

Consultation on a Fuel Poverty Strategy for Scotland

November 2017



Scottish Government
Riaghaltas na h-Alba
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Ministerial Foreword

Everyone should have enough money in their pocket to pay the essential costs of housing and energy and still be able to lead a healthy and decent life. Poverty and hardship of any form can impact on any household and can come about because of a range of reasons; and as a government we are taking action to tackle it through maximising incomes and addressing the poverty premium. Inequalities that we have promised to address across the poverty spectrum – to help improve the opportunities for our children, to narrow the attainment gap, and to reduce health inequalities – can be partly addressed through the action we take on fuel poverty. In our ambition for Scotland we want to see more households living in well insulated warm homes; accessing affordable, low carbon, energy; and having an increased understanding of how to best use energy efficiently in their homes.



Our ambition does not stand alone. It is backed by a robust fuel poverty strategy, including a Warm Homes Bill to set a new legislative target, against which we will report our progress. As a Government, we will be held to account on our efforts to improve the lives of those who have struggled to heat their home affordably. But this is not just the responsibility of the Scottish Government, particularly when we do not hold all the powers. To eradicate fuel poverty, we need to ensure that this issue is not just acknowledged, but embedded in our policies and those of our partners across all sectors and at both a national and local level. This will mean exploring further how we can work together with those who are at the sharp end of fuel poverty, and with stakeholders including local government and third sector organisations, to maximise our efforts and deliver on our ambition.

This Government is investing more in tackling fuel poverty than any other Government – £1 billion between 2009 and the end of this parliament – yet around 31 per cent of Scottish households were in fuel poverty in 2015. Among them are families with young children and individuals suffering with serious medical conditions. This is unacceptable in a modern, progressive and compassionate country like ours. Children who are forced to sleep in cold, damp bedrooms and are unable to find a warm well-lit place to do their homework will be less likely to achieve their full potential. It's broadly accepted that a number of medical conditions can worsen in a cold environment, causing misery for those experiencing it and placing increasing demand on NHS resources. Otherwise capable individuals who are unable to afford basic energy needs may be more likely to withdraw from their community. We need to take even further and faster action to help lift those experiencing this poverty into a better quality of life and to stop others falling into it.

We therefore propose to enshrine our ambition to eradicate fuel poverty in a new Warm Homes Bill.

The Warm Homes Bill will set a new measurement framework and will align itself with wider actions on tackling poverty and inequalities. By setting our ambition in legislation through the Warm Homes Bill we are demonstrating that we are serious about taking action to tackle this issue and driving forward change. The Bill will set out clear objectives, against which our progress will be measured, and will ensure we work closely with partners to deliver targeted policies that will achieve our goals.

Fuel costs that have risen well above the rate of inflation have been the biggest driver of fuel poverty in Scotland to date. This Government doesn't have powers to control fuel prices, but we do have strategies to increase the availability of affordable low carbon heat. Through our Climate Change Plan, our Energy Strategy and the forthcoming Scotland's Energy Efficiency Programme (SEEP) we will be paving the way for innovation and coordinated efforts across sectors to find the most effective solutions for households no matter where they live in Scotland. This, coupled with strong links to our Government's Economic Strategy, will help deliver our aims to create sustainable employment opportunities that will boost incomes in communities the length and breadth of Scotland.

Earlier this year I formally responded to reports from the Scottish Fuel Poverty Strategic Working Group and the Scottish Rural Fuel Poverty Task Force. Both groups were tasked with looking anew at the issues we face specifically in Scotland, and they made over 100 recommendations to inform our approach to tackling fuel poverty and improving the energy efficiency of people's homes wherever they live in Scotland. The views of these groups have informed this consultation paper.

The consultation looks at our existing approach and legislative framework and sets out detailed proposals for a new Fuel Poverty Strategy and the targets which will be enshrined in legislation. We would welcome your views and any additional evidence you can offer in answer to the questions which feature throughout the document.

Scotland is one of only a handful of European countries to define fuel poverty, let alone set a target to reduce it, and I make no apologies for this government's continuing long term ambition to eradicate it. It is through partnership working that we can make a real transformational change.

The Warm Homes Bill, at its heart, will be based on our principles of fairness and equality for all, and as such will be set within the overarching agenda set out by the Fairer Scotland Action Plan. By continuing to push boundaries we will develop innovative solutions that will help make our ambition a reality.

Introduction

This is a Scottish Government consultation paper that seeks views on proposals to tackle and diminish fuel poverty in Scotland. The paper will seek views on an approach that brings together actions from across government, and across society, to create a comprehensive strategy to deliver reductions in fuel poverty. The paper will also seek views on how progress should be monitored and how our aim to tackle fuel poverty effectively is translated into an appropriate statutory framework.

Background

This consultation forms part of the response to recommendations made by the Scottish Fuel Poverty Strategic Working Group (SWG) and the Scottish Rural Fuel Poverty Task Force (RFPTF). Both groups explored many key issues in detail and this consultation paper will not duplicate those significant efforts, rather it will seek views on an approach that builds on that earlier work and incorporates new approaches that align with expert recommendations.

Consultation on a new fuel poverty strategy

This consultation document meets our Programme for Government and manifesto commitments to consult on a new fuel poverty strategy and introduce a Warm Homes Bill.

This consultation is set out in 8 sections and seeks views on specific issues relating to the purpose of the Warm Homes Bill (such as whether we have targets; what they are; and how progress is measured and monitored) and also the complexities of the strategy (such as how we account for local variations; how we ensure collective ownership is taken; and how the strategy can support and facilitate local partnerships). The consultation sets out our approach to focus on outcomes. This new approach will shift the focus of policy from processes and inputs towards the impact that the policy and its delivery has on people and communities. It also encourages public services and other key contributors to work together effectively, delivering the best possible outcomes for communities across Scotland.

Sections 1 and 2 set out the legislative and policy context, covering the opportunities presented by the introduction of new legislation and setting out the relevant policy interventions across government that will help deliver necessary reductions in fuel poverty.

Section 3 highlights differences in communities and seeks views on how we might address specific challenges in island areas.

Section 4 looks at the importance of partnership working, noting our collective responsibility as a society to address fuel poverty. This section seeks views on how national and local delivery partners could work better together.

Section 5 sets out proposals for a new fuel poverty target and seeks views on setting this in legislation. This section also explores how progress can be measured through various indicators.

Section 6 seeks views on how progress is monitored, evaluated and reported on, including establishing a new Fuel Poverty Advisory Panel and a Partnership Forum to replace the existing Fuel Poverty Forum.

Section 7 sets out an outcomes-focussed approach that aligns with principles recommended by the Scottish Fuel Poverty Strategic Working Group and Scottish Rural Fuel Poverty Task Force. This section seeks views on how the proposed outcomes framework could be improved.

Section 8 seeks views on any positive or negative impacts there may be of implementing the proposals.

Next steps

Responses to this consultation will be analysed and that analysis published in spring 2018. A draft Fuel Poverty Strategy will be published shortly after that, prior to the introduction of the Warm Homes Bill to the Scottish Parliament.

Section 1: Legislative Context

The first Fuel Poverty Statement was published by the Scottish Executive in 2002 under section 88 of the Housing (Scotland) Act 2001 and set out Scotland's definition of fuel poverty, i.e. that a household was fuel poor if energy costs to keep their home sufficiently warm were not less than 10% of their income (informally known as the '10% definition'). Backed by legislation, the statement also set a target to ensure, so far as reasonably practicable, that people are not living in fuel poverty in Scotland by November 2016.

At the time of the target being set, when fuel prices were substantially lower than now, around 16% of Scottish households were thought to be experiencing fuel poverty, based on the 10% definition. The measurement of fuel poverty using that definition is very sensitive to changes in fuel prices and since 2003, fuel prices have risen far higher and far faster than inflation. In 2015, fuel prices were more than two and a half times – 170% – higher than their level in 2003, a much faster growth than general inflation over the same period, which increased at almost 30%. This reality has made achieving the fuel poverty target increasingly challenging, especially given that the Scottish Government has no powers over the regulation of fuel prices.

In June 2016, the Minister for Local Government and Housing informed Parliament that, based on the advice received by experts, it was unlikely that the statutory fuel poverty target would be met. This was despite significant Government investment well in excess of half a billion pounds since 2009 in domestic energy efficiency – helping to deliver over one million energy efficiency measures to over one million households.

At this time, the SWG and the RFPTF had already been instructed by Ministers to consider the issues and make recommendations on what more could be done to tackle fuel poverty. Both groups reported on their findings in October 2016 and set out a vision for a new fuel poverty strategy which would be firmly based on the principle of social justice and creating a fairer, more equal society. The SWG also set an immediate action to commission an independent, academic review of the existing definition, which Ministers did.

Review of the Fuel Poverty Definition

The recommendations from those working groups provided the scaffolding for a comprehensive review which was carried out by an independent panel of academic experts, which reported in September this year.

<http://www.gov.scot/ISBN/9781788512428>.

The Scottish Government is grateful to the Panel which has, in a very short timeframe, set out a series of evidence based recommendations with a clear aim of making improvements to the current fuel poverty definition.

In its report, the Panel made clear that continuing to use the existing 10% definition would be unsatisfactory. The Panel was also clear that any definition should not be based on household income before housing costs (BHC) and therefore proposed a definition as follows:

Households in Scotland are in fuel poverty if:

- they need to spend more than 10% of their after housing cost (AHC) income on heating and electricity in order to attain a healthy indoor environment that is commensurate with their vulnerability status; and
- if these housing and fuel costs were deducted, they would have less than 90% of Scotland's Minimum Income Standard (MIS¹)(*) as their residual income from which to pay for all the other core necessities commensurate with a decent standard of living.

() For clarification, the corresponding housing and fuel cost elements of MIS are also subtracted from the MIS total. The Panel also recommends that the Childcare cost element of MIS is subtracted from the MIS total, prior to deriving a residual income level. Childcare costs would therefore also be deducted from the household's residual income to ensure that we are comparing like with like.*

¹ The UK Minimum Income Standard is produced by Loughborough University for the Joseph Rowntree Foundation and attempts to define the income that different household types need in order to reach a minimum socially acceptable standard of living, drawing on the experience and opinions of ordinary people. The Panel recommends that, for the purposes of fuel poverty, the definition be based on 90% of the MIS total for each household type, excluding council tax, rent, water rates, fuel costs and childcare costs.

The Panel's report demonstrates that the proposed new definition should be better targeted on those likely to be experiencing adverse outcomes associated with fuel poverty – such as being unable to heat the home to a comfortable level; impacts on the physical condition of the dwelling such as damp and mould; financial problems, including debt, directly related to fuel; broader financial difficulties; and indicators of poor wellbeing.

Based on the evidence the Panel presented, the Scottish Government agreed that the current definition of fuel poverty that has been used in Scotland is no longer fit for purpose. We propose to implement the main components of the revised definition recommended by the independent Panel and to refer to it in the Warm Homes Bill.

The new definition will include an income threshold based on 90% of the UK MIS (after subtracting housing, fuel and childcare costs) and the 10% fuel cost to income ratio will be based on an AHC basis.

We recognise that the use of MIS within the measurement for fuel poverty is a different approach to measurement of other forms of poverty. However, the Scottish Government agrees with the Panel that fuel poverty is distinctly different from other forms of poverty in its drivers and we want to ensure that the most appropriate measurement indicators are used to identify those experiencing it.

Some of the detail of the measurement of the definition proposed by the independent panel will not be taken forward:

- the MIS thresholds will not be adjusted upward for households living in remote rural areas or where at least one member of the household is long-term sick or disabled. These elements are inconsistent with the broader approach taken by Scottish Government in measuring income poverty and policy towards national minimum and living wages; and
- the enhanced heating regime for vulnerable households will not be applied for households with children under 5 since this is inconsistent with established NHS guidance. This will be subject to further review and medical expert advice on optimum temperatures for children.

In addition to those specific points, the Panel concluded that age should not become a proxy for those who are likely to be vulnerable to the adverse health outcomes of fuel poverty until a much older age than is presently used as a threshold in Scotland (which is 60 years). Based on the evidence available at this time, the Panel commented that a threshold nearer 75 to 80 years might be more appropriate. However, it recommended further work is undertaken to develop a specific list of health and disability categories, as well as age bands, which would satisfactorily encompass the term “*vulnerable to the adverse health and wellbeing impacts of living in fuel poverty*”.

The Scottish Government will consider whether to take forward such work in relation to the fuel poverty definition. However, we are determined that this should not delay implementation of a revised definition which will form the bedrock of our statutory targets and we want to keep consistency with our overall approach to measuring

income poverty. The Scottish Government proposes that, for older households, where a person does not suffer from any long-term ill health or disability, they will not be considered vulnerable until they reach 75 years of age. Analysis of the 2015 Scottish House Condition Survey (SHCS) data suggests that 60% of households with any adults aged between 60 and 74 inclusive will remain classed as vulnerable to adverse health outcomes of fuel poverty because of health issues or because they also contain another adult aged 75 or over. Overall, around 80% of households classified as vulnerable under the existing definition will remain so under the new definition.

The new definition will accept the independent panel's recommendation on heating regimes for vulnerable households, by increasing the bedroom temperature from 18°C to 20°C and maintaining the living room temperature of 23°C. This removes the potentially harmful impact of a 5°C temperature difference between different rooms in the home.

Initial modelling indicates that adopting the Panel's recommended definition, with the adjustments to the measurements set out above, would result in fuel poverty in Scotland decreasing from 30.7% of households to 25.7%. This mainly results from the introduction of an income threshold to the fuel poverty definition. As a result, higher income households are excluded from being defined as fuel poor, addressing a common criticism of the old definition. It would also lead to a significant shift in some aspects of the demographic profile of those considered to be fuel poor, including a shift away from older owner occupiers towards younger people and those with families and towards households with higher housing costs compared to their income, primarily in the social rented and private rented sectors. Importantly, fuel poverty would show a stronger relationship with low income and the Scottish Government believes that this proposed definition would allow better targeting of support at those who need it most.

Questions:

- 1) Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use AHC and MIS as means to measure fuel poverty in Scotland?
 - a) What, if any, challenges do you think this approach could present in enabling targeting of resources to those most vulnerable to fuel poverty; and
 - b) If this definition is to be used, how would you propose these challenges are overcome?

- 2) Do you have any views on the proposal of using 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty?

Section 2: Scottish Government Policy Context

The complex nature of fuel poverty means there are a range of drivers and there can be a range of causes – from insecure employment to poorly insulated and draughty homes to excessive fuel prices – that affect whether an individual is in, or is vulnerable to, fuel poverty.

Targets and legislation won't deliver our ambition of affordable warmth and energy use on its own. This strategy and the forthcoming Warm Homes Bill are cross-cutting and will be complemented by activity across a range of sectors. By reducing fuel poverty we are forging links to a number of our priorities across government such as: reducing health inequalities; empowering communities; growing a sustainable economy, including in rural areas; and reducing carbon emissions. Our work on fuel poverty may also contribute to the progressive realisation of the right to an adequate standard of living (including the continuous improvement of living conditions), supporting our commitment to take actions that give effect to the vitally important economic, social and cultural rights set out in the International Covenant on Economic, Social and Cultural Rights.

We already have a wide range of policies and approaches in place that contribute to reducing fuel poverty. Some examples of these, and the drivers of fuel poverty they help to tackle, are set out below.

Energy efficiency

Building on the success of the Home Energy Efficiency Programmes for Scotland (HEEPS), we are working to develop and implement SEEP, which will be a core component of the Scottish Government's new Energy Strategy. We consulted on SEEP and the draft Energy Strategy earlier this year and are currently working to further develop both in response to the feedback received.

SEEP will provide an offer of support to owners and occupants across Scotland – domestic and non-domestic – to improve the energy efficiency rating of their buildings over the longer term, with eradication of fuel poverty at its heart.

It will be an integrated programme of support for domestic and non-domestic buildings with a key role for partners in local government, housing associations, communities and the private sector, building on our existing successful energy efficiency programmes, in particular HEEPS.

In addition to our focus on removing inadequate energy efficiency in properties as a driver of fuel poverty, SEEP will also seek to leverage further private investment into improving energy efficiency to support the development of loan schemes to enable households and businesses who can afford to pay, to spread the upfront costs of investing in energy efficiency.

We have already consulted on the overall design of SEEP in early 2017 – the consultation set out the challenges and opportunities of integrating our policies and programmes to deliver wider benefits and to support energy solutions that provide

warmer homes and better outcomes for consumers overall. We are now analysing the responses to this consultation as we develop a Routemap for the programme, which we will publish in 2018. This will set out our long term ambition for the programme, its component parts, and our timeline for delivery. In particular it will set out how we will consider the role of standards and regulatory frameworks that give certainty to consumers and make it as easy as possible and the norm to invest in energy efficiency. It will set out the range of incentives and delivery mechanisms that can support the uptake of energy efficiency measures, and the advice and information services that SEEP will offer to ensure that households and businesses can benefit from improvements to their properties. It will set out our clear and continuing commitment to improving the energy performance of buildings where fuel poor households live, through our area-based and national schemes.

Our commitment to a programme on this scale, across Scotland, provides certainty of work and an economic boost to urban and rural communities. As set out in our Programme for Government we will bring forward legislation, in the third year of this Parliamentary Session, necessary to deliver Scotland's Energy Efficiency Programme

We have also been consulting this year on a number of aspects relating to SEEP, including the regulation of private rented sector housing to increase energy efficiency standards. How we shape policy as a result of these consultations can play a part in alleviating fuel poverty and this will be a key consideration going forward. We will be seeking views on other strategic approaches to improving energy efficiency in the coming months. For example, later this year we will be consulting on our preferred approach to regulation of district heating and on Local Heat and Energy Efficiency Strategies (LHEES), which will provide important information to help design our future SEEP delivery programmes, and to ensure that district heating is developed in a way which supports our fuel poverty objectives.

Energy prices

Energy prices remain a huge concern for many Scottish households and this Government is acutely aware of the pressures that many face in meeting their energy bills. During its review of the energy markets, the Competition and Markets Authority (CMA) found that domestic energy consumers face substantial detriment, with customers as a whole paying an average of £1.4 billion per year more than they would have done under a well-functioning market in the years from 2012 to 2015 – a sum reaching £2 billion in 2015.

Although the existing market provides scope for consumers to save money on their energy bills by switching tariff or supplier, a low level of consumer engagement in the market persists, and this is particularly pronounced in Scotland. Moreover, those who do engage are typically higher income earners with the ability to pay by Direct Debit and with access to mains gas and the Internet who can access lower prices by switching to fixed price deals.

We welcome the remedies proposed by the CMA to increase competition and engagement in the market – these reforms are long overdue. We are carefully monitoring the implementation of the remedies to ensure the benefits are felt by all

Scottish consumers, particularly for those most in need. However, we do not believe the remedies address the fundamental issues here and it is clear that the UK Government has failed to provide a competitive market that delivers fair energy bills for all.

The power to regulate the energy market rests with the UK Government. But we are determined to use the powers we do have to provide targeted support to those who need it. We believe everyone should be able to access affordable energy and we are currently exploring a range of delivery options to facilitate this, including, as announced by the First Minister on 10 October, a publicly-owned energy company (POEC). Further details will be available by the end of the year, when the Government's long term Energy Strategy is published. We are also looking further at collective switching models, identifying barriers to switching and developing targeted policy interventions. And we are working to ensure that the benefits of Smart Meters are fully realised for all consumers, but with a particular focus on the benefits that the roll-out can bring for those in fuel poverty.

Energy companies are key partners in delivering a fairer Scotland, and in December 2016 the Cabinet Secretary for Communities, Social Security and Equalities chaired a summit of suppliers to address inequalities in the retail energy market. Ministers will follow-up with energy companies in the coming months as we seek to identify further actions they could take that will make a material and important difference to low income families in Scotland.

As highlighted in the recommendations of the SWG, supporting local energy generation can play an important part in developing affordable energy supplies. Scotland is already a leader in the development of Local Energy Systems, providing local solutions to match local needs with improved consumer and community benefits.

Local energy can help to tackle some of our most pressing issues from security of supply, to demand reduction, making energy supplies more affordable for households and businesses, to stimulating regeneration and local economic benefit. Various funding programmes, including the Local Energy Challenge Fund, have supported projects that seek to demonstrate the use of low carbon technologies to reduce consumer energy bills.

The Scottish Government wishes to see renewable energy projects making an offer of shared ownership to local communities as standard. Increased shared ownership offers a range of benefits, including building capacity and empowering community members through giving them control or input into local energy. The income received from the investment can support a range of local projects, including tackling fuel poverty should the community decide this is a priority.

Energy use

Through Home Energy Scotland (HES) we already offer advice and support on energy use in the home. We also recognise that some of our more vulnerable householders will need additional support and we currently offer home visits where

that is more appropriate. We have been considering how this could be expanded and are supporting pilots to test different approaches.

This includes the HES Homecare pilot programme, which we launched earlier this year and that will see up to 220 rural households offered targeted in-home support to cut their energy bills. Advisers from HES will visit selected homes in rural areas, through referrals from Health partners, to see what more can be done to reduce their fuel bills. The £300,000, 12-month HES Homecare pilot will be evaluated before a decision is taken on whether to roll it out to households nationwide. The HES Homecare pilot complements previous pilots we have run through HES, which have tested new and innovative approaches to helping householders control their heating systems, enabling them to maximise the benefits of the energy efficiency measures that have been installed. We are considering the findings of these pilots, as well as working with our partners, as we design SEEP to ensure that behavioral advice is fully embedded into programme delivery, helping householders feel empowered and in control of their homes.

Income

Inclusive growth remains central to creating a fairer Scotland and tackling poverty in any setting; and through maintaining close links with this government's economic strategy we will continue to build a skilled, healthy, productive workforce that is essential to the sustained, long-term prosperity of the Scottish economy.

Through the development of SEEP we will provide the opportunities to develop the supply chain for energy efficiency services and technologies. Once the programme is fully operational we expect there to be an estimated 4,000 jobs supported each year across Scotland, including in remote areas.

We are also working to develop a social security system that meets the needs of our most vulnerable citizens and we will consider different ways that any devolved benefits can be used to help those that need them.

In addition, as set out in the 2017 Programme for Government, in 2018 we will start the roll-out of a Family Financial Health Check aimed at those on low incomes.

This will offer low-income families with children access to a 'financial MOT', including advice on maximising incomes, ensuring benefit take up, and make the most of their money by accessing the best deals on financial products and services, including energy tariffs. We will ensure that the families in most need know about this service and are encouraged to use it.

Section 3: Recognising the distinctiveness of all our communities

We recognise that addressing fuel poverty in our island communities presents a different set of issues to many other parts of Scotland. Whilst Scotland's inhabited islands are diverse, they share particular challenges. Many people in rural and remote areas of Scotland can often struggle to heat their homes because their properties tend to be more exposed to wind and weather and can be more expensive to heat as the majority are not connected to mains gas supplies and households are reliant on electricity and unregulated fuel types to heat their homes. We believe it is unacceptable for people to face these fuel poverty challenges just because of where they live, and we asked the RFPTF to look specifically at these issues and to recommend how best to address them.

However, there are also island-specific opportunities, including a more readily identifiable community, strong local relationships extending to a tradition of self-sufficiency in many places, and a resource-rich, high quality environment that supports good quality of life.

A refreshed fuel poverty strategy should respond to the unique circumstances of all our communities and this principle underpins many of the wider proposals set out here. For example, we want to maintain and build upon the flexibility within our delivery programmes to ensure they meet the needs of those communities. Through our HEEPS: Area-Based Schemes we already distribute funding based on an assessment of need, which means that remote areas, including all island communities, receive more per head of population to tackle fuel poverty than those on the mainland. In addition, our HEEPS: Warmer Homes Scotland (WHS) scheme is being delivered on a regional basis, including a separate Islands region, to ensure that all households, including those living in more remote parts of the country, get the same level of service as those in urban areas.

This is already helping to address some of the issues remote and rural communities can face, such as additional costs and time taken to assess properties and install energy efficiency measures.

We also know that small businesses often find it challenging to adapt to changes to Government schemes where additional training and certification is necessary.

Through the development of SEEP we will provide the opportunities to develop the supply chain for energy efficiency services and technologies. It is critical that the supply chain keeps up with demand, and our commitment to building capacity in this sector will help to create more highly-skilled and better paid jobs in our local communities, as well as help to provide better quality goods and services.

As SEEP develops we continue to work with the six local authorities who are represented on the Islands Strategic Group, to ensure any proposals for change are sufficiently flexible to respond to their unique but varied local circumstances. We will also look at opportunities for innovation, including using digital technology to overcome travel and distance barriers.

The Scottish Government is also actively reviewing the recommendations of the RFPTF in the development of SEEP and will ensure these are factored into the emerging policy where appropriate.

Questions

- 3) In relation to island communities, are there any additional
 - a. challenges ; and / or
 - b. opportunitiesthat we need to consider in developing our strategy?

- 4) In relation to rural and remote rural communities, are there any additional
 - a. challenges ; and / or
 - b. opportunitiesthat we need to consider in developing our strategy?

Section 4: Partnership working

In order to meet our long term ambition we need a comprehensive delivery plan that sets out a clear and common aim to eradicate fuel poverty that all our partners – across local and national government; across business and industry; and across the third sector – can sign up to working towards. Our national partners, including COSLA, Energy Saving Trust (EST), energy companies and NHS Scotland, will be working collaboratively with local authorities and third sector organisations to maximise the effectiveness of our delivery mechanisms and to strengthen the bonds between policies.

Local partners will be crucial to successfully eradicating fuel poverty. We already collaborate with COSLA and local authorities to deliver our HEEPS: Area-Based Schemes; and through HES, delivered on our behalf by the EST, we are reaching more third sector and frontline organisations than ever before. We also provide funding for low carbon projects through the Climate Challenge Fund, which includes supporting projects that deliver energy efficiency advice and support in relation to fuel poverty at a local level. These partnerships will have an ongoing role in helping to identify those most in need and to support them into a better quality of life. We are already testing new ways of forging closer partnerships with local health and social care organisations through our rural HES Homecare pilot which is providing locally based in-depth support to vulnerable householders. These new and existing partnerships make reaching the most vulnerable people more efficient, particularly in remote and rural areas.

But we know we need to do more. We are very supportive of locally led, collaborative approaches that provide partners with opportunities to align their collective resources in more effective and efficient ways to improve outcomes in tackling fuel poverty.

Local partners can also use community planning as a vehicle in which to collaborate, especially where action to address fuel poverty can support related themes which a Community Planning Partnership (CPP) identifies as local priorities.

Health services in Scotland are a vital link to individuals who are most in need. The Chief Medical Officer has already asked that all NHS Boards plan and deliver hospital services that ensure routine enquiries for vulnerability are built into person-centred care so that those at risk of poverty or inequality attain the best possible health outcomes. This was followed up more recently with a joint letter from Ministers in the health and housing portfolios to NHS Chief Executives to encourage more collaborative working that will help mitigate the impacts of fuel poverty on health and wellbeing.

Questions

- 5) Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty? What would best support, or enable such partnerships?
- 6) What can local partners do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty? This might include sharing best practice or developing strategic approaches.
- 7) How can SG support local delivery partners (e.g. third sector organisations and social enterprises) to measure their success?

We are often told that the one-stop-shop approach, that HES delivers, is crucial for a smooth customer journey. However, we are mindful of our collective responsibility to ensure that individuals receive good quality advice and support – whether they are seeking advice about income or lifestyle changes they can make, or are receiving physical energy efficiency measures through delivery programmes. We want all consumers to have confidence in the service they receive no matter where they live in Scotland, and in our reporting we want to reflect the success of outcomes delivered at local level as well as successes through our national programmes. We also recognise that smaller organisations can find it a burden to undertake regular, in-depth, reporting on the outcomes they have achieved and that it can be challenging to balance resources to deliver a service with those needed to fulfil reporting requirements.

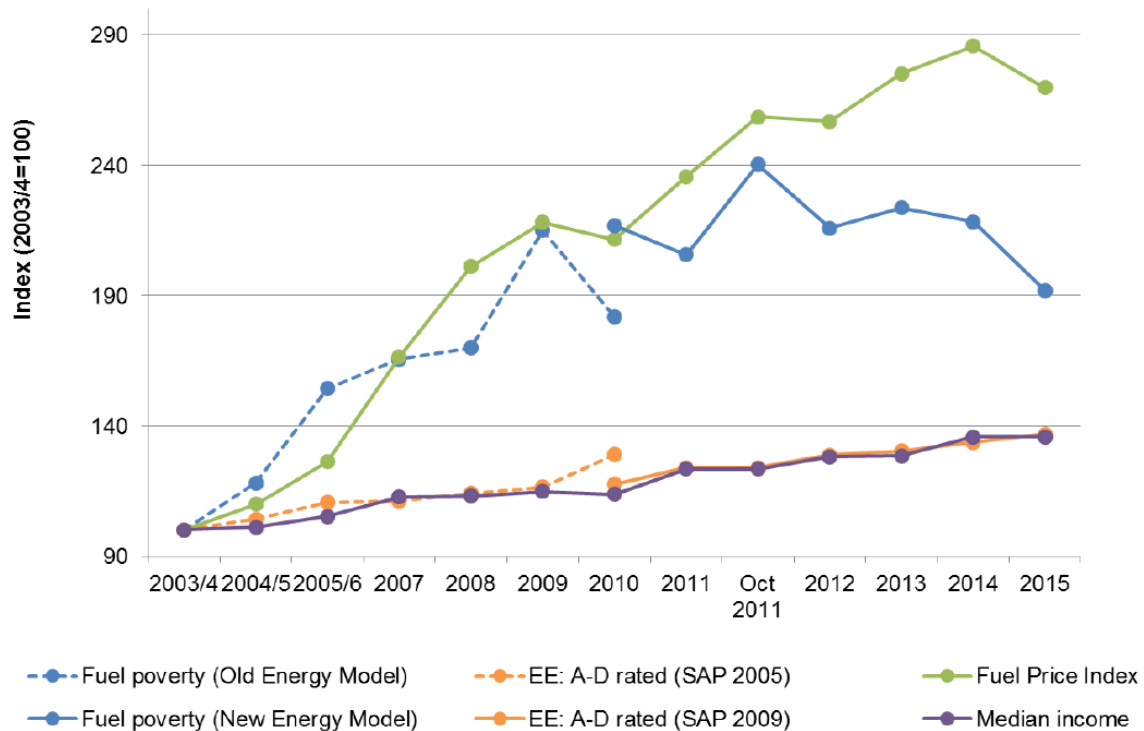
Questions

- 8) How can the Scottish Government best support local or community level organisations to accurately
 - a. measure;
 - b. report on; and
 - c. ensure quality ofprovision of advice and support services and their outcomes?
- 9) How can the one-stop-shop approach be enhanced for the benefit of HES clients; and in particular,
 - a. Are there any improvements that you think can be made to the HES service to further enable it to best reach the most vulnerable to fuel poverty client groups?

Section 5: Targets and indicators

We recognise that the fuel poverty landscape now is very different to that of 2002, in particular in relation to fuel prices, and that eradicating fuel poverty is a massive challenge. The gains we have made in the last 10 years to address some aspects of fuel poverty, such as improving the energy efficiency of homes, have been outstripped by other factors which are beyond our control, primarily rising fuel prices, and this will continue to be a challenge in the years to come. Since 2003, the proportion of dwellings rated A to D has increased by 37% and median household income has grown by 36%. However, fuel prices have risen much faster, so that by 2015 they were more than two and a half times their level in 2003, an increase of 170%.

Trends in Fuel Poverty, Fuel Price, Energy Efficiency and Median Income, 2003/04 to 2015



Source: Scottish House Condition Survey: 2015 Key Findings report at <http://www.gov.scot/Resource/0051/00511081.pdf>.

We also recognise that the revised definition will require changes to how we measure fuel poverty and how we tackle it, influencing our delivery programmes and meaning it will be 2019 before we can report against progress using data from the SHCS.

However, eradicating fuel poverty is crucial to making Scotland fairer and that is why we are introducing the Warm Homes Bill to enshrine our ambition to do so in legislation.

We therefore propose to include in the Bill a new statutory target to eradicate fuel poverty.

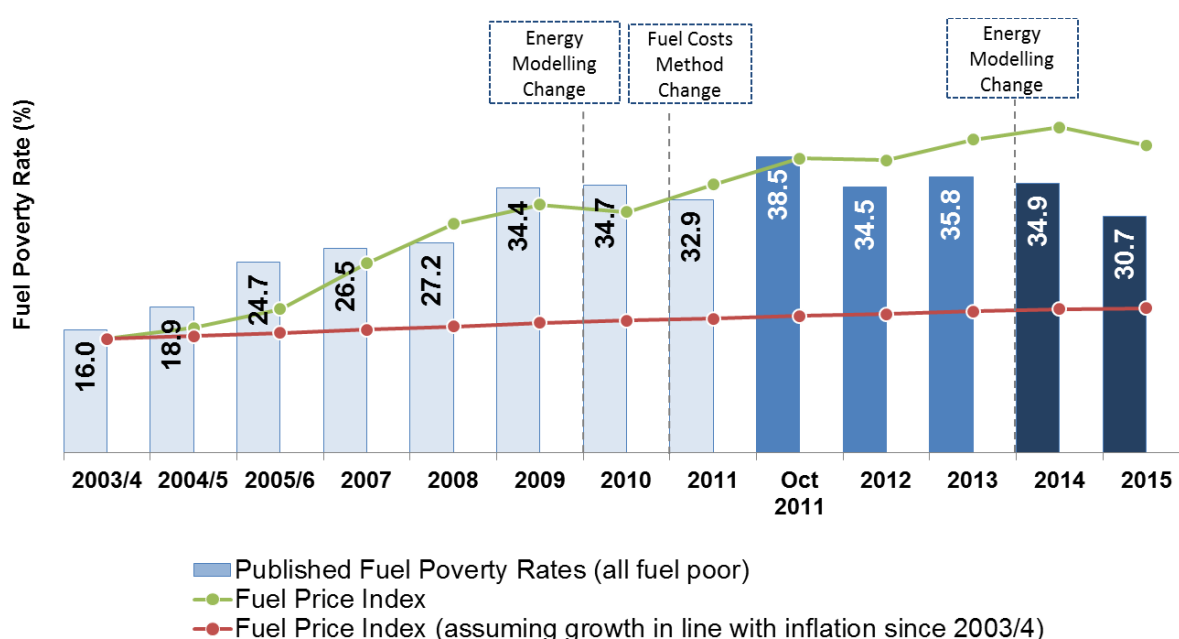
Questions

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

Measurement of indicators

Our long term ambition of eradicating fuel poverty will only be achieved by significant effort to tackle all of its drivers but we recognise that a number of factors which contribute to fuel poverty levels, in particular fuel prices, remain beyond our control. Our proposed approach will underpin our overarching ambition with a framework that takes that into account. By 2015, fuel prices were more than two and a half times their level in 2003, an increase of 170%, a much faster growth than general inflation over that time. The chart below demonstrates how that compares to fuel poverty levels, based on the definition of fuel poverty used at the time (the '10% definition'), over those years.

Fuel Poverty Rates & Fuel Price Trends since 2003/04



Source: Scottish House Condition Survey: 2015 Key Findings report at <http://www.gov.scot/Resource/0051/00511081.pdf>.

Whilst the Scottish Government will do all it can to encourage and promote greater engagement with the energy market – including switching suppliers, and a greater uptake of low carbon, affordable energy solutions – powers to put an end to excessive fuel price increases remain reserved to the UK Government. But we must be ambitious, which is why we are looking to develop a publicly-owned energy company to do as much as we can to minimise energy costs. We will also continue to drive forward our aspiration to eradicate poor energy performance as a cause of fuel poverty. We must continue to grow a sustainable economy, creating more jobs and raising incomes.

Our proposed framework will underpin our overarching ambition. We propose to have three indicators with sub-targets within this framework which would be monitored on a non-statutory basis:

SUB-TARGETS

- The overall fuel poverty rate will be less than 10% by 2040 ;
- Ensure the median household fuel poverty gap is no more than £250 (in 2015 prices before adding inflation) by 2040 ; and
- Remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040.

WITH INTERIM MILESTONES TO 2030

- The overall fuel poverty rate will be less than 20% by 2030;
- Ensure the median household fuel poverty gap is no more than £450 (in 2015 prices before adding inflation) by 2030; and
- Progress towards removing energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating

Further measurements – Fuel Poverty Gap

The Warm Homes Bill will set targets relating to the eradication of fuel poverty, and whilst our focus will always be on reducing overall numbers of people in fuel poverty, we must do all we can to alleviate the adverse effects of those who remain unable to afford their energy costs. With this in mind, and in addition to monitoring these key trends and the impact on the overall levels of fuel poverty, we propose that it would be helpful to monitor the depth of fuel poverty households are experiencing. By doing so, we aim to demonstrate a more rounded picture of the effectiveness of our interventions and the progress in reducing that gap.

The fuel poverty gap is not a measure which we currently track or target on. However, based on the revised definition of fuel poverty, initial analysis indicates that the median fuel poverty gap was £654 in 2015. Whilst our ambition is to reduce the median fuel poverty gap to less than £250 (in 2015 prices before adding inflation) by 2040, we plan to set an interim milestone to reduce the fuel poverty rate to 20% by 2030 and reduce the fuel poverty median gap to less than £450 (in 2015 prices before adding inflation) by 2030, which will be a significant improvement for those who are struggling with their energy costs. We will start publishing information on the fuel poverty gap in the annual SHCS Report. We will commission an independent review of delivery to 2030 and recommend further necessary action to take to meet the 2040 eradication target and associated sub-targets. This would be undertaken by 2031.

The lowest rates of fuel poverty are associated with higher energy efficiency standards. We will aim to eradicate energy efficiency as a driver of fuel poverty by setting an ambitious target to ensure all homes reach a minimum energy efficiency rating. Further work is being done to set a long term direction for SEEP, including

setting out minimum standards of energy efficiency across different tenures. We will be consulting on these issues in the coming months and the outcome of those will inform how this target is set.

The sub-targets we have set out will involve a significant effort across all drivers of fuel poverty. The SWG and RFPTF were clear in their respective recommendations that we need to look beyond the three traditionally recognised drivers of fuel poverty (income, fuel prices and energy performance) and consider new ways to influence action across wider factors, including how individuals use energy in their homes. These recommendations were strongly supported by stakeholders across the sector and as we develop SEEP we will continue to refine our approach to ensuring householders receive the appropriate support to enable them to make informed choices about their energy use.

Questions

- 11) What are your views on the proposed sub-targets?
 - a) What are your views on the proposed levels?
 - b) What are your views on the proposed timeframe?
- 12) What are your views on the proposed interim milestones?
 - a) What are your views on the proposed levels?
 - b) What are your views on the proposed timeframe?

Section 6: Monitoring, evaluation and reporting

The Scottish Government established the Scottish Fuel Poverty Forum (the Forum) in 2008. Most recently there were 16 organisations represented including representatives from energy companies, charities and fuel poverty experts. The Forum has the following remit:

- Monitor the implementation of the Scottish Government's energy efficiency schemes.
- Advise Ministers on further actions required.
- Liaise with the Fuel Poverty Advisory Group for England to develop an appropriate link that will ensure Scottish interests are fed into reserved policy areas.

Since it was established, the Forum has had many notable achievements, including the development of the current HEEPS, both the area-based and national fuel poverty programmes.

In 2015, Scottish Ministers established two short-life, expert groups to provide advice and recommendations on tackling fuel poverty: the Scottish Fuel Poverty Strategic Working Group (SWG) and the Scottish Rural Fuel Poverty Task Force (RFPTF). The groups were independently chaired and made up of representatives from a range of organisations with an interest in energy efficiency and fuel poverty. Among the recommendations of the two groups was that the role and remit of the Fuel Poverty Forum should be reviewed.

The SWG's recommendations included that changes should be made to the existing governance arrangements of the Forum. It proposed the establishment of a more focused statutory body to provide advice and scrutiny, and a mechanism for regular exchange of best practice. It suggested this new body should play an important role in the monitoring and evaluation of SEEP in parallel to the SEEP Board's scrutiny role.

It did, however, recognise the importance of the existing Forum and the experience and expertise of the members. It therefore recommended that it should play an important part in the transition to any new arrangements for advice and improve the approach where required. The SWG also suggested that the existing Forum should oversee the development of the new fuel poverty strategy, but was clear that its longer term role and remit should be reviewed. It also suggested that there should be a cross-Ministerial meeting to discuss the development of the strategy.

Based on these recommendations, Ministers have approved a proposal for two new bodies to be established, an independently chaired Scottish Fuel Poverty Advisory Panel and a Partnership Forum to be set up to replace the existing Forum. The Advisory Panel will be a smaller, strategic group which will meet at least four times a year. The Partnership Forum will have a wider membership and will meet a minimum of once per year, with the potential to meet a second time within the same year if required.

The remit of the Advisory Panel will include:

- monitoring and reporting on progress of the development and implementation of the Scottish Government's Fuel Poverty Strategy, including a new fuel poverty target;
- supporting and challenging Government at all levels on delivery of its fuel poverty and energy efficiency programmes and efforts to tackle fuel poverty;
- encouraging and fostering a partnership approach to tackling fuel poverty across the public, private and third sectors; and
- monitoring and reporting on the delivery of the SWG's and RFPTF's recommendations contained in each group's respective reports.

The Advisory Panel will report to Ministers annually on progress.

The Scottish Fuel Poverty Partnership Forum will:

- review the annual SHCS results regarding levels of fuel poverty;
- provide a source of expertise that can be called upon to sit on short life working groups on specific issues and provide evidence to the Advisory Panel as required; and
- support a co-ordinated approach to tackling fuel poverty across the public, private and third sectors.

We expect these new groups to be operational by early 2018.

Questions

- 13) How should the new Fuel Poverty Advisory Panel and Fuel Poverty Partnership Forum monitor progress towards meeting the proposed sub-targets and interim milestones?
- 14) What do you think the Advisory Panel's priorities should be in its first year?

Tackling fuel poverty is a long term commitment that requires strategic interventions across a range of sectors which take time to embed in practice. It can be challenging to identify households who are in fuel poverty without asking detailed questions on household income and fuel use. Delivery of our programmes relies, therefore, on the use of proxies to identify households likely to be fuel poor by virtue of having low incomes and high fuel costs. For example, in our HEEPS: Area-Based Schemes councils can use a range of proxies to identify areas or neighbourhoods where the incidence of fuel poverty is likely to be high. This includes using national indicators, such as the Scottish Index of Multiple Deprivation (SIMD) data, and council tax bands as proxies for low income; or more local information, such as use of free school meals, blended with stock condition information which can identify properties with poor thermal efficiency. Our WHS scheme also uses proxies, identifying eligible households based on the receipt of certain benefits. Our approach to using proxies has always sought to outweigh the complexities and high resource costs associated with assessing individual household incomes against fuel costs – such as through using doorstep tools, something considered by the Definition Review Panel in their report <http://www.gov.scot/ISBN/9781788512428>.

However, we recognise that use of proxies can be a fairly blunt approach to identifying fuel poor households and that other approaches should be explored.

A strategic, cross-sectoral approach was set out clearly in the SWG report as a crucial element to providing support to those who need it most. The Panel which undertook the review of the fuel poverty definition recommended a doorstep tool which could help assess eligibility based on the revised definition and help with local implementation and delivery of programmes. We will consider how this could be tested to see how effective it is in terms of delivery of Scottish programmes.

Questions

- 15) What examples do you have of using proxies to identify fuel poor households?
 - a) Which proxies did you use?
 - b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?
- 16) What are the key lessons to be learnt from any existing approaches that apply proxies in door-to-door, on-the-ground assessments in this context?
- 17) Do you have any concerns about the use of a doorstep tool, in particular the challenges around delivery of area based schemes?

Overall fuel poverty levels will continue to be monitored and published annually as part of the SHCS. In addition, the 2001 Act committed Scottish Government to report progress on measures set out in a Fuel Poverty statement every 4 years. The Scottish Government believes that collective responsibility must be taken across society for tackling all of the drivers of fuel poverty if we are to achieve our common aim of eradicating it. With this in mind, we believe that any future reports on delivery plans should continue to be no more regular than every 4 years. However, we recognise that any commitments to regular reporting need to be jointly developed and agreed with key partners – ensuring a collaborative approach to reporting progress and demonstrating collective responsibility for action taken.

Questions

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

Section 7: Outcomes and Principles

At the heart of our fuel poverty strategy is our commitment to work with the people and communities of Scotland to deliver the best possible outcomes. Tackling the issue comprehensively will require serious long-term commitment to work with our partners across the public, private and third sectors.

However, the aims remain true to those that were identified in the 2012 Fuel Poverty Evidence Review, namely:

- All households are able to enjoy adequate thermal comfort;
- Energy bills present less hardship to lower income households (defined as lowest 3 deciles of income);
- There is increased understanding by households of how to use energy in the home;
- Increased long term income for fuel poor households; and
- Dwellings occupied by fuel poor households have lower carbon emissions.

These outcomes are already firmly embedded in new and existing programmes like SEEP and HEEPS; through actions set out in the Fairer Scotland Action Plan; and through implementing an effective social security system alongside a plan for greater economic growth across Scotland. We will continue to work across Government and with partner organisations to support the strategic delivery of these aims.

The recommendations made by the SWG and the RFPTF have been a valuable guide in developing our strategy. We want to ensure that we align this strategy with the guiding principles set out by these groups and therefore the following principles will underpin our approach:

- The fuel poverty strategy will be firmly based on the principle of social justice and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland;
- The Scottish Government's approach to fuel poverty eradication will be set on a statutory framework, measured and overseen by Ministers and delivered via partnership structures at a local level. Building on the assets of individuals and communities will be at the heart of this partnership and early intervention and prevention will be crucial to success; and
- The needs of individuals and families will be at the heart of service design and delivery and the fuel poverty strategy will address all four drivers of fuel poverty: income, energy costs, energy performance, and how energy is used in the home.

Outcomes-focused working helps shift the focus of policy from processes and inputs towards the impact that the policy and its delivery has on people and communities. It also encourages public services and other key contributors to work together effectively. By developing an outcomes framework for fuel poverty we are enabling Scottish Government and its partners to adopt a shared understanding of what needs to be achieved for those who are in, or at risk of falling into, fuel poverty.

To demonstrate the links between the drivers of fuel poverty, the policies that address them, and this strategy's outcomes, we have developed a logic model – a simplified diagram that shows the logical relationship between policy activities and the outcomes or benefits of those activities. The logic model is attached as an annex to this consultation.

Questions

- 19) What are your views on, or experience of how an outcomes-focused approach would work in practice?
 - a) Would it encourage national and local policy and delivery partners to work together effectively, and if not, what alternative approach(es) do you propose could be used instead?
- 20) Do you think the principles detailed in the 3 bullet points above are adequately reflected in the outcomes framework?
- 21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground?
 - a) If so, how?
 - b) If not, why?

Section 8: Assessing impacts

We are considering the impact of implementing our proposals.

An Equality Impact Assessment (EQIA) will help us understand policy impacts on people because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Data availability on levels of fuel poverty for each of these equality groups is varied, but the EQIA process will help to identify (and mitigate) negative impacts and proactively look for opportunities to promote equality.

A full Strategic Environmental Impact Assessment (SEA) will be carried out during the development of SEEP. The delivery of SEEP will be one of the mechanisms, amongst others, that will help us to remove inadequate energy efficiency in properties.

A Business Regulatory Impact Assessment (BRIA) allows us to assess the likely financial costs and benefits and the associated risks of the proposals that might have an impact on the public, private or third sector. A full BRIA will be carried out during the development of SEEP, the latter being the mechanism we will use to deliver energy efficiency improvements to buildings over the longer term, with the eradication of fuel poverty at its heart.

A Children's Rights and Wellbeing Impact Assessment (CRWIA) will allow us to assess whether the proposals will advance the realisation of children's rights in Scotland and protect and promote the wellbeing of children and young people.

A Health Impact Assessment (HIA) will allow us to identify and assess the potential impacts of the proposals on health and wellbeing and make recommendations to maximise benefits and minimise risks.

Our interim EQIA has been published alongside this consultation.

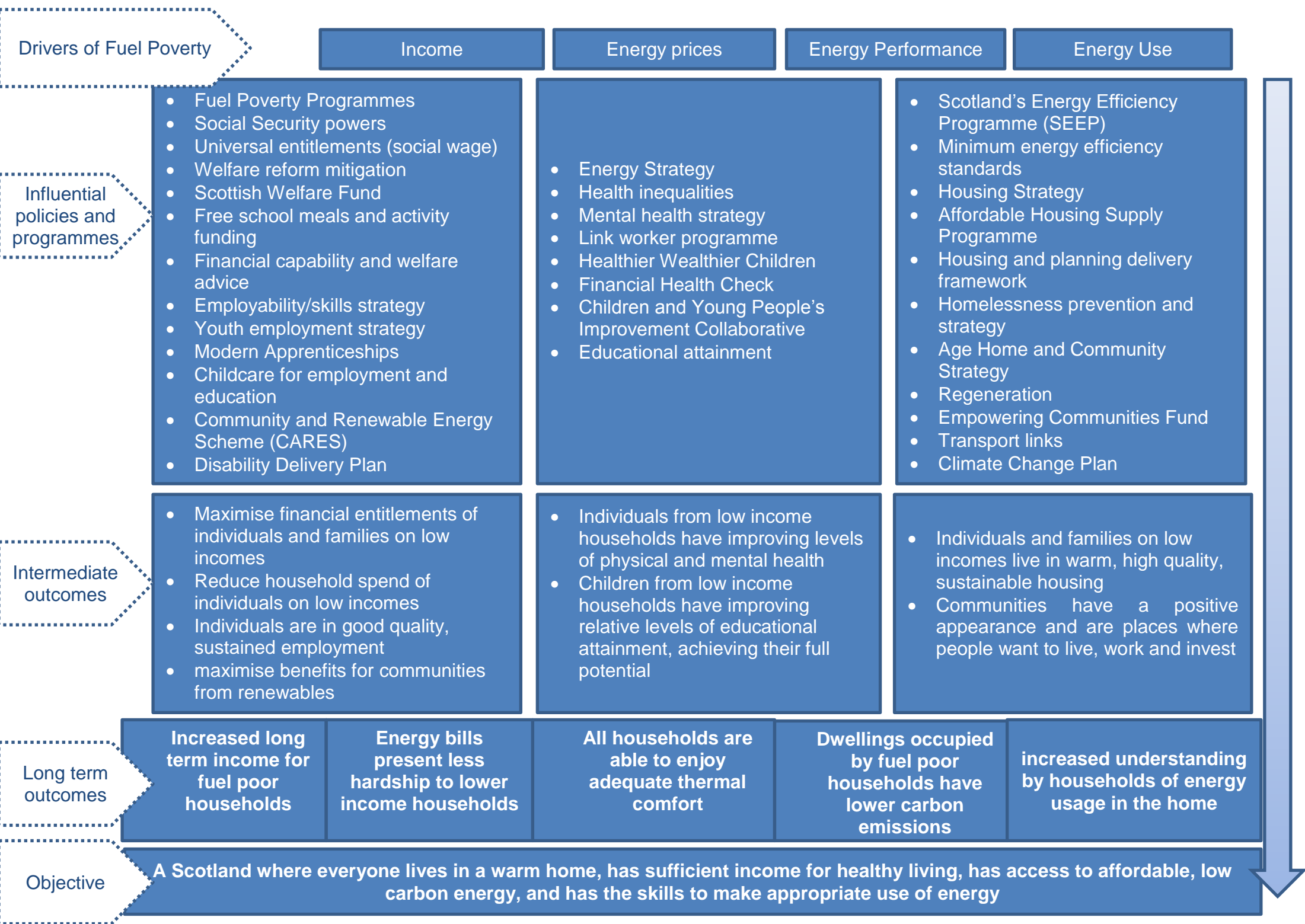
The final HIA and CRWIA will be published alongside a draft Fuel Poverty Strategy in Spring 2018, in advance of the Warm Homes Bill being introduced in Parliament.

Questions

- 22) Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?

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

- 24) Do you think any of these proposals will have an impact, positive or negative, on children's rights? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?



GLOSSARY

Term or Acronym	Meaning
Advisory Panel	Fuel Poverty Advisory Panel
AHC	After housing cost
BHC	Before housing cost
Bill	Warm Homes Bill
BRIA	Business Regulatory Impact Assessment
CMA	Competition and Markets Authority
CPP	Community Planning Partnership
CRWIA	Children's Rights and Wellbeing Impact Assessment
EQIA	Equalities Impact Assessment
EST	Energy Saving Trust
Forum	Fuel Poverty Forum
HEEPS	Home Energy Efficiency Programmes for Scotland
HES	Home Energy Scotland
HIA	Health Impact Assessment
LHEES	Local Heat & Energy Efficiency Strategies
MIS	Minimum Income Standard
Panel	Definition Review Panel
POEC	Publicly Owned Energy Company
RFPTF	Scottish Rural Fuel Poverty Task Force
SEA	Strategic Environmental Impact Assessment
SEEP	Scotland's Energy Efficiency Programme
SHCS	Scottish House Condition Survey
SIMD	Scottish Index of Multiple Deprivation
SWG	Scottish Fuel Poverty Strategic Working Group
WHS	Warmer Homes Scotland

Responding to this Consultation

We are inviting responses to this consultation by 1 February 2018.

Please respond to this consultation using the Scottish Government's consultation platform, Citizen Space. You view and respond to this consultation online at <https://consult.scotland.gov.uk/better-homes-division/fuel-poverty>.

You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 1 February 2018.

If you are unable to respond online, please complete the Respondent Information Form (see "Handling your Response" below) to:

Fuel Poverty Strategy Consultation
Scottish Government
Fifth Floor
Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

It would be helpful to have your response by email or using the electronic response form. The electronic response form can be accessed at the following website address <http://consult.scotland.gov.uk>. You can also email your response to FuelPovertyStrategy@gov.scot

Handling your response

If you respond using Citizen Space (<http://consult.scotland.gov.uk/>), you will be directed to the Respondent Information Form. Please indicate how you wish your response to be handled and, in particular, whether you are happy for your response to be published.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form attached included in this document. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material,

responses will be made available to the public at <http://consult.scotland.gov.uk>. If you use Citizen Space to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to:

Fuel Poverty Strategy Consultation
Scottish Government
Fifth Floor
Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Scottish Government consultation process

Consultation is an essential part of the policy-making process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.scotland.gov.uk>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Consultations may involve seeking views in a number of different ways, such as public meetings, focus groups, or other online methods such as Dialogue (<https://www.ideas.gov.scot>)

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.



Consultation on a Fuel Poverty Strategy for Scotland

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
 No



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