Facing Fuel Poverty:
Research on face-to-face actions to help consumers in fuel poverty in Scotland
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1. Summary and Key Recommendations

It is now recognised that how energy is used in the home is one of the four key drivers of fuel poverty, and that providing tailored energy advice, will be an important element of alleviating fuel poverty.

Four key drivers of fuel poverty:
- Energy efficiency of homes
- Household incomes
- Energy prices
- Behaviour in relation to heating usage

The Consumer Futures Unit (CFU) at Citizens Advice Scotland (CAS) commissioned Changeworks to carry out research into this area focusing on face-to-face advice delivered in the home. The CFU was keen to understand what projects and services exist in Scotland, and what support is available to consumers. In addition, the CFU wanted to understand the costs, associated outputs and outcomes from current projects.

While this research has not critically investigated the value of one type of advice over another, it has provided evidence to suggest that holistic face-to-face fuel poverty advice in the home is reported as a necessary service for certain householders. This includes advice on fuel debt and billing, switching, heating system operation, energy behaviours and referrals for energy efficiency measures. The research reported that face-to-face fuel poverty advice was of particular benefit for some consumers who are hard of hearing, unable to leave their home, vulnerable, experiencing mental health problems or who don’t have English as a first language. Our evidence shows that this type of bespoke advice brings a wide range of benefits to householders beyond reducing energy costs.

Consideration should be given by the Scottish Government:
- To continue to invest, and look to invest further, in face-to-face fuel poverty advice services as a necessary service to support certain vulnerable households.

However this research has also highlighted that organisations report securing funding as one of the key challenges to delivering face-to-face advice.

We therefore recommend that organisations that fund fuel poverty advice projects should:
- Look to award multi-year funding to increase the efficiency of projects and services that otherwise need to commit considerable ongoing management and staff resource to project set-up, securing annual funding and training staff (due to issues of retention).
- Be more flexible in allowing funding to be pooled so that projects can expand rather than be replicated, increasing efficiencies and reducing additional overheads.
Although this project has highlighted the value of this service provision, questions remain unanswered regarding both the costs of delivering such a service and what the quantifiable outcomes for consumers are on a nationwide scale. Whilst this research aimed to provide benchmarks for service delivery in Scotland, uncertainties remain. Difficulty in benchmarking was due to challenges in obtaining data from projects, and variation in project activities and calculation methods. Data that was obtained on costs, from 51 of 158 projects, suggested that the average cost per client for delivering face-to-face fuel poverty advice is £194. However this varies considerably between and within projects based on the depth of service provided or required and other factors such as advisor travel time.

The research has also shown that the way in which delivery organisations evaluate their projects varies considerably. While some delivery organisations completed effective outcome monitoring, many organisations undertook less advanced evaluation programmes and for example only recorded measures such as number of households visited. It was also reported that the methodologies used to measure outcomes are not consistent and that further thinking is required to establish how the timescales of positive measures are reported. The variability of outcome monitoring by individual projects meant that providing benchmarks for the benefits and quantifiable outcomes for face-to-face advice delivered in the home was difficult and could not be completed with confidence.

Based on the research report by Changeworks, the CFU proposes the following recommendations which focus around the need for improved monitoring and evaluation.

**Consideration should be given by the Scottish Government to:**

- Commission a pilot project programme delivering face-to-face fuel poverty advice with clear monitoring and evaluation goals and criteria. This would provide greater clarity on both the scope and scale of outcomes achieved from this type of project as well as the associated costs¹.

- Develop a standard regarding the savings achieved as a result of behaviour changes from in-depth energy advice.

- In line with the above, look to support delivery organisations to carry out monitoring and evaluation, for example through resources or upskilling.

**Recommendations for organisations that fund fuel poverty advice projects are:**

- Require projects to carry out a minimum level of evaluation. This should include quantifiable outcomes, such as bill savings, as well as qualitative outcomes. It is recognised that the scale of projects may restrict the depth of evaluation which can be achieved and that funders will have different priorities (e.g. health, environmental).

- Allocate funding to projects specifically to carry out monitoring and evaluation.

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¹ Since the research was commissioned the Scottish Government have announced the ‘Homecare pilot programme’. See section 2.1 for more details.
It is recommended that organisations delivering fuel poverty advice:

- *Start thinking about monitoring and evaluation of projects before delivery commences and create a suitable monitoring plan.*

- *Build in as much monitoring and evaluation as possible. It will help to identify what the project has achieved, areas for improvement and build the case for further funding applications. It also contributes towards sector-wide learning in regards to what projects can and do achieve.*

- *Share best practice with other delivery organisations.*
2. Introduction

2.1 Policy Context

The latest figures show that 31% of households in Scotland are in fuel poverty². Despite efforts over many years to reduce this figure, the Scottish Government’s target to eradicate fuel poverty by November 2016 was missed.

Fuel poverty is largely recognised to be the result of four factors:

- Energy efficiency of homes
- Household incomes
- Energy prices
- Behaviour in relation to heating usage³

Government efforts to date have focused on a number of programmes aimed at improving the energy efficiency of homes, and indeed evidence shows that the energy efficiency of Scottish homes has increased over the last few years¹. However there is recognition that households, particularly those who are vulnerable, need further support.

In recognition that their fuel poverty eradication target would be missed, the Scottish Government convened two groups to provide recommendations on future approaches to addressing fuel poverty: the Scottish Fuel Poverty Strategic Working Group and the Rural Fuel Poverty Task Force. The CFU was a member of both groups.

Reporting in late 2016, both groups stressed the importance of addressing energy use in order to effectively tackle fuel poverty. Discussions in both groups have emphasised the need for fuel poor households to receive advice and bespoke support on a range of issues including switching tariffs and energy behaviours. This builds on a recognition that improving the energy efficiency of homes and providing income maximisation is inadequate to tackle fuel poverty. The groups’ discussions also highlight how changes in the sector – such as increases in the number of renewable technologies – mean that further advice and support may be needed.

In March 2017 the Scottish Government responded to the reports from the two groups with a number of actions to take forward⁴. In relation to energy use – using heating and energy saving technology - the Scottish Government committed to consider, through SEEP, how best to provide advice and support on energy consumption and energy use in the home and the development of tools to review and monitor energy use. They also announced that a Homecare pilot, to be delivered by Home Energy Scotland (HES), will be launched in 2017. The pilot which will run for a one year period will assess the benefits and costs of providing an area based, home delivered outreach service for vulnerable households. The CFU supports this initiative and has been invited to sit on the advisory group.

² Scottish House Condition Survey: 2015 Key Findings
³ Until recently it had widely been accepted that there were three causes of fuel poverty; however householder behaviour is now being recognised as a fourth factor. For example, Changeworks’ Position on Future Approaches to Tackling Fuel Poverty
2.2 Our Research

Given the findings from both groups about the necessity for face-to-face advice delivered in the home, the CFU was keen to understand what projects and services exist in Scotland, and what support is available to consumers. In addition, the CFU wanted to understand the associated outputs and outcomes from current projects to identify best practice and value for money, which can inform future approaches in Scotland.

In October 2017 the CFU commissioned Changeworks to carry out this research. The research was carried out via an online survey, desk-based research, qualitative telephone interviews and data analysis.
3. Overview of face-to-face fuel poverty projects in Scotland

3.1 Overview of projects in Scotland

The research identified 158 projects or services in Scotland delivering face-to-face fuel poverty advice. This mostly includes live projects and a small number of completed projects. It should be noted that this is the number of discrete projects or services. These are delivered by 108 organisations, fourteen of which are delivering multiple projects (in most cases two or three projects, but one organisation had thirty live/recently completed projects). Conversely, some projects are delivered in partnership by multiple organisations. It should be stressed that the data does not reflect the scale of projects which varies considerably i.e. whilst there are 158 projects some of these will be much smaller than others in terms of number of staff and clients supported.

Figure 1 shows the breakdown of organisation type against these 158 projects. This shows that half are delivered by community organisations, charities or social enterprises; and a further 13% are delivered by these organisations on behalf of housing associations (HAs) and local authorities (LAs). HAs deliver 21% of projects themselves, LAs deliver 4% and 1% of projects are delivered by a partnership of HAs and LAs. Nine percent are delivered by local Citizens Advice Bureaux (CABx).

![Figure 1: Organisations delivering face-to-face fuel poverty projects or services in Scotland](image)

3.2 Funding Sources

40 out of 119 projects that provided information on funding sources were Climate Challenge Fund (CCF) projects; a Scottish Government fund which supports community groups and housing associations to deliver carbon reduction projects. Other common sources of funding are charities or trusts which fund 29 out of 119 projects. Most commonly this was Scottish Power Energy People Trust, and also Big Lottery and British Gas Energy Trust.

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5 Completed in the last three years

It should be noted that these figures represent the number of projects rather than the scale of these projects in terms of funding and number of clients visited. Home Energy Scotland is a large national programme which was allocated £4.6 million in core funding by The Scottish Government for 2016/17⁷ - although the majority of this is not focused on home visits which currently number about 900 a year. Similarly, the most recent round of CCF funding was £9 million⁸ although this was awarded to projects other than those with a fuel poverty focus.

3.3 Details of projects being delivered

Survey data provided some indication about the scale of projects delivering face-to-face advice in the home in Scotland. It was clear from the data that most projects are reasonably small, with fewer than four members of full-time equivalent staff and most having only one.

Data was also collected on the length of service delivery which showed that the majority of projects had been running for over 5 years. However this question may have been interpreted to mean the length of time the organisation has been delivering a service rather than the specific project.

Data also showed that 60% (34 out of 55) projects are targeted at a specific client type. Of the projects which do target specific groups, the most commonly targeted clients are social housing tenants, long term sick or people with health problems, elderly and families. ‘Other’ was the second largest category and included first time tenants, those at risk of homelessness, carers and people who are housebound. Evidence showed that apart from Housing Associations, no particular organisation type in particular was found to target specific groups.

Survey respondents were asked what type of fuel poverty advice they offered to clients. Data showed that almost all projects provided advice on:

- Fuel debt
- Tariffs and suppliers
- Energy behaviours
- Heating systems (demonstrations)
- Other billing issues
- Referrals for energy efficiency measures

Twenty projects also provided other types of advice, other than fuel poverty. Types of advice included: water use, food waste, household budgeting and welfare and benefits advice.

3.4 Reaching clients and onward referrals

The research identified that the most common route for clients to find out about advice services/projects was through third party referral organisations, including Home Energy Scotland. Other routes to reaching clients included promotions such as events and training, outreach work including through medical practices, word of mouth and networks of referrals for charities.

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⁷ Figure provided by The Scottish Government, March 2017.
3.5 Delivery partners

Survey results showed that half of the projects stated that they worked in partnership. Common partners included CABx, LAs, HAs, community organisations, networks of fuel poverty/energy/support services, and Care and Repair. Delivery organisations who were interviewed as part of this research commonly mentioned the benefits of partnership work as an aspect of their project that worked particularly well. It was noted that building a good relationship with partner organisations can help to generate more referrals into the project, create a more holistic advice service for householders and reduce travel costs by referring to similar services operating in closer proximity. Further, establishing networks can create a more joined up service in the area. For example, in Moray, a group called Warmer Moray has been set up with a range of stakeholders including the local authority and HAs; this provides a forum to share ideas about tackling fuel poverty.

4. Benefits of delivering face-to-face advice

Findings highlighted the benefits of delivering fuel poverty advice face-to-face (as opposed to other delivery mechanisms), and in what circumstances face-to-face advice is deemed most necessary. The results are based on interviews with project representatives delivering face-to-face fuel poverty advice in Scotland and therefore represent their opinions.

A number of the interviewees felt strongly about the benefits of face-to-face advice over alternatives with one advisor remarking

“I wouldn’t have done the job if I couldn’t visit them”

and another explaining

“we pride ourselves on offering a face-to-face service”.

Interviewees described how being in a person’s home enables the adviser to identify issues outside of the residents’ initial enquiry making it easier to tailor advice to the householder. It also offers an opportunity to provide solutions to issues which the householder may not know or feel comfortable raising themselves, such as experiencing the temperature of the person’s home.

In terms of the practicalities of delivering advice, home visits allow the advisor to deliver demonstrations of technology such as heating controls and also allows the opportunity to make references to and explain residents’ energy bills. Being in-situ with the householder also enables quicker resolution of issues, as they are able to give verbal confirmation of the mandate enabling direct liaison with the fuel supplier. Energy advisers from across the Citizens Advice Service also note that it is particularly useful to provide face-to-face advice when consumers need to complete a form or application and can be provided with physical support.

It was also reported that at a home visit, householders are more likely to open up about sensitive issues as they are in an environment in which they feel more comfortable. A large number of the interviewees also described the significance of both parties being able to read one another’s body language.
5. When face-to-face advice is a necessity

Organisations interviewed in this research largely carry out home visits as a matter of course and use other means of communication such as telephone contact to offer on-going support. However other services delivered advice over the phone unless a visit was considered necessary; in particular where clients’ needs are more straightforward. This decision appeared to be partially funding dependent.

Interviewees indicated that fuel poverty advice is best delivered face-to-face in particular where householders are:

- Hard of hearing
- Unable to leave their home
- Vulnerable
- Experiencing mental health problems
- Do not have English as a first language
- Have one complex issue or a number of issues
- Most at risk of failing their tenancy (applicable to housing associations) i.e. first-time tenants, recently in-debt or homeless residents, or those experiencing mental health or family issues.

However it was acknowledged that home visits were not the answer for all vulnerable clients, as despite needing advice, some householders for a variety of reasons, do not feel comfortable having an advisor in their home. In support of this, the Extra Help Unit (EHU)⁹ provides vulnerable consumers with support on energy complaints over the telephone and consumers report this an invaluable service - 91% of consumers are satisfied or very satisfied with quality of service. The EHU report that telephone advice for certain vulnerable consumers can also have benefits, such as the flexibility of contact times and the relative ease of rearranging appointments.

6. Challenges to delivering face-to-face advice in the home

The availability of funding was cited by interviewees as the biggest challenge facing delivery organisations. Issues included the competitive nature of funding, persuading funders face-to-face advice is worthwhile and the short term nature of funding.

A particular tension was apparent between depth and breadth of advice projects. Research highlighted that there appears to be a pressure from some funders to maximise the number of clients supported, yet this can reduce the time spent with each household. Delivery organisations therefore, were conscious of the need to balance this so as not to compromise on quality of service.

It was also evident that funders often drive the extent and type of evaluation carried out by delivery organisations. In some cases this was leading to ‘light touch’ evaluation.

Other challenges that were reported by delivery organisations related to engaging householders, capacity issues and adviser experience. Interviewees identified that engaging people can be particularly difficult, especially at the beginning of a project when householders and community organisations are unaware of the service. Interviewees also highlighted that those who are most difficult to engage are often those who need the most help. In relation to capacity, interviewees noted that there is a balance to be achieved in trying to see as many people as possible without compromising the quality of the service. Interviewees also reported that in some cases both adviser safety and the emotional effects of visits were a concern.

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⁹ The Extra Help Unit is a specialist team of caseworkers investigating energy and post complaints on behalf of vulnerable consumers. The service is delivered by CAS and covers the whole of Great Britain helping domestic and micro-business consumers.
7. Costs of delivering projects

Project cost data was provided for 51 projects and showed that the majority of projects (60%) had annual costs of between £10,000 and £70,000. This provides an indication of the size of projects but must be taken with caution since many of the projects include non-fuel poverty aspects or contain other fuel poverty advice activities, such as events.

Case study organisations were asked for actual cost data and this indicates that the largest projects cost around £290,000 per year.

By dividing the overall project costs by the number of clients an average cost per client was estimated. Typically the cost of delivering fuel poverty advice was £100 - £300 per client, and on average £194 (Figure 2). However this varies considerably between and within projects based on the depth of service provided or required and other factors such as advisor travel time. In addition, some project costs will be allocated to activities other than the delivery of face-to-face fuel poverty advice such as events and workshops. It was difficult for organisations to breakdown the budget to isolate funding for home visits alone.

The data above provides some indication on what typical costs might be but more research is needed to refine this, particularly with more detailed data on costs and from a greater number and variation in organisations. It is anticipated that different types of organisations may have different costs but insufficient levels of data were obtained to be able to comment on this.
8. Outcomes: Monitoring and evaluation

Feedback from delivery organisations suggests that face-to-face fuel poverty advice results in a range of benefits to householders. These include fuel bill savings, carbon savings (in some cases) and a range of ‘softer’ outcomes such as increased health and wellbeing. However the research identified that there is a lack of evidence across the sector of the quantifiable outcomes of this type of advice.

The research highlighted that whilst all organisations are monitoring and evaluating their projects to some extent, some are only recording project activities (i.e. number of clients advised) or evaluating a limited number of outcomes. Further, the evaluation being carried out is inconsistent across projects. For example, reported bill savings from different projects can arise from a variety of sources (e.g. Warm Homes Discount, tariff switching or behaviour change savings) and assumptions used for these calculations, such as behaviour change savings, vary. This is highlighted in figure 3 below which shows that the most commonly cited average bill saving per client across 30 projects was £201-£300. However this may be misleading as different organisations were reporting their bill savings on a variety of timescales.

![Figure 3: Bill savings achieved per client](image)

The data showed that an average annual saving of £316 was reported from the 30 projects that provided data. However, 2 organisations reported that their projects delivered ‘estimated lifetime’ savings of £317 on average. The research indicated that different organisations were reporting the same outcomes to occur on both a one off and annual timescale. For example, receipt of Warm Home Discount requires the householder to be in receipt of qualifying benefits, apply to the fuel supplier on an annual basis and have their qualifying criteria remain unchanged. It should also be noted that the Warm Home Discount is a finite allocation of funding and therefore qualifying householders could still miss out. This suggests that in some cases further consideration needs to be given as to the likelihood of an outcome reoccurring.

However, it is clear from this research that some organisations are carrying out thorough project evaluations and there is therefore scope for best practice and information sharing with organisations that are less experienced.
9. Conclusions and Recommendations

Research undertaken by Changeworks for this project has provided evidence to suggest that face-to-face fuel poverty advice in the home is reported as a necessary service for certain households. Our evidence also suggests face-to-face advice in the home brings a wide range of benefits to householders beyond reducing energy costs - something that has been highlighted by others\(^\text{10}\)\(^\text{11}\).

Consideration should be given by the Scottish Government to:

- *Continue to invest, and look to invest further, in face-to-face fuel poverty advice services as a necessary service to support some vulnerable households.*

However this research has also highlighted that organisations report securing funding as one of the key challenges to delivering face-to-face advice.

**We therefore recommend that organisations that fund fuel poverty advice projects should:**

- *Look to award multi-year funding to increase the efficiency of projects and services that otherwise need to commit considerable ongoing management and staff resource to project set-up, securing annual funding and training staff (due to issues of retention).*

- *Be more flexible in allowing funding to be pooled so that projects can expand rather than be replicated, increasing efficiencies and reducing additional overheads.*

Although this project has highlighted the value of this service provision, questions remain unanswered regarding both the costs of delivering such a service and what the quantifiable outcomes for consumers are on a nationwide scale.

Research completed within this project has reinforced the CFU’s initial views that no industry wide benchmark data for face-to-face fuel poverty advice exist. Whilst this research aimed to provide benchmarks for service delivery in Scotland, in respect to both costs and quantifiable outcomes, it has become clear that large uncertainties remain. Difficulty in benchmarking was due to challenges in obtaining data from projects, variation in project activities and delivery and due to variations in calculation methods.

In relation to delivery costs, this uncertainty is largely due to organisations not being able to or choosing not to provide data. Data on costs was only received from one third of the 158 projects and showed a wide variation. While limited quantifiable data was available on project costs, it was apparent from interviews that costs are higher for projects in rural areas, where there is a greater requirement for travel, and less where volunteers are involved in the delivery of advice. More research is needed to refine the reasoning behind the variation in project costs, which could be provided by more detailed costs from a larger number of organisations.

\(^\text{10}\) Working with the health sector to tackle fuel poverty Healthy Homes project final report December 2016

This research has importantly highlighted that monitoring and evaluation is not completed with consistency across delivery organisations in Scotland. This has made it difficult to understand what outcomes are being achieved on a national scale. Our evidence shows for example that it is hard to assess outcomes when organisations only record activities delivered—i.e. the number of household visits per annum.

The research has shown that evaluation methodologies used to assess outcomes vary considerably. As has been discussed here, the time scale of outcomes is an important consideration for organisations and funders. As with average figures for savings that can be made from switching supplier, knowing the timescale of these savings i.e. whether they can be achieved annually or not, is important when assessing if projects are being effective in alleviating fuel poverty.

Recommendations from the commissioned research focus around the need for improved monitoring and evaluation of face-to-face fuel poverty advice projects. Recommendations are made for consideration by the Scottish Government, funders and delivery organisations which aim to support a greater level and more consistent approach to monitoring and evaluation. This will enable a better picture to be obtained of the impacts of this type of advice and will allow for easier comparison of different fuel poverty advice measures. The research also suggests that current evaluations are undervaluing the benefits of services and therefore improved monitoring and evaluation will help to make a stronger case for investment in this type of advice. As was highlighted in the research report however, projects should not be deterred from their key focus of delivering high quality and effective advice services and evaluation activities must be proportionate to the scale of the project.

Based on the research report by Changeworks, the CFU proposes the following recommendations which focus around the need for improved monitoring and evaluation.

**Consideration should be given by the Scottish Government to:**

- Commission a pilot project programme delivering face-to-face fuel poverty advice with clear monitoring and evaluation goals and criteria. This would provide greater clarity on both the scope and scale of outcomes achieved from this type of project as well as the associated costs.

- Develop a standard regarding the savings achieved from behaviour changes from in-depth energy advice. A standard could have different savings dependent on level of advice, type of advice and fuel type. This would provide consistency across projects and organisations, and also support organisations to evaluate their own services. This should be carried out in consultation with other key stakeholders.

- In line with the above, look to support delivery organisations to carry out monitoring and evaluation, for example through resources or upskilling.

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¹² It is worth highlighting that there is a range of resources available from the Climate Challenge Fund (CCF) on monitoring and evaluating the impacts of projects.
Recommendations for organisations that fund fuel poverty advice projects are to:

- Require projects to carry out a minimum level of evaluation. This should include quantifiable outcomes, such as bill savings, as well as qualitative outcomes. It is recognised that the scale of projects may restrict the depth of evaluation which can be achieved and that funders will have different priorities (e.g. health, environmental).

- Allocate funding to projects specifically to carry out monitoring and evaluation.

It is recommended that organisations delivering fuel poverty advice:

- Start thinking about monitoring and evaluation of projects before delivery commences and create a suitable monitoring plan.

- Build in as much monitoring and evaluation as possible. It will help to identify what the project has achieved, areas for improvement and build the case for further funding applications. It also contributes towards sector-wide learning in regards to what projects can and do achieve.

- Share best practice with other delivery organisations.

In terms of how to carry out monitoring and evaluation, it is recommended that projects should measure the following:

**Financial and carbon savings**

Fuel bill savings should be measured, as applicable, from:

- ‘Emergency advice’ i.e. fuel debt recovery or emergency loans

- Non-emergency advice:
  - Behaviour change (averages applied across the sector – see recommendation above)
  - Changing supplier, tariff and/ or fuel
  - Other billing issues, such as fuel bill errors
  - Warm Homes Discount
  - The installation of energy efficiency measures or low-cost equipment.

Some of these savings can be calculated accurately based on specific client data i.e. debt recovery and other billing issues. However those savings arising from behaviour changes and installation of energy efficiency measures are more challenging to accurately measure per client. Average savings can be applied, and where possible, verified or refined through actual bill monitoring of a small sample of households. This may become easier with the introduction of smart metering. As was highlighted in the report, fuel bill savings will be achieved on different timescales - this should be carefully considered by delivery organisations.

In addition, carbon savings from behaviour changes and installation of measures can be measured in the same way using carbon conversion factors from fuel type (electricity, gas, etc).
Wider benefits from advice

It is recommended that organisations also measure the wider benefits to households resulting from this type of advice, such as:

- Increased confidence and ability to manage energy bills and energy usage (encompassing a wide range of skills including using heating controls, speaking to energy suppliers, handling debt, etc).
- Improvements in the home, such as warmth, comfort and reduction of damp/condensation.
- Improvements in health and wellbeing as a result of the above.

A qualitative (i.e. interviews or case studies) and/or quantitative (i.e. surveys) approach could be taken to evaluate these outcomes.

The most relevant approach is proportionate to the project in terms of level of advice provided and resources to carry out the evaluation; larger projects should therefore include a quantitative element and may wish to go further than the recommendations above and undertake measures such as temperature and humidity monitoring. This can ensure that affordable warmth outcomes are achieved after the delivery of tailored fuel poverty advice.
The Consumer Futures Unit puts consumers at the heart of policy and regulation in the energy, post and water sectors in Scotland. Part of Citizens Advice Scotland, we research and gather evidence, which we use to improve outcomes for consumers.

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