



**DWP BELOW AVERAGE RESOURCES CONSULTATION
END FUEL POVERTY COALITION RESPONSE
11 April 2024**

The End Fuel Poverty Coalition is a [broad coalition of more than 70 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We broadly welcome the work undertaken to develop the Overarching Measurement Framework proposed by the Social Metrics Commission and its development by DWP. Embracing a more nuanced poverty measurement fosters deeper comprehension, empowering policy makers and charities to more effectively tackle poverty's underlying causes.

There are some welcome features - for example, taking account of capital, the costs of disability, childcare and some debts. The publication of poverty gap data will also be welcome as will and the inclusion of lived experience measures.

A further crucial development would be to take into account domestic energy costs.

The impact of living in cold damp homes - which is often linked to the high cost of energy - is now more widely understood. [1] We have had reports of disabled people unable to afford to charge their wheelchairs, patients with long term illnesses running up huge energy debt to keep their vital equipment running or having to turn to the NHS as health conditions deteriorate.

Sadly it has also become much more widespread with Warm This Winter campaign research finding that a third of the UK population (29%, 15.4m people) experienced mould in their homes frequently or occasionally in winter 2023/24. [2]

Indeed, the situation is so severe among vulnerable groups that two-thirds (61%) of children's social workers have witnessed young people living in conditions with excessive levels of mould according to new research among members of the Social Workers Union. [3]

Households are priced out of energy, with many saying they would need an additional GBP73 a month to be able to heat their homes. [4] And they are also priced out of the steps which could alleviate energy poverty in the long run. Nearly four in 10 UK households (39%) say they cannot afford to insulate their homes, according to new data commissioned by the Warm This Winter campaign. [5]

And, of course, for those households on prepayment meters the situation may be even worse with energy clicking off leaving them in dark, cold homes.

It may be that these costs can be included in housing, childcare or disability costs and we would be grateful if the Department could keep us informed of any more work on the development of these measures.

Finally, we would also urge the inclusion of household energy debt within the “inescapable debt costs” metric.

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 70 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Action with Communities in Rural England](#), [ACE Research](#), [Advice for Renters](#), [AgeUK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), [Brighton & Hove City Council](#), Bruton Town Council, [Camden Federation of Private Tenants](#), [Child Poverty Action Group](#), Church Poverty Action, [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), [Debt Justice](#), Disability Poverty Campaign Group, [Disability Rights UK](#), [E3G](#), EBICO, [End Child Poverty Coalition](#), [Energy Saving Trust](#), Energy Cities, Fair Energy Campaign, [Epilepsy Action](#), [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Good Law Project](#), Greenpeace, [Groundwork](#), Hackney Foodbank, [Heat Trust](#), Home Start Oxford, [Independent Age](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), London Borough of Lewisham, Marie Curie, [Mayor of London](#), Moorland Climate Action, [National Pensioners Convention](#), National Union of Students / [Students Organising for Sustainability](#), NCB, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, Right To Energy Coalition, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stonewater Housing Association](#), [Stop The Squeeze](#), Uplift, [UNISON](#), Warm & Well North Yorkshire, [Warm & Well in Merton](#), [Young Lives vs Cancer](#).

The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#) and the Coalition is also part of the [Warm This Winter](#) campaign. In Scotland we work closely with [Energy Action Scotland](#). In Wales, we work with [Climate Cymru's Warm This Winter](#) activity and in Northern Ireland with the NEA-backed [Fuel Poverty NI coalition](#).

Contact: info@endfuelpoverty.org.uk

- [1] <https://www.endfuelpoverty.org.uk/about-fuel-poverty/>
- [2] <https://www.endfuelpoverty.org.uk/households-at-risk-from-mould-in-cold-damp-homes-crisis/>
- [3] <https://swu-union.org.uk/2024/04/social-workers-report-children-living-in-dangerous-conditions/>
- [4] <https://www.endfuelpoverty.org.uk/struggling-households-need-73-a-month-to-keep-warm-this-winter/>
- [5] <https://www.endfuelpoverty.org.uk/public-priced-out-of-essential-warm-home-measures/>