

# Housing Rights

## Consultation response

Response to the  
Fuel Poverty Strategy Consultation

March 2025

## 1.0. Introduction

### 1.1. About Housing Rights

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 60 years, we have been helping people to find and keep a home. We believe that prevention is better than the cure. Our work seeks to ensure that individuals and families living in Northern Ireland do not reach this crisis point. We recognise, however, that this is not always possible, and we also provide advice and assistance to help ensure that the experience of homelessness is rare, brief and non-recurrent. Housing Rights passionately believes that no one should be without a home and work towards the goal that every citizen in Northern Ireland has a good quality, affordable and sustainable home that meets their needs. In particular, the organisation's services are targeted at people who need help to:

- Prevent them from becoming homeless;
- Find suitable rented accommodation;
- Sustain their tenancies;
- Explore their housing options;
- Avoid repossession and eviction;
- Tackle disrepair or poor conditions in their homes; and
- Meet their housing costs;
- Repay mortgage and/or rent arrears;
- Resolve disputes with their landlord and/or lenders.

In the year ending March 2024, our advice services dealt with queries from over 13,000 households on over 53,000 housing issues. We provide a specialist housing helpline open Monday to Friday complemented by a digital Live Chat service accessed through a comprehensive user-led advice website [www.housingrights.org.uk](http://www.housingrights.org.uk). Our busy frontline advice service is supported by an advocacy and representation service staffed by dedicated caseworkers and a small legal team who prevent and alleviate homelessness by liaising with landlords, lenders, and other agencies, as well as provide representation for County and High Court.

In addition to preventing homelessness, our services also assist in promoting access to justice by providing an emergency court representation service (Housing Possession Court Duty Scheme) which assists households at risk of homelessness due to mortgage or rent arrears who are unrepresented in court proceedings. Since December 2019, we have also administered a Housing Mediation Service to address and avoid the escalation of disputes to prevent homelessness.

The reach and expertise of our advisers also extends to Northern Ireland's prisons to assist those entering or leaving custody to safeguard tenancies and/or to access appropriate support to prevent homelessness on release.

We work to support communities and other frontline advisers across Northern Ireland by providing a well-established practitioner support programme, through our Community Housing Advice Partnership and through a comprehensive training and legal information service.

In addition to frontline specialist advice, representation and support services, Housing Rights has a policy and participation service that influences government policy decisions to improve housing and homelessness in Northern Ireland. Our policy work is framed by the views and experiences of the people who contact us for advice and aims to support the identification of evidence-based, informed solutions.

## 1.2. The nature of this response

Housing Rights warmly welcomes the publishing of the draft Fuel Poverty Strategy and submits this consultation response to help inform the final drafting of the document. The draft Strategy<sup>1</sup> has been published by the Department for Communities (the Department) and has grouped actions and questions into several overarching themes. These themes are:

- Vision and Principles
- Make homes more energy efficient
- Collaborate and build capacity
- Protect consumers
- Governance and Accountability

To facilitate data collection, Housing Rights will structure this response in alignment with the key themes and answer the questions outlined directly. Where there is some overlap of input, we may choose to group some of these questions and will indicate when doing so. We may choose not to answer certain questions. In these cases, Housing Rights feels the subject matter is outside of our specialism, and we could not contribute effectively to the debate.

To support policy development, Housing Rights has recently worked with independent researchers to better understand the challenges and opportunities in delivering a Just Transition for low-income homeowners and tenants in the private rented sector. We are preparing to publish the final mixed methods research report alongside a conjoint analysis, which identifies the likelihood, under different contextual circumstances, that landlords and homeowners would take action to improve the energy efficiency of their properties. Among other circumstances, this conjoint analysis considers indicators such as grants/loans, products including heat pumps, solar panels and retrofits, and other determinant factors such as the length of time it would take to carry out work. Whilst this research has not yet been published, we have shared the reports with officials in the Department and will reference some of the findings in this response. It is our intention to work with policymakers and key stakeholders to develop policy recommendations to support this area of work.

Housing Rights' work supporting people in housing need and at risk of homelessness in Northern Ireland highlights the persistent role of affordability challenges and disrepair issues in many peoples' lives in Northern Ireland, particularly for low-income households living in the private rented sector. On this basis, our advice experience means that we are expertly placed to engage constructively and comment on several key areas outlined within the Fuel Poverty Strategy.

## 2.0. Overarching comments

Housing Rights welcomes the outcomes-based approach to developing the strategy and the commitment to developing indicators to monitor progress. Housing Rights would encourage the

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<sup>1</sup> [Consultation on a draft fuel Poverty Strategy](#)

selection of indicator data sets that allow comparison between housing tenures and within different socio-economic groups or household income bands.

We also welcome the approach taken to the strategy's development with the involvement of a reference panel including and voluntary sector specialists who represent particular groups with specific experience of fuel poverty. Moving forward, it would be helpful if specific involvement could be sought from the housing sector, especially given the prominence of issues in the private rented sector. Given Housing Rights' client experience in this area, we would be happy to contribute.

### 3.0. Vision and Principles

**Q1: Do you agree with the proposed vision and guiding principles? If not, please suggest alternatives and why?**

**Q2: Do you agree with the timeframe and review period? If not, why not?**

Housing Rights agrees that the proposed vision and guiding principles are appropriate and linked to the Climate Change Act (NI) 2022<sup>2</sup>.

Housing Rights would assume that the vision of *'a warm, healthy home for everyone'*<sup>3</sup> infers that the Department's commitment is to everyone, including those on low incomes and on a cross-tenure basis. Given the importance of affordability to this vision and the link between housing circumstance and poverty (including fuel poverty) it may be helpful to be explicit about this inference, either in the vision statement itself or in the narrative.

Given the Fuel Poverty Strategy's emphasis on eliminating poverty, inequality and social deprivation under *long-term sustainable solutions*,<sup>4</sup> Housing Rights would submit that there may also be an opportunity to link the principles to the forthcoming Anti-Poverty Strategy. Given the Department is currently developing both strategies,<sup>5</sup> Housing Rights believes there is an opportunity to develop a relationship between the two, ensuring that they complement one another and can work in tandem to achieve shared objectives.

Housing Rights also agrees that it is essential for the strategy to be needs-based. It would be welcome to understand on what basis the assessment of objective needs will be identified, and which metrics will be used to assess the strategy's progress in delivering objectives. For example, will levels of fuel poverty be disaggregated on a tenure basis and/or by income level? Is it also appropriate to consider the legal obligations to promote equality of opportunity here under Section 75 of the 1998 Act and therefore including indicators based on reaching communities in need and delivering services may be useful in evaluating the success of the strategy. These would be especially useful at the Year 5 review stage and could inform actions over the second half of the Strategy's lifespan.

Housing Rights also agrees that collaboration is extremely important and welcomes its inclusion. We do, however, urge the need for effective collaboration to ensure the delivery of the strategy's objectives is effective and person-centred. To this end, it would be helpful to understand how this

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<sup>2</sup> [Climate Change Act \(Northern Ireland\) 2022](#)

<sup>3</sup> [Consultation on a draft fuel Poverty Strategy](#), page 14

<sup>4</sup> [ibid](#) page 15

<sup>5</sup> [Poverty Policy | Department for Communities](#)

collaboration will be resourced. This could be demonstrated in the final draft or early in the Strategy's implementation.

As an organisation committed to the full participation of experts by experience, Housing Rights particularly welcomes that a key principle of the Fuel Poverty Strategy is that it is participative. We believe there is an opportunity for a key role to be played by affected people and communities in monitoring the effectiveness of the strategy. Housing Rights would be happy to assist with facilitating this, as may be the case for some members of the strategy's reference panel.

Housing Rights agrees the strategy should be long term. We note the link between this work and the work also being undertaken by the Department through the Housing Supply Strategy and would suggest there may be merit in aligning the term with the term adopted in the Housing Supply Strategy i.e. to 2039 instead of 2035. Housing Rights also agrees that it is pragmatic to review progress at the midpoint in 2030. The Department may wish to consider if there is a need for additional review periods and/or flexibility to adjust the pathway. This may be important as our knowledge of what a successful approach to addressing this issue continues to emerge and particularly as the funding model for delivering some of the initiatives required may need attention.

## 4.0. Make Homes More Energy Efficient

**Question 3: What would a readily understandable and measurable definition of "thermal comfort" look like?**

Thermal comfort presents challenges to establishing a concise definition as it is, in a sense, subjective to every individual person and influenced by personal factors. This is demonstrated by the BS EN ISO 7730 definition of thermal comfort as *'that condition of mind which expresses satisfaction with the thermal environment.'*<sup>6</sup> A person's perception of thermal comfort can be influenced not only by their own biology through their metabolic rate but also through their access to sufficient and suitable clothing. In this context, this would mean access to sufficiently insulating clothes in the winter and, as summer temperatures in Northern Ireland continue to rise, sufficiently cool clothes in the summer. Housing Rights understand that a measurable definition of thermal comfort cannot consider the individual circumstances of each person, but the individual nature of the experience of thermal comfort demonstrates the importance of linking both the Fuel Poverty Strategy and the Anti-Poverty Strategy to address the totality of influencing factors which contribute to the quality of life of people in Northern Ireland, including energy wellbeing and housing conditions. This understanding has also influenced the support for and adoption of measurements such as the Housing Health and Safety Rating System (HHSRS) in other jurisdictions, which links property conditions to occupants' health.

In a housing-specific context, it falls to policymakers to create a definition that sets an environmental standard that enables satisfaction with a person's thermal environment and mitigates the risk factors that personal factors can present.

There is a consensus around the most important environmental factors that contribute to thermal comfort in a building.<sup>7</sup> These are:

- Air temperature

<sup>6</sup> [ISO/FDIS 7730 - Ergonomics of the thermal environment — Analytical determination and interpretation of thermal comfort using calculation of the PMV and PPD indices and local thermal comfort criteria](#)

<sup>7</sup> [Thermal comfort in buildings - Designing Buildings](#)

- Air velocity
- Radiant temperature
- Relative humidity

Housing Rights recommends considering these environmental factors in creating an understandable definition of Thermal Comfort.

For measurables, Housing Rights' research, '*A Just Transition to a Green Housing Stock*' Social Market Research acknowledges that the British Standards Institute published guidance PAS 2030 and PAS 2035, and the German Standards of *Passivhaus* for new-builds and *EnerPhit* for retrofits '*set the standard on implementation measures.*'<sup>8</sup> Housing Rights recommends that these measurements be used to assess the effectiveness of thermal comfort improvements in people's homes.

***Question 4: For MEEs in PRS to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?***

***Question 5: Should MEES also be applied to other tenures? Please give reasons for your answer.***

Housing Rights welcomes the inclusion in the Strategy of Outcome 1 to improve energy efficiency for vulnerable households, and agree that it aligns with the Housing Supply Strategy.<sup>9</sup>

The current statutory minimum fitness standard in Northern Ireland is applicable across all tenures of housing and is set out in Article 46 of the Housing (Northern Ireland) Order 1981<sup>10</sup> and underwent minor updates through Article 97 of the Housing (Northern Ireland) Order 1992.<sup>11</sup> The standard states that for a dwelling to be fit for human habitation, it must:

- Be structurally stable
- Free from serious disrepair
- Free from dampness prejudicial to health of occupants
- Have adequate provision for heating, lighting and ventilation
- Have an adequate piped supply of wholesome water
- Have satisfactory facilities in the house for the preparation and cooking of food, including a sink with a satisfactory supply of hot water and cold water, for the exclusive use of occupants
- Have a system for the draining of foul, waste and surface water

This standard is a physical standard, primarily concerned with the internal and external fabric of the building and the provision of heating, lighting, ventilation and sanitation. The advantages of this pass/fail model is that it is easy to understand and has undoubtedly driven an improvement in housing standards in Northern Ireland. The first House Conditions Survey, carried out in 1974, found

<sup>8</sup> *A Just Transition to a Green Housing Stock*, Housing Rights and Social Market Research, page 52

<sup>9</sup> [Housing Supply Strategy - A Home for Everyone](#)

<sup>10</sup> [Housing \(Northern Ireland\) Order 1981](#)

<sup>11</sup> [The Housing \(Northern Ireland\) Order 1992](#)

that 20% of all homes in Northern Ireland were unfit for human habitation.<sup>12</sup> By 2016, this number had fallen to 2.1%.<sup>13</sup>

As acknowledged by the Strategy's consultation document, the current standard is significantly lower than the other constituent nations of the UK. Further, a report published by the Department's predecessor, the Department for Social Development alongside Queen's University Belfast, identified key weaknesses with the current model of fitness standards in Northern Ireland. While acknowledging the past success as a key driver of improvement, it recognised that *'its value falls short as a means of dealing with modern housing challenges and complimenting the Northern Ireland Executive's wider policy agenda.'*<sup>14</sup> Housing Rights, therefore, welcome the commitment within the Fuel Poverty Strategy to address this, and improve standards for all tenures by 2030.

Housing Rights notes that different approaches are taken for different tenures. For example, the Strategy proposes to introduce a revised Decent Homes Standard for social housing by 2026 and Minimum Energy Efficiency Standards (MEEs) for the private rented sector (PRS) by 2027. The consultation document acknowledges that the PRS is home to the poorest standard of housing in Northern Ireland.<sup>15</sup> While Housing Rights acknowledges that this may be a practical approach given the greater complexity of property ownership in the PRS, a core principle of the Fuel Poverty Strategy, as discussed above, is that it is needs-based. To this end, prioritising improved standards in the social sector over the tenure of the most objective need, the PRS, runs slightly incongruous with one of the Strategy's foundational principles.

To guard against this and ensure that the Strategy is needs-based, we must understand more about what exactly is being proposed in the MEEs for the PRS. We would appreciate the Department's clarity on this matter and are happy to engage constructively. Will MEEs be a lesser standard than what is being proposed for a new Decent Homes Standard for the social rented sector? Will the proposed energy efficiency standards mirror MEEs in England and Wales, which require homes in the PRS to meet EPC band E standard?<sup>16</sup> If this is the case, this would not effectively meet the principle of needs-based targeting, given Northern Ireland Housing Executive (NIHE) and Housing Association commitments to raise their stock to EPC band C, and would not meet the principle of long-term sustainable solutions either, as bringing PRS homes to EPC band E would likely be insufficient to meet the net zero targets as set out by the Climate Change Act (NI) 2022.<sup>17</sup> Or, will the proposed MEEs reflect the current Labour Government's plan to raise MEEs to EPC Band C by 2030?<sup>18</sup> If the strategy is to be needs-based, the problem is worst in the PRS, and a needs-based approach should, therefore, begin there.

In terms of data, the intent of the Housing Rights/SMR research was to overlay the stats provided by NIHE's House Condition Survey with NISRA's deprivation statistics<sup>19</sup> to pinpoint areas of high fuel poverty and allow for strategic geographical targeting of improvements. Unfortunately, the delay in the publication of the House Condition Survey presented a barrier, and we were unable to carry out the exercise. We do recommend, however, that the Department carry out this exercise upon the

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<sup>12</sup> [The Housing Executive - News](#)

<sup>13</sup> [Review of the Housing Fitness Standards](#)

<sup>14</sup> [ibid.](#)

<sup>15</sup> [Consultation on a draft fuel Poverty Strategy](#), page 18

<sup>16</sup> [Domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK](#)

<sup>17</sup> *A Just Transition to a Green Housing Stock*, Housing Rights and Social Market Research, page 38

<sup>18</sup> [Inside Housing - News - Labour government confirms 2030 target for EPC C](#)

<sup>19</sup> [Deprivation | Northern Ireland Statistics and Research Agency](#)

publication of the House Condition Survey, and we are happy to liaise with the Department regarding methodology.

A barrier that the Department will face in implementing MEEs is landlords' attitude toward making efficiency improvements to their properties. In focus groups carried out by SMR for *A Just Transition to a Green Housing Stock*, landlord participants were mostly negative on the prospect of various products and retrofitting, with their biggest concern being maintaining financial viability.<sup>20</sup> Responses concentrated on the cost of installing efficiency improvement measures and a lack of return on their investment. Most were negative about the cost of heat pumps and very few saw a financial advantage in deep retrofitting. Some landlords were not willing to spend anything to upgrade their properties, regardless of any grant or loan. It is notable that the research suggests that some of these landlords would be likely to sell their properties instead of undertaking this work and that those in this position are likely to be older landlords. It is possible however, that the age profile of these landlords means that they may be likely to sell their properties regardless and it is recommended that further research is undertaken to understand where these properties are likely to go as some anecdotal evidence suggests that newer landlords may purchase these properties and may be more likely to follow regulation. None at all were interested in availing of a loan, but some were willing to make improvements if a government grant covered most of the costs. The range of contribution that landlords said they would be willing to make themselves to the cost of retrofitting was between 20% and 50%.

The conjoint analysis carried out alongside this piece of research broadly mirrors these findings, but some simulations of certain scenarios in relation to financial support and type of product show that landlords would be more willing to engage with efficiency improvements under certain circumstances. These simulations could provide valuable insight into shaping the Department's strategy for the implementation of MEEs. Housing Rights will present these findings to the Department in the near future and are happy to share the results.

In addition, some landlords were not willing to make any commitment to staying in the rental sector as a condition of a grant, with flexibility to sell when they wanted cited as the main reason. Older landlords, in particular, were unwilling to make any guarantees about how long they would remain in the sector. Of those who were willing, the general response was that they would be willing to make a commitment to stay in the rental market for up to five years as a condition of a grant, or would be willing to pay back the grant in full or in part if they sold earlier.

More information, including the result of our quantitative survey which largely reflects the above, is included in the final report shared with the Department. Some key results from the survey include 62% of landlords believing that the government should pay to make homes more energy efficient, and 43% saying they would sell their property first rather than spend any money on retrofit measures. There is, however, some willingness among the landlord community. 78% of landlords said they would be willing to spend some amount toward retrofitting, and 42% believed that tenants should have the costs of retrofitting covered by the landlord.

These results paint a very complex policy picture for the implementation of MEEs. The generally negative attitude of landlords to energy efficiency improvements and a potentially significant number being unwilling to engage with retrofitting, makes it an incredibly difficult task for the Department to reach many of the private renters all across Northern Ireland who are in fuel poverty. In addition, the surprisingly high proportion (43%) saying they would sell the property first before carrying out any

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<sup>20</sup> *A Just Transition to a Green Housing Stock*, Housing Rights and Social Market Research, page 14



energy efficiency improvements risks at least some of the tenants of these households becoming homeless during an already unprecedented housing crisis. As noted above, the Department's policy response, therefore, will have to be well thought out, with equal regard given to incentivisation and enforcement. Housing Rights will soon begin drafting a policy briefing which will make recommendations based on the joint findings of the research report and the conjoint analysis, and share this with the Department.

Regarding Question 5, Housing Rights would need to see the proposed MEEs before making an informed recommendation on this issue. If the MEEs stipulate an EPC band of C, and for Northern Ireland to hit our net zero targets as set out by the Climate Change Act (NI) 2022, most houses will need to meet band C, the MEEs will likely need to apply to all homes, regardless of tenure.

**Question 6: Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient? Please provide reasons for your answer.**

Housing Rights welcomes the commitment to implement improved Fitness Standards for all tenures by 2030. As referenced above and acknowledged in the consultation document, the current fitness standard lags behind the other jurisdictions on these islands and they are, in Housing Rights' view, unfit for purpose. An example of a failure of the current system is the requirement to have '*have adequate provision for...heating...*' In reality, this can, and does, be interpreted as being satisfied if a client has access to an electrical socket into which they can plug an electrical heater. Essentially, creating a scenario that actually contributes to fuel poverty.

In 2016, Housing Rights responded to a consultation on the review of the statutory minimum housing fitness standard for all tenures of dwelling. The response set out our view that '*the current fitness standard is unsatisfactory, and needs replaced in its entirety. It is insufficient to make amendments to the standard which do not directly link housing with health.*'

In the nine intervening years, the standard has not been raised, and in 2025, Housing Rights' view on this matter remains consistent. We are encouraged that the Department are examining introducing the Housing Health and Safety Rating System (HHSRS). **Housing Rights recommends that the current fitness standard is replaced with the HHSRS.** HHSRS is not only a more holistic system for assessing housing conditions and their impact on people, it has also been used effectively in England and Wales for several years and has been given international recognition by being adopted in the USA. Its implementation would assist in addressing both thermal comfort and fuel poverty across all tenures in Northern Ireland.

Linking fitness standards to health is essential, given the long-recognised body of evidence on the impact of housing on health.<sup>2122</sup> To this end, **Housing Rights recommends that the Department liaises generally with the Department of Health (NI) on a number of areas where housing and health are linked to work together to tackle poor housing and fuel poverty, thus reducing risks to health.**

**However, improving the minimum fitness standard is only one aspect of improving standards across all tenures in Northern Ireland. There also needs to be adequate resourcing for enforcement.**

<sup>21</sup> [Housing impacts health: new WHO guidelines on housing and health](#)

<sup>22</sup> [Health Equity in England: The Marmot Review 10 Years On | The Health Foundation](#)

Housing Rights believes that any fitness standard is only as good as its enforcement. There is therefore a need for local councils to be equipped with adequate resources to enable them to properly enforce the fitness standard and thereby protect tenants, help improve people's health and wellbeing and tackle those landlords who provide a poor standard of housing.

Housing Rights believes that there is a clear link between raising the housing standards in the private rented sector and the licensing of private landlords. As recognised by the consultation document, there are more risks to health, wellbeing and safety when living in the private rented sector; some of which may be attributed to the lack of regulation in that sector.

Housing Rights believes that the effectiveness of the HHSRS could be further enhanced by making compliance with it a condition of any licensing system. The review of the fitness standard is, therefore, an integral part of the wider review of the role and regulation of the private rented sector that the Department is currently undertaking for Phase Two of private rented sector reform.

Landlord licensing could complement the HHSRS and lead to improved policy and practice in the sector. Licensing would enable Government to collect much more relevant data on the private rented sector than can be currently collected under the Landlord Registration Scheme. Critically, however, it also generates a small financial resource which allows councils to effectively target poor-condition properties, thereby improving the overall housing stock.

Evidence from England, which operates a selective licensing system, shows that in areas where licensing is implemented, it can lead to greater professionalism in the sector. Research has also shown an increase in council satisfaction with the quality of housing under their jurisdiction, and an increase in tenant satisfaction with their landlord and their rental property and with the standard of the property.<sup>23</sup> In addition to these tangible benefits, a successful landlord licensing scheme can lead to a self-funding enforcement regime.

***Question 7: Do you agree that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles?***

***Question 8: Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing: a) income thresholds and b) eligibility criteria? Please give reasons for your answer.***

***Question 9: Do you agree that an income threshold should increase in line with minimum wage levels/inflation or another index such as Retail Price Index (RPI) to mitigate increases in the cost of living? Please give reasons for your answer.***

***Question 10: Should the Energy Performance Certificate (EPC) rating of a house be considered as part of eligibility criteria (i.e. the least energy efficient homes are considered first)? Please give reasons for your answer.***

Housing Rights welcomes and agrees with the above proposals and believes them necessary to ensure the success of the Strategy. A coordinated approach across all schemes is essential to maximise impact, identify and prioritise those in need, and prevent gaps in support.

Housing Rights would request more information on how the Department intends implement more flexible income thresholds and eligibility criteria, or how it intends to use the Retail Price Index to

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<sup>23</sup> [An Independent Review of the Use and Effectiveness of Selective Licensing](#)

mitigate rises in the cost of living, but agrees with these proposals in principle and is happy to engage further on this with the Department. There is a parallel example that emphasises the importance of aligning support in line with cost of living increases which can be found in the private rented sector. Local Housing Allowance (LHA), which dictates how much housing support private rented tenants are entitled to, saw a freeze between 2020 and 2024. The Joseph Rowntree Foundation recently completed a key piece of research into this period and highlighted that this freeze has directly contributed to over half of private renters being in poverty, and warned that further freezes in support would likely see this number increase.<sup>24</sup> Their key recommendation from the research was that LHA should be permanently relinked to cover the bottom 30<sup>th</sup> percentile of local rents.

This is a vital example of the importance of tying support to increases in costs of living. Housing Rights, therefore, considers it vital that the thresholds should rise to mitigate the impact of rising costs.

Housing Rights agree that the EPC rating system should be considered as part of the eligibility criteria as this would help pinpoint those people in the poorest quality of housing and therefore in more danger of fuel poverty.

***Question 11: Do you agree that the new scheme should take a Whole House retrofit approach? Please give reasons for your answer.***

***Question 12: If the Whole House approach is used, do you agree that all recommended measures must be installed unless there are exceptional reasons not to? Please give reasons for your answer.***

The primary research findings for Housing Rights' *A Just Transition to a Green Housing Stock* echo many of the issues raised by the literature and international comparisons. The language used around climate change can appear to many of Northern Ireland's homeowners, tenants and landlords to be daunting and technical, contributing to a sense that the issue of climate change itself, and its mitigations, falls within the purview of governments and technocrats rather than lying with individual members of the public.

Whilst the majority of those surveyed subscribe to the idea that everyone should take some responsibility to help limit the effects of climate change and say that they have a good understanding of how to reduce their energy bills, most low-income homeowners, tenants and private landlords currently plan to make only minor improvements to their homes. To put this in context, it is important to note that low-income homeowners and private tenants are more likely than the rest of the Northern Ireland population to report that their homes are hard to heat, draughty and mouldy. They are more likely, to be in fuel poverty and in the most need of home improvement, yet they have the lowest level of ability to do so.

Any plans that low-income homeowners and private tenants have for improvements are largely driven by the motivation to save money through lower heating bills and the cost of installing improvements is perceived as relatively high compared to the perceived benefits. Unsurprisingly, therefore, low-cost solutions such as improved insulation and draughtproofing are the most favoured. Such measures, however, may not get many of these properties up to an EPC band C rating. Furthermore, the goal of EPC band C may not even be sufficient to meet the contribution that home emissions need to make to meet climate change targets.

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<sup>24</sup> [Stop the freeze: permanently re-link housing benefits to private rents | Joseph Rowntree Foundation](#)

When it comes to deeper retrofitting measures with higher upfront costs, higher-income homeowners are the most likely group to consider solar panels and new heating systems. Low-income homeowners have very limited financial resources at their disposal and, in this time of economic strain, are likely to prioritise daily living expenses over capital spending on their homes. The conjoint analysis found that the percentage they would have to pay on loans was the most important issue that they would consider in any decision to undertake retrofitting. With better-off homeowners being more financially empowered to install deeper retrofitting measures and lower-income homeowners being more concerned about the costs, there is a likelihood that those who can afford it will gain all the benefits in terms of warmer homes and lower bills, whilst less well-off homeowners will be left behind.

These findings clearly show that the cost of a deep or 'whole house' retrofit is the most significant determining factor in influencing a low-income homeowner's decision to improve their homes' energy efficiency. It is also a dominant consideration for private renters, but the nature of their tenure complicates their situation, and this response will cover this below.

Low-income homeowners are motivated by a desire to save money on their heating bills, but perceive the cost of installing improvements as prohibitive compared to perceived benefits. It is this cost differential that the Department must address to encourage low-income homeowners to engage with retrofitting. This can be achieved through a two-pronged approach. **Firstly, by investing a significant amount of funding into the new Affordable Warmth Scheme to enable as much uptake as possible. This would also require generous eligibility criteria and is required if the Department is to reduce home emissions significantly enough to meet climate targets. Secondly, by adopting a 'whole house' retrofit approach to maximise the savings made by low-income homeowners who do avail of the scheme. Maximising savings made would also maximise the number of low-income homeowners this approach would lift out of fuel poverty.**

There is a further social consideration the Department must take into account. The evidence shows that if insufficient government support is provided, it is likely only higher-income homeowners will invest in energy efficiency measures for their homes, and therefore, only higher-income homeowners will make savings in the medium to long term. This scenario would, therefore, contribute heavily to already increasing<sup>25</sup> social inequality and entrench the gap between rich and poor. Increasing social inequality can lead to a myriad of deeply undesirable and destabilising consequences, such as reduced life expectancy, poorer health outcomes, lower educational attainment, decreased social mobility, increased crime rates, social unrest, political instability, decreased trust in institutions and a breakdown in social cohesion.<sup>26</sup>

As mentioned above, our primary research shows that private tenants in Northern Ireland find themselves in a more complex situation than homeowners due to the nature of their tenure. Tenants in the private rented sector are just as keen to have a warm home as others, but they are constrained from taking on anything other than basic measures because they do not own their properties. Many tenants feel unempowered to take any action at all except for very basic draughtproofing measures and are almost completely dependent upon their landlords to make more substantial property upgrades. Furthermore, tenants face a dilemma concerning the cost of upgrades and the potential for their rents to rise. Whilst they would like to have their homes improved, they fear that their rents will rise significantly afterwards, and some see a less optimally heated home as the 'price' for a rent

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<sup>25</sup> [Rising inequality: A major issue of our time](#)

<sup>26</sup> [Inequality – Bridging the Divide | United Nations](#)

they can afford. The conjoint analysis of private rented sector tenants also showed that the most important issue when it comes to retrofitting is the availability of alternative housing options.

With six out of ten private landlords saying that their properties have a damp or heating issue, most accept that their properties will need to be upgraded in the future to achieve at least EPC band C. For most landlords, it is primarily a cost/benefit decision as to how and when they will take steps to bring their properties up to that level. Conjoint analysis shows that the most important factor in determining a decision to retrofit is the percentage they would have to pay on loans associated with installation.

For some, the outcome of the cost/benefit analysis will be to sell up and leave the rental market. In this context it is important to consider that different landlords are at different stages of their business cycle. Older landlords who see themselves as nearing the point of leaving the market and retiring expressed the view that they would rather sell up than invest in retrofitting their properties. Landlords who are building up their portfolio at an earlier stage of their business cycle might be more willing to consider investment in retrofitting as they see themselves as being in the business for long enough to see the rewards.

In this context, a scenario is created whereby both the tenant and the landlord are motivated by the financial impact of improving the energy efficiency standard of the home. The tenant's motivation is to save on energy bills, but they will often lack the financial means for a significant retrofit. For a landlord, on the other hand, who is more likely to be able to afford energy efficiency schemes, the dominant reason for not carrying out efficiency improvements is no return on investment. The options for a landlord to create a return on that investment are to either raise the rent, or sell the home. Raising rent would see savings made by the tenant on energy bills go instead to the increased rent, and either of these two options represent a danger of homelessness to the tenant. The viability of the rent increase option, is also based on an assumption that low income tenants could afford to pay an increased rent. Our advice experience and previous primary research carried out by the organisation indicates that this is not the case. For many low-income tenants, they already prioritise their rent payment above all other costs (due to the precarity of their tenancy) and 'do without' essentials such as using the heating. Neither of these outcomes are desirable from a policy design perspective if the intent is to lift low-income homes out of fuel poverty and compliment the broader policy framework established through the Homelessness Strategy,<sup>27</sup> Programme for Government<sup>28</sup> and Housing Supply Strategy<sup>29</sup> of reducing homelessness.

Therefore, the policy to address this must carefully navigate these opposing motivators and be designed to ensure that the tenant can enjoy the benefits of a warmer home and be lifted out of fuel poverty. It must also seek to dismantle the barriers to landlords making energy efficiency improvements to the home while mitigating the risk of a significant selling off of property, which could risk making tenants homeless. Housing Rights will address this in our response to Question 17.

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<sup>27</sup> [Ending Homelessness Together Homelessness Strategy 2022-27](#)

<sup>28</sup> [Our Plan: Doing What Matters Most](#)

<sup>29</sup> [Housing Supply Strategy - A Home for Everyone](#)

**Question 13: Do you agree that the new scheme should prioritise low carbon heating solutions where possible?**

**Question 14: Do you agree that the new scheme should offer renewable technologies such as solar panels and battery storage to offset the running costs of low carbon heating solutions in low income households? Please give reasons for your answer.**

**Question 15: Do you agree that rural properties should be prioritised for energy efficiency support? Please give reasons for your answer.**

Housing Rights agrees that the new scheme should prioritise low-carbon heating solutions where possible. This would prioritise more efficient home heating and insulation and have the dual effect of reducing fuel poverty and reducing emissions in line with Northern Ireland's climate change targets.

In our surveys of homeowners and private renters, solar panels were the single most popular measure these groups would use to improve the energy efficiency of their homes (32%).<sup>30</sup> However, higher-income homeowners were significantly more likely to favour the option than low-income homeowners (35% vs 25%).<sup>31</sup> Supporting this finding, focus groups with tenants and homeowners revealed that there were concerns about the payback times for solar panels and, therefore, the length of time it would take for people to see meaningful savings.<sup>32</sup>

Given the relative popularity of solar panels for both homeowners and tenants, with the main prohibitive factor being payback times, any steps that the Department could take to mitigate or remove entirely the associated solar panel installation costs which is specifically targeted at low income households may maximise both the uptake and impact of the strategy. **Housing Rights, therefore, recommends that the new scheme should offer renewable technologies such as solar panels and battery storage on a targeted basis to offset the running costs of low-carbon heating solutions in low-income households.**

Two key strategy principles are *long-term, sustainable solutions* and *needs-based*. The principle of long-term, sustainable solutions also seeks to align with the Department's duties under the Climate Change Act (NI) 2022. A requirement for policy proposals which seek to align with the Act is '*supporting the social and economic needs of people in rural areas*.'<sup>33</sup>

In addition to this, houses in rural areas tend have lower EPC band rating than houses in urban areas and households are more likely to rely on oil than their urban counterparts.<sup>34</sup> Housing Rights supports a needs-based strategy, and given the characteristics of homes, any needs-based strategy is likely to prioritise rural properties. However, Housing Rights would raise that the private rented sector is similarly disadvantaged in terms of standard of housing. While there is significant private rented stock in rural areas, it tends to be concentrated around urban centres. It would be helpful if the private rented sector were similarly prioritised on a needs-based basis.

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<sup>30</sup> *A Just Transition to a Green Housing Stock*, Housing Rights and Social Market Research, page 17

<sup>31</sup> Ibid.

<sup>32</sup> Ibid. page 13

<sup>33</sup> [Climate Change Act \(Northern Ireland\) 2022](#) Section 30 (3)(j)

<sup>34</sup> [House Condition Survey Main Report 2016](#)

**Question 16: Do you agree with a sliding scale approach to funding for home energy schemes?**

**Question 17: Do you agree that loans are the fairest financing option for landlords who are required to improve their assets? If not, what would you suggest as alternative funding options?**

Housing Rights agrees with a sliding scale approach to funding for home energy schemes and deems this to align with the needs-based principle of the Strategy and a progressive approach. Housing Rights agrees with the consultation document that a multi-year budget is necessary to ensure that schemes are both long-term and sustainable.

Housing Rights would submit that should the Department elect to implement a sliding-scale approach to funding for home energy schemes, the policy should be consistently monitored for uptake and kept under review. We raise this, as can be seen in Table 1 below, the purchase preference of homeowners drops off significantly the more they would be expected to pay to install improvements. This table is a simulation of the conjoint analysis piece of Housing Rights' recent research. As solar panels are the most popular product for homeowners the table below has been chosen to demonstrate the impact financial support has on decision-making. Solar panels tend to cost in the region of £6,200 to £12,000 to install.<sup>35</sup> Based on this, a cost of £10,000 has been input as it is within the field. The financing options, ranging from a full grant, through decreasing partial grants, to the homeowner paying in full to measure the purchase preference of the homeowner are then tested.

**Table 1:**

|                            |                               |                               |                               |                               |                               |              |
|----------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|--------------|
| Product                    | Solar panels                  | Solar panels                  | Solar panels                  | Solar panels                  | Solar panels                  | Solar panels |
| Total costs                | £10,000                       | £10,000                       | £10,000                       | £10,000                       | £10,000                       | £10,000      |
| Percentage                 | You pay 0%<br>Grant pays 100% | You pay 20%<br>Grant pays 80% | You pay 40%<br>Grant pays 60% | You pay 60%<br>Grant pays 40% | You pay 80%<br>Grant pays 20% | You pay 100% |
| Years                      | 20                            | 20                            | 20                            | 20                            | 20                            | 20           |
| Interest rate              | 0%                            | 0%                            | 0%                            | 0%                            | 0%                            | 0%           |
| Monthly costs              | £ -                           | £ 8.33                        | £ 16.67                       | £ 25.00                       | £ 33.33                       | £ 41.67      |
| <b>Purchase Preference</b> | <b>50%</b>                    | <b>12%</b>                    | <b>7%</b>                     | <b>5%</b>                     | <b>4%</b>                     | <b>3%</b>    |
| <i>Standard error</i>      | 2%                            | 1%                            | 0%                            | 0%                            | 0%                            | 0%           |

As can be seen above, there is a significant drop in the purchase preference of homeowners from a full grant, even to an 80% grant. We will provide the full conjoint analysis to the Department so it can carry out its own simulations, but this simulation evidences that, unless full grants are made for efficiency improvements, there will likely be little uptake, and therefore less people lifted out of fuel poverty and less chance of meeting climate change targets.

**Housing Rights recommends that should the Department elect to implement a sliding-scale approach to funding for home energy schemes, the policy should be consistently monitored for uptake and kept under review. There is a possibility that alternate policies and additional funding pay be required to meet the Fuel Poverty Strategy's objectives.**

<sup>35</sup> [Solar panels: costs, savings and benefits explained - Energy Saving Trust](#)

In regards to fair financing options for landlords, Housing Rights points out above, that because of the motivating factors for both tenants and landlords, there is the potential for a complex scenario to occur that will be difficult to address. Conjoint analysis shows that, for landlords, the most important factor in determining a decision to retrofit is the percentage they would have to pay on loans associated with installation. For the purposes of demonstration, Table 2 below shows a similar table, this time based on responses of landlords. External insulation has been chosen as the test product, as this was the most popular product for landlords. Average cost of external insulation installation is £11,000,<sup>36</sup> as our closest test cost, £10,000 cost was chosen for this test. This was coupled with a repayable loan on a 2% interest rate repayable over a 10 year term.

**Table 2:**

|                               |                               |                               |                               |                               |                               |                        |
|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|------------------------|
| Product                       | Insulation external           | Insulation external           | Insulation external           | Insulation external           | Insulation external           | Insulation external    |
| Total cost                    | £10,000                       | £10,000                       | £10,000                       | £10,000                       | £10,000                       | £10,000                |
| Loan coverage (rest by grant) | You pay 0%<br>Grant pays 100% | You pay 20%<br>Grant pays 80% | You pay 40%<br>Grant pays 60% | You pay 60%<br>Grant pays 40% | You pay 80%<br>Grant pays 20% | You pay 100%           |
| Loan in years                 | 10                            | 10                            | 10                            | 10                            | 10                            | 10                     |
| Intrest rate                  | 2%                            | 2%                            | 2%                            | 2%                            | 2%                            | 2%                     |
| Cost per month                | £<br>-                        | £<br>18.40                    | £<br>36.81                    | £<br>55.21                    | £<br>73.61                    | £<br>92.01             |
| Benefit per year              | Extra 1% rental income        | Extra 1% rental income        | Extra 1% rental income        | Extra 1% rental income        | Extra 1% rental income        | Extra 1% rental income |
| <b>Purchase Preference</b>    | <b>44%</b>                    | <b>14%</b>                    | <b>6%</b>                     | <b>4%</b>                     | <b>6%</b>                     | <b>0%</b>              |
| <i>Standard error</i>         | 3%                            | 1%                            | 1%                            | 1%                            | 1%                            | 0%                     |

As we can see above, for landlords, even if a grant were to cover 80% of the cost and a loan 20%, the percentage of landlords willing to carry out external insulation on this basis reduced from 44% to 14% and continued to fall off significantly as the loan increased in comparison to a grant.

This is not surprising when compared with the primary research which surveyed landlords. In response to our survey, 54% of landlords said the cost of installing energy efficiency measures in their properties outweighs the benefits.<sup>37</sup> When asked to consider incentives which would motivate them to carry out improvements, 82% responded that it would be a grant, while only 12% say they would be motivated by a loan.<sup>38</sup> Indeed, 62% of landlords believed the government should pay to make homes more energy efficient.<sup>39</sup> This same sentiment was also largely reflected in the landlord focus group, more details of which can be found in the final report.

**While Housing Rights agrees that loans are the fairest financing option for landlords who are required to improve their assets, this research suggests it is likely an unviable option.** Even in the event of coupling these loans with enforceable legislation to compel landlords to raise the standard of their properties such as the aforementioned MEEs or HHSRS, it is likely that tenants may not see the financial benefits of savings made through improvements. 89% of landlords say that if they were forced by the government to install energy efficiency measures, it is likely they would increase rent.

<sup>36</sup> [How Much Does External Wall Insulation Cost in 2025](#)

<sup>37</sup> *A Just Transition to a Green Housing Stock*, Housing Rights and Social Market Research, page 147

<sup>38</sup> *Ibid.* page 148

<sup>39</sup> *Ibid.* page 154



Similarly, 79% said if they installed energy efficiency improvements of their own accord, they would likely increase rent.<sup>40</sup>

This presents a serious issue for renters. In a housing crisis, where the private rented sector is witnessing unprecedented and rapid rent rises, the prospect of further rent rises risks making low-income private renters homeless.

**Given landlord motivation is focused on return on investment, Housing Rights recommends that consideration should be given to mitigating the potential risks to tenants that could be posed by landlords having to take on debt via a loan in order to make energy efficiency improvements.**

Consideration should be given to grants, conditions of which could be guarantees from a landlord around not raising rent above market rate (with an adjudication and redress scheme available to the tenant), a commitment not to evict a tenant unless in exceptional prescribed circumstances (with similar recourse available to the tenants), and a commitment to remain in the sector for a set period of years.

## 5.0. Collaborate and Build Capacity

***Question 21: Do you agree that we should utilise and build referral pathways between Government, local Government, health professionals and the Voluntary and Community Sector? If yes, how can we best achieve this?***

In our experience of specialist advice provision in the last 60 years we agree that there is a need for access to trusted advice and that existing advice models where communities already engage should be built on.

Housing Rights is the leading specialist housing advice provider in Northern Ireland. The Department provides our core funding via the Housing division, an arrangement which is outside of the arrangement for the generalist and debt advice sector. It would be helpful, especially given the prominence of housing-related linkages to fuel poverty, if the finalised strategy included reference to Housing Rights alongside our partners in the Community and Voluntary Sector.

It would be helpful to be involved in discussions around the referral partnerships and one-stop shop approach to this issue, as our advice experience may be helpful. As well as providing direct advice to around 13,000 households each year on over 50,000 housing issues, we also provide a range of services that increase the capacity of other advice providers and communities to deliver advice in their own networks.

Two examples of projects which may be particularly relevant are noted below:

For over twenty years, the Community Housing Advice Partnership (CHAP) model has supported advice agencies in offering housing advice in their local communities. We do this through training, peer review, and casework. Over 50 frontline locations can access specialist support and free training on a range of issues. The service is funded by the NIHE.

Housing Advice NI<sup>41</sup> is an online service/portal for people who need information and advice on homelessness and housing in Northern Ireland.

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<sup>40</sup> Ibid. page 160

<sup>41</sup> [Housing advice | Housing Rights](#)

The service gives people information that is easy to find, understand and act upon. It allows for the quick resolution of housing queries for people able to 'self-serve.' It is supported by a digital advice service for more complex queries and to support users who are less able to self-serve. It also acts as a gateway to Housing Rights helpline and casework/legal representation services.

While it is not clear what type of advice would be offered via the one-stop shop model, further information about Housing Advice NI is offered below, as it is assumed the service would be web-based. It would be helpful to further understand if there will also be telephony or digital advice, and/or additional tools or templates.

The information on the Housing Advice NI portal:

- Is written in plain language
- Avoids unnecessary jargon
- Includes audio-visual content
- Is clearly structured

This allows users to quickly scan and easily locate relevant information to help them with their housing issues. During user testing for the development of our new site, we clearly understood the stress and anxiety that people will face when in a housing crisis and adapted our content approach in light of this. We would encourage similar thinking to be adapted by the Department in the development of a similar resource for energy efficiency.

Similarly, the Department should be mindful of the needs of users with limited English who may rely on machine translator applications to access web advice content written in English. All of our web content is written to suit a reading age of nine years (the average UK reading age) and younger to ensure that translation is accurate. This also assists with users who have 'very poor literacy levels,' which research shows impacts 17% of people in Northern Ireland. The site no longer uses PDF format for downloadable information, as low-income households are often reluctant to use mobile data for downloads of PDF format information.

**In our view, therefore, Housing Advice NI is an exemplar in the provision of web-based content for low-income households likely to be impacted by fuel poverty and we would encourage the Department to consider these insights in the development of any resource as part of this strategy.**

In our view, the usefulness of the web-based content aligned with the direct gateway to further advice provision is also critical for the users the Department wishes to assist. The Housing Advice NI model, and its direct referral pathway to Housing Rights' advice service, has been commended by the Joseph Rowntree Foundation, in a report published as part of the Altair/Joseph Rowntree Foundation Poverty Prevention Project as a model for other jurisdictions.

Housing Rights agree that any one-stop shop model should include referral pathways between the Government, local Government, health professionals and the Community and Voluntary Sector. We would also extend this to energy companies, who could/should provide referral pathways for those customers who contact them directly as the first port of call. Energy companies could establish referral networks directly from the companies to independent advice networks where the issue is relevant such as debt or housing issues. Housing Rights agrees with the establishment of a task force/working group to develop enabling frameworks for energy-efficiency communities. We are of the strong opinion that any such taskforce or working groups should include experts by experience and members of the local community. This would serve two purposes. Firstly, it would ensure that the Fuel Poverty Strategy adheres to its participative key principle. Secondly, through the input of

experts by experience and the local community, it would have the impact of improving the design of policy or any initiatives that the task force or working group decide to act upon.

***Question 22: Do you agree with a taskforce/working groups to develop enabling frameworks for energy communities?***

Housing Rights agrees with the principle of the establishment of taskforces and working groups to develop enabling frameworks for energy communities, and the principle of participative design of policy and initiatives. We recommend that the Department take account of our response to Questions 39, 40 and 41 to ensure this initiative is as participative and effective as possible.

***Question 23: Do you agree that government should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation?***

Housing Rights agrees with the above proposal and believe that this would align with and support the introduction of HHSRS.

***Question 24: Do you agree that we should work with organisations that provide emergency support, to seek a consistent approach across Northern Ireland and the inclusion of a referral to a long-term solution? If so, what would be the best way to achieve this?***

See response to Question 21.

***Question 25: Do you agree with the proposal to prioritise Discretionary Support to provide emergency financial support if there is a future energy or cost of living crisis, until we have better data to target large scale payments? If not, can you provide a reason?***

Housing Rights agrees with this proposal and has for a long time been concerned that Article 19 of Schedule 2 of the Regulations<sup>42</sup> prohibits Discretionary Support (DS) grants from being used to pay for fuel costs, yet there is no such equivalent article in Schedule 1, which covers DS loans, allowing loans to pay for fuel but not grants. In our view, this is a contributor to fuel poverty as people are understandably reluctant to put themselves in debt to pay for fuel.

The inclusion of Article 19 in Schedule 2, which only applies to DS grant claimants, puts them at an immediate disadvantage compared to DS loan claimants. Housing Rights has raised concerns above regarding the Regulations disadvantaging those in receipt of grants and by extension those most in need and suggested Regulation change to mitigate against this adverse impact.

Given the relentless cost of living crisis and spiralling fuel costs, it is Housing Rights' view that in this case, the only means to rebalance this disadvantage specific to grant claimants is to remove Article 19 of Schedule 2, allowing grant claimants to use their DS grant to pay for short term fuel costs. Housing Rights' own experience tells us that spiralling fuel costs present one of the biggest challenges to maintaining a home, particularly for people in the private rented sector and the current situation is placing people under severe financial pressure. This is particularly pertinent in Northern Ireland where fuel poverty rates are so high, as acknowledged by the consultation document.

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<sup>42</sup> [The Discretionary Support Regulations \(Northern Ireland\) 2016](#)

The Department's recognition that fuel costs should be considered a basic need is implicitly recognised by the omission of an equivalent article in Schedule 1. Housing Rights sees no reason why this should not equally apply to Schedule 2.

**Housing Rights recommends, therefore, that the Discretionary Support Regulations (Northern Ireland) 2016 be amended to remove Article 19, Schedule 2, to enable the use of DS grants to pay fuel costs.**

This action would enable the proposal made in Question 25 and ensures that people in fuel poverty can be targeted based on need and without fear of incurring debt. Given the turbulent economic experience of the past two decades which encompass the Global Financial Crash, austerity, Brexit, the COVID pandemic, the cost-of-living crisis, the Russian-Ukraine War and more, we have witnessed an almost perpetual cost of living and energy crisis which has been particularly damaging on low-income households, it is Housing Rights belief that offering those most in need the opportunity to apply for a DS grant to meet fuel costs would offer a more holistic approach to lifting people out of fuel poverty, rather than relying on a government-backed definition of an energy or cost-of-living crisis which may shift in parameter and exclude some households who may need access to financial support.

## 6.0. Protect Consumers

Housing Rights recognises that this section sits outside our area of speciality.

## 7.0. Governance and Accountability

***Question 34: Do you have suggestions about how government could change our use of language to improve buy-in and engagement on fuel poverty?***

Housing Rights welcomes this proposal and, as demonstrated above with our design of Housing Advice NI, we agree that language is important. We believe it would be helpful for the Department to consider if the Frameworks Institute can help with the reframing of fuel poverty. They have extensive experience in framing the conversation around similar issues, including housing, homelessness and poverty alongside Crisis and the Joseph Rowntree Foundation.<sup>43</sup> Learning from this could help the Department successfully reframe the issue of fuel poverty, and mitigate the risks of confusion that can come with changing language.

***Question 35: Do you agree that government should take a basket of indicators approach to measuring and understanding fuel poverty?***

***Question 36: Are the indicators suggested the correct ones? Please provide reasons for your answer***

***Question 37: If you agree with the introduction of an indicator based on energy confidence, agency or awareness, do you have suggestions about what kind of indicator might be most valuable?***

***Question 38: Do you agree with our proposal that carbon emissions are not used as a fuel poverty indicator? Please provide reasons for your answer***

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<sup>43</sup> [Talking about homes: what we can learn from homelessness and poverty research - FrameWorks Institute](#)

Housing Rights agrees with the above proposals and welcome the inclusion of indicators within the Strategy. We would encourage the Department to disaggregate the statistics derived from these indicators by tenure and/or income levels. Given the linkages between fuel poverty and housing tenure, and fuel poverty and income levels, Housing Rights considers this to be essential in ensuring need is accurately identified and targeted.

In addition, the Department should include an indicator for the ability to pay utility bills without going without. The addition of this indicator as well as the ability to disaggregate statistics based on tenure is particularly important for targeting need in the private rented sector, where fuel poverty in Northern Ireland is worst. In 2020, Housing Rights commissioned research into the impact of the pandemic on private renters in Northern Ireland.<sup>44</sup> The research showed that not only were private renters in Northern Ireland facing acute affordability challenges, but showed that private renters will often prioritise the paying of rent above all other bills, to ensure that they keep their homes. In the intervening period between the publication of the research in 2020 and today, average private rent in Northern Ireland has risen from £664 per month<sup>45</sup> to £891 per month.<sup>46</sup> A rise of this magnitude will have consequences for household spend elsewhere, including fuel. Therefore, an aggregate which would allow the pinpointing of those renters in the private sector, indeed across all sectors, who are struggling to pay their utility bills, will allow the Department to identify people in need who may not otherwise appear through looking at high level indicators such as income levels.

***Question 39: What is the best way to continue to engage with people experiencing fuel poverty?***

***Question 40: Do you agree with the proposal for a Fuel Poverty Advisory Group, if not, can you suggest an alternative proposal?***

***Question 41: If you have any further comments or suggestions not already captured, please provide these.***

Housing Rights agrees with the proposal for a Fuel Poverty Advisory Group and welcome its conclusion in the Strategy. For reasons similar to the above, we recommend that experts by experience continue to be involved for the duration of the Advisory Group's existence.

Housing Rights would, however, urge the Department to provide more clarity of detail on this proposal concerning the following:

- Will experts by experience be invited to be involved in the Advisory Group or through a separate structure? We encourage the participation of experts by experience at all decision making levels of the strategy.
- When will they be invited and for what purpose?
- How will they influence?

In 2023, Housing Rights commissioned Involve to carry out research on the involving experts by experience in decision-making about housing and homelessness in a truly participative manner.<sup>47</sup> The main recommendations of this research were as follows:

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<sup>44</sup> [The Perfect Storm: The impact of Covid-19 on renters | Housing Rights](#)

<sup>45</sup> [News And Analysis - PropertyPal](#)

<sup>46</sup> [NI Housing Market Update: Q3 2024 - Market Reports - News And Analysis - PropertyPal](#)

<sup>47</sup> [Putting the US in hoUSing | Housing Rights](#)

- **Involvement makes a difference** – Involvement should make a difference to participants, to decisions, to policies and to services. The difference involvement can make should be planned into the participation process at the earliest possible stage and should be communicated clearly at the end of the process.
- **The statutory environment should support participation by default** - Participation is institutionalised when it happens to a high quality by default: as a normal and unquestioned component of the decision-making process, rather than something that happens on an ad-hoc or occasional basis. This happens when it is written into the rules of how decisions get made. Embedded practice is where the decision of whether and how to engage is routine and built-in to the process, rather than being at the discretion of the decision maker. Putting participation on a legal or statutory footing could act as an important precursor to changing the culture, behaviour, and practice of institutions.
- **There is capacity for participation within decision-making structures** – High-quality public participation requires skills, knowledge and experience to be able to respond to different policy contexts and to develop opportunities for people to participate that are inclusive and accessible. This is especially true in policy areas such as housing, where there is significant overlap between the experience of poor housing and homelessness and the experience of barriers to participation, which we elaborated on above.
- **Involvement happens throughout the decision-making process** - Involvement can take place at any stage in the policy process, as long as there is room for change as a result. However, the stage in the policy process is a key element of the context for involvement and will impact on the types of methods that are appropriate. Involving people early in the process can help identify issues, generate a shared vision, and shape the agenda so that it is close to the needs of people most impacted by the decision. Likewise, involving people after the decision has been made and during its implementation can provide oversight and scrutiny on how services are delivered and ensure that they meet the aims of the policy and address the needs of service users. There will be opportunities throughout the policy cycle to invite and encourage participation. However, the approach and the methodologies used should take account of the stage the decision-making process is at to ensure participation can add value and to avoid manipulative or tokenistic engagement.
- **Decision makers have strong connections with others who are already involving affected groups** - There is significant participation expertise and practice in civil society and the community and voluntary sector in Northern Ireland. Organisations are claiming spaces to involve and collaborate with people who have experience of poor housing and homelessness for whom other spaces of participation present barriers. In some cases, those groups may already work closely with decision makers, in others, their relationship may be more adversarial. However, the onus is on decision makers to build those connections and support civil society groups to continue to do their vital work
- **Understand what works** - Evaluation is important for ensuring that engagement meets its objectives, and for ongoing learning and improvements to how engagement happens. Good evaluation can provide a deep insight into the strengths and weaknesses of planning, implementation, inclusiveness, participant experience, impacts on decisions, policies and processes, and can capture learning of what works and what does not, so that improvements can be made.

**Housing Rights recommends that these recommendations are adhered to as principles in the establishment and maintenance of any Fuel Poverty Advisory Group.**

Also, whilst we recognise that there is often capacity building work done to support the involvement of people with lived experience, it can come across as patronising if we don't also recognise that policymakers and other stakeholders may need to adjust their approaches to involvement. This requires policymakers to frame their thinking and recognise that experts by experience are there as equals and can, by virtue of their experience, bring perspectives and ideas to the table that traditional decision-makers cannot.

# Housing Rights

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