributed over 90,300 emergency food parcels in 2023/24. This is the highest number of parcels that the network in Northern Ireland has ever distributed and represents a 11% increase on 2022/23 levels. This percentage increase is higher than the respective figures for England (5%), Scotland (-0.1%), and Wales (1%). These figures represent more than a doubling (143% increase) in the number of parcels distributed five years ago

in 2018/19 and they are far above the levels seen before the rapid increases in the cost of living in 2021/22 (62,600 parcels).¹²

The Consumer Council for Northern Ireland Household Expenditure Tracker highlights those in the lowest earning households at the bottom 25% of the income distribution have just £49.95 of discretionary income per week after spending on the basics. It also shows that Northern Ireland's lowest earning households' gross household income per week is £283.26 per week, 6% lower than the rest of the UK and that income from social security benefits is at 70% in Northern Ireland compared to 61% in the UK.¹³

An ARK research paper¹⁴ found that around 25% of households in Northern Ireland could not afford to pay an unexpected £500 bill and just over 24% of households reported having to turn the heating down or off due to costs (over half (52.1%) of respondents who described themselves as low income had turned the heating down or off because they could not afford it). Respondents who reported financial hardship were asked to identify how they have been coping and 44.6% reported borrowing from friends and family and 26.6% reported increasing credit card debt.

The ARK research paper also found that almost half (49.3%) of respondents agreed that it was the responsibility of the government to reduce differences in income between people with high and low incomes. It found that 61.7% of respondents disagreed (24.4% strongly disagreed) that the Northern Ireland Executive is doing all that it can to reduce poverty.

2.3 The Impact of the Cost-of-Living Crisis

Research by the Consumer Council shows 90% of consumers in Northern Ireland are concerned about the rising cost of basics. The cost of home energy tops consumer concerns at 91%, followed by food and non-alcoholic drinks (80%). To

¹² <https://www.trussell.org.uk/news-and-research/latest-stats/end-of-year-stats>

¹³ Northern Ireland Household Expenditure Tracker Q2 2024, April to June, Consumer Council, November 2024

<https://www.consumerCouncil.org.uk/research/q2-2024-northern-ireland-household-expenditure-tracker>

¹⁴ The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update, May 2022

<https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf>

cope with these rising costs over a quarter (27%) of consumers reported eating poorer quality or less nutritious food and 24% said they had been skipping meals or eating fewer times in the day (23%).¹⁵

The Women's Regional Consortium and Ulster University carried out detailed research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives and families. A research paper summarising the findings along with a shorter summary document and a topic summary specific to the costs of education are all available on the Women's Regional Consortium website here:

- **Full research paper:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>
- **Summary leaflet:**
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/03/The-Impact-of-the-Cost-of-Living-Crisis-on-Women-in-NI-In-Brief-1.pdf>

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.¹⁶ These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

"It's awful watching your electricity and gas meter all the time. I'm sick of it all to tell you the truth."

¹⁵ Consumers' views and behaviours in response to the rising cost of basics, The Consumer Council, March 2024

<https://www.consumercouncil.org.uk/news/90-consumers-concerned-about-rising-cost-basics>

¹⁶ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019

<https://fabians.org.uk/a-female-face/>

“I’m just putting the heating on for my wee one getting up for school. Once I get home it’s not on again until she comes home from school again.”

“We actually don’t have the heating on. I’ve been trying to top up the gas but it just keeps running out all the time so I’ve given up putting it on and I’m just using the wee electric heaters. We have heaters, the ones that don’t cost much to run so that’s what we’re living on the wee plug in heaters.”

“Last week I had no money for gas whatsoever, we literally had no gas. I had to choose between gas and food. The whole week we had no gas and it was cold. It was shit.”

“I can’t hold out to the gas and electric at the minute. I’ve turned off nearly all my radiators, I only have 2 on now. I can’t afford to have them on. If I’m cold I just have to put a blanket round me.”

“Electricity and gas has been absolutely devastating for me, it’s hard to make ends meet. I seem to have no money at the end of the month.”

“They put the old age pension up so I’m getting an increase in April but the forecast on my broadband /TV is going to eat it all up. My rent is going up too. It’s all going up so I won’t see it, I won’t be any better off. It disappears before you even get it.”

“I go to things like this [focus group] or other programmes that get me out of the house and I can keep warm and not put my own heat on. I just go and sit anywhere else when I’m cold to get heat in other places. I have gas heating and it’s very expensive.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

2.4 Welfare Reform/Austerity Policies and Women

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. However, the safety net provided by the social security system has been weakened by a decade of welfare reform changes

meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down.

Welfare reform and austerity policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women.¹⁷

In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)¹⁸ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

As time goes on, the two-child limit is likely to have a disproportionate impact on families in Northern Ireland. Research by the Northern Ireland Human Rights Commission outlined that larger family sizes are more common in Northern Ireland. ONS statistics show that 21.4% of families in Northern Ireland have three or more children, compared to 14.7% of families in the UK as a whole.¹⁹

The Department for Communities has estimated that the average number of monthly recipients on Universal Credit and Child Tax Credit affected by the policy will be 14,000 in 2022/23, rising to 16,000 in 2023/24 and 19,000 in 2024/25.²⁰ Households that are impacted by the two-child limit lose just over £287 per month per child.

¹⁷ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

¹⁸ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019
https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

¹⁹ Cumulative impact of tax and social security reforms in Northern Ireland, NI Human Rights Commission, November 2019, [Final CIA report Oct 2019.pdf \(qub.ac.uk\)](https://www.qub.ac.uk/~qub00001/~/media/Research/NIHRC/Final_CIA_report_Oct_2019.pdf)

²⁰ Welfare Mitigations Review, Independent Advisory Panel Report, October 2022
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

The impact of ongoing welfare reform policies including the two-child limit, larger family sizes and rising poverty levels in Northern Ireland will have impacts on the ability of many low-income families to afford a range of essentials including energy costs. As outlined throughout this response, women will often be forced to absorb the impacts of these issues by going without essentials to try and provide for their children and families and in some cases will be unable to shield their children/families from the impacts of poverty.

2.5 Borrowing and Debt

Borrowing and debt are far from gender neutral. Women are more likely than men to claim social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing unpaid care and more likely to have to make up for cuts to services through unpaid work. As women's incomes are generally lower over their lifetimes this leaves them more vulnerable to short-term financial problems or income shocks making them more likely to have to rely on borrowing and debt to make ends meet.

Research by the Women's Regional Consortium²¹ on Women Living with Debt in Northern Ireland showed that the majority of the women's borrowing had been to fund essential items or to make ends meet. It also found that many (51%) had resorted to high-cost lending and difficulty meeting their debt repayments was a common problem (60%). Worryingly, there were also examples of borrowing through loan sharks including paramilitaries (6%). The impact of the Cost-of-Living Crisis on women's debts was evident in our subsequent research with 60% of the women reporting their debts had been impacted by rising energy prices and 60% also reporting their debts had been impacted by rising food prices.²²

Low-income households are the most vulnerable to debt and increasingly are having to use borrowing to meet everyday expenditure. Research by the Joseph Rowntree

²¹ Women Living with Debt, Women's Regional Consortium, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

²² Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

Foundation²³ shows that Cost-of-Living increases have hit poorer households the hardest. In the poorest fifth of families 6 in 10 cannot afford an unexpected expense, more than half are in arrears and around a quarter use credit to pay essential bills.

2.6 Timescale to Respond

The final date for responses to this consultation is 6 March 2025. While on the face of it, it looks like this gives respondents 12 weeks to respond to this consultation this is not the case. This consultation was published on the website on 12 December 2024 and ran over the Christmas holiday period. In effect, respondents had less than 12 weeks to respond and allowances must be made for holiday periods. In order to enable genuine and meaningful consultation the consultation timeframe should be at least 12 weeks.

As the Women's Regional Consortium we want to ensure that women from the most disadvantaged and rural areas of Northern Ireland are given the chance to share their valuable experiences and opinions to help influence and shape the actions of Government. A shorter consultation timeframe severely limits the opportunities to organise engagement with local groups to explain the contents of the consultation, facilitate discussion and meaningfully collect the views of those impacted by its contents. It means that organisations like ourselves have insufficient time to properly consult with affected women so that their views/experiences which are so critical remain outside the process. We do however welcome the fact that the Department have carried face to face engagement with local groups including a Women's Centre in relation to this consultation.

This consultation was published alongside a number of other Government consultations which also require detailed responses by the Community and Voluntary sector. The volume of consultations continues to put huge pressure on an already overstretched and under-resourced sector who are facing significant challenges due to funding cuts, insecure contracts and increased demand for our services.

²³ UK Poverty 2023, Joseph Rowntree Foundation, January 2023
https://www.jrf.org.uk/sites/default/files/jrf/files-research/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf

3.0 Specific Questions

1. Do you agree with the proposed vision and guiding principles? If not, please suggest alternatives and why.

Yes, we agree with the proposed vision and guiding principles. We support the comments made by the FPC:

“The proposed vision – ‘A warm, healthy home for everyone’ – is clear and aspirational. It succinctly conveys that fuel poverty is a cross-departmental and cross-sectoral challenge, encompassing issues relating to energy, health, housing, equality, social deprivation, and the environment.”

However, we strongly agree with the comments made by our colleagues in NEA NI and the FPC who have welcomed the draft strategy’s vision and principles but stated:

“we are disappointed by the lack of specific, measurable targets – particularly a clear target for reducing fuel poverty. We also urge that the finalised strategy is backed by comprehensive funding and a detailed action plan for effective implementation.”

The final Fuel Poverty Strategy must include specific, measurable targets to reduce fuel poverty, a detailed action plan and have the necessary funding to achieve its vision and actions.

2. Do you agree with the timeframe and review period? If not, why not?

We agree with the 10-year timeframe and review period. This provides for a long-term strategy as well as annual reporting which ensures accountability. As highlighted by our colleagues at NEA NI: *“these mechanisms will be critical for assessing progress and making timely adjustments in response to emerging challenges and opportunities, such as shifts in energy markets, evolving decarbonisation policies, and advancements in technology.”*

Make homes more energy efficient

3. What would a readily understandable and measurable definition of “thermal comfort” look like?

As outlined by NEA NI *“defining thermal comfort is complex, as it depends on multiple factors – some measurable and others more subjective.”* We echo the calls of NEA NI and the FPC for the need for a robust definition of thermal comfort. We agree with NEA NI who have urged the Department to incorporate the guidance from the Building Services Research and Information Association, research from other jurisdictions and the World Health Organisation (WHO) guidelines which recommend that occupied rooms be maintained at 18– 21°C. We agree with NEA who believe that *“homes should meet a standard that they can be **kept warm at a reasonable cost.**”*

We support the consultation’s proposal to update Housing Fitness Standards by 2030 but agree with NEA NI and the FPC who believe that this long overdue and want to see this delivered sooner.

4. For MEES in PRS to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?

As the private rented sector has the highest levels of fuel poverty we strongly support introducing MEES in the PRS. We support the calls by NEA NI and the FPC for the final Strategy: *“to include specific, measurable targets for MEES implementation and reducing fuel poverty.”* The FPC recommended a target to reduce fuel poverty to 20% by 2027 and eradicate it by 2035, ensuring no low-income households live in homes with an EPC rating below Band C.

In terms of data we support the recommendations from NEA NI which are:

- **Up-to-Date EPC Certificates (or similar):** To assess property energy efficiency and measure improvements.
- **Records of energy efficiency upgrades:** Including dates and details of improvements made.

- **Records of complaints:** Information from tenants about issues like damp, mould and cold recorded by councils and the Northern Ireland Housing Executive (NIHE).
- **Property age and type:** To understand the potential for energy efficient upgrades and low-carbon heating systems.
- **Heating systems:** Information on current systems and their efficiency.
- **Heating costs:** Information on current energy expenditure to evaluate the impact of MEES.
- **Boiler servicing records:** Evidence of annual servicing, with clear dates and manufacturer details.
- **Insights from Scotland’s Private Rented Sector Landlord Loan scheme:** Lessons learned regarding uptake and outcomes to inform a similar scheme in NI.
- **Insights from Rent Smart Wales:** Example of aiding and managing enforcement.

We agree with the views of NEA NI and the FPC that the barriers to overcome include landlord resistance due to costs, enforcement gaps, potential tenant displacement during upgrades, and affordability for small-scale landlords. The issue of displacement of tenants was raised in our focus group discussions as the women felt that many of those on low-incomes would not be able to bear the financial burden of displacement.

“If someone was getting their whole house done, would they have to leave? Where are they going to stay? How can you afford to stay out of your house? If you’ve no family to go to what do you do, if you can’t afford to stay in a hotel or somewhere. Where would you stay – you would need support if there was major works.”

5. Should MEES also be applied to other tenures? Please give reasons for your answer.

Yes, we believe that MEES should be applied to other tenures. Our focus groups discussions have suggested that many social housing properties also have poor

energy efficiency levels. As NEA NI states: *“all housing sectors require minimum standards to improve energy efficiency and reduce fuel poverty.”*

We also agree with NEA NI that affordability remains a key barrier to necessary improvements: *“Without adequate financial assistance, many households will struggle to meet MEES requirements. To prevent additional strain on fuel-poor households, robust protections and sufficient funding must be provided to enable them to afford essential upgrades.”*

“I live in a Housing Executive property and I found out that we had no insulation in the attic. My friend was helping me put away my Christmas decorations and she asked me why there was no insulation. I had to push NIHE to get that done.”

“See the storm I went into my kitchen and everything was blowing about. There’s a draught behind my washing machine. I have rang the Housing Executive many times but I’m not getting any help with it. My bathroom is always freezing, the house is so old. The kitchen is always freezing too. We end up locking ourselves in the living room or upstairs bedroom to stay warm.”

“I’m in Housing Association property and the house is freezing. I didn’t sign up for damp or draughts.”

“There are not just problems in private rentals but also in NIHE/social housing.”

“House swaps – there is a need to look at standards there. Because I agreed to move I had to go ahead with it. My son leaned on the bathroom sink and it fell on the floor. I had to fork out to put a new bathroom in as it wasn’t safe. I was waiting on my Housing Association to do it.”

“As soon as my heating goes off within 20 minutes it’s cold again. I can’t have my temperature set too high so I have it on lower so I can afford it. If I put it up to 20 degrees my bill would be too big.”

6. Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient? Please provide reasons for your answer.

Yes we believe that updated fitness standards would contribute to making homes more energy efficient. However, in order to ensure this happens there must be proper enforcement of the fitness standards. Our focus group feedback showed that landlords are slow to act or simply don't act at all unless there is legislation in place that forces them to. There was some concern that if updated fitness standards were introduced this could lead to landlords removing their houses from the rental market and that would further reduce supply of rental properties when demand already outstrips supply.

"The only reason my private landlord sorted the fire alarms was because there was a new law, even though I had pushed him to try and get him to do it before the law came in."

"Landlords need a push. We've had to fight for some things. Our landlord did fix our shower pretty quick when it needed fixed but then a shower is something that everybody needs. The house needs other work and the front door needs changed because of a draught but nothings been done about that. I just had to tape it myself, I don't have the money to change it. I can't afford it. You don't want to spend money when it's not your house – you're adding value to their house."

"If you bring in new standards how many landlords will drop out of renting their house? There's already not enough houses."

"In 2025 you should have double glazing."

"A proper front door. You need a composite door to keep the heat in."

"It makes such a difference to go from single to double glazing."

"I'm in social housing and our bathroom leaked and it took a year and a half to fix a massive hole in it. Every time someone took a bath or shower there was a puddle on the kitchen floor. The only reason it got fixed was that my son who is a year and a half slid on the floor and hit his head on a cupboard and I had to bring him to hospital. That's the only reason they came out to fix it."

7. Do you agree that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles?

We support the proposal that all government domestic energy schemes should take into account the principles of the Fuel Poverty Strategy. We agree with NEA NI and the FPC that: *“A coordinated approach across all schemes is essential to maximise impact, prioritise those in need, and prevent gaps in support.”*

8. Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing income thresholds and eligibility criteria? Please give reasons for your answer.

Yes, we agree. A more flexible approach to setting income thresholds and eligibility criteria is needed. We agree with NEA NI that: *“a rigid approach that relies solely on income thresholds fails to capture the complex realities of households facing fuel poverty. Many factors - including household composition, health conditions, and housing conditions - affect energy consumption and affordability. For example, a person with a specific health condition may spend more on heating bills and a larger family will naturally have higher energy demands than a single-person household.”*

We again agree with NEA NI who have said that: *“To ensure support reaches those in need, DfC should adopt a more flexible, data-driven approach, prioritising disposable income over gross income to better assess financial capacity. A vulnerability matrix should also be introduced, similar to that used by the Northern Ireland Sustainable Energy Programme (NISEP), to assess priority need.”*

“I don’t think there should be any argument about pensioners – they can’t move around and they feel the cold a lot more. The priority should be those people, those in the worst homes.”

“High childcare costs can affect your ability to heat your home.”

“Universal Credit is not enough to keep you and to meet your bills. Prices are going up, electricity is going up, fuel is going up but our money’s not going up. Benefits are going up £7/week – what’s that going to get you – wouldn’t even get you 2 boxes of strawberries.”

9. Do you agree that an income threshold should increase in line with minimum wage levels/inflation or another index such as RPI to mitigate increases in the cost of living? Please give reasons for your answer.

Yes, we agree that the income threshold should increase in line with inflation and minimum wage levels. Without doing this more and more people end up struggling to pay for their energy costs and narrowly miss out on any help available because they fall outside a set of eligibility criteria which has failed to keep pace with these changes.

We support NEA NI who have recommended: *“targeting the worst first which is likely to be a combination of the lowest income households alongside those with the worst energy performance.”*

We also agree with NEA NI that: *“assessing income after housing costs is also essential, as high rents, mortgages, and other expenses significantly reduce disposable income, making energy costs harder to manage.”* Focus group feedback reinforced this with discussion around the high costs of childcare which significantly lowers levels of disposable income.

“Any new scheme has to move with the times – it needs to be future proofed – try to build in eligibility limits that rise with inflation and the minimum wage, etc.”

“They need to look at disposable income – actual income so what people have available to spend after things like paying for childcare.”

10. Should the Energy Performance Certificate (EPC) rating of a house be considered as part of eligibility criteria (i.e. the least energy efficient homes are considered first)? Please give reasons for your answer.

We agree that the EPC rating should be considered as part of the eligibility criteria but it should not be the only factor. Data collected by NISRA²⁴ shows that when

²⁴ Energy rating of housing in Northern Ireland: Up to March 2023, NISRA, July 2024.
<https://datavis.nisra.gov.uk/communities/energy-rating-of-housing-in-northern-ireland-2023.html - Section 2: Individual EPC bands>

looking at all dwellings in Northern Ireland, approximately two-fifths (39%) of dwellings achieved an energy rating of C or above. However, the most common rating in Northern Ireland was a rating of D (35%). The median energy efficiency rating in Northern Ireland is in band D, with majority of homes that are privately rented sitting in bands D or E and socially rented homes falling into band D. This illustrates the clear need for the EPC rating to be included as part of the eligibility criteria.

We agree with NEA NI who have suggested that the Department should engage with Government departments in England and Wales given current EPC reform reviews to determine any areas of learning in this area.

“The state/condition of the home is important, you need to find the homes that are the worst performing and target them.”

“New builds have been thrown up and some are falling apart. The EPC needs to be up to date – being lived in is different from when it was first built - 5 years later the EPC could be different.”

“You shouldn’t be able to sell your house or move house unless you have a certificate. They do it for cars. You can’t pass if it’s not up to a certain standard.”

11. Do you agree that the new scheme should continue with the Whole House retrofit approach? Please give reasons for your answer.

The whole house retrofit scheme is the most beneficial to tenants, it can be disrupting if there are ongoing small, individual renovation and improvement works especially for people with disabilities, those with care needs and their carers, older people and those with children.

Focus group feedback was supportive of the whole house retrofit approach so that the maximum benefits could be gained from energy efficiency improvements and some felt that it would be cheaper in the longer-term to do it this way.

There were some concerns about where people would stay while works are ongoing during renovations and we agree with our colleagues in NEA NI that it is important to identify and reduce barriers that prevent access to these schemes.

“Surveys of the home are important – there’s a need to look at the whole house and try to do everything at one time so that you can get the greatest impact from a warm home.”

“Even though its expensive it’s cheaper in the long run – you don’t have to go back and forward.”

12. If the Whole House approach is used, do you agree that all recommended measures must be installed unless there are exceptional reasons not to?

Please give reasons for your answer.

Yes, we agree that the whole house approach is the ideal way to achieve maximum energy efficiency so where this is possible it should be the approach. However, as raised by NEA NI: *“a balance must also be struck between maximising heat loss savings and the additional cost and disruption of a full retrofit. If the costs and disruption outweigh the benefits, it may not be practical to insist on installing every recommended measure.”*

We also agree with NEA NI on the need for a thorough assessment of both properties and residents to ensure the measures are suitable for them taking into account factors such as disruption, health considerations and the potential need for temporary accommodation.

13. Do you agree that the new scheme should prioritise low carbon heating solutions where possible?

Low carbon heating solutions should be considered where possible in line with current net zero targets. It must be acknowledged that not all properties will be suitable for the low carbon solutions. Focus group feedback was broadly supportive of low carbon heating options but affordability was always a factor in these discussions not only in terms of installation but in terms of ongoing repair and

servicing of these options. Discussions suggested that people should be properly informed of the low carbon heating solutions and the costs involved with them.

“I have no problem moving to low carbon.”

“Is it more expensive to run or fix?”

“I’d like to know the details first – is it going to cost more? Could they put a cap on what they charge you? You would like to know all this information. The one-stop shop should be able to help with this”.

“It’s the advice you need – by putting this in you’re saving £x. You need to know how much it’s going to cost you.”

14. Do you agree that the new scheme should offer renewable technologies such as solar panels and battery storage to offset the running costs of low carbon heating solutions in low-income households? Please provide reasons for your answer.

Renewable energy technologies should be offered in improvement works to low-income households. We agree with NEA NI who have said that: *“financial support is essential for low-income households to access renewable technologies, as many cannot afford the upfront costs. Ongoing affordability also needs to be considered, as even where these technologies are installed at no cost to the householder, expenses related to ongoing maintenance, energy storage, and other operational costs could still pose a barrier for some low-income households. Addressing this through subsidies or further financial assistance would help ensure that these solutions remain financially viable for low-income households in the long-term. This is particularly important for rural or ‘hard-to-treat’ properties which might require additional upgrades or insulation to maximise efficiency.”*

Focus group discussions have suggested willingness to use renewable energy where possible and affordable. As we have previously raised there is a need for clear information and advice around these renewable technologies including costs not just in terms of installation but regarding service and maintenance also.

15. Do you agree that rural properties should be prioritised for energy efficiency support? Please give reasons for your answer.

Yes, we agree that rural properties should be prioritised for energy efficiency support. Given the dependence on oil heating particularly in rural properties there is a need to help them move away from this type of heating in line with net zero targets.

We support the views of the FPC: *“As well as the PRS, there is a need to prioritise energy efficiency support for rural properties, which face additional challenges, such as reliance on oil heating and restricted access to low-carbon heating technologies.”*

We also support NEA NI who have stated: *“Data from the House Conditions Survey indicates that older homes are predominant in rural areas, requiring greater investment in energy efficiency upgrades. We agree with the draft strategy’s recognition that the current Affordable Warmth Scheme has not effectively addressed ‘hard-to-treat’ homes, which are often located in rural areas, as grants have been insufficient to meet the needs of these properties.”*

The Department needs to consider different approaches in rural areas in terms of reaching those who are the most marginalised and addressing fuel poverty in these areas. Focus group discussions highlighted a range of issues in rural areas including higher levels of stigma around poverty, access poverty in terms of services including transport, the need for trusted partners and networks particularly within the community and voluntary sector to identify, support and advocate for those in fuel poverty and the critical need for funding and resources to help with this important work.

“It’s good to see a question on rural in the consultation – fuel poverty disproportionately impacts on rural communities because of a lack of access to services and over reliance on oil heating.”

“Farm families are very unlikely to put themselves forward for help.”

“If living rurally where do you go to get guidance/support on fuel poverty – a lot of people don’t know about the help and support that exists.”

“It’s hard to look at fuel poverty without looking at the other factors contributing to this. The lens they are looking at rural poverty through is too narrow – it needs to include transport costs as these are a major driver of fuel poverty – in terms of rural needs they need to be more aware of these issues – this is a massive gap.”

“There is a failure to understand rural.”

“What works in Fermanagh is going out to people’s homes and having a chat. It’s about trust and filtering around the knowledge. In the Community & Voluntary sector in rural areas they go the extra mile to ensure people are helped and supported even if they are a couple of pound over the threshold.”

“There is so much need in rural areas but it’s getting people to ask for help and accept help. The Community & Voluntary sector don’t have the staff/capacity to do the outreach that is needed in the wee towns and country areas – that’s what’s needed. It’s so hard to reach people rurally.”

“Community Advice Fermanagh did outreach in high deprivation areas – it is needed but it can be difficult to get people to come because of stigma – it can be difficult no matter how much we advertise. There is a need to overcome the stigma.’

16. Do you agree with a sliding scale approach to funding for home energy schemes? Please provide reasons for your answer.

The sliding scale approach to funding is welcomed as it ensures that funding is given to those who are most in need and that those on the lowest incomes and the most vulnerable households will be prioritised for help. Many people will need financial support for home energy schemes and to adopt low-carbon solutions. We would like to see grants rather than loans being made available for low-income households for this work as many simply could not afford the repayments or take on additional debts.

We agree with our colleagues in NEA NI who have stated: *“We support a sliding scale approach to funding for home energy schemes to distribute resource based on need, prioritising low-income and vulnerable households in line with the ‘Needs-Based’ principle. However, while we agree with this approach, we want to see further*

detail from DfC on the eligibility criteria for the new scheme in the upcoming consultation.”

17. Do you agree that loans are the fairest financing option for landlords who are required to improve their assets? If not, what would you suggest as alternative funding options?

We agree with NEA NI who support a sliding scale approach where those with the greatest need receive the most support while those with greater financial capacity contribute in line with their circumstances. This should help in terms of reducing landlord resistance to the installation of energy efficiency measures and ensure comfort and affordability for tenants. We agree with our Women’s Policy Group colleague who are: *“sceptical of subsidising landlords to improve their assets”* and who therefore recommend that assistance should be loan-based and not grant funded.

18. Do you agree that we should consider increasing levies from electricity bills to fund energy efficiency schemes for low-income households? Please give reasons for your answer.

No, we do not support increasing levies from electricity bills. The Cost-of-Living Crisis has severely impacted on low-income households as we have outlined in Section 2.3 of this response. Many of these low-income households have no surplus money to pay for an increase in the levy even if it is only a small increase. Many are struggling to meet their food and energy bills and many are getting into debt just to meet the cost of essentials.

We agree with colleagues in NEA NI that if increasing levies on electricity bills was deemed absolutely necessary, we would accept it under certain conditions: *“funds from any levy increase must be ring-fenced and used exclusively for supporting low income and vulnerable households, and levies must be proportional.”*

“They’re really taking it from the people they’re giving it back to.”

“If your bills are raised your income has to be raised to match. People are already struggling now without their bills being raised. It’s not fair to raise the bills of people who are struggling already. What about the people that don’t notice it coming out?”

“They have a lot of money why are they not getting charged a bit more than the people who are literally saving £1 coins and saving 50ps for their electric.”

“If it’s £3-4 a year that might be OK but not more.”

19. Should we explore introducing levies on gas to increase funding for such energy efficiency measures? Please provide reasons for your answer.

No, we do not support introducing levies on gas. We agree with NEA NI that: *“this would effectively act as a tax on heating and place additional financial pressure on households.”*

We also agree with NEA NI that: *“Where levies are absolutely necessary to fund energy efficiency schemes for low-income households, we prefer levies on electricity rather than gas, as this spreads the cost more fairly across a larger consumer base. Most households in NI use electricity, while only 33% have mains gas heating.”*

20. What are your thoughts on exploring any revenue-raising opportunities for energy efficiency schemes from unregulated heating sources such as home heating oil?

No, we do not support any revenue-raising opportunities from unregulated heating sources such as home heating oil. Once again this would simply act as a tax on heating and place additional financial pressure on households.

We are in agreement with this statement from NEA NI: *“Where levies are absolutely necessary to fund energy efficiency schemes for low-income households, we prefer levies on electricity rather than gas or oil, as this spreads the cost more fairly across a larger consumer base. In NI, 62% of households rely on home heating oil and already contend with challenges due to its unregulated nature.”*

“It’s hard you just can’t put £20 on oil.”

“I’m part of an oil savers scheme so when I order 200-300 litres of oil I get £20 off. My mum puts it on her credit card and I pay her back over time.”

Collaborate and build capacity

21. Do you agree that we should build referral pathways between Government, local Government, health professionals and the Voluntary and Community Sector? If yes, how can we best achieve this?

Yes, we strongly agree that referral pathways should be built between Government, local Government, health professionals and the community and voluntary sector in order to help those most in need. We support the FPC and NEA NI who have stated: *“We strongly agree that DfC should build on and utilise existing partnerships and referral pathways between Government, local Government, health professionals and the Voluntary and Community Sector, to support a more coordinated and holistic support system for people struggling with fuel poverty.”*

We know from our focus group research across a range of issues that there is a lack of public awareness around entitlements and access to help and support across a range of issues. For example, our research on Universal Credit found that 86% of the women we spoke to had not heard of the Universal Credit Contingency Fund which provides a grant to help people in Northern Ireland get through the five-week wait in Universal Credit.²⁵ We also know that uptake levels for the Healthy Start Scheme in Northern Ireland are the lowest across the UK regions at just over 52%.²⁶ We provide these statistics by way of example of the need to work in partnership across sectors to ensure that we can reach the most marginalised and those who are most impacted by fuel poverty.

²⁵ The Impact of Universal Credit on Women, Women’s Regional Consortium, September 2020 <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/September-2020-The-Impact-of-Universal-Credit-on-Women.pdf>

²⁶ Healthy Start Scheme in Northern Ireland, ARK Policy Brief June 2024 <https://www.ark.ac.uk/ARK/sites/default/files/2024-06/policybrief28.pdf>

Focus group discussions also suggested that there is a lack of public awareness on the schemes that are available to help those in need. Providing information purely online was not helpful and while it worked for some it did not work for everyone especially those who are the most marginalised. Women at the focus group sessions suggested information leaflets in places frequented by people such as Women's Centres, community groups, food banks, GP surgeries/hospitals and schools.

Research conducted by the Consumer Council in 2022²⁷ found that only 34% of respondents could recall seeing or hearing information or publicity on help and support available to energy consumers who may be struggling with their energy bills (those living in fuel poor households were less likely to recall information or publicity, 26% vs. 37%). This research also highlighted levels of awareness of existing energy schemes where 61% were aware of the Boiler Replacement Scheme and 52% were aware of the Affordable Warmth Scheme. Awareness levels among the fuel poor were lower for both schemes at just 37% and 47% respectively.

Women's Centres provide trusted, local spaces for women to access help and support to address financial vulnerability and poverty in ways that work best for them. Women's Centres provide a range of services to low-income women including education and training, childcare, access to advice and information, food and foodbank vouchers and help with clothing, furniture and other household goods.

Our research²⁸ highlighted the great importance women placed on the services of their local Women's Centres and how critical they were to the health and wellbeing of many disadvantaged and rural women:

- Many women had been able to access support specific to cost of living increases through their local Women's Centre/group, for example, with food and energy bills,

²⁷ A Review of Fuel Poverty Levels in Northern Ireland, The Consumer Council, May 2022
https://www.consumerCouncil.org.uk/sites/default/files/2022-10/Research_Report_Review_of_Fuel_Poverty_Levels_in_NI_1.pdf

²⁸ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

household goods, clothing and help with children's costs as well as signposting for further financial help and support.

- Many of the women stated that they felt there had never been a greater need for the services provided by Women's Centres/groups as a result of ongoing welfare reform changes and the impact of the Cost-of-Living Crisis. Many said they would be in a much worse situation if they did not have access to their local Women's Centre/group.
- Some of the Women's Centres provide access to a Social Supermarket which offers discounted food and also a range of wrap around support services and these were highly valued by the women who had access to them.

"I'd be screwed if I didn't have Ballybeen Women's Centre. They can sort out foodbank vouchers, gas and electricity vouchers. They can help with so much even just making phone calls on your behalf, filling in forms, etc. Anything to do with my son – I wouldn't be where I am without their help."

"My kids got free school meals this year for the first time since I started work because Greenway Women's Centre helped me to fill in the form and I submitted the right paperwork."

22. Do you agree with a taskforce/working group to develop enabling frameworks for Energy Communities?

Yes, we agree with a taskforce/working group as a means of engaging people and communities in energy projects. We agree with NEA NI who have stated that: *"This should consider ways to empower individuals and communities to engage in energy projects and address barriers to participation. Building community resilience is essential in the transition to sustainable energy. To be effective, resource needs to be attached to the development of energy communities."*

"We have the lowest number of community energy schemes on these islands – Scotland has way more of these schemes – we need to be more progressive and forward thinking – this is upstream. We need to get upstream and get communities involved. We need to be progressive in this space."

23. Do you agree that government should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation? Please provide reasons for your answer.

Cold homes are associated with a range of poor health outcomes and excess winter deaths. LucidTalk polling for NEA NI shows the impact of energy hardship on health - 31% of respondents reported that rising energy costs had negatively affected their or their household's health and wellbeing. Impacts included deteriorating mental health (21%), worsening physical health (13%), and increased strain on healthcare services, with 5% requiring more GP or hospital visits. Adding the significant pressures on the health service which have been ongoing for a number of years including long waiting lists there is a clear need for implementing the NICE6 guidelines.

24. Do you agree that we should work with organisations that provide emergency support, to seek a consistent approach across Northern Ireland and the inclusion of a referral to a long-term solution? If so, what would be the best way to achieve this?

We agree that the Department should work with organisations providing emergency support and this would ensure consistency of response across Northern Ireland. We share the concerns of NEA NI however that the draft strategy does not contain details of how this this will be done. This is important particularly in rural areas where there are increased difficulties with access to services.

We also agree with the inclusion of referrals to long-term solutions which is critically important. We support the NEA NI calls for effective delivery including clear, accessible, and widely available information, greater collaboration and knowledge-sharing and working with experienced organisations to improve outreach and accessibility.

We want to see community and voluntary sector partners valued as part of this referral process. Organisations working in the sector have years of experience of this work and in tackling poverty and disadvantage. They are skilled at reaching the most marginalised within communities and provide trusted spaces and skilled people

to do this work. It is valuable work that must be recognised and funded properly so that these organisations are valued as true partners in this process.

“The trust is there in the community and voluntary sector. They’re on the ground and they know their people.”

“People need other supports – benefit checks, help with food, they need holistic support and the best value for money – the community and voluntary sector should do that.”

“There has to be acceptance that the community and voluntary sector are equal partners – they shouldn’t be viewed as the cheapest option.”

“Public health workers, social workers are giving advice on fuel poverty – it’s really important to be working with the Dept of Health on this.”

25. Do you agree with the proposal to prioritise Discretionary Support to provide emergency financial support if there is a future energy or cost of living crisis, until we have better data to target large scale payments? If not, can you provide a reason?

Yes, we agree with the proposal to prioritise Discretionary Support to provide emergency financial support in the event of a future crisis. Discretionary Support is a familiar source of support for those on the lowest-incomes. However as noted by NEA NI there are vulnerable people not in receipt of benefits who are equally in need of help who will not be able to access Discretionary Support.

We also stress to the Department the need to implement the recommendations from the Independent Review of Discretionary Support²⁹ which include the need to protect and increase the budget, to provide more grants rather than loans and to increase awareness of Discretionary Support. As highlighted by the Review report:

“Fundamentally, members of the public cannot ask about something they have never

²⁹ Independent Review of Discretionary Support, February 2022
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf>

heard of, and politicians reported that people coming to their constituency offices for help were not asking for help with DS, but rather asking for help with problems with debt, or food insecurity, or fuel poverty. A similar lack of public awareness was reported by advice workers and community support staff.”

We also support the following recommendation from the Independent Review with regards to energy costs and urge the Department to take action to implement this: *“We do, however, see a case for extending grants to cover fuel costs. Paragraph 19 of Schedule 2 currently excludes “the costs of fuel consumption” from grants, but they are not excluded from loan. We are unclear why energy costs are currently treated differently to other essential costs.”*

“Concerned about relying on Discretionary Support for help – very reluctant to be relying on this for support – many times it’s a loan rather than a grant.”

26. Do you agree with the proposal to gain a better understanding of the impact of changes to Winter Fuel Payments and introduce additional support where appropriate? If not, why and do you have alternative suggestions?

Yes, we strongly agree. There is a need for research on the impact of the changes to Winter Fuel Payments to determine who has been most affected by this policy change and where additional supports should be best targeted.

In our response to the Winter Fuel Payments EQIA we provided a range of reasons why women are likely to be more impacted by this policy change:

- Women are more likely to live in poverty and have been more impacted by welfare reform policies
- Women are more likely to be in receipt of social security benefits
- Women have longer life expectancy
- Women are more likely to be in low-paid, part-time and insecure work keeping their incomes lower over their lifetimes
- Women are more likely to provide care either for children or other family members limiting their ability to undertake paid work

- Women are more likely to have to make up for cuts to public services through unpaid work
- Pension wealth for women is much lower than men and women are less likely to have retirement savings than men.

All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

We echo the concerns of the FPC who have stated: *“FPC members remain deeply concerned about the changes to the Winter Fuel Payment eligibility, which leave many low-income, vulnerable pensioners - especially those just above the threshold - without support, increasing their risk of living in cold, damp homes. Older people can also face additional energy expenses due to disability or care needs, and they are more likely to have larger heating bills due to living in poorly insulated homes with inefficient heating systems. While further analysis of the changes' impact should be conducted, it won't address the immediate issues for next winter. Urgent action is needed to plan and provide support for affected pensioners now and in the years ahead.”*

We recommend that the Department acts in relation to the NEA NI suggested mitigations:

- Include **disability benefits** in the eligibility criteria;
- Consider introducing an **income cut-off** to the eligibility criteria, although this would require data matching with HMRC, which is currently unavailable;
- Explore a **“near Pension Credit”** criteria for pensioners just above the threshold;
- **Automatic Pension Credit Enrolment** for the 26,000 pensioners eligible for Pension Credit but have not yet claimed;
- Expand **domestic energy efficiency schemes**.

“Pensioners had no time to prepare for the Winter Fuel Payment cut. People £5 over the limit for Pension Credit had no time to budget for this before the loss of the Winter Fuel Payment. It’s going to cost in the long term in terms of illness, etc. They should have planned for this better.”

Protect consumers

We agree with the FPC that: *“this section of the draft strategy, in particular, requires more tangible actions and a clearer demonstration of how this objective will be achieved.”*

27. Do you agree that we should improve our understanding of the impacts of energy decisions on different consumer groups? If so, what would be the best way of understanding these impacts?

Yes, there needs to be an improved understanding of the impacts of energy decisions on different consumer groups. These impacts should also be kept under review.

As suggested by NEA NI: *“Section 75 of the Northern Ireland Act provides a framework for assessing impacts and requires DfC to give due regard to promoting equality of opportunity in carrying out its functions.”*

We also suggest that the Department should remain close to consumers to improve their understanding of the impact of energy decisions on different groups. They should involve people with lived experience and involve organisations in the community and voluntary sector who are advocating for consumers across different groups.

28. Do you have suggestions for how we could improve understanding and awareness of existing tools to enable consumers to manage their energy costs?

There are a range of organisations in the community and voluntary sector working in the area of energy, information and advice. Often these organisations are best placed to reach those who are the hardest to reach as they are trusted and known by their service users. We agree with NEA NI that: *“DfC should work with and support organisations that provide information, training, and tools to help consumers better understand and manage their energy usage.”* Community and voluntary sector partners must be valued for this work which includes the provision of adequate funding for this work.

As highlighted by the FPC³⁰ there are a range of vulnerable consumers including those who do not have access to the internet, those where English is not their first language, rural households, households with disabilities, etc who may all need additional help in understanding how to manage their energy costs and specific work to address awareness levels among these groups. The Department must ensure that information and tools for managing energy costs should be easily accessible for all consumers both in terms of being easy to find and ensuring that the information is understandable. Addressing the needs of the most marginalised consumers must be part of this process.

Once again, we caution that only putting information and tools online is not enough to ensure that all consumers can access it. We agree with our Women’s Policy Group colleagues that *“providing up-to-date information at key locations such as Women’s Centres, doctors’ surgeries, with midwives and health visitors could also help to reach particularly vulnerable populations.”* Focus group feedback also suggested that information should be put in community settings like Women’s Centres. They talked about the importance of the information provision and signposting work that goes on in places like Women’s Centres and advice providers in terms of awareness of the help and tools that exist to help manage energy costs.

³⁰ A New Fuel Poverty Strategy For Northern Ireland, Fuel Poverty Coalitions, October 2023 <https://fuelpovertyni.org/wp-content/uploads/Fuel-Poverty-Strategy-for-NI-Report-Final.pdf>

The draft Strategy proposes a 'One Stop Shop' for information which could be beneficial provided it has the budget it needs to do this work effectively and works with trusted partners and networks to reach those most in need.

"Put the information in Women's Centres."

"Mums find out through Home Start, Sure Start, social workers/social services."

"Doctors, dentists, health visitors."

"Leaflets in schools and hospitals."

"The independent advice sector needs more secure, long-term funding so they can recruit more staff and keep them."

"The support that communities need can be different – it needs careful engagement with local communities around these things."

"Don't just rely on websites and social media."

"Put it in places where people go – wee fliers in hospitals."

"Through the Women's Centre and Foodbanks."

"We're very lucky we have support here in the Women's Centre – you don't know these things exist unless you're here to find out about them."

"Women find out about help available through talking to each other and in places like the Women's Centres."

"Lot of people don't know about the help that's available – they can find out in the Women's Centre."

"Help should be publicised – it shouldn't be hidden from people – awareness should be raised. The fact my son was three and a half before I was made aware of Healthy Start is a disgrace. The majority of women here didn't know anything about Healthy Start. It's been kept a secret because they don't want to have to spend the money. Yet there's a crisis of poverty – an epidemic of poverty."

29. How can we support vulnerable people to ensure they are on the most affordable tariff?

As outlined in our answer to the previous question we believe that the key to support the most vulnerable people is to work in partnership with community and voluntary sector organisations who are working with consumers on the frontline and to use existing networks to reach those who are the most vulnerable.

We also support the introduction of a social tariff for energy bills as detailed in our answer to the next question.

30. Do you agree that we should explore potential affordability support for populations where energy efficiency measures may not be the right solution? If so, which population groups? Please provide reasons for your answer.

We support the introduction of a social tariff for energy bills and agree with both the FPC and NEA NI: *“Many households remain in crisis over energy bills. NEA NI strongly supports the introduction of an energy social tariff to support low-income and vulnerable households with unaffordable energy bills. We agree that DfC should investigate targeted affordability support further – and believe this exploration should be happening already.”*

We point the Department to the FPC report³¹ which detailed a range of groups that should be considered in identifying vulnerable households.

“You have social tariffs for broadband so why not for energy?”

“I would be looking higher up to pay for social tariffs – people who can afford it should pay more. The poor get poorer and the rich get richer.”

³¹ A New Fuel Poverty Strategy For Northern Ireland, Fuel Poverty Coalitions, October 2023 <https://fuelpovertyni.org/wp-content/uploads/Fuel-Poverty-Strategy-for-NI-Report-Final.pdf>

“I agree that people with a terminal illness should be able to access a social tariff.”

31. Is further research required to identify gaps in non-price protection for different energy users in Northern Ireland? If yes, what should we focus on?

Yes, we agree that further research is required to identify gaps in non-price protection for different energy users in NI and fully support the suggestions for key focus areas made by NEA NI on how this should be conducted.

32. What are your views on whether government should adopt a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes?

We support the adoption of a common quality assurance standard. This would help to ensure ease of comparison across schemes and help improve consumer confidence and protection.

33. Do you agree that government should take a common approach to consumer protection across all supported energy efficiency schemes? Please provide reasons for your answer.

Yes we agree to a common approach to consumer protection. Consumers should be able to expect the same protections across all energy efficiency schemes and avoid postcode lotteries and gaps in support. We agree with NEA NI that: *“Without a consistent approach, consumers could face confusion and uncertainty, undermining confidence in the schemes.”*

Governance and Accountability

34. Do you have suggestions about how government could change our use of language to improve buy-in and engagement on fuel poverty?

Focus group discussions suggested that the language used by Government can often be inaccessible and in some cases can feel stigmatising. Simple, non-technical language avoiding the use of overly technical terms and acronyms is essential for improving buy-in and engagement.

We agree with NEA NI who have highlighted that while poverty can be a stigmatising word, fuel poverty is a widely recognised term linked to broader discussions on poverty and inequality.

We would also like to highlight the dangers around compartmentalising poverty. Poverty is poverty and needs addressed in the round. We call for a comprehensive, fully funded Anti-Poverty Strategy for Northern Ireland and for the Fuel Poverty Strategy to work alongside it. As Chair of the Committee for Communities, Colm Gildernew MLA said: *“We must see the publication of an anti-poverty strategy in the coming weeks, which contains ambitious proposals to reduce poverty and support those who are most in need.”*³²

“I don’t think they should limit social tariffs to terminal illness – poverty is a real issue here. The poverty I see on a daily basis is unbelievable. I don’t care about tariffs what I see is fix the issue – we’ve been going round in circles here. I’m sick to death of sitting in focus groups and people telling me we need to wait for a 3-year mandate. I don’t care. I want to see people out of poverty – we need to go to the politicians and tell them to do what it takes to get people out of poverty.”

“There needs to be awareness – don’t try and hide information on help from people – make it public knowledge for those living in poverty.”

“More information is needed – if you know about entitlements to things and how to go about getting them.”

“Points systems make people really nervous (like PIP). You have to really fight your case – you have to really fight for why you need it. It’s downgrading too going through this. Depends who is on the other end of the phone too – are they understanding? If someone with anxiety is being questioned it will make them worse.”

“There is a need to consider the naming of schemes – not labelling people but making it clear what the schemes are.”

³² <https://www.ageni.org/news/anti-poverty-strategy-group/>

“The language used across the board is causing problems getting people to come to things where there is information on help – if they see negative words they won’t come.”

“Need to pick venues where there are a number of different things on, like libraries, so people are not seen to be getting advice – it’s overcoming the stigma.”

“There is a need to consider the naming of schemes – not labelling people but making it clear what the schemes are.”

“Poverty is poverty – compartmentalising it is dangerous – it needs to be done in conjunction with an Anti-Poverty Strategy – tackle poverty through good jobs, better social security – it all needs to be linked.”

“This is a very welcome strategy but it needs to feed into the Energy Strategy and an Anti-Poverty Strategy – it needs to be done alongside these and cross-departmentally – this needs to happen.”

“Strategies are strategies but we need to remember that we are dealing with real people and that must not be forgotten.”

“We need to raise Universal Credit, do whatever we can, provide an emergency fuel relief card for those who haven’t been able to put their heat on for weeks in dire circumstances. There is a need to lift people out of poverty or things are going to get worse – it’s disgusting. I’m sick of all the discussions around it – fix it for the people.”

35. Do you agree that government should take a basket of indicators approach to measuring and understanding fuel poverty?

Yes, we agree that Government should take a basket of indicators approach to measuring and understanding fuel poverty. However, we agree with both FPC and NEA NI that this must be accompanied by a clear fuel poverty reduction target.

We share the concerns of NEA NI that not having a target for reducing fuel poverty or plans to introduce one is a major shortcoming which is essential for driving accountability and progress.

36. Are the indicators suggested the correct ones? Please provide reasons for your answer.

We support the comments made by NEA NI in relation to the indicators. NEA NI are broadly positive about the suggested indicators but have proposed some areas where they could be strengthened. We particularly agree with NEA NI around concerns with the infrequency of the NI House Condition Survey.

37. If you agree with the introduction of an indicator based on energy confidence, agency or awareness, do you have suggestions about what kind of indicator might be most valuable?

We support NEA NI who agree with the introduction of an indicator based on energy confidence, agency or awareness stating: *“it would be valuable to gauge people’s understanding and confidence in navigating available support and implementing long-term energy solutions. Tracking this over time would help identify areas where improvements are needed.”*

38. Do you agree with our proposal that carbon emissions are not used as a fuel poverty indicator? Please provide reasons for your answer.

We echo the views of NEA NI that *“Carbon emissions data should be recorded and available to see but should not be used as a fuel poverty indicator.”*

39. What is the best way to continue to engage with people experiencing fuel poverty?

Involving those with lived experience of fuel poverty is essential. We therefore strongly support the recommendations from NEA NI that *“DfC should also consider establishing a Lived Experience Advisory Group, that would work alongside the proposed multi-agency Fuel Poverty Advisory Group, guiding, advising and challenging actions and progress over the lifetime of the Fuel Poverty Strategy.”*

It is essential to remove any barriers to participation and to consider how to reach out to vulnerable and marginalised consumers. We support the NEA NI suggestions around reaching out to vulnerable groups including community-based initiatives, partnerships with trusted local organisations and tailored approaches that consider language, digital access, and cultural differences.

40. Do you agree with the proposal for a Fuel Poverty Advisory Group, if not, can you suggest an alternative proposal?

Yes, we agree with this proposal, but only on the basis that it involves the right people. It must include representatives from organisations who work with those living in fuel poverty such as NEA NI and organisations working in related areas including advice services. Community and voluntary sector involvement is essential.

It is critical that this group engages with those with lived experience of fuel poverty and the organisations who advocate for them.

41. If you have any further comments or suggestions not already captured, please provide these in the box below.

In relation to the 'One Stop Shop' that has been proposed we would like to see more detail around this proposal including the budget. In order to be successful it must work with trusted partners and networks to reach those who are the most vulnerable and marginalised. Providing a central place for accessing energy advice and information would be beneficial but central to its success would be effective awareness raising so that consumers know about it and it is easily accessible regardless of the circumstances of the consumer. Analysis of the queries to the One Stop Shop could also be a useful tool for the Department to enable them to track common areas of enquiry and need.

Focus group discussions highlighted a range of areas that a 'One Stop Shop' could cover and these are provided below.

"Insulation."

"House check – to check what insulation the house has because I don't know."

"Suppliers – how to deal with them."

"What's in my house – I'd like to get everything checked including the things you can't see."

“Where are the gaps?”

“Get a report to give the landlord after the house has been assessed – so you know what to ask for – what needs fixed – like a house MOT.”

“Practical advice – turning the thermostat down, how high should the radiators be, give things like the wee thermometers that tell the temperature of the room, how to find out how many units you are using, what you’re paying on your bills.”

“Advice on how to pick different providers – shopping around.”

“What the units mean, how many you’re using and how long they will last”

“Advice for safety on heating – I’m in a 2-bedroom flat and the boiler is in my daughter’s bedroom. There’s only one way to put the bed in the room so she’s sleeping next to the cupboard it’s in. I never thought that would be safe with carbon monoxide and everything. It just didn’t feel right to me. It’s right beside her. If I turn on the hot water at night it makes a noise right next to her. It makes me feel bad.”

“The resources for the Strategy are very limited. There is a need for a one-stop shop – it needs to be a library of knowledge – they need to know every scheme/every bit of support so that the information can be given to the citizen wherever they live – they should know where to go.”

In focus group discussions the idea of a ‘House MOT’ was suggested. Many of the women were unsure of what energy efficiency measures their homes had and they would like to have a professional check and report on the energy efficiency of their homes to advise of the changes needed to make improvements. They also felt that this would be useful to give to a landlord to highlight the areas where improvements were needed.

We include the following quotes from the focus group discussions which illustrate the issues that women are facing in their homes, their struggles to afford energy costs,

and their suggestions for change. These are useful considerations in terms of the Fuel Poverty Strategy development:

“It would be good to have something like a Healthy Start Card something like that which you can use for gas/electric.”

“The gas went on my credit card multiple times over Christmas, we’re all in debt!”

“A quarterly bill is cheaper than if you’re on a meter – those on a meter are usually the most disadvantaged so why are they paying more? It should be flipped, if you can afford to pay quarterly you should be charged more.”

“I have to think about how much I can afford before I put my gas on.”

“I don’t put my heating on in my house for any more than two hours.”

“I’m paying £20 every three days for gas in my flat.”

“I was homeless and waiting on a flat for a year and half so I had to take to take it even though it’s awful and full of damp. I needed a house so I had to take it. There’s damp everywhere.”

“They keep telling me to open my windows to help with the damp but then you’re just letting the heat out. They’re telling me if I want to help the damp I have to open my windows. They keep telling me to ventilate so the windows are open and we’re freezing and you’re wandering round with dressing gowns or hoodies on. They don’t care. I spent a lot of money on my flat on new floors and painting but it’s all ruined because of damp. I had to fight for a year and half to get a new door. I had to go to MLAs to get it – they’re not listening to the people who are complaining about it.”

“It’s the way you’re living – keeping doors and windows open in Winter to try and help with the condensation.”

“I’m in NIHE properly and it’s got mould. I’m asthmatic and my breathing has got worse since living there. I was losing heat because of keeping the windows open to help with the mould.”

“I have damp in all the bedrooms and the bathroom and I’ve been told to keep all the doors and windows open because of condensation even in the Winter.”

“My house is really old. I don’t have a damp problem but probably because it’s so draughty!”

“I am in a private rental. My landlord is not the worst. The front door is wooden and it sweats and I see gaps in the side of it. The windows in my son’s bedroom (he’s 3 and a half) I can see the gap and feel the wind coming in. My landlord didn’t fix it so I bought some silicone and did it myself, he didn’t do anything. The bathroom is mouldy and I’m used to opening the windows to help with it but in the Winter it’s cold.”

“My Housing Association have been really poor about coming back to me about anything. And I’m paying more in rent too than Housing Executive. They act like it’s our fault there are problems.”

“I’ve been waiting on the Maintenance Officer to come out since the start of the summer and still nothing. I have rang and left voicemails and still nothing not even a phone call.”

“My cousin’s boiler broke and she was too embarrassed to even ask her family for help. She didn’t have any money so she went without heating for 2 months. She didn’t have the money to service her boiler. She gets no help as she wasn’t on benefits. She doesn’t want to take on any more loans as she’s already in debt. Her mortgage has went up double in price but there’s no help for her. If you own your own home it’s all on you.”

“My hallway and living room is huge it’s like walking into a wall of coldness.”

“When you’re signing for a house swap you don’t see issues with windows and draughts etc when you’re just walking around it’s not until you’re living in it.”

“There are a lot of people on the transfer list so swaps are the main way for people to get a house to meet their needs, not through NIHE/Housing Associations, through Facebook!”

“You can’t withhold your rent if you’re on benefits as it comes straight out of your benefits.”

“Pride, embarrassment, judgement, mental health stops people from seeking help. Anxiety - being questioned puts people off.”

“Lack of knowledge, not knowing where to go means you don’t know about things that could help.

“More information is needed so you know about entitlements to things and how to go about getting them.”

“Raise Universal Credit, do whatever we can, provide an emergency fuel relief card for those who haven’t been able to put their heat on for weeks in dire circumstances. We need to lift people out of poverty or things are going to get worse – it’s disgusting. I’m sick of all the discussions around it – fix it for the people.”

“We need to ensure we continue to hear from people on the ground.”

“The official stats on fuel poverty don’t capture the impact of the Cost-of-Living Crisis, the war in Ukraine, etc so sometimes the stats are behind – there is a need to consider how the data responds to worldwide events.”

“The official stats on fuel poverty tell a different story to what we are seeing on the doorsteps – there is a need to have up to date information to base these decisions on.”

“People are afraid to say they have mould or damp in their house because they’re afraid of social services getting involved.”

“Some people are not getting into energy debt they are just self-disconnecting – they’re not buying oil or top ups. They will get into debt for other things so energy debt is not an accurate measurement.”

“It’s the bits you see that you think about – I never went in the attic so I didn’t know there was no loft insulation.”

“Insulation – I don’t know enough about it and sometimes you can’t see it to know if it’s there or not.”

“Government need to spend more money on insulation.”

“Do the energy rating at the start and then again at the end of the works and see the difference. That would give a list of all the things

that need done in the house – so you can see what needs done and what the grant could help you with. The one stop shop could maybe help with this.”

“Women know the problems in their homes and they know what solutions are needed but it’s about how understanding/responsive the person who owns the house is. Women are having to do things themselves to their houses to try and help with the cold, damp, etc.”

“You have to fight to get things done – sometimes you have to get MLAs involved.”

“They told me it would take five years for a new bathroom so I saved really hard and did what I could to it. I forked out £600 to do what I could and it was all ripped out when they did come round to do it. I’m a single parent that money could have went elsewhere.”

“The draft strategy could be strengthened by including how they will look at data from the community and voluntary sector to give that bigger picture.”

“People who are working, paying for childcare, paying for mortgage, there’s nothing for them.”

“The Strategy needs to be very clear about where the individual needs to go for help.”

“Funding from Govt – is it being used in the right areas? There’s a lot of money in debt advice – but what is needed is more preventative work.”
