

A Snapshot of Social Housing

Energy efficiency and fabric



**citizens
advice**

**East Dorset
& Purbeck**

Full report

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Summary

This 'Snapshot of Social Housing' explores clients' problems which are related to the condition of the fabric and the energy efficiency of their social housing.

The study looks at the causes of the problems and identifies what some of the social housing providers (SHPs) are doing to improve the energy efficiency of their properties. By gathering and analysing this evidence, we hope to understand where problems arise and make suggestions of ways to reduce them.

It is based on a sample of 63 clients, all tenants of SHPs, who had received our advice at some time over a period of two months in 2021 (October and November) and who had particular problems with the fabric of their social housing or their heating system. Four out of five of the households in the study had one or more people with a disability or health conditions. For each client we categorised their problems and recorded details from their dwelling's Energy Performance Certificate (EPC), where it existed. SHPs were contacted to find out their plans and priorities for upgrading the energy efficiency of their housing stock.

The two main problems that clients experienced were affording their energy and the long waits they had for a repair or upgrade to be done.

In many cases, a client would have afforded their energy bills more easily if they had understood or known how to control their heating better. SHPs do not always give this information to new tenants.

SHPs should keep written instructions for the controls of all heating appliances in their properties, give a relevant copy to all tenants when they move in and demonstrate how the controls are used.

Delays were beyond the clients' control and were a very significant aspect of many of their experiences. SHPs were difficult to contact and sometimes raised expectations of future improvements to the property that didn't materialise for several years.

SHPs should show much more resolve in dealing promptly with disrepair. They should take steps to be more accessible to their tenants and refrain from raising false expectations of improvements that can't be met.

SHPs are making ambitious plans to improve the energy efficiency of their properties but there is evidence that some could be giving less priority to tenants who have a history of rent arrears.

When rolling out energy efficiency programmes, we urge all SHPs to have policies that are based primarily on the condition of a property and don't disadvantage different groups of tenants.

Some tenants with disabilities said they had extra need for a home that is always warm.

Where there is a choice of retrofitting different properties of equally evaluated requirements, SHPs could start with ones occupied by occupants with particularly high energy needs due to their disability.

We found that an EPC banding of C or above did not always protect the occupier from problems arising from poor energy efficiency. EPC assessors were found to have made mistakes or false assumptions about features of the dwelling and they do not have a mechanism for taking account of how well the heating and its controls were working. There is general distrust of EPC banding levels and evidence that they are not always reproducible.

The government should ensure better regulation of EPC assessors. It should introduce an assessment of how well a property's heating system and controls are actually working, which is reported separately from the EPC.

The government's definition of fuel poverty for statistical purposes using the LILEE indicator (Low Income Low Energy Efficiency), excludes households living in a dwelling at EPC band C or above. With doubt about the accuracy of EPC assessments and the fact that they don't take account of poorly functioning heating systems, there are questions about the appropriateness of this definition.

The government should remove the link to a low EPC banding in its definition of fuel poverty.

The study did not use a representative sample of all the tenants of SHPs, only those who were experiencing problems with the fabric of their homes and the heating systems. To examine some of the issues more thoroughly a study with a more representative sample and a more rigorous protocol would be needed.

Introduction

Advisers at East Dorset and Purbeck Citizens Advice are well aware of the pivotal role that the condition and energy efficiency of housing has on the lives of their clients. It can impact both their physical and mental health.

This has become even more evident due to the increasing cost of energy, exacerbated by other financial stresses such as the reduction in Universal Credit, periods of reduced pay during the pandemic and general increases to the cost of living. Ever more people who struggle to heat their homes adequately are being referred for advice.

Citizens Advice in East Dorset and Purbeck, run a number of funded projects to help clients who have problems specifically with energy issues; for example, struggling to afford their energy costs, problems with meters and heating controls, and faulty heaters. Clients from all over Bournemouth, Christchurch and Poole (BCP) and the Dorset council area are referred to these advisers, who have a very good overview of the problems and their causes. In October and November 2021 (the period of the study), they advised 364 clients under these projects, with six advisers. This was 54% more clients than in the same two months of the previous year when there were four advisers and it demonstrates the scale of the increase in demand between the two years.

This study was driven by the desire to understand more about the condition and energy efficiency of the homes of clients who were tenants of social landlords, to look at the resulting impact on them, and to learn about the way in which landlords were dealing with repairs and energy efficiency upgrades. By gathering

and presenting this local evidence, we hope to reinforce the resolve of both government and local social housing providers to implement policies that can bring early improvements to the condition of housing stock and the lives of people who live in them.

The focus in this pilot study has been entirely on social housing. Although the condition of private rental properties is generally lower¹, we feel that there is more opportunity to influence social housing providers because they are not-for-profit organisations and have a remit to provide affordable and secure homes.

Background

Fuel poverty

Households are said to be in 'fuel poverty' when they are living on a low income in a home which cannot be kept warm at reasonable cost. Fuel poverty can mean making a choice between energy and other essentials or falling into debt and, for some, the result is living in a cold home, with the accompanying negative impacts on health and wellbeing².

In order to track and tackle fuel poverty, the government has used different ways of defining fuel poverty over the years. In February 2021 the LILEE³ indicator was introduced, which finds a household to be fuel poor if it:

- has a residual income below the poverty line (after accounting for required fuel costs)
- and*
- lives in a home that has an energy efficiency rating below band C.

This definition is used when conducting surveys to provide statistics used by the government and others to target and track policies on fuel poverty. It involves a

¹ Gov.uk, [English Housing Survey: headline report](#), page 32, December 2020.

² Gov.uk, [Sustainable warmth: protecting vulnerable households in England](#), page 9. February 2021.

³ Gov.uk, [Sustainable warmth: protecting vulnerable households in England](#) page 10 with footnote for definition of terms. February 2021.

complex assessment of a household's characteristics and is not used to identify individual households in fuel poverty⁴. So, in practice, our advisers have a more practical way to identify clients in fuel poverty and this may depend on which grants they are accessing to give financial assistance for improvements in energy efficiency measures or direct help with fuel bills. As a general rule of thumb, a household can be considered to be in fuel poverty if its energy costs are over 10% of the household income, less any extra disability benefits that are claimed.

Any sudden increase in energy costs automatically puts more households into fuel poverty. In October 2021 the 12-month inflation rate for electricity was 18.8% and that for gas was 28.1%⁵. It has been suggested that in 2022 there will be even higher increases, with annual energy bills paid by the typical customer going up from the current level of £1,277 to between £1,890 and £2,240 in 2022⁶. That is, by between 48% and 76%.

Although the energy price cap protects customers paying standard variable rate energy tariffs to some extent, it is reviewed and reset by OFGEM twice yearly. Unless the government intervenes, the price cap is anticipated to rise by £700 in April 2022, about a 50% increase, affecting around 11 million households on default tariffs⁷.

These price increases will bring many more households into fuel poverty as well as worsening the situation of those who are already in fuel poverty. However, increases in energy prices aren't as hard hitting in an energy efficient home compared to an energy inefficient household.

Energy efficiency of housing

Good energy efficiency of housing is vital to keep energy costs down and government regulations prescribe the levels of energy efficiency to which new

⁴ Gov.uk, [Fuel poverty methodology handbook \(low income low energy efficiency\)](#) page 3, April 2021.

⁵ Gov.uk, [Consumer price inflation, UK: November 2021](#), December 2021.

⁶ UK Parliament, [Rising energy costs: the impact on households, pensioners and those on low incomes - House of Lords Library](#), December 2021.

⁷ Citizens Advice, [Soaring price cap set to leave energy bills as a proportion of benefits levels at 'generational high'](#), January 2022.

homes should be built. Over the years the levels have increased and in June 2022 new standards will result in a 31% reduction in carbon emissions compared to current standards. Then, from 2025, new regulations will be introduced through the Future Homes Standard⁸ which will require all new homes in England to be ready for net zero emissions.

But older homes are generally much less energy efficient than new ones and likely to be in need of extensive retrofitting measures before they change hands. This is because the government introduced Energy Performance Certificates (EPCs) as a way of describing and measuring energy efficiency in terms of cost. With few exceptions, the owners of most buildings are required to make an EPC available to prospective buyers or tenants before their property is sold or rented out and this gives a strong incentive to have an EPC showing good energy efficiency.

The EPC gives the overall energy efficiency score out of 100 which has been computed from a complex algorithm using data supplied by an accredited assessor who visits the building and assesses the energy efficiency of different features. The assessed features include: walls, roofs, floors, windows, heating systems and controls, hot water and lighting. According to the score, the building is allocated a band from A (highest efficiency) to G (lowest). The EPC is then valid for a period of 10 years from the date of inspection.

Figure 1 shows an example of a section of the EPC of a newly built home, which has a current assessed score of 86, putting it into band B. The full EPC states what energy efficiency measures could be taken and the resulting potential score and band. Here, the potential is shown to be a score of 97 and band A.

Figure 1. Section of an EPC

Score	Energy rating	Current	Potential
92+	A		97 A
81-91	B	86 B	
69-80	C		
55-68	D		
39-54	E		
21-38	F		
1-20	G		

⁸ Gov.uk, [Net Zero Strategy: Build Back Greener](#) page 146, October 2021.

As well as having to provide an EPC to prospective tenants, private landlords (with few exceptions) must ensure that all their lettings have an EPC at band E or above, unless the necessary improvements to reach this band would cost more than £3,500.

No such requirement about EPC level currently applies to social landlords.

However, their housing has to comply with the Decent Homes Standard which sets a minimum quality for social homes. The Standard does not currently include minimum EPC ratings but is in process of being reviewed to ensure that it supports the decarbonisation and improvement of energy efficiency of social homes, making them resilient to climate change⁹.

In October 2021, the government published its '*Net Zero Strategy: Build Back Greener*'. Amongst the key commitments¹⁰ were:

- upgrading **fuel poor homes to EPC band C by 2030** where reasonably practicable,
- consulting on phasing in higher minimum performance standards to ensure **all homes meet EPC band C by 2035**, where cost-effective, practical and affordable.
- considering setting a **long-term regulatory standard for Social Housing**, subject to consultation.

With possible regulatory standards for minimum EPC rating on the horizon, many social landlords are in the process of reviewing their housing stock, making plans and implementing retrofitting measures. This is a huge and expensive operation for which the government has provided some limited finance.

⁹ Gov.uk, [The charter for social housing residents: social housing white paper](#) page 54 – 55, November 2020.

¹⁰ Gov.uk, [Net Zero Strategy: Build Back Greener](#) page 135 -136, October 2021.

Limitations of the Energy Performance Certificate

It would appear that the EPC band would be a good way of knowing how energy efficient a building is. The Standard Assessment Procedure¹¹ (SAP) on which it is based takes account of a very wide range of variables for the building, with values to be selected from many tables.

But although in theory this should result in an accurate assessment, in practice this is not necessarily the case. Not all of the variables can always be accessed or evidenced. Instead, standardised estimates are often made, based on the minimum building regulations in force when the building was built, but which may not be correct for that particular property. It is common to see EPCs where descriptors are stated but followed by the proviso, 'assumed'.

There is evidence that assessments do not give consistent results, with different assessors producing widely different ones. This is described in a later section of this report, 'Social Housing Providers' plans and priorities'.

Many buildings have had energy efficiency improvements made over recent years so, with EPCs being valid for 10 years, there may be some that underestimate the current energy efficiency of the building. Alternately, if features have deteriorated, the banding will now be too high.

How the Snapshot was taken

This Snapshot includes information about: **Social Housing Providers (SHPs)** whose tenants we have advised; the **clients and their specific problems** to do with their social housing; and the **energy efficiency** of those clients' homes.

We started by writing to the SHPs who were likely to have clients in the study to ask what they were doing about improving the energy efficiency of their housing

¹¹ Building Research Establishment, [The Government's Standard Assessment Procedure for Energy Rating of Dwellings](#), October 2013.

stock and how they were choosing which properties to upgrade first. We had previous evidence that the choice might not always be made in a fair way, so we also asked whether a tenant's history, such as rent arrears or behaviour, might influence priority. There was one SHP that we didn't write to because their annual report stated this clearly.

Although we provide an overall list of all the SHPs who have tenants in the study, each is then referred to individually using a randomly generated descriptor (SHP1, SHP2 etc) because, with the small, unrepresentative sample of clients, comparisons between the SHPs would not necessarily be fair.

Clients were included in the study if they met all of the following four criteria:

1. Advised any time between 1 October 2021 and 30 November 2021 by any adviser at East Dorset and Purbeck Citizens Advice,
2. The advice had a case heading that indicated an issue about housing repairs or energy,
3. Tenants of a social housing provider that had been identified in their casenotes,
4. The issue involved a problem relating in some way to the fabric of their home or their heating system.

These problems were then categorised under the following ten types, with most households experiencing more than one:

- Heating repair needed (including controls and thermostat)
- Unsatisfactory heating type or controls
- Use of the heating controls
- Property repair needed (this also included repairs unrelated to energy efficiency)
- Retrofit identified as needed (either by client, adviser or the SHP)
- Lengthy waiting time for SHP action
- Poor quality repair or retrofit
- Cold home
- Damp/mould
- Energy affordability

It can be seen that the last three categories are likely consequences of some of the others and that categories could be interrelated.

The categories were decided following a meeting with the energy project advisers who had worked with many of the clients in this study. The advisers told us about the key issues they'd seen arising from problems with the fabric of a dwelling and its heating system and their experience and insights greatly added to our own understanding. Many of these insights are included in this report.

The client data was gathered retrospectively by reading the casenotes and extracting the relevant information. This included information about the ten categories of problems that the clients encountered and also an indication of the occurrence of disability in the household.

Case studies to demonstrate particular client problems were selected to include in this report but they have been anonymised by altering some client descriptors.

Information about the energy efficiency of each household's home was gathered from the dwelling's EPC¹², when it existed. All EPCs are available online unless the householder has opted out of it being viewed by others.

The Snapshot

Clients in the Study

In the two-month period covered by the study, there were 63 clients who matched the four criteria and whose data was included. They were all clients who had experienced problems that were related to the poor fabric or heating systems of their social housing.

¹² Gov.uk, [Find an energy certificate - GOV.UK](#)

With the role of housing being a well-established determinant of health¹³ and our underlying interest in the profile of our clients, we analysed the incidence of disability and poor health in the households in the study.

Looking for evidence in their case record of mental or physical disability or a serious health condition, (all of which we will now refer to as a disability), we found that 86% of the households in the study included one or more people with a disability. Figure 2 indicates how the 86% was broken down between households, according to the person with the disability: households where there were other(s) in addition to the client; where it was only the client; and where another person(s) in the household had a disability but not the client.

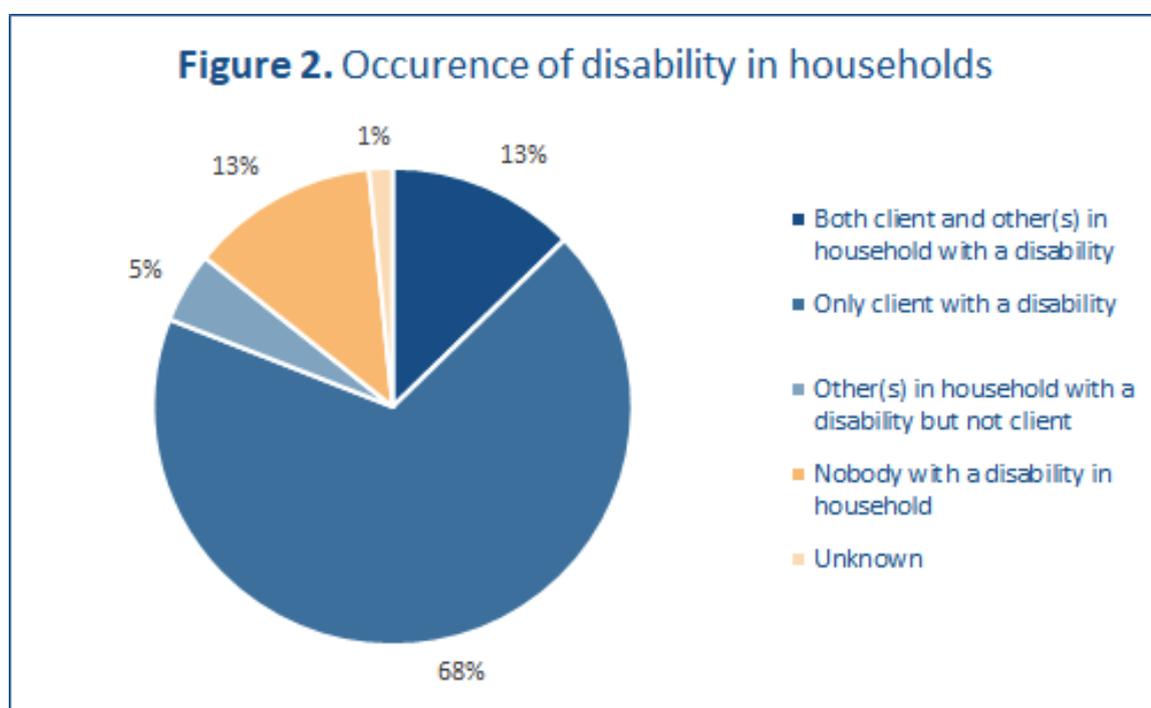


Figure 2 shows that 81% (68% + 13%) of the clients in the study had some sort of disability/condition. This is a very high percentage; higher than the 66% of all East Dorset and Purbeck Citizens Advice clients who were advised over the period of the study and whose disability status was recorded in their profile. However, to be allocated social housing, a household has to show some priority, so it is not surprising that, overall, tenants living in social housing have a higher occurrence of disability than those who do not.

¹³ Rolfe, S. et al., [Housing as a social determinant of health and wellbeing: developing an empirically-informed realist theoretical framework](#) | BMC Public Health, July 2020.

The casenotes revealed that many of the households in the study had very serious and multiple health conditions to contend with, no doubt making it very difficult to deal with other problems as well. On occasions some clients, especially those with mental health issues, were, at times, completely overwhelmed by their situation and were unable to continue engaging with the adviser for a while.

In some of the casenotes, reference was made to the fact that heating costs were high because the client's condition restricted them leaving the home or could be managed better if they were warm. One of the clients explained that their condition entailed running extra electrical equipment and aids which contributed to the cost of their energy. While this wasn't related to their home's energy efficiency it did show how people with disabilities can incur extra costs that contribute to them being in fuel poverty.

The Clients' Social Housing Providers

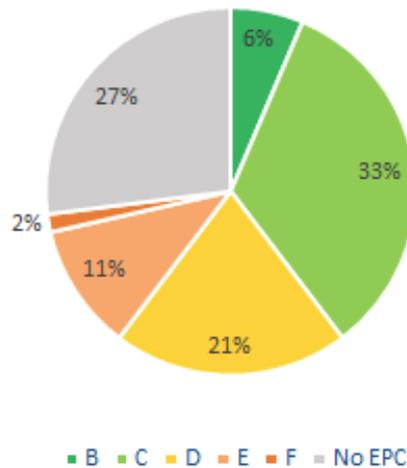
Listed in alphabetical order, the SHPs of clients in the Study are: **Abri, Aster, BCP Council, Bournemouth Churches Housing Association, East Boro Housing Trust, Housing 21, Magna Housing, Poole Housing. Partnership, Sovereign, and Stonewater.** They are referred to in the Figures with a random descriptor, unrelated to the order in this list.

Energy Performance Certificates (EPC)

1. Occurrence of different EPC bands

Figure 3 shows the percentages of clients' homes in the study with different EPC bandings, with the grey area representing those homes that have never had an EPC. Since 2008 it has been obligatory for landlords to obtain and provide a valid EPC to new tenants, so the 27% with no EPC probably represents clients who had been tenants since before this date. The dwellings without an EPC are generally likely to have an energy efficiency corresponding to a lower band EPCs because they would have been built before 2008 when building regulations stipulated lower standards of energy efficiency than they do now.

Figure 3. EPC band of all dwellings in the Study



There were no clients in the study whose dwelling was in band A or G, so the range went from B to F. Most of the bands include dwellings which have an EPC but it has expired, with more than 10 years having elapsed since the assessment. And with SHPs already taking measures to improve the energy efficiency of their stock, the bands for some dwellings may be lower than they would be if the dwelling were assessed now.

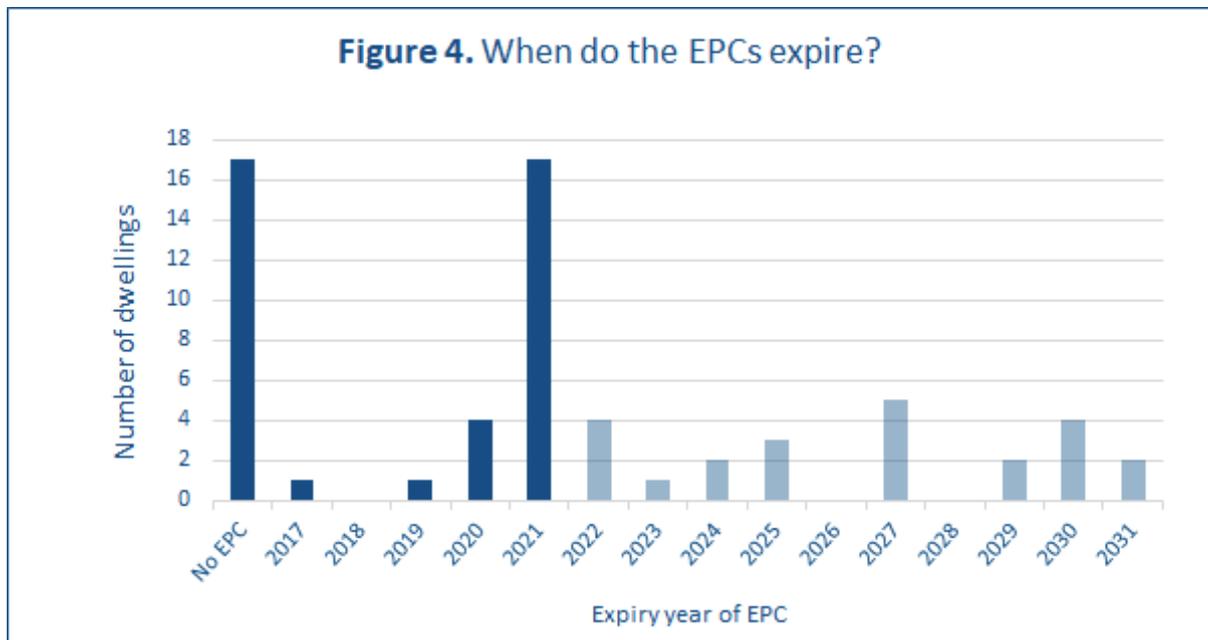
Figure 3 shows that over a third (39%) of the clients in the study live in a home with an EPC band C or above. There were two clients in the study whose problems were entirely to do with repair issues, unconnected with energy efficiency but when these two were removed from the analysis, the percentage of clients in band C and above did not change.

We were surprised that over a third of the clients in the study had energy efficiency problems while living in a dwelling at EPC band C or above, which is the target that the government considers appropriate for all dwellings by 2035. However, if the SHPs in the study have more dwellings in the higher ECP bandings than the lower bands, then there would be a correspondingly higher number of tenants in these higher banded dwellings to have problems. This is because the study only included clients who were experiencing problems and did not look at a representative sample of the SHPs' tenants so, Figure 4 should be interpreted with caution.

There were two SHPs that replied to our enquiries about their energy efficiency programmes and gave us information from which we could deduce the current percentage of their homes that were at EPC band C or above. For both SHPs the current percentage appears to be about 75%, meaning that they have three times as many households living in homes at the higher ECP banding than they have households below it. If other SHPs have a similar ratio, this might go some way to understanding how as many as a third of clients in the study lived in a home at the target banding yet still experienced energy efficiency problems with their home. However, we still consider this issue to be an important one that warrants further unravelling.

2. Expiry date of the EPCs

The range in the date of expiry of all the EPCs in the study is shown in Figure 4, where households without any EPC or where it has expired are shown in dark blue and the ones with a valid EPC in light blue.



Only 23 out of the 63 households in the study had a valid EPC. SHPs are only required to provide a valid EPC to a tenant when the dwelling is newly let or about to be let, but the low number of valid EPCs does indicate something of the

extent of work needing to be done by SHPs as they assess their housing stock and make plans for its improvement.

EPCs give a description of the different features of the building that have been assessed and label each feature as either 'very good', 'good', 'average', 'poor', 'very poor' or 'N/A'. The description of a feature includes the word 'assumed' if the assessor hasn't been able to physically access it. For roofs, the energy efficiency is unknown when there is another floor above, so the description states this and the label given is 'N/A'.

For each client in the study who had one, we recorded information about six basic features of their dwelling's EPC, as shown in Table 1 below. For each, the extent of 'assumed' descriptions and 'N/A' labels is given as a percentage of all 46 EPCs in the Study (valid and invalid), with the two not overlapping.

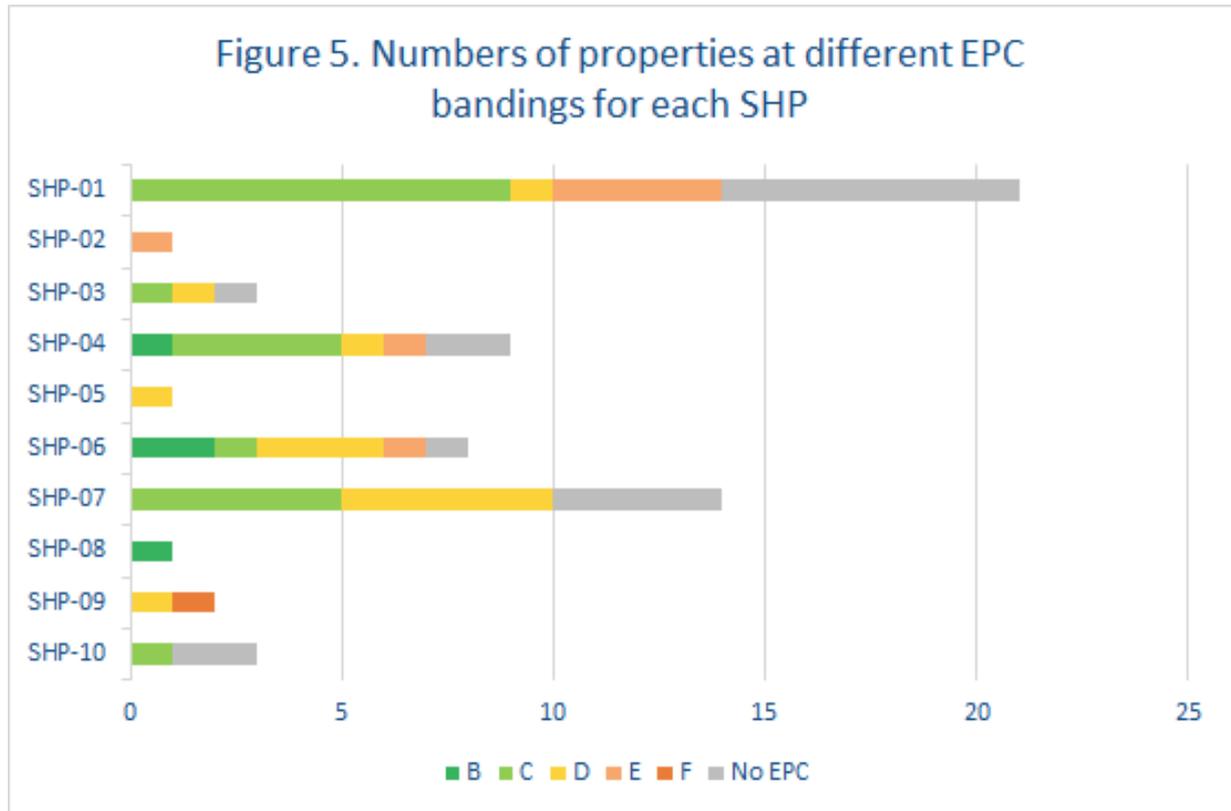
Table 1. Percentage EPCs in Study where features were not fully assessed.

Building feature assessed	% of EPCs where feature 'assumed'	% of EPCs where feature N/A	Total % of EPSs where feature not fully assessed
Walls	46	0	46
Roof	15	26	41
Windows	0	0	0
Main Heating	0	0	0
Main Heating Control	0	0	0
Hot water	0	0	0

Somewhat under half of all the walls and the roofs in the study had not been fully assessed and this finding contributes to our reservations about the dependability of EPCs.

All figures in this report that include information relating to EPCs should therefore be treated with some caution because of the possibility that the EPC bands do not reflect the current efficiency and the fact that not all assessments have been fully made.

Having given this proviso, Figure 5 below is included because it does show the distribution of EPC bands between the SHPs in the Study. With questionable EPC bandings and the fact that some SHPs have low numbers of tenants included, it isn't possible to draw general conclusions from this Figure.

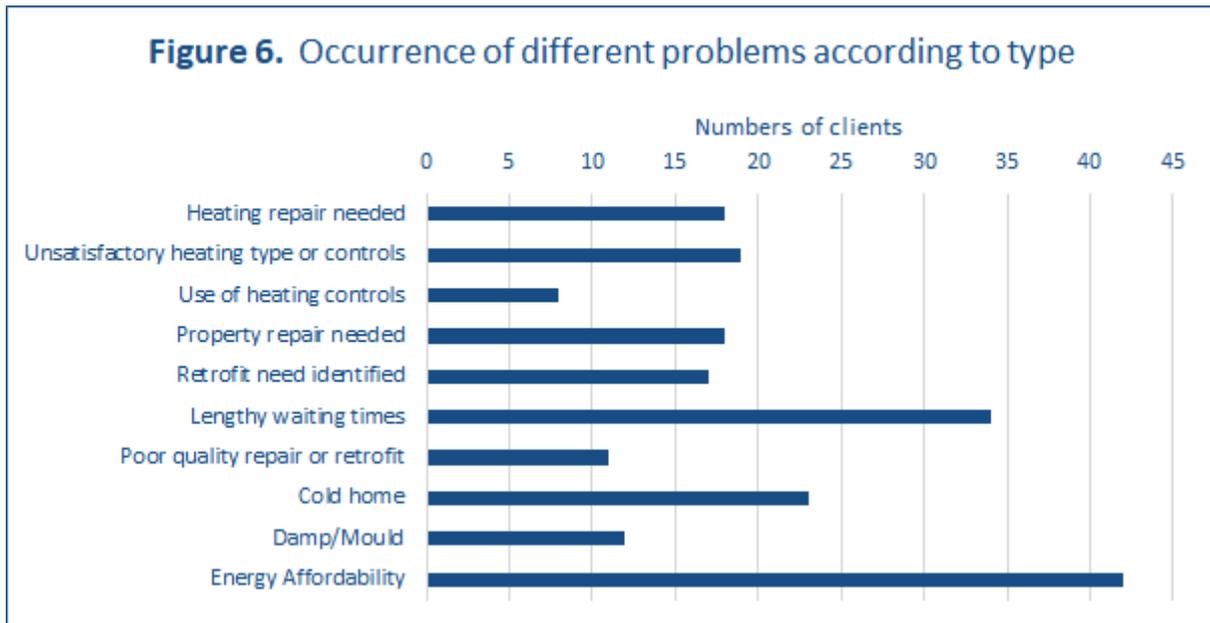


The Tenants' Problems

1. Relative prevalence of different problems

For each client, their different problems relating to the fabric of the dwelling or the heating system were categorised under the ten headings¹⁴ that had been agreed with the energy advisers. Most clients had more than one type, and Figure 6 shows their occurrence, with problems of energy affordability and lengthy waiting times being most prevalent.

¹⁴ **1. Heating repair needed** (including controls and thermostat), **2. Unsatisfactory heating type or controls**, **3. Use of heating controls**, **4. Property repair needed** (this included repairs both related and unrelated to energy efficiency), **5. Lengthy waiting times** for SHP action, **6. Retrofit identified as needed** (either by client, adviser or SHP), **7. Poor quality repair or retrofit**, **8. Cold home**, **9. Damp/mould**, and **10. Energy affordability**.



As noted previously, the categories are interrelated and the last three categories, cold home, damp/mould and energy affordability, are likely to be consequences of the others.

2. Heating repair needed (including controls and thermostat)

Most of the problems in this category also had issues relating to lengthy waiting times for SHP action that in some cases extended to years. If repairs were needed to the heating system there could also be related problems of affordability because it's likely that the tenant will have to use supplementary heating before the repair is done. We found that the supplementary heating was usually portable electric units or fan heaters that are very expensive to run and, for some clients, had been provided by the SHP.

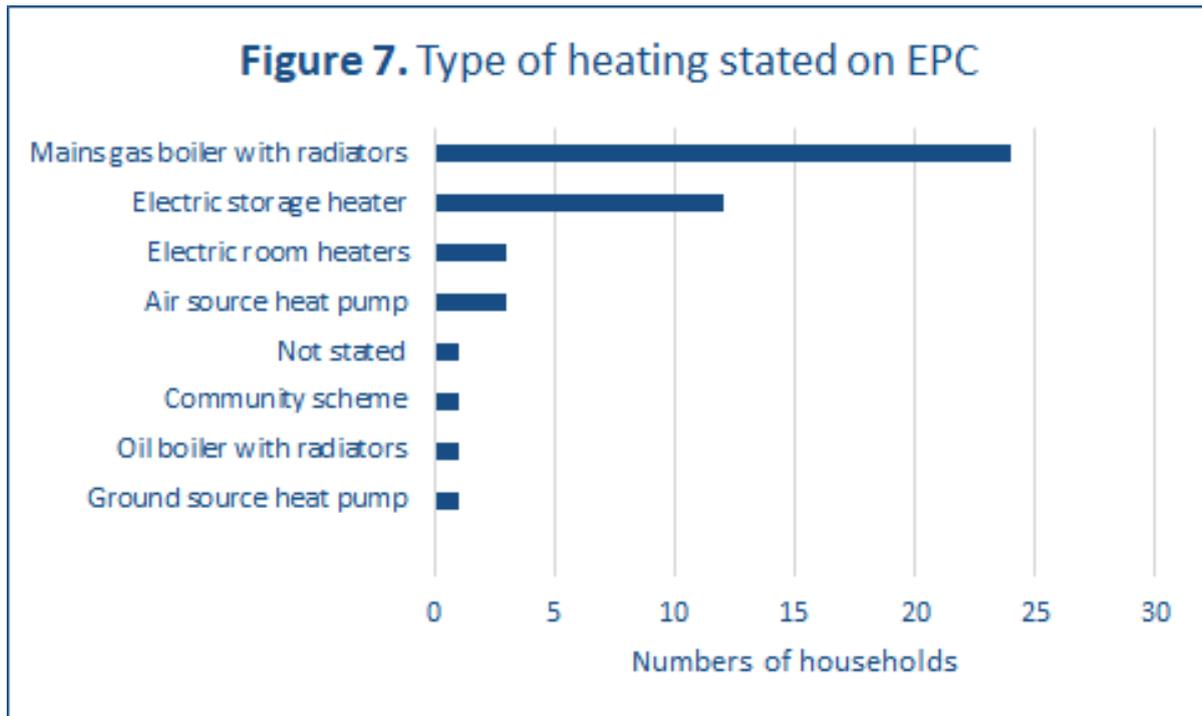
If the controls or thermostat need repair, the tenant cannot control the heating properly. Sometimes this had led to having a cold home while for another client, with a broken thermostat, it had led to unnecessary, excessive heating costs.



The thermostats on Steve's old storage heaters had stopped turning, so his home was very cold in freezing weather. The SHP took two years to deal with the repair, eventually fitting new storage heaters, but only after intervention by our adviser.

3. Unsatisfactory heating type or controls

Figure 7 shows the occurrence of different types of heating for all the homes in the study where there was an EPC that specified the primary heating system type.



Seventeen out of the 63 households in the study did not have an EPC and their heating type does not appear in Figure 7. They are the tenants who are likely to live in older properties that were last let out before EPCs became obligatory. As it stands, Figure 7 shows many more gas boilers than electric storage and room heaters. Although we didn't record the heating type of clients without an EPC, our impression from reading the casenotes was that electric heating was very prevalent and frequently associated with problems. This was endorsed by the advisers who said that many problems arise from old type storage heaters and portable electric heating appliances. Usually, these older heating systems are in older properties with possibly lower standards of insulation, so energy efficiency is doubly compromised and costs can be very high.

We had also noted problems with air and ground source heat pumps, which are new technology that the government is encouraging people to install in its drive towards net zero carbon. There were four heat pumps, as identified on the EPC, in the study and all of them were associated with very high running costs despite all of them being used in well insulated homes, according to the EPC. Three of these heat pumps were in band B properties and the other was band C. We do not know how old the heat pumps are and, with technology and installation expertise possibly increasing, it is to be hoped that problems with heat pumps will reduce.

However, it is worrying that EPC assessments are not able to pick up on how well a particular heating system works and that they can give such an unrealistic indication of the energy efficiency of a dwelling. This is particularly so when, under the LILEE definition, no household in band C or above can be described as being in fuel poverty.

4. Use of the heating controls

When first reading the casenotes, we were focussed on searching for evidence of problems to do with the fabric of the dwellings and not the cases where the client was having difficulty with using the heating controls. It was the advisers who pointed out how much this can contribute to problems with heating costs and that the cause can sometimes relate back to the SHP not having provided the tenants with adequate instructions when they started the tenancy. This might be through having given no instructions whatsoever, leaving the tenant with written instructions that they don't understand, or telling them how the controls work but the tenant being unable to retain the information. The advisers said that when a tenant asks for clarification about using the controls, sometimes the housing officers themselves don't know how the controls work and can't help. It was mentioned that a tenant can be just too nervous to adjust the controls of their heating.

Not setting heating times and temperatures appropriately can result in a cold home or one that is overheated and unnecessarily expensive to run. The advisers said that many of these problems could be avoided if SHPs could give clearer instructions, written and verbal, and demonstrate how controls work

when a tenant moves into a property. And, this would also apply to existing tenants who are struggling with their heating controls.



Joan had a boiler for water and heating and she'd reported a fault with the thermostat to the SHP a year ago. The heating kept coming on during the summer so, to overcome this, she turned off the boiler completely and used an immersion heater for the water. But she didn't know how to set this and resorted to turning it on and off manually, using more electricity than necessary.



Megan's father didn't like to have heating in his bedroom so, instead of just turning off his radiator, she turned off the whole gas central heating and used electric plug-ins instead, incurring unnecessary cost.



Rashid's storage heaters didn't work so, over the winter, while waiting for replacement, the SHP gave him fan heaters which he didn't use because he feared the cost. When new storage heaters were eventually installed Rashid didn't know how to control them because he'd been given no instructions.

5. Property repair needed

There were 18 clients with problems in this category and for 15 of them the need for a repair related in some way to a feature that affected the energy efficiency of the home. For the remaining three, any repair seemed to be for an unrelated feature, like a broken toilet or plasterwork. What stood out in the analysis was the fact that clients with problems with repairs were highly likely to also have a problem with lengthy waiting times. Indeed, this was usually at the heart of their repair problem and we discuss this below under that category.



Two radiators in Abeni's property were not attached to the wall and her SHP didn't respond to her for over a year. Abeni also had a dependent child with physical health issues. Once Citizens Advice contacted the SHP they began to take some action in fixing the problem.

6. Retrofit identified as needed (either by client, adviser or the SHP)

We use the word 'repair' to mean an act of mending something to bring it back to its original or functioning condition, for example to repair a toilet or to repair a broken window. The word 'retrofit' we apply to the act of replacing an original feature of the building with something new that is designed for high efficiency and low energy consumption. SHPs, as already mentioned, are planning to progressively retrofit properties to bring them up to band C or above.

There were 17 clients in the study who had a problem relating to the need for a retrofit but for six of them the casenotes did not mention that the client had already spoken with the SHP about it. For the remaining 11, the clients had already had some engagement about the need for a retrofit and, for nearly all of these, there was also an overlapping problem of lengthy waiting times. In some cases, the SHP had given the client the impression that energy efficiency measures were imminent and when they didn't materialise within a year or so the clients felt aggrieved, having been left struggling with inefficient heating or a poorly insulated home. One client in the study had already been waiting 5 years for a promised new boiler. Figure 7, shows the types of heating for the dwellings in the study that had an EPC and, even recognising that some information here might be out of date, it would appear that SHPs have a long way to go in retrofitting their housing stock. They are making welcome plans to do so, but should beware of falsely raising the expectations of individual tenants about the speed of implementation.



Hailey struggles with mental and physical health conditions. She has old storage heaters and has been waiting 6 months for an upgrade to a gas boiler and radiators. The upgrade started in another flat but resulted in a leak. As a result, the whole upgrade programme stopped and the client is waiting for a new company to do the installations.

7. Lengthy waiting time for SHP action

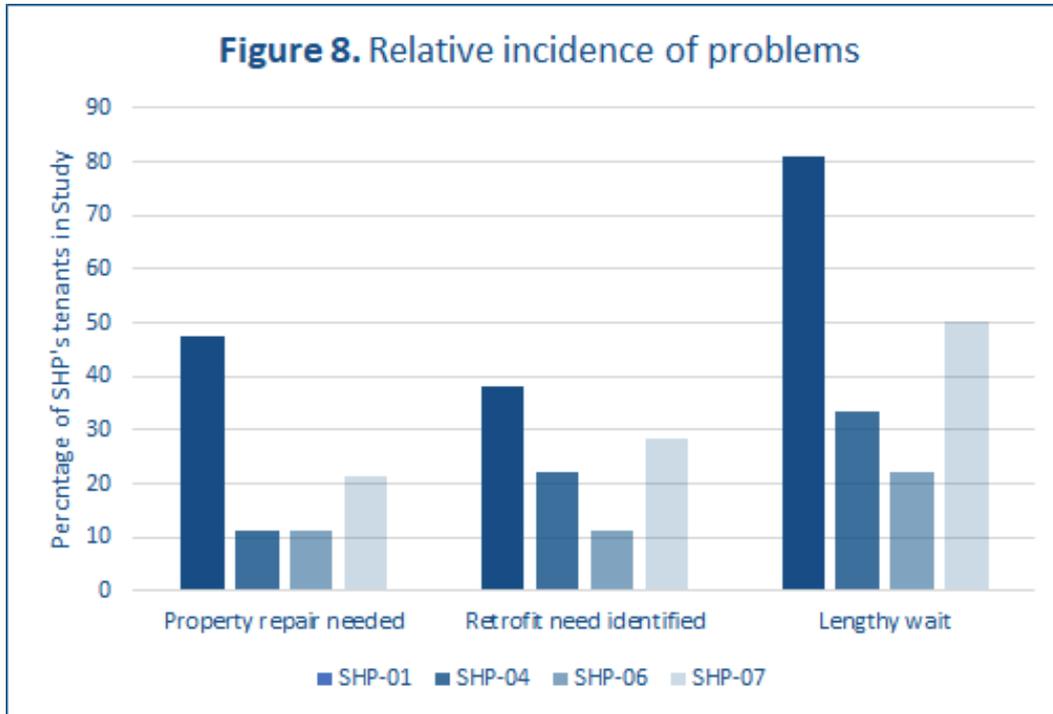
For over half the clients in the study, their problems were exacerbated by the lengthy wait they endured before the SHP attended to their housing needs. In reading the casenotes we could sense the extreme frustration and sometimes despair that some clients felt when serious problems with their housing continued over several years without any effective response. It was common to read of ongoing waits of 2 and 3 years and one client was told that there would be a 4-year waiting list for their repair.

One client with a radiator that 'didn't work' told the adviser that they just didn't report repair problems now because experience had taught them that the SHP wouldn't do anything unless they deemed it an emergency. Even when a repair had been activated by the SHP, we read of appointments with the contractor being repeatedly cancelled and some jobs apparently being abandoned. The pandemic, with its associated staff absences and need for social distancing, has certainly made it very difficult for SHPs to provide an effective repair service. However, with some problems having continued for several years, we had the impression that some SHPs had long lacked resolve to provide an effective repair service.

The advisers endorsed this, adding how difficult it can be to actually make contact with an SHP and that clients sometimes don't report a problem because they are exhausted by previous failed attempts to do so. These are disappointing observations, especially considering that more than 4 in 5 households in our study included people who were vulnerable through having disabilities or a health condition.

We wanted to see if there was any evidence to suggest that some SHPs are providing a poorer or slower repair service than others because, over the years,

some advisers have commented that this might be so. There were some SHPs in the study where the numbers of tenants were extremely low, so we compared only the four SHPs with the highest numbers. For each of these four SHPs, Figure 8 shows the percentage of their tenants in the study who had a 'property repair needed' problem, a 'retrofit needed' problem and a 'lengthy wait' problem.



With SHP1 showing much higher percentages with these two problems than the other SHPs, it's tempting to think that the advisers' comments about this SHP had been justified. However, numbers in the study were very low and certainly not a representative sample of those four SHPs' tenants. To test the indications given in Figure 8, a much wider study, specially designed for this purpose would need to be done.



Two years ago, Paul was told by his SHP that there was a 4 year waiting list to get two missing doors replaced and fix a large draft from the front door. During this time Paul was suffering with his physical and mental health. In the meantime, the advice was just to put a curtain up.

8. Poor quality repair or retrofit

After having waited for a repair or retrofit to be done, it can be particularly upsetting if the work is substandard and causes further problems. In this study there were 6 clients where this happened, with repercussions such as widespread mould after cavity wall installation, mould after loft insulation, floods due to an improperly installed wetroom, and builders leaving the home in an unacceptable state after carrying out repair work.

It would probably be impossible for SHPs to eliminate faulty repairs and installation completely but, when it happens, there can have a very negative impact on the tenant who is in need of a supportive response and speedy rectification of the ensuing problems as well as the original work.

9. Cold home

Cold homes can have a variety of causes related to the fabric of the home and its heating appliances and this was often noted in the casenotes. But a cold home can also be the result of the occupant not using their available heating. The advisers told us that some clients are so worried about the cost of heating that they are reluctant to turn it on and instead, for example, might resort to using a blanket or going to bed to keep themselves warm.



Graham has physical disabilities and has frequent infections. His home has night storage heaters that don't work well because by lunchtime they have lost all their heat. He describes the bathroom as being 'Baltic' and says that he often hides under the bedcovers in the afternoon when he's cold.

10. Damp/mould

Damp and mould problems had a relatively low incidence in the study but the effects could be very distressing to the clients and affected their health. It can be a contentious issue, with the tenant adamant that they heat and ventilate the home sufficiently and don't often dry laundry inside, but the SHP thinking that this might not be the case. In many of the casenotes we read, it seemed clear that there existed a cause beyond the tenant's lifestyle and that the mould and

damp, particularly the former, was having a serious effect on their and/or their children's health. Bearing in mind the high incidence of disability and health conditions of clients in the study, it seems that SHPs could react more quickly to help solve an individual's problems with damp and mould. In some of the cases we looked at, there had been considerable and on-going delay in addressing the problem, with years going by without the problem having been resolved.



Charlie has a young child but her home is damp. There is mould in several rooms and wardrobes, also on the baby's cot and toys and she has to clean the mould off every day. She complained to her SHP who told her to ventilate the home properly, which she said she was already doing. With mould still a problem, after some months they sent a surveyor who closed off vents in some of the rooms. This didn't solve the problem and 6 months later a second surveyor visited who said the radiators should be moved. Charlene's home still has a mould problem and she is worried about her child's health.

11. Energy affordability

Nearly all clients in the Study had a problem to some extent with affording their energy and this might have been caused by a variety of factors such as low income, priority debts, meter problems and high energy tariffs. But a problem with energy affordability was only counted in the study if it appeared to have been caused to some degree by the poor energy efficiency of the home and the heating system. A judgement on whether to count it as a problem in this category of the study was made after reading the client casenotes and was inevitably subjective.

Figure 6 shows that about two thirds of the clients in the study had problems affording their energy for the reason specified above and that this was the most prevalent problem experienced. In many cases the advisers were able to apply for grants to give these clients some assistance.

Personal choices can impact the cost of energy but the advisers said that they had noticed a reduction in careless usage, with clients making more of an effort to turn off appliances and monitor their energy. They said that, for many clients, it isn't possible to identify anything more to reduce their costs. Indeed, some

clients are so worried about the cost of their heating that they turn off the primary source and, instead, might use supplementary heaters just in rooms they're occupying. This, of course, is something that the advisers can highlight to the client because supplementary heating is likely to cost far more than a controlled primary source.

The quality of the Snapshot

The following factors will have affected the quality of this Snapshot.

Lens filter

A deliberate filter to the study was applied so that only those people who came to us for advice and who had significant problems associated with the fabric of the dwelling or heating system, were included in it. By selecting only these people, the experiences of the very many social housing tenants who enjoy excellent housing conditions were not included. This has resulted in a dark picture, albeit one that the clients in our study may well recognise.

Resolution

By limiting inclusion in the study to our clients advised over only two months, the numbers are lower than we would have liked. While this prevents us making confident and precise comparisons between, say, different SHPs, figures with some low numbers are included in the report to show what data was collected.

Focus

Our definition of the categories of problems was not precise, with blurred and overlapping boundaries. Allocation of a problem to a category was based on our subjective reading of the details that we read in the case recordings which, in turn, depended on what the client disclosed and what had been recorded by the adviser.

Time delay

The fact that EPCs are valid for 10 years and that SHPs do not necessarily have them updated when efficiency improvements are made, (unless there is a

change in tenant), means that our Figures are likely to include some dwellings that now have an inappropriate EPC banding.

Viewpoint

Problems have been presented as they have been perceived by the client and they don't show the same situations from the SHP's perspective. It's a limited viewpoint but we feel it has value because it shows to someone who doesn't live in low standard social housing what things can be like and how problems have the potential to harm a tenant's physical and mental health.

Although this Snapshot is somewhat blurred and limited in its view, we believe that it has identified some important features of social housing that warrant further investigation and remedial action. These are outlined in the final section of the report.

Social Housing Providers' plans and priorities

Making contact with SHPs

At the start of the study we made contact with the 11 main SHPs in the area. After collecting the data, there were just ten of these SHPs that had tenants included in the study. We wanted to find out; 1. What plans they had for improving the energy efficiency of their stock, 2. How they were prioritising the improvements, and 3. Whether a tenant's history, like rent arrears, might have any bearing on this.

For most of the SHPs, with a few welcome exceptions, we had the utmost difficulty getting the contact details of the relevant person to ask. When we made enquiries about these details through the general enquiry e-forms or email addresses given on the SHPs' websites, there were some SHPs that never responded. And when we managed to make telephone contact, some staff did

not know or refused to give us the relevant email address. Some staff said they would pass on our request for details to another person, but we never heard back. It was a long drawn out process and, for most of the SHPs, we had to resort to internet searches and scrutiny of SHP annual reports and blogs to find a name and then to infer an email address. Then, having sent the enquiry email to the relevant person, even after chasing, six of the SHPs never replied, and one gave only minimal information. We experienced, at a mundane level, the kind of contact difficulties and delays that some of the clients in the study had spoken of.

The four SHPs who did give a considered reply were very helpful, giving thoughtful and sometimes detailed resumes of their approach to improving their stock. Their responses are summarised under the three headings below but first, some context.

Principles for retrofitting social housing

SHPs have recently been able to compete for government funding to decarbonise their housing stock and the closing date for applications for the first wave of this Social Housing Decarbonisation Fund was October 2021. Applications had to comply with Guidelines¹⁵ which stipulated that funded projects must be compliant with the PAS2035:2019 certification scheme for domestic retrofit projects and carried out by installers approved under it. The Guidelines also said that competition would be based upon the following key principles:

- **Worst First:** giving priority to improving the worst performing homes
- **Fabric First:** ensuring that insulation and heat loss measures are prioritised over others, such as low carbon heating.
- **Lowest Regrets:** choosing measures that are unlikely to need further replacement on the journey to Net Zero.

To some extent these principles were reflected in the responses to our questions.

¹⁵ Gov.uk, [Social Housing Decarbonisation Fund Demonstrator: competition guidance notes](#), August 2021.

Responses to the Questions

Plans and policies

All four of the responders were in the process of reviewing all their housing stock or had already done so and were making plans for its improvement. There were differences in approach, with one SHP deciding to swap from electric to gas for many properties below EPC band C and installing solar PV systems on off-gas properties, and another SHP opting to retrofit off-gas properties with air or ground source heat pumps. With the government aiming to phase out the installation of natural gas boilers by 2035¹⁶, the former approach didn't seem to comply with the 'Lowest Regrets' principle .

Prioritisation

One of the SHPs mentioned all three of the principles as guiding their priorities, while one said it was dealing with the 'Worst First' and another the 'Fabric First'. The SHP that was being guided by 'Fabric First' was considering installing sensors and smart technology in homes where tenants had experienced damp and mould, so that they could offer a more proactive service. Most SHPs who replied said that energy measures might involve individual properties or whole estates.

Effect of tenant history on prioritisation

One of our clients, not necessarily in this study, had lived in an area where the SHP was carrying out energy efficiency measures, which they very much wanted. However, they had been told by a member of staff that they couldn't have the improvements because of their rent arrears. The energy efficiency improvements were made to neighbours' properties but not to theirs.

It turned out that the SHP officer who said this had not been following the organisation's policies. But it was because of the apparent unfairness of this case, where someone with financial problems and struggling to pay a priority debt was refused measures that would lower their energy costs, that we were interested in the answer to the question.

¹⁶ Gov.uk, [Net Zero Strategy: Build Back Greener](#) page 22, October 2021.

Worryingly, one SHP who replied said that although they had a principle of 'Fabric First', they were considering using residential data or a tenant's history to help target investment. Our reply urged the SHP not to take a discriminatory approach, especially to those struggling financially and with rent arrears.

A social housing provider's experience of EPCs

One of the SHPs recounted their experience of the unreliability of EPCs saying that they had reviewed a number of their own properties with low EPC bandings and believed the majority of them to be too low because of the wrong assumptions that had been made about some features. They had a property that they knew had been built to very high efficiency standards and assessed at EPC band B. They had inadvertently ordered a further assessment and the result was a band E, with wrong assumptions having been made and no recognition that the heating was by heat pump. Experiences such as this are contributing to our distrust of the EPC bandings.

Conclusions and Recommendations

Throughout this report we have used the term 'clients in the study' to emphasise that the sample of social housing tenants that we have studied is not representative of all tenants. Instead, it is an exploratory Snapshot from the point of view of our clients who have had problems with the fabric of their home or its energy efficiency. The sample of tenants in the study had a high incidence of disability and the problems recorded were likely to have a particularly negative impact on them.

Many of the features that we've picked out from this Snapshot may need further, more targeted investigation. For instance, we have seen that the level of EPC banding can be a poor indicator of the extent of energy efficiency problems encountered by occupants of the dwelling. A valid EPC can be up to 10 years old and therefore not take account of any improvements or deteriorations during these years. The assessment of features may be based on incorrect assumptions or even wrong descriptions. Crucially, every energy assessment is made on the premise that the heating systems and controls are working properly. Our client evidence shows this is certainly not always the case yet

there is no mechanism in the assessment process to take account of this. As a result of all this there is general distrust of EPC banding levels.

The government should ensure better regulation of EPC assessors. It should introduce an assessment of how well a property's heating system and controls are actually working, which is reported separately from the EPC.

The fact that EPC bandings are unreliable is important for at least two reasons. The government uses an EPC banding below band C as a component of its definition of fuel poverty. If the assessments of bandings are wrong, so will be the resulting household statistics on which the government decides and monitors policies related to fuel poverty. Another reason it is important is that, in the recent past, eligibility for certain grants¹⁷ has been restricted to dwellings at a specified low EPC band. If the banding is questionable, so will be the allocation of these grants, whether to Local Authorities, SHPs or individuals.

The government should take out the link to a low EPC banding in its definition of fuel poverty.

The study has highlighted categories of problems that clients have experienced, and energy affordability and lengthy waits for SHP action were the most prevalent.

Affordability problems in general were experienced by nearly all the clients in the study and were primarily the result of a low income. Citizens Advice has recommended¹⁸ four steps the government could take to deal with the general cost of living challenge over the coming year, which has been caused mainly through the steep increase in the cost of energy. They are financial measures that would put more money in the pockets of those who most need it and help stabilise the market.

But a home with poor energy efficiency also contributes to problems with affordability and this was a clear contributing factor for two thirds of all the clients in the study. It is a problem that can be alleviated by prompt attention to repairs of broken heating systems and a programme for retrofitting properties with poor energy efficiency.

¹⁷ Green Homes Grant Local Authority Delivery Scheme.



¹⁸ Citizens Advice, [How to protect consumers as energy prices rise](#), January 2022.

Many SHPs are making ambitious plans to improve the energy efficiency of their housing stock and this is welcome, but it should be done in ways that don't discriminate against particular tenants, particularly those who are struggling financially and have rent arrears.

When rolling out energy efficiency programmes, we urge all SHPs to have policies that are based primarily on the condition of a property and don't disadvantage certain groups of tenants.

Tenants with disabilities may have extra need for a home that is always warm and may have high energy costs generally.

Where there is a choice of retrofitting different properties of equally evaluated requirements, SHPs could start with ones occupied by occupants with particularly high energy needs due to their disability.

The other key problem area for the clients in the study was the lengthy waits for action by the SHP. And this was a problem, unlike energy affordability, that had few causes apart from apparent inaction by the SHP. Many in the study experienced long delays before their housing needs were adequately dealt with and, in the meantime, lived in poor conditions, had very high heating costs and some felt in despair. Others felt aggrieved because an energy efficiency measure had been identified and promised by the SHP but it hadn't materialised after several years.

SHPs should show much more resolve in dealing promptly with disrepair. They should take steps to be more accessible to their tenants and refrain from raising false expectations of improvements that can't be met.

The energy advisers frequently need to explain how a client can use less energy by setting more appropriate controls for their heating. Many long-lasting problems could have been prevented if tenants had been given better instructions about the heating controls when they moved into a property and could always access help if needed.

SHPs should keep written instructions for the controls of all heating appliances in their properties, give a relevant copy to all tenants when they move in and demonstrate how the controls are used.

In this report we ask our local SHPs and government to consider the suggestions we've made. Some are simple and require little or no investment, while those to the government ask for a rethink about established practices . We believe that they all have the potential to help improve lives, especially those of the most vulnerable.

Research and report by Rosemary Lunt and Amy Smith.

With thanks to all the advisers whose evidence forms first alerted us to these problems and to the energy advisers whose clear casenotes and invaluable insights helped steer the course and the content of this study.

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