# The Commission for Customers in Vulnerable Circumstances: Call for Evidence

#### Introduction

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 works with both the Scottish and the UK Governments on energy efficiency programme design and implementation.



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EAS welcomes the opportunity to respond to this consultation. Given its remit, EAS's response focuses primarily on those areas that it considers may impact most on fuel poor and vulnerable consumers.

### **Consultation Response**

EAS supports the areas identified by the Commission for consideration, especially the area of physical health/disability, as we have seen in our work that physical ill-health and disability can add to a person's need for warmth in their home. We would add that there are additional elements which should also be considered, which may touch on some of these areas, such as transient/life events, however are worth making explicit in this response. These groups include: carers and single parent households.

EAS notes also that people experience fuel poverty at different points in their life and may be vulnerable at some times and not at others e.g. those who have a newborn baby, those who lose their jobs, or those suffering bereavement ( if the person who died paid the bills, this could add to their vulnerability). Being ill or disabled can also lead to being vulnerable as more heat is required to keep warm. It is also worth adding that some people do not qualify for assistance under some of the fuel poverty schemes, they have a low income and may have problems accessing what they are eligible for, in addition they may have extra costs, such as care, to be considered.

EAS would like to highlight that people suffering financial vulnerability, such as energy debt, also need to be considered. This situation can also lead to poor mental health and stress and touches on many of the other areas of vulnerability identified for consideration.

A point to consider: one of the consultation questions asks about particular challenges that suppliers face in identifying and supporting customers in vulnerable circumstances via different channels e.g. telephone, online. We would add that vulnerable consumers often find themselves penalised due to not being able to access the best switching deals as they are not online, or don't use direct debit as the way to pay for their energy bills.

EAS notes key trends that commissioners should be aware of could include that of people in rural areas not switching and remaining with their home companies. There are high levels of fuel poverty in rural areas, and the rural dimension with the inclusion of a poverty premium due to living in a rural area, tends to be overlooked and/or underestimated by policy-makers.

EAS has delivered various projects involving people in vulnerable circumstances in fuel poverty. An example of such a project is the Aiming Beyond Cancer (ABC) project. EAS worked with Tighean Innse Gall (TIG) in the Western Isles and with Shetland Islands Council (SIC) to deliver the ABC project. The purpose of the project was to offer a layered level of support to people with

an 'active' cancer diagnosis. It used a dedicated intervention home visit service and offered a range of energy efficiency measures and support advice to identified households.

The ABC project enabled the provision of replacement boilers, new heating/hot water systems and a range of other energy efficiency measures for vulnerable people – all with a cancer diagnosis – most of whom were not eligible for support from other schemes.

#### This work included:

- Offering tailored energy advice to reduce energy costs.
- Supplying energy efficient heating where the home had no central heating or an old, inefficient heating system.
- Replacing broken or energy inefficient white goods with highly energy efficient white goods as needed.
- Supplying highly energy efficient white goods where these did not exist, eg fridge/freezers and tumble dryers/washer-dryers.
- Installing energy efficient controls on existing heating systems as needed.
- Offering a range of insulation measures.

Often for those with cancer, energy bills rise as patients remain at home during treatment and recovery (often meaning that their income levels fall too), as well as the physiological effects of cancer requiring that they stay warmer. ABC provided a practical means of ensuring that at a particularly stressful time, energy bills and keeping warm were one less thing for cancer patients and their families to worry about.

EAS has worked in a third of Scottish local authorities with this vulnerable group – those with a cancer diagnosis or a long term life limiting illness and our comments above are based on this experience.

## Conclusion

EAS has no further points to make in relation to this consultation.