

All-Party Parliamentary  
**carbonmonoxide**  
 Group



## All-Party Parliamentary Carbon Monoxide Group

### Briefing following a parliamentary roundtable on Vulnerability, Fuel Poverty and Carbon Monoxide

#### About the All-Party Parliamentary Carbon Monoxide Group (APPCOG)

The All-Party Parliamentary Carbon Monoxide Group (APPCOG) is the leading forum for Parliamentarians from both Houses and all parties to work together discuss ways of tackling carbon monoxide (CO) poisoning, improve government policy on carbon monoxide safety, and raise public awareness of the threat posed by deadly CO gas.

Through its busy programme of events and research, the APPCOG seeks to push the vital issue of CO safety up the political agenda. In doing so, the APPCOG works closely with a coalition of CO campaigners, charities and energy industry companies committed to tackling CO poisoning in the APPCOG Stakeholder Forum. The Group also connects Parliamentarians with specialist advice from its working groups, which are made up of medical, healthcare, science and research, and communications professionals. Recent reports by the APPCOG include *'Carbon Monoxide Alarms: keeping tenants safe and secure in their homes'* and *'Carbon Monoxide Poisoning: saving lives, advancing treatment'*.

#### Background and Methodology

This briefing was prepared following a Parliamentary roundtable held in October 2018. The discussion was chaired by Liz Twist MP and brought together leading figures from across the CO safety and fuel poverty sectors. The groups attending the roundtable were:

- London Fire Brigade
- Citizens Advice
- Northern Gas Networks
- Gas Tag
- The Committee on Fuel Poverty
- The Department for Business, Energy and the Industrial Strategy (BEIS)
- National Energy Action
- Local Authority Building Control
- Liverpool John Moores University
- Plymouth Energy Community
- Policy Connect
- Chartered Institute of Environmental Health

The conversation focused on four main strands of discussion: -

- What factors lead to fuel poverty and increased risk of CO poisoning;
- How to raise awareness of CO risks amongst the most vulnerable;
- The importance of partnership working and better data usage in tackling fuel poverty and the associated CO risks; and,
- How to make existing support more accessible to those in fuel poverty.

Before the roundtable, participants were sent a background briefing document outlining existing research into the links between carbon monoxide and fuel poverty, as well as the latest BEIS statistics on fuel poverty in

England. Because fuel poverty and housing are devolved responsibilities, the roundtable focused on policy in England.

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## Factors contributing to fuel poverty and increased CO risk

National Energy Action estimates that 3.5 million households in the UK are affected by fuel poverty – approximately 12.9% of all households<sup>1</sup>. In England, a household is considered to be in fuel poverty if they have required fuel costs above the national median level, and if were they to spend that amount they would be left with a residual income below the official poverty line; this is known as the Low Income High Cost definition<sup>2</sup>. In 2016, BEIS estimated that 2.55 million English households were in fuel poverty, up 0.1% from 2015. The average fuel poverty gap in England was £326<sup>3</sup>.

Whilst most homes in England do have central heating systems, the prevalence of secondary heating systems such as gas fires and wood-burning stoves is still relatively high. Whilst some homes use secondary heating systems such as a log fire for comfort or aesthetic appeal, there are also homes that are reliant on these heating systems. This is often due to structural or financial difficulties making them unable to heat their homes sufficiently with central heating. These difficulties could be one or a combination of: an insufficient central heating system; low household income; and health conditions or other vulnerabilities increasing susceptibility to cold. Households which are reliant on secondary heating sources are more likely to be in fuel poverty and spend longer amounts of time inside their homes.

BEIS data shows that households living in older dwellings and poorly insulated homes are more likely to be fuel poor<sup>4</sup>. Fuel source also has a large impact on fuel poverty. 80.8% of those living in fuel poverty are on the gas grid (compared to 84.9% of the population in total), however those who live off the gas grid are 1.5 times more likely to be fuel poor, and their average fuel poverty gap is nearly twice that of those connected to the gas grid<sup>5</sup>.

Those in fuel poverty tend to exhibit certain behaviours which increase their risk of CO poisoning, particularly around the lack of servicing of appliances and the reliance on older, more risky heating appliances for both central heating and secondary appliances. Servicing of appliances serves a dual purpose: firstly, it makes appliances more efficient and cost effective; and secondly, it also makes them safer and less likely to emit CO. Experts at the roundtable spoke of the ‘Heat or Eat’ mentality - those who could not afford to heat their homes sufficiently were unlikely to prioritise things like getting their appliances serviced. A significant factor in the lack of servicing amongst vulnerable customers was also the fear of old appliances being condemned. This could leave homes without any heat and unable to afford replacements.

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## How to support those vulnerable to fuel poverty and CO poisoning

### Better data

Gas Distribution Networks (GDNs) are obliged to connect a certain number of off-gas homes to the gas grid in a scheme known as the Fuel Poor Network Extension Scheme (FPNES). Natural gas is a cheap and relatively safe fuel to burn to heat the home and can therefore help tackle both fuel poverty and CO risks. However, there are a number of challenges associated with the delivery of the FPNES, such as finding those who are most in need, and ensuring that those who are connected to the gas grid can then afford or access other upgrades to their heating systems.

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<sup>1</sup> National Energy Action, *Fuel Poverty Statistics*, 2018, <https://www.nea.org.uk/about-nea/fuel-poverty-statistics/> (accessed 11<sup>th</sup> October 2018)

<sup>2</sup> BEIS, *Annual Fuel Poverty Statistics*, 2018, 2018, p.6, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719106/Fuel\\_Poverty\\_Statistics\\_Report\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719106/Fuel_Poverty_Statistics_Report_2018.pdf) (accessed 11th October 2018)

<sup>3</sup> Ibid., p. 3

<sup>4</sup> Ibid., p. 4

<sup>5</sup> Ibid., p. 44

A key theme that emerged around identifying the most vulnerable consumers was that of more effectively using data to map where vulnerable people live. In the summer of 2018, the eligibility criteria for the FPNES were edited so that residing within the 25% most deprived areas was no longer a factor for households being eligible for a connection<sup>6</sup>.

This amendment was designed to ensure that the FPNES is targeted at those who are in fuel poverty, which has different criteria to deprivation measures. However, participants expressed concern that this was making it harder for GDNs to successfully find those in need of the scheme, and reduced its cost-effectiveness as some projects could struggle to reach a critical mass of connections.

This difficulty in identifying households in need is compounded by the fact that different utility providers and networks, local government organisations, housing associations, fire and rescue services, health organisations, and the Department for Work and Pensions often cannot share data on vulnerable consumers, especially under the General Data Protection Regulation (GDPR).

This seems particularly inefficient under the Priority Services Register (PSR) model, with different utility providers holding data on the same vulnerable households who they have responsibilities to. By not being able to access or share data - or in the case of GDNs, maintain their own PSR - utility suppliers and networks are missing households who may be in need of other services. By expanding collaboration between government and those providing different energy and fuel poverty services, those most in need can be more effectively reached and supported to make key upgrades to their homes and access other essential services.

One caveat to increased sharing of other organisations' data, with permission, is that existing data sets are incomplete. Relying on welfare and PSR data alone is insufficient, as approximately 30% of those in fuel poverty do not receive any benefits, and 90% of those eligible to be on a PSR are not. Therefore, there must be continued and increasing efforts to raise awareness amongst those in fuel poverty of the support available to them, and how they can combat CO risks.

**FINDING: Government should audit what types of data is held on those in fuel poverty or vulnerable circumstances by various organisations (i.e. councils, housing associations, local authorities, energy suppliers, energy networks, other third party organisations), with a view to streamlining referral pathways and building a more comprehensive map of the where the most vulnerable people live to target support.**

## Use of partnerships

A major theme that emerged from the discussion was the importance of forming closer partnerships between those delivering fuel poverty schemes and local organisations who work with people in fuel poverty. This could include third sector organisations and frontline public services.

This model is already used by some local governments and energy networks to deliver support to the most vulnerable. Partner organisations - or trusted intermediaries as they are sometimes called - usually already have an established presence and reputation in communities. They are able to use their expertise and networks to identify those eligible for a network connection or other support schemes (such as the Energy Company Obligation (ECO)), and then pass on the referral to the provider. In some circumstances, the partner organisation also supports the customer through the installation process, for example if the customer is particularly vulnerable or unable to navigate the complex referral process alone.

The trust placed in third sector organisations and frontline services, like fire and rescue, means that partnerships can dramatically increase the uptake of programmes amongst those in traditionally hard to reach areas. This is partly because there is no suggestion of being sold something (which is a considerable challenge for corporations, even when offering a free service). Some trusted intermediaries are already being trained by

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<sup>6</sup> Ofgem, *Decision to change the criteria for the Fuel Poor Network Extension Scheme*, 2017  
<https://www.ofgem.gov.uk/publications-and-updates/decision-change-criteria-fuel-poor-network-extension-scheme>

GDNs on how to spot signs of CO poisoning and offer free advice to vulnerable consumers, as they are more likely to be welcomed into the home. This can also work in reverse and some GDNs have already begun training their gas engineers to spot the signs of vulnerability in customers so they can then refer the customer on to other relevant support services.

Participants felt that such collaboration should be further encouraged and recognised by Ofgem, either by increasing the significance of partnerships in energy networks' and suppliers' reports to Ofgem, or Ofgem setting targets for partnership working as part of the energy networks' price controls. However, for such partnerships to be truly effective some ECO and other referral pathways need to be streamlined to ensure that the most vulnerable do not face prolonged delays in receiving support.

**FINDING: Ofgem should explore ways to encourage partnership work between GDNs, energy suppliers and third party organisations as part of the RIIO price control period. These partnerships could cover both referrals and support services to tackle fuel poverty and CO and improved communications around CO.**

### **Awareness raising and trusted intermediaries**

A major barrier to helping those at risk of fuel poverty and CO poisoning is the lack of awareness amongst all consumers – but particularly those in more vulnerable situations - about the risks of CO. This can lead to people taking unnecessary risks including blocking vents, burning unsuitable solid fuels such as barbeques indoors, and not getting appliances serviced. Consumers are also unaware about what support is available to them from energy providers and networks. As mentioned above, approximately 2% of households are on a PSR, despite 20% being eligible. This means that the most vulnerable customers are missing out on essential support such as alternative energy provision in a power cut or free gas safety checks.

There were two common suggestions for increasing public awareness of the support available to vulnerable customers and the risks of CO. Firstly, participants called for increased investment into CO public awareness campaigns and dedicated spending to promote energy efficiency and fuel poverty programmes like the PSR, ECO, Warm Homes Discount etc. Secondly, they reiterated the value of partnership work. By working with trusted local partners to install CO alarms, promote awareness messaging, and signpost fuel poverty measures, energy suppliers and distribution networks are able to raise awareness of CO risks and increase uptake of free CO alarms and support services significantly more than if they had been working alone.

**FINDING: Industry, government, fire and rescue services and fuel poverty organisations should adopt a more joined-up approach to CO awareness messaging with clearer sign posting to information and support.**

### **Scrutiny of private landlords**

40% of the English population lives in the private rented sector. Legally, landlords are responsible for ensuring that any gas appliances are checked annually and CO alarms are installed wherever there is a solid fuel burning appliance. However, roundtable participants shared worrying experiences of landlords not regularly servicing gas appliances and failing to ensure that homes had sufficient safety equipment or adequate heating mechanisms. This was particularly troubling for vulnerable or low income tenants, as many feel unable to report faults in the home for fear of eviction.

Local Authority funding cuts were also an area of concern, as they significantly reduced their capacity to enforce health and safety and fitness for habitation regulations. Suggestions for improvement included the introduction of a national landlord database, and the mandatory annual submission by landlords of their gas safety certificates for all properties to their local authority.

Participants discussed landlords' responsibilities to improve energy efficiency of privately rented homes under the Minimum Energy Efficiency Standards regulations. By making the homes in which vulnerable people live more fuel efficient, there would be a reduction in energy costs and associated CO risks. At the time of the roundtable, landlords were unable to rent out properties with Energy Performance Certificate rating below E; however, they could apply for an exemption if they could not find external funding for energy efficiency improvements. BEIS was consulting on removing these 'no cost to the landlord' exemptions and mandating that landlords had to spend up to £2,500 to ensure homes met energy efficiency rating E. However, participants felt that this was too low, and should instead be £5,000. Since the roundtable, the price cap has been set at £3,500.

## Contact Details

For more information about the work of the APPCOG, Policy Connect and other issues, please contact:

**Georgina Bailey**

Carbon Monoxide Safety Policy Manager

[georgina.bailey@policyconnect.org.uk](mailto:georgina.bailey@policyconnect.org.uk)

0207 202 8586