

Submission on the Consultation on the Revised Energy Poverty Action Plan- May 2024



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Introduction

One Family welcomes the invitation to make a submission regarding the Revised Energy Poverty Action Plan. One Family is Ireland's national organisation for people parenting alone, sharing parenting, and separating. We were established in 1972 as Cherish and provide specialist parenting, therapeutic and family support services around Ireland. Children are at the core of our work, and we seek to improve their lives by empowering, supporting and up-skilling their parents.

We campaign against child poverty, for reform of the family justice system and for the State to recognise and cherish all families equally, regardless of their marital status. More information on One Family can be found at www.onefamily.ie. This submission is informed by our direct work with one-parent families and our role representing these families at a local and national level over more than 50 years.

One of the services that One Family provides is a national helpline for lone parents. We experienced a 39% annual increase in contacts made last year, more than double the increase between 2021 and 2022. Most contacts relate to significant income inadequacy issues, concern around energy bills and complexities related to accessing the Social Protection system to help with arrears and to avoid disconnection. This demonstrates to us very clearly that poverty continues to tighten its grip around one-parent families and the State must do more to support lone parents and their children.

One-Parent Families in Ireland

There are almost 220,000 one-parent families in Ireland today, making up one in four of all families with children. Almost 85% of those are headed by women, while just over 15% are headed by men.¹ One in six and half of all children (15.5%) live in a single parent family household.² These families are not a homogeneous group and come in all shapes and sizes. However, one constant remains. Lone parents and their children remain one of the most socially and disadvantaged groups in Ireland and shamefully, have been for decades.

Energy poverty is not a new phenomenon for lone parents and their children. It remains a persistent feature of the lives of many one parent families on low incomes and living in homes that are energy inefficient. The surge in energy bills costs these past few years, has simply compounded this ongoing fact of life. We need to see long term, targeted supports put in place as a matter of urgency.

¹ CSO Census 2022

² State of the Nation- Department of Children, Equality, Disability, Integration, and Youth 2024
<https://www.gov.ie/pdf/?file=https://assets.gov.ie/292960/3259a3ae-1752-4384-b5e1-5756d8c915f0.pdf#page=null>

Questions related to the consultation on review of the EPAP

Implementation of Legal Framework

1. Energy poverty has been defined at the EU level, identifying low income, low energy efficiency and high energy expenditures as the main factors. What other factors would you include in a national definition? Which of these do you think is the most important to include in a national definition?

- Significant variation exists within the European Union in terms of both the definition and measurement of energy poverty. This is likely due to many factors including weather patterns, temperature differentiations, energy usage, building construction, social policy and other cultural influences. In Sweden for example, it can be more difficult to capture energy poverty data as heating costs are typically included in rent payments. However, Sweden does well in terms of energy efficiency ratings of residential homes and has broad social policies in place which result in much lower poverty rates than other member states.³
- Ireland currently uses the traditional Low Income High Cost (LIHC) metric. An ESRI report on energy poverty from June 2022 looked at the merits of two other measurements; expenditure-based energy poverty and self-reported energy deprivation.⁴ The UK prefer a Low-Income, Low-Energy Efficiency model. A recent European Commission report considered four types of energy poverty metrics; Energy expenditure above the threshold, Minimum Income Standard, Hidden Energy Poverty: Energy expenditure below a threshold, which are expenditure-based and monetary gap metrics as well as a Consensual-based metric model.⁵ All have their advantages and disadvantages. Some are data driven, some provide for a qualitative approach. Many have gaps that miss important information around particular demographics, and this is of concern to us, given that one-parent families are already at significant disadvantage.
- A Multi-Dimensional approach considers both the household socioeconomic profile and geography. It takes factors such as energy efficiency of the home, gender, health, employment status and education level into account.⁶ This would require more disaggregated national and potentially European data collection, to examine individual cohorts such as one-parent families more closely, including looking at outcomes as a result of relevant policy changes. We believe such a model could significantly benefit policy making in all areas more broadly and is worthy of investment. This model would also require an assessment as an individual rather than as a household.

³ https://energy-poverty.ec.europa.eu/system/files/2021-10/epov_member_state_report_-_sweden.pdf

⁴ <https://www.esri.ie/system/files/publications/RS144.pdf>

⁵ https://energy.ec.europa.eu/document/download/8038caf1-c91c-41cb-ac9a-3f113437f9df_en?filename=Selecting%20Indicators%20to%20Measure%20Energy%20Poverty.pdf

⁶ <https://shorturl.at/BQGga>

- We believe that this approach is the best way to fully capture an intersectional understanding of energy poverty across Ireland and create policies that protect those most at risk of energy poverty.
- We would also like to see transport costs included in both the definition and metric used to capture energy poverty. To continue to eliminate the cost of transportation for those who use private vehicles, taxis, car rental or public transport, fails to take account of the gendered experience of energy poverty. It is often women who are responsible for bringing their child/ren to and from childcare and school and after school activities, who are getting themselves to their place of work or education and who do much of the grocery shopping. Transport costs are rising and their inclusion in any future metric is crucial if we are to adequately capture the lived reality of all those who live in this country and vulnerable to energy poverty.

Meeting the Cost of Energy

1. What barriers do you believe are preventing customers from accessing affordable and reliable energy services?

Volatile, high-energy costs, the energy efficiency of people's homes, income inadequacy and failure to provide for a 'financially vulnerable' category for the Vulnerability Register.

2. Which groups do you consider have not received enough support, up to now?

We believe there are many groups impacted by a lack of support. As One Family is advocating for one-parent families, this submission will focus on this cohort.

3. In the areas of energy prices, meeting the cost of energy and consumer protection, what further actions do you think could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.

Many lone parents have been experiencing energy poverty long before international energy prices began to spike over the last few years. This spike has obviously further impacted on lone parent headed households, especially those on lower incomes, who live in rented accommodation, whose homes are not energy efficient, who have Pay As You Go meters and those reliant on oil and solid fuels to heat their homes.

- The Fuel Allowance must be restored to provide 2020 levels of purchasing power and eligibility widened to include those on Working Family Payment.
- The Qualified Child payment must be considered as a tool to combat child poverty. Children living in homes experiencing energy poverty must be protected as a priority, given what we know about the impact this has on health and well-being. This payment must be increased to restore purchasing power and the differentiation between children under and over 12 restored and retained in Budget 2025.
- It is imperative that retrofitting of homes is scaled up and those most in need are targeted including one-parent families at risk of or who are experiencing energy poverty.

- Lone parents on lower incomes who own their own homes should be offered grants that eliminate any costs of retrofitting work. They need access to information on such grants at a local level, such as energy community hubs or One Stop Shops. A freephone number should be available to help decipher what is and is not available and help eliminate anxiety around perceived expense of carrying out such work.
- The disconnection moratoria put in place over the winter periods will have been extremely helpful to many households in energy arrears. However, this will have led to build up of potentially unsustainable debt levels. There was also a failure by suppliers to continue to engage with consumers during this time which could have helped clear some of the level of arrears accrued. Debt write off should be considered for those experiencing energy poverty.
- Pay As You Go Meters can offer some benefits to those on lower incomes, however, prepay customers do not have the same levels of protection against disconnection than those on bill pay meters. Those reliant on oil and solid fuel are faced with large upfront costs and also cannot avail of consumer protections offered by the CRU. The Energy Poverty Action Plan pledged to create a 'financially vulnerable' category for the Vulnerability Register ahead of Winter 22/23. This is still not in place and needs to be legislated for urgently.
- Funding for retrofitting of social housing must be reviewed and ambition scaled up. Local Authorities (and potentially Approved Housing Bodies) must be provided with sufficient resources to ensure all social housing pre-2006 is of a good standard.
- The Energy Poverty Action Plan pledged to create a 'financially vulnerable' category for the Vulnerability Register ahead of Winter 22/23. This is still not in place and needs to be legislated for urgently.

4. What gaps do you see in the current Energy Poverty Action Plan? How could we address those gaps in a revised Action Plan?

- The Energy Action Plan provided for an emergency response to sharp rises in energy in 2022. These one-off measures have undoubtedly helped many households in need. However, these measures were universal, and credits were provided to every household with an MPRN, whether they needed it or not. While we recognise that this allowed for a quick response at that time, the Action Plan fails to provide more long-term strategies to those who experience energy poverty regularly, not just in a Cost-of-Living Crisis.
- Some of the €10 million fund pledged in the current Action Plan should be used to alleviate persistent energy poverty into the future.

5. Are there specific programs or initiatives from other countries that you think could be effective in reducing energy poverty in Ireland?

As this is not a policy area that we have expertise in, but those who have adopted a multi-dimensional approach and/or have deeply embedded equality policies in place, such as in many Scandinavian countries appear to be doing very well in this area.

6. How can smart energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?

Again, this is not a policy area that we have expertise in. We would be very interested to read more about how such solutions could work and would recommend that vulnerable cohorts such as one-parent families be provided adequate information to be able to make informed decisions and be able to use the technology to their advantage. For example, heat pumps have been provided in some social housing developments in recent years. We are aware though that tenants have reported that they have not been provided with enough information on how best to operate them.

Energy Efficiency

1. How can renewable energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?

This is not our area of policy expertise but would again welcome further information on this and are happy to contribute in relation to the lived experience of one-parent families.

2. The Government is acutely aware of the need to balance the support available under the Warmer Homes scheme and the waiting times for that support. Do you think the scheme could be adapted in any way to better target the support so that we can achieve that balance? Are the current eligibility criteria still appropriate? Please provide references to any relevant material that would support your response.

- There is a lack of awareness of the Warmer Homes Scheme more generally. We would like to see any Departments with interaction with the cohorts who are eligible for the scheme, make contact to advise service users that this scheme is available.
- We would like to see information, advice and guidance provided at a local level to ensure that one-parent families have easy access and to alleviate any concerns or anxieties they may have around it.
- This could be provided through local libraries, community energy hubs or mobile units.
- We note that recipients of One Parents Family Payment and Job Seekers Allowance are eligible for the scheme but there is no specific mention of those on Job Seekers Transitional Payment. It would be helpful to specifically mention Job Seekers Transitional Payment is also included where information is made available.

3. The Government has put in place several supports for landlords (including a range of grants, a tax incentive, and the forthcoming home energy upgrade loan scheme) to upgrade the efficiency of their rented properties. Are there other measures (acknowledging the challenges facing the housing sector) that the Government could take that you think would further support upgrades in the private rented sector? Please provide references to any relevant material that would support your response.

Retrofitting homes within the private rental sector is a major issue and reform of approach is urgently needed. Many one-parent families are living in rented accommodation and have no agency around how their homes are heated or how to improve the BER of their homes. Funding needs to be ramped up and landlords encouraged to do more to improve the energy efficiency of their assets. However, works cannot be used as a reason to evict sitting tenants.

Research

1. What best practice regarding research on energy poverty (e.g. dissemination, public engagement, mechanisms for continuity) should we consider?

- Stakeholders should be made aware of what research is out there and what research is being relied upon to inform policy making.
- We would like to see a more outcome focussed approach taken with evaluation taking a wider scope than just cost/benefit analysis.
- Research must tie into what is happening at a local, national and European level and so MEPs, Councillors and Oireachtas members should also be kept informed.

2. Besides the Economic Social Research Institute's (ESRI) research programme into Energy Poverty, which generally covers measurement and targeting, what other areas do you think should be investigated/researched?

- Energy poverty must be considered within the wider context of a Just Energy Transition and the necessity of meeting emission ceilings and targets set under legislation at both a national and European level. There is a danger that those on the margins will be left behind and left to shoulder a disproportionate burden of this transition. Ensuring that cohorts experiencing or who are/will be vulnerable to energy poverty should receive targeted supports to ensure that transition is fair and equitable. We would like to see more research into this topic and ensure that it underpins any future strategies.
- It is also important to capture the daily reality of cohorts living in energy poverty. Quantitative data can only go so far. We have lone parents and their children living in their own homes, others in rental accommodation. Some are living in rural parts of the countries and others in cities. Some are prepay customers while others rely on solid fuels. Gender, ethnicity and other factors can impact how energy poverty is experienced and its extent. Qualitative research can better inform decision and policy makers and get a better understanding of the intersectionality of experience on the ground.

Communications and Governance

1. How can we better communicate our work in the area of Energy Poverty to all stakeholders?

- The Stakeholder's Forum is an annual event, and it is important that this continues and that decision makers attend to listen and learn.
- The forum should aim to be as inclusive as possible with membership to encompass advocates for all members of society.
- More communication between forums would be welcome.
- Our voices matter and it is imperative that our views are not just acknowledged but also form an integral part of this review. We would like to be informed as to why particular aspects are taken on and others are not. This will help build confidence and trust in the process.

2. What suggestions do you have for ensuring the inclusion and representation of diverse voices in the development and implementation of the Energy Poverty Action Plan?

- Ensure stakeholders from across civil society are included.
- Provide adequate funding to NGOs and charities related to our policy and advocacy work. With very limited resources available on this front, we are having to choose which policy areas to focus on, to the detriment of others.
- Consider establishing a sub-committee that includes people directly impacted by energy poverty to hear their lived experience directly.

Policy design

1. In your view, how can we integrate other policies (e.g. housing, energy market regulation, income tax and income support) in our Plan to tackle Energy Poverty?

- The Steering Group has been convened to ensure that the relevant Government departments and agencies noted above are part of this work. It is imperative that there is a cross-departmental approach to ensure that everyone is working together, that they understand what the goals are and work collectively and collaboratively to achieve those goals. Without that collaboration and integration, the effectiveness of any future Action Plan will be greatly diminished.
- Integration should also include the Dept of Health, the HSE as well as the Child Poverty and Wellbeing Office.
- We can see how this issue crosses and intersects, and every department and agency must play its part. However, the DECC must play a leading role in its implementation.

Closing Question

1. Are there any other matters you wish to raise in relation to Energy Poverty

- It would be helpful to be able to feed in an report issues and patterns as they arise for one-parent families in relation to energy poverty. It might be useful to consider how this could be done and made available to all stakeholders.
- We would like the problems related to energy bill arrears and Pay As You Go meters to form part of this review and specific measures established to deal with these issues.
- We believe it is vital that transport costs be included within this review and should be included in future Action Plans.

Ends

We would like to thank you for the opportunity for One Family to feed into this review and we look forward to working with you all into the future.

If you would like to discuss anything contained in this consultation in further detail, please contact One Family Policy Officer Carly Bailey at cbailey@onefamily.ie