



NK/CMcA/9861

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Dear Sirs

Better Use of Data – Consultation

Introduction - Energy Action Scotland

Energy Action Scotland (EAS) is the Scottish charity with the remit of ending fuel poverty. EAS has been working with this remit since its inception in 1983 and has campaigned on the issue of fuel poverty and delivered many practical and research projects to tackle the problems of cold, damp homes.

EAS welcomes the opportunity to make comment on the Better Use of Data consultation. However much of the consultation is out with our area of operation and as such EAS limits its response to the section on Improving Public Services and Providing Assistance to Citizens Living in Fuel Poverty.

We note that the proposed main clauses would seek to allow public agencies to share personal data with other public agencies in specific contexts in order to improve the welfare of the individual in question. If this could be assured then EAS would be broadly in support of this, however the definition of “public agencies” must be tightly controlled to ensure that spurious agencies or parts of agencies do not use the information for simply making marketing approaches to vulnerable householders. EAS would agree that allowing public authorities access to civil registration data to prevent sending letters to people who have deceased and to make it easier for citizens to interact with public services is on the whole a worthwhile achievement.

Our particular comments relate to the following questions around the section “Providing assistance to citizens living in fuel poverty”

Q 5 Should the Government share information with non-public sector organisations as proposed for the sole purpose of providing assistance to citizens living in fuel poverty?

This would need to be managed with extreme care; non-public organisations could be fuel utilities that could simply make the case of advertising alternative tariffs claiming that these would address fuel poverty for that household without any understanding of their personal circumstances. There is the issue of fuel poverty definition, with the definition being used in England currently different to that used in Scotland and other parts of the United Kingdom. The question then is how do agencies understand who is fuel poor without a very large data gathering exercise which would undoubtedly centre on welfare benefit data.

It is hard to see what can realistically be achieved by non-public sector agencies by giving them access to restricted data i.e. a family or individual just on benefit without knowing their housing provider, rented or owned, their level of fuel consumption high or low and their ability to switch fuels i.e. from electricity for heating to gas.

Q 6 Would the provision of energy bill rebates, alongside information about energy efficiency support, be appropriate forms of assistance to citizens living in fuel poverty?

Energy bill rebates alone will not solve fuel poverty over the longer term they are a short stop measure that does little to change the individuals circumstances. Nonetheless they are important and should be continued. There is a discussion to be had about the level of rebate and whether or not this should be flat rate or take into account the geography of the UK with a higher level of rebate given to those living further north, however that is not for this response.

The data sharing exercise currently undertaken between the DWP and fuel utilities has shown a positive intervention for many fuel poor households and could be built upon to take into account other groups who may be considered to be fuel poor by using certain benefits as a proxy. The current system splits into two groups a core group and a broader group with the core group being automatically eligible for support. What additional data would be useful is hard to understand as EAS believes that the data is already used effectively if there is any fault or downside it is the limit on numbers placed on the broader group, no additional data collection would change this.

The question of providing information about energy efficiency support will hinge around what actual levels and types of support there actually are for fuel poor households and again this will be very dependent on where people live as each Government or Assembly has a different response to the provision of help, for example the Scottish Government currently have their Home Energy Efficiency Scheme for Scotland which gives grant to home owners, EAS is aware that this level of support is not available to vulnerable or fuel poor households in England and the question would be what level of information could realistically be given and how would any action taken by the householder from that information be recorded.

Q 7 Are there other forms of fuel poverty assistance for citizens that should be considered for inclusion in the proposed power?

In terms of data collection and sharing fuel utilities already know a great deal about each consumer, their payment method, their fuel usage, their tariff and their level of debt. They also know what different payment methods and tariffs would provide a better deal and lower payments to that individual consumer. They should use that data to achieve a more positive outcome not just for fuel poor consumers but for all consumers.

What fuel suppliers do not know is if any individual consumer is fuel poor, they have no access to levels of income and they should not. This may prejudice a particular offering from the supplier i.e. not offering direct debit if the consumer is seen as having a low income and it is believed they may be in danger of defaulting on a payment plan.

Fuel poor citizens require three things, an energy efficient home, a level of income that means they pay (under the Scottish definition) less than 10% of that income for the fuel needed to provide a warm healthy home environment and fuel at an affordable cost. If via existing communication channels information can be gathered to realistically make an assessment of the risk of fuel poverty for any individual then that should be done. But unless that information gathered can then

provide assistance to truly address fuel poverty then we act simply to create an ever growing data base of information on the individual with no real use in addressing fuel poverty.

In conclusion EAS believes that it is not the need to gather even more data that is required to address fuel poverty but a more and better use of the data we already hold. For example a consumer with both gas and electricity within their home and also being eligible to be accepted onto a priority services register would have to register with the gas GDO, the electricity DNO, their gas supplier and their electricity supplier. No single person/organisation holds a central register and if that consumer changes supplier they will then need to notify the new supplier.

EAS believes that sharing existing data between services is more important than creating another data base or starting another data collection exercise.

Yours faithfully



Norman Kerr
Director