



Changes to the Affordable Warmth Scheme

February 2018

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1 Introduction

- 1.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (NI) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).
- 1.2 The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.
- 1.3 The Consumer Council welcomes the opportunity to respond to the Department for Communities (DfC) consultation on its proposed Changes to the Affordable Warmth Scheme. We have attached our response to the consultation in Annex A as requested.
- 1.4 If you would like further information or to discuss any issues in this paper, please contact Mark Crawford on 028 9025 1640 or mark.crawford@consumercouncil.org.uk.

Annex A – Your responses to the Consultation

Name: Mark Crawford

Organisation: The Consumer Council for Northern Ireland

Position in the organisation: Senior Policy Officer (Energy)

Proposal 1

The Department proposes that one installer, managing the installation of all measures to the household, becomes the preferred delivery method.

How much do you agree with this proposal? (Please tick one option)

Strongly agree	Agree	Don't know	Disagree	Strongly disagree
	✓			

Comments

DfC advises that anecdotal evidence suggests having multiple installers for different measures can be difficult for householders. The Consumer Council would be concerned that households, especially those where there is vulnerability, are struggling to get the work done and are possibly not having the work completed. We therefore agree that a single installer facilitating the completion of all measures will improve management of the delivery arrangements for consumers. Furthermore, a single installer as a point of contact for the consumer would also be preferable should any follow up information or redress be deemed necessary.

Proposal 2

The Department proposes to raise the income threshold to £23,000 for households with more than one person and reducing it to £18,000 for all single person households.

How much do you agree with this proposal? (Please tick one option)

Strongly agree	Agree	Don't know	Disagree	Strongly disagree
	✓			

Comments

DfC has explained its rationale for reviewing the current income threshold of £20,000 for all households and its subsequent proposal to increase the amount to £23,000 for households with more than one person, whilst reducing it to £18,000 for all single person households. It would seem that these changes in the threshold should enable more households to benefit from the scheme, which is welcomed.

The paper, however, does not provide supporting evidence to demonstrate that increasing the value to £23,000 will allow entry for a quantifiable number of households that do not currently meet the criteria for the scheme.

We would welcome any evidence that demonstrates how many households have previously failed to qualify for the Affordable Warmth Scheme as a result of the threshold being £20,000.

We believe that households that have previously been rejected on the basis of the £20,000 income criteria should be automatically reconsidered for the scheme using the new £23,000 criteria.

In our view, whilst an increase to the threshold that helps more householders to qualify for the scheme is welcome, it is important to ensure the threshold is set at the most appropriate level. To achieve this, an evidence based approach is needed which supports the new proposed figure of £23,000. At the least this would include an assessment of how many applicants have previously been disqualified because of the income requirement, how many more applicants would qualify with the change and the effect this would have on the budget.

Proposal 3

The Department proposes that Disability Living Allowance, Attendance Allowance, Personal Independence Payment and Carer's Allowance are removed from the calculation of income for the Affordable Warmth Scheme.

How much do you agree with this proposal? (Please tick one option)

Strongly agree	Agree	Don't know	Disagree	Strongly disagree
	✓			

Comments

The Consumer Council acknowledges that during DfC's consultation with stakeholders there was broad support for disability related allowances to be removed from the Affordable Warmth Scheme's income calculation. We would also agree with DfC's assertion that continuing to allow the various disability related allowances in the calculation of income could suggest that those with a disability are being penalised in relation to those without a disability.

We are unclear however as to whether DfC has evidence demonstrating that the inclusion of disability related allowances has previously denied those affected access to the Affordable

Warmth Scheme. The provision of such analysis would give the necessary assurances that this proposal is appropriate to for helping affected consumers qualify for the scheme.

Proposal 4

The Department proposes the removal of age-related and disability-related eligibility criteria from the boiler replacement element of the Affordable Warmth Scheme.

How much do you agree with this proposal? (Please tick one option)

Strongly agree	Agree	Don't know	Disagree	Strongly disagree
	✓			

Comments

The Consumer Council agrees with the rationale that it is reasonable to assume a household receiving less than the annual scheme threshold would find it difficult to replace an old inefficient boiler. We are therefore in agreement with the proposal to remove age-related and disability-related eligibility criteria from the boiler replacement element of the scheme.

However, The Consumer Council has specific statutory duties that have particular regard to consumers 'who are disabled or chronically sick; and of pensionable age' and this category of consumers is particularly susceptible to the harmful effects of fuel poverty. We suggest that this group of consumers along with households containing young children are given a higher priority within the scheme overall.



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