



## **Evidence submission from Warm Wales in respect of the Warms Homes Programme**

- **What are the main lessons learned from the Welsh Government's current Warm Homes Programme?**

Our involvement with the Warm Homes Programme has been primarily through the Nest scheme and, as such, our answers to these questions relate mainly to that component of the programme.

The Nest scheme is a tremendously positive scheme that has created vast numbers of warmer homes across Wales. In the last six months, alone, we have supported 65 householders with applying to Nest, and the impact of now being able to heat their homes has been significant.

*'It's wonderful coming downstairs to a warm room in the morning; I've started painting again and working on a book'*

*'I am delighted – I've had a new boiler and radiators, and all installed in just a few weeks'*

In considering future iterations of the programme though, there is, we believe, scope to refine and enhance aspects of the delivery model to make the scheme more efficient, accessible and inclusive.

- **How can these lessons help shape the next iteration of the Warm Homes Programme to ensure that it better supports those living in, or at risk of, fuel poverty? In particular:**

- **what should the eligibility criteria for home energy efficiency measures be?**

The principle of the current eligibility criteria is sound, however, there are several anomalous elements that could usefully be amended to ensure the programme reaches those most in need of support.

Under the health route into the Nest scheme, welfare benefits including PIP and Attendance Allowance are counted as 'income' in the same way as a salary would. Benefits such as PIP though, are paid to cover expenses incurred as part of living with an impairment or chronic health condition and are, therefore, not the same as a salary and should not, in our opinion be classed as 'income'.

An approach that saw these benefits deducted from income, in the same way as mortgage and rent payments are, would enable the scheme to reach more people living in fuel poverty. It would also support the scheme to better advance equality and social justice considerations as per a later question in this document.

Secondly, individuals who have a business registered to their address are ineligible for support via the Nest scheme. This is irrespective of what the business is or what its turnover is.

Many of these businesses, in our experience, are extremely small scale – selling vintage clothes on Ebay, for example, or making cakes – and it is difficult to see why having their business registered at their home should make a difference to their eligibility for the Nest scheme. Either, removing this criteria, or amending it to have a turnover or profit threshold, would improve the reach of the scheme while making it fairer and more inclusive.

- should the area-based approach to tackling fuel poverty (Arbed) continue,
- what specific support should be made available to meet the challenges associated with rural fuel poverty?
- how can private sector landlords be encouraged to tackle fuel poverty amongst tenants?
- **how can any successor scheme(s) better advance equality and social justice considerations?**

To better advance equality and social justice considerations any successor scheme would need to address two core areas that can impact current delivery:

- The communication breakdowns that occur between the scheme and householders

- The aspects of the scheme that are more difficult for householders with more complex needs to adhere to or engage with.

### **The communication breakdowns that occur between the scheme and householders**

Under the current scheme, there are aspects of the processes involved that can lead to a variety of breakdowns in communication, resulting in householders not being kept up to date about their application or the installation of measures. These breakdowns most often, in our experience, affect those householders with more complex needs. Advancing equality and social justice considerations will require improving processes from the current scheme so they best support those householders.

We support householders to make their application via a three-way phone call with us, them and Nest – this is a successful method as we will have prepared the householder in advance so they know what to expect and have any useful documents to hand. Making these calls can take a long time as capacity at Nest can mean that calls are transferred to an ‘overflow’ line where applications cannot be made.

As one of a number of partner organisations making very regular, successful referrals into the scheme this can be difficult as it adds significant time to the process. It would be beneficial to have a dedicated phone number we, and others doing similar work, could use; it would support good relationships between Nest staff and partner organisation staff while making processes more efficient.

In our experience, the process of surveying a property to establish which measures should be installed and whether work is required by the householder in advance of that, can be a source of considerable delay, brought about by two core types of issue:

- Electrical surveys – where the property is not connected to the gas mains - and technical surveys – which are undertaken when the property is more structurally complicated - can take months to be completed. Conveying messages to the householder about this does not always happen, and in most cases, the time taken for these surveys to occur extends the installation date well beyond the usual timeframes.
- Surveys not uploading to the system correctly and this not being noticed or addressed and / or the householder not being informed that a delay has occurred and / or the householder not being informed of the outcomes of the survey. These issues can create considerable delay and can, in some cases, lead to applications being cancelled.

In one recent example, the householder was waiting five months for measures to be agreed and the case is on-going as no installation date has been provided yet.

*[The householder] was originally referred for Nest help in August 2021 and still has not been done, survey was delayed then there was another survey, then they needed a tech survey, then they couldn't decide the best type of heating to install and needed ages to think about it. Now they have decided on air source heat pumps, but apparently they are awaiting parts for these as they are on back order.*

In another, technical issues meant that surveys and floor plans could not be accessed, adding delays to an already complex case that, ultimately, took seven months to see measures installed.

Part of the surveying process involves identifying activity that the householder may need to undertake to enable an installation to go ahead and we have found that this part of the process can be a source of communication breakdowns (as mentioned above).

Typically, breakdowns in communication involve one, or both, of the following:

- A householder not being told they need to undertake certain activity, such as clearing a room of items, and then submitting photographic evidence of this
- Evidence that is submitted not always reaching the correct end location, and therefore is logged as not having been submitted.

Both of these will result in delays to an installation date being agreed and, in some cases, applications are cancelled owing to a perception that the householder has ceased engaging. These issues are usually established to have occurred when we and / or the householder follow up with Nest to check on the progress of the work. There is very little pro-active communication from Nest to the householders to chase up missing evidence.

*I have been assisting a landlord with 3 properties he has emailed all the documents twice now yet they say they have not received them they have now told me they have cancelled the referral as the landlord isn't engaged.*

*His tenant has a non-working boiler no heat or hot water. When you ring the install team all they say is we haven't received the documents. Its soul destroying. I am going round in circles.*

In another example, a householder was told to undertake work including removing bath panels, getting a new, larger attic hatchway and clearing items from several areas of the house. She had done these things but did not know she needed to submit pictures.

That the work of Nest is split between two organisations does appear, at times, to be a contributing factor to some of the communication breakdowns as, apart from anything else, it can make following the progress of an application and installation more difficult, and this is especially the case if something is more complicated and requires additional or unusual decisions to be made.

Establishing a case-load approach at Nest so that the same advisor sees an application through from initial submission to final installation of measures would help mitigate some of these communication issues, creating a clearer line of responsibility.

This approach would also serve to advance equality and social justice considerations as many people find it easier to engage with or follow up with a named individual who is somewhat familiar to them.

### **The aspects of the scheme that are more difficult for householders with more complex needs to adhere to or engage with**

The Nest scheme, its purpose, and the eligibility criteria that underpin it, encourage applications from people with more complex needs, for example, having mental health issues or physical health issues, being older, being digitally excluded or a combinations of these things. Indeed, Nest has a 'priority' status for some of these applications.

However, some of the expectations that are placed on applicants to the scheme can be prohibitive to these individuals and, even with the support of organisations such as ours, they can create delays and add to workloads across the process. There will also, obviously, be those individuals who are not supported by another agency and who then may struggle further with processes or end up not seeing their application through.

The elements of the process that cause most difficulty most often are:

- Clearing rooms in advance – householders are expected to clear rooms, or parts of rooms, and submit photographic evidence to Nest before a date for installation can be agreed. That date is often several weeks into the future,

meaning the disarray caused by clearing the room needs to be lived with for those weeks.

- Taking and submitting photos of cleared rooms, lifted floors etc. For individuals with access to the internet and appropriate devices this is straightforward, however, many people remain digitally excluded either through a lack of access to the internet and devices, or a lack of skills to carry out this request. Relying on others to help with this is not always an option.

In the last six months, several notable examples of these issues stand out:

- An individual with autism and mental health issues for whom exercise, routine and stability were essential to his wellness, being asked to clear heavy gym equipment and a number of other items from two rooms in a two-bed flat.
- An elderly woman with mobility issues who needed a range of items within easy reach of where she sat being required to move these, putting them out of access, as well as move larger furniture items from another room. She also had no means of taking and submitting the photographs requested.

Householders understand why these requests are made but having a more flexible approach would be extremely beneficial to a number of applicants. For example, providing the installation date in advance, and then requesting the evidence the day before would be much more accommodating to those for whom moving items around is more difficult. Similarly, having straightforward approaches to foregoing the requirement to submit evidence in cases where that will be prohibitive would make the scheme more accessible and inclusive.

- **How can the Welsh Government ensure that the next iteration of the Warm Homes Programme better aligns with its efforts to decarbonise Welsh housing?**

We would like to mention two other aspects of the current scheme that may bear useful consideration in a future iteration of Nest – these fit loosely under this question, albeit that they are only tangentially related to the topic of decarbonisation.

The first is the matter of repairs and services. The current scheme provides for the first annual service but thereafter these become the responsibility of the householder. It is uncertain (to us) how many boilers fall into disrepair owing to poor maintenance or how many have to be replaced owing to a minor repair not being done at the right time. However, exploring this and creating a programme for subsidised or funded services and repairs may extend the efficient life of a number of boilers.

The second is the matter of stand-alone loft insulation. This is something we receive a number of enquiries about but there are no schemes currently running that provide this. Instead the insulation needs to be part of a package with a new boiler / heating system. Again, there may be merit in exploring this as an element to a new programme, allowing those homes that are poorly insulated and therefore inefficient to heat, but which have a functioning heating system to make their homes warmer and more affordable to heat.