[**Heat**](https://www.gov.scot/publications/consultation-adult-disability-payment/) **in Buildings Strategy**

**Scottish Government**

April 2021

**Age Scotland’s response to the Scottish Government’s consultation on the draft heat in buildings strategy.**

**1.To what extent do you support the pathway set out for achieving the 2045 net zero target and the interim 2030 target?**

We support the commitment to improve energy efficiency of homes as a first measure, with net zero heating systems being a second step in this plan.

There is a lack of detail in this pathway and it particularly does not address how households will be supported to meet the targets and key dates that have been set out.

A significant part of the pathway should centre around communication with the public around the targets, supported by a substantial information campaign on what households will be expected to do. This will also require funding and other support to be made available for households to apply to. While it is understandable that the pathway has focused on key dates, without planning in the support to households it seems unlikely that the scale of ambition in this pathway can be achieved.

What is the Scottish Government’s pathway for support to households to meet these net zero targets?

**2. What are your views on any risks of unintended consequences from this pathway?**

This pathway does not address how a household would navigate these key dates and targets, so the biggest risk would be households not achieving these targets at the intended times.

As the areas of energy efficiency installations and net zero heat systems are technical in nature and likely to be areas that many households are not familiar with, there is considerable risk of scams and rogue trading in this environment. This will be even more likely if the Scottish Government does not take stringent action to ensure that consumers can use trusted trader schemes and have recourse to verify that any work that could be done to their home will be done so legitimately.

The scams carried out by the rogue trader Home Energy and Lifestyle Management Systems (HELMS) are particularly concerning as they operated under the UK Government’s Green New Deal scheme, using the trust that came as part of their registration as a Green Deal provider. There are many households in Scotland who are still adversely affected by this situation and who have never received full Government support to rectify the situation they were put in.

The pathway is currently lacking any detail on how households will be supported to achieve the changes required to meet the 2030 and 2045 net zero targets. An unintended consequence of this is likely to be unreasonable pressure on older households, who could be some of the least able to afford or engage with and manage the work to their homes that will be required as part of the net zero transition.

Older people are most likely to be living in homes that rate lower than EPC band C. According to the Scottish Household Survey 2019, older households are most likely to live in EPC band D and E rated dwellings, with 58% in this band, and 5% in band F.[[1]](#endnote-2) These figures put more older households in bands lower than EPC C than for families (43% D and E, 2% F) or other households (49% D and E, 5% F).[[2]](#endnote-3) This would suggest that older people will be the single largest group of people who will need to improve the energy efficiency of their homes.

Another important factor to consider is that there are a considerable number of older people living on their own. According to the Scottish Household Survey 2019, there are 357,000 single pensioner households, which makes up 14% of all households in Scotland. In addition to this there are 343,000 older households.[[3]](#endnote-4) This has implications for the ability to pay for older people, as those who live on their own are likely to have a reduced capacity to afford the measures necessary for the transition to net zero.

Older people are most likely to own their homes, with 62% of them owning their homes outright and 4% owning them with mortgages.[[4]](#endnote-5) However, it is important not to assume that all older people that own their home have the ability to afford the changes that their homes may require. Many older people may appear wealthy as their home will have value, yet they may live on a low fixed income and therefore not be able to afford unexpected costs that are outside their budget.

There are a considerable number of older homeowners who bought their homes using the Right to Buy schemes, who now own ageing former council homes that may not be well maintained or have a high energy efficiency rating. This group is often a low-income group and many people will have lived in their home for over 20 years. On a basic level their homes are unlikely to suit their needs, yet older homeowners can be very reluctant to leave their homes and those who bought under Right to Buy may have very low equity in their homes.[[5]](#endnote-6)

Fuel poverty rates are far too high in Scotland and provide another indicator for the scale of support that older people are likely to need. Older people make up 36% of those in fuel poverty.[[6]](#endnote-7) This equates to 1 in 3 older households living in fuel poverty. Age Scotland housing research has found that 1 in 5 older households always or sometimes struggles to pay their energy bills. This rises to 1 in 3 for older disabled households.

Age Scotland thinks that the Scottish Government should target support towards older people to help encourage people within this group to benefit from energy efficiency improvements to their homes.

**3. What are your views on our assessment of strategic technologies in low and no regrets areas to 2030?**

It is essential that the Scottish Government provides clear advice on the types of technology that households should consider having installed to bring their homes to net zero emissions.

While it is understandable that further research into these types of technologies is ongoing, the Scottish Government needs to be as close to certain as possible that the technologies that people are being asked to invest in will provide sufficient improvement to the emissions from their homes that they will not face needing to change their heating systems again.

**5. How do you think a new heat target should account for the need to deliver against our statutory fuel poverty targets?**

No household should be put into fuel poverty or left in fuel poverty as a result of installing new heating measures. For homes already in fuel poverty, it is likely to be difficult to afford to upgrade their heating system.

The Scottish Government should target households in fuel poverty for extra support in improving the energy efficiency of their homes. A significant investment of targeted grants and loan funding should be made available, and a focus should be made on households that are living in fuel poverty.

**Chapter 3 - People**

**9. What are the most significant actions we can take to ensure that Scotland’s people and organisations are meaningfully engaged in the net zero heat transition?**

The Scottish Government should make a significant investment into their communications and engagement campaigns around the net zero heat transition. This will need to start as soon as possible but also extend for a long period, so that people are being consistently targeted with information about what will be required of them.

There will need to be clearly identifiable Scottish Government branding, as mentioned in the strategy, however this will need to be done carefully. The recent confusion over the new fire alarms rules in Scotland should be an example of what to avoid when communicating these new requirements to the public. Of the people who became aware of the new standards for fire alarms, most became informed following a private company AICO being given permission to use the Scottish Government’s logo on a mass leaflet drop to people’s homes. AICO chose to use strong language about the new law on fire alarms, but their message coupled with the Scottish Government’s logo caused the most concern. Age Scotland became involved in the discussion on this rule change following the volume of calls and emails that were received from concerned older people who had received AICO’s leaflet. Equally, the way that AICO chose to engage with people through leaflets delivered directly to people’s homes was a very effective way to inform people about the change to the rules around fire alarms.

The need to communicate clearly and consistently with people is all the more important as engaging homeowners in the net zero heat transition is asking them to make investments in their homes in a way that has not been done before. While this requirement is also consistent with the Scottish Government’s ambition for homeowners as expressed in the Housing to 2040 strategy, it does not change the fact that this will be a large shift in expectations for homeowners.

The Heat in Buildings Strategy explicitly mentions increasing the digital presence of the Home Energy Scotland and other Scottish Government advice services. While this will be an important step to help inform many people, it is essential that the availability of information does not become digital by default.

It will be essential that traditional forms of communication are used as well as digital ones to ensure that the public is communicated with in an inclusive manner, otherwise a significant tranche of older people will be digitally excluded. There are over 500,000 people over 60 in Scotland who do not use the internet: only 66% of over 60s use the internet in Scotland and this rate falls to 43% of those over 75s.[[7]](#endnote-8) This is a significant number of people that must not be overlooked or left uniformed during the transition to a net zero society.

The Scottish Government should send information out to every household to outline the changes that will be required and that signposts people to advice services where they can get more information and support. Printed information should also be available at GP surgeries, libraries and other services that people interact with once the pandemic is less acute.

**10. What in your view are the opportunities, if any, available to key organisations, such as local government, businesses and trade associations and community or other non-government organisations, in supporting this public engagement activity?**

The Scottish Government should provide information for organisations that work with the public, to signpost them to core information on the Heat in Buildings strategy, the energy efficiency measures that are recommended for households to install and on the zero emissions heat options that households should be looking to install.

The Scottish Government should make this information easy to access and comprehensive so that advisers who work with the public and other staff of key organisations can inform themselves of the heat targets and what the Scottish Government needs people to be doing in their homes.

While many organisations will know to signpost people to Home Energy Scotland for tailored advice and support, the Scottish Government should consider how to ensure that organisations are generally aware of the work that this Heat in Buildings Strategy requires and how they could be supporting the people they interact with to engage with it.

There should be a strong role for local authorities in ensuring that vulnerable people are being targeted for help and that services to support groups, such as older people, to afford energy efficiency upgrades to their homes.

This level of support does not currently exist, and this can be evidenced quite well when you look at the role of Care and Repairs across Scotland. Care and Repair Scotland is a set of charities based in 27 of Scotland's local authorities, that provide a trusted trader service to older people and ensure that they can access handy-person support at low-cost to help with work around their homes. Currently, there is not a consistent level of Care and Repair support available across the different local authority areas of Scotland. It is for the local authority to decide the level of provision that the local Care and Repair can provide, with some offering grants and subsidised loans for the work that older owner occupiers need for their homes, and some local authorities not providing the service at all.

It will make a significant difference to the transition and adaptation to a net-zero economy if older owner occupiers across Scotland have an easily identifiable organisation that they can turn to for support. It would be even better if this organisation had adequate funding to provide a similar level of service across Scotland.

Local Authorities should also be in the position to take calls and enquiries from members of the public and to direct them towards lists of trusted traders or to signpost them to organisations such as Home Energy Scotland that could help them with energy efficiency installations. The coronavirus pandemic has seen local authorities across Scotland provide fewer services over the phone and the Age Scotland Helpline has heard from people who cannot get in touch with their local authority about various council run services. It will be essential that local authorities have the resources required to provide more responsive services for people to use.

**11. In your opinion, could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic? (age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief).**

It will be important that financial help is not restricted to certain age groups.

**13. What further action can we take to support people to make informed choices on the energy efficiency and heating options available to them?**

The Scottish Government should not make any assumptions about the level of knowledge that people have around energy efficiency measures that could be installed in their homes or about zero emissions heating systems.

Even on a more basic level, Age Scotland’s research would tend to indicate that older people can be very disengaged from managing their energy costs. In our most recent research, Housing Needs of Older People – Panel Research, respondents were generally of the opinion that actions to lower their energy bills through switching energy provider was more hassle than it was worth, and they were frustrated that loyalty to their energy company was not recognised.[[8]](#endnote-9)

In other housing research, Age Scotland’s 2020 National Housing Survey asked respondents about their experience of paying their energy bills. Over half responded that paying their bills was not a problem right now but that they were concerned about rising energy prices. In addition to this, 20% of respondents either always or sometimes struggled to pay their energy bills.[[9]](#endnote-10)

The Scottish Government should look to fund fuel poverty and energy efficiency advice services to a much higher degree, so that there is scope for everyone to get timely advice and support about energy efficiency and heating options that are available to them.

**14. What is your view on the current level of support and advice provided through existing services such as Home Energy Scotland and the Energy Efficient Business' Support service?**

Age Scotland’s Helpline refers older people with energy needs to Home Energy Scotland’s advice line for support. This important service should receive more support in order to scale up the advice and support that they can provide.

Age Scotland’s research indicates that Home Energy Scotland’s name is not as well recognised as it could be among older people. In Age Scotland’s National Housing Survey 2020, 45% of respondents had heard of Home Energy Scotland. These respondents were most likely residents of small towns (46%) and rural areas (51%) and respondents aged 55-64 (51%).[[10]](#endnote-11) This same research found that 55% of respondents were not aware of any of the Scottish Government’s energy efficiency programmes.[[11]](#endnote-12) In Age Scotland’s Orkney Housing Survey 2019, 52% of respondents had heard of Home Energy Scotland.[[12]](#endnote-13)

While the strategy mentions increasing the digital presence of Home Energy Scotland, the use of leaflets and printed material that promotes Home Energy Scotland will also be important to raise awareness about this service among older people. The Scottish Government should include information on this service in any information campaign that it runs on energy efficiency installations and the actions people will need to take in their homes.

**16. What are the most appropriate steps we can take within our powers to ensure sufficient consumer protection for supported energy efficiency or zero emissions heat installations?**

It will be important for the Energy Consumer Commission to have a role in consumer protection and consumer recourse if they find that they haven’t received the standard of work or goods that they should have done.

Trading Standards Scotland is an organisation that reports on the levels of scams that many people in Scotland are facing. Unfortunately, the area of energy efficiency installations is one where the confusion caused between schemes available in some areas of the UK and not others, not to mention the technical nature of the work being proposed, means that many people in Scotland have fallen foul of scams in this area.

**20. What changes can be made to the Strategy to help maximise positive impacts and minimise negative ones on people experiencing fuel poverty and other vulnerable groups?**

As we stated in our answer to question 2, it is important not to assume that all older people will be able to afford to install the energy efficiency measures required or new heating systems to their homes.

There is a real opportunity to tangibly improve many people’s quality of lives by improving the energy efficiency of their homes and lowering their fuel bills. There will, however, need to be substantial Scottish Government investment through grants and loans that will help people to meet the costs required to improve the energy efficiency of their properties.

**Chapter 4 -Place**

**22. What is your view on how best to engage, and support, local communities in the planning and implementation of the heat transition in their area?**

Community groups can be a good way to help information to be spread among people in the community. Age Scotland has over 500 member groups that we help to support and employs Community Development Officers to provide support to groups across Scotland. It would be of great benefit to use community groups to help disseminate information to groups, such as older people.

Offering to provide speakers at group meetings or providing information in the form of leaflets that can be shared among members of groups can be a great way to provide information in more accessible means.

The use of community hubs such as GP surgeries, libraries and cafes to hold information leaflets and display posters signposting people on where to go for further information on issues can also be effective.

**24. In your opinion, what steps can we take to ensure that policies set out in this strategy do not unfairly impact Island and other remote communities?**

As island and remote communities are already more likely to have homes with lower EPC band levels and higher rates of fuel poverty, it will require a concerted effort from the Scottish Government to tailor action in island and remote areas to their local circumstances. Age Scotland’s Orkney Housing Survey 2018 explored older people’s energy use. Of note is the range of fuel types used to heat their homes: 45% of respondents used oil, 25% of respondents used solid fuel and overall, 62% of respondents used more than one fuel type to heat their homes.[[13]](#endnote-14)

It is likely to require advisors within Home Energy Scotland and other advice organisations that specialise in the potential solutions and funding available for island and remote communities. A real emphasis should be made on the fact that there will be no one-size-fits-all solution to improve the energy efficiency and heating of Scotland’s homes, but this is even more the case in island and remote areas.

Looking to facilitate the sharing of best-practice information and ideas between islands or different remote areas could also help people to find energy efficiency or heating solutions that works well for their particular situations.

1. [Scottish house condition survey: 2019 key findings - gov.scot (www.gov.scot)](https://www.gov.scot/publications/scottish-house-condition-survey-2019-key-findings/pages/5/), Table 21. [↑](#endnote-ref-2)
2. [Scottish house condition survey: 2019 key findings - gov.scot (www.gov.scot)](https://www.gov.scot/publications/scottish-house-condition-survey-2019-key-findings/pages/5/), Table 21. [↑](#endnote-ref-3)
3. [Scottish household survey 2019: supplementary analysis - gov.scot (www.gov.scot)](https://www.gov.scot/publications/scottish-household-survey-2019-supplementary-analysis/pages/2/) [↑](#endnote-ref-4)
4. [Scottish house condition survey: 2019 key findings - gov.scot (www.gov.scot)](https://www.gov.scot/publications/scottish-house-condition-survey-2019-key-findings/pages/4/) [↑](#endnote-ref-5)
5. McCall et al., [The Legacy of the Right to Buy and the Differentiation of Older Home Owners | Social Policy and Society | Cambridge Core](https://www.cambridge.org/core/journals/social-policy-and-society/article/abs/legacy-of-the-right-to-buy-and-the-differentiation-of-older-home-owners/280125253B98FBB6BAC42E31CE0CF4E1) [↑](#endnote-ref-6)
6. <https://www.gov.scot/publications/scottish-house-condition-survey-2018-key-findings/pages/6/#:~:text=In%202018%20an%20estimated%2025.0,%25%20(around%20583%2C000%20households).&text=The%20fuel%20poverty%20rate%20is,survey%20between%202012%20and%202015>. [↑](#endnote-ref-7)
7. [Scottish household survey 2019: annual report - gov.scot (www.gov.scot)](https://www.gov.scot/publications/scottish-household-survey-2019-annual-report/pages/8/) [↑](#endnote-ref-8)
8. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/housing-needs-of-older-people---panel-research/> pp 9 – 10. [↑](#endnote-ref-9)
9. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/national-housing-survey/>, p 39 [↑](#endnote-ref-10)
10. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/national-housing-survey/> p36. [↑](#endnote-ref-11)
11. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/national-housing-survey/> pp 36 – 37. [↑](#endnote-ref-12)
12. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/orkney-housing-survey/> p28. [↑](#endnote-ref-13)
13. <https://www.ageuk.org.uk/scotland/our-impact/policy-and-research/political-briefings/orkney-housing-survey/> p28. [↑](#endnote-ref-14)