Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Warm Healthy Homes Fund

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Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.[1] The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

[1] Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities Consultation on the Warm Healthy Homes Fund. As part of this process, we held a focus group discussion with a group of women to discuss the proposals and some of their comments are included as quotes throughout this response.

1.5 We wish to endorse the responses made by the Fuel Poverty Coalition (FPC NI), National Energy Action NI (NEA NI), the Rural Community Network (RCN) and by the Women's Policy Group of which we are a member. We fully endorse their responses and urge the Department to take their evidence fully into consideration.

2.0 General Information

We know from our research work that women often bear the brunt of poverty in their homes. Women often act as the 'shock absorbers' of poverty going without heat, food and other essentials to protect their children and family members when money is tight.[2] The same can be seen with energy costs, women will stay in cold homes through the day, only using heating when their families are at home and will prioritise the use of hot water for their children/family members. These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

Women's Regional Consortium research[3] shows that women are struggling with the costs of the most essential items including food and energy bills with 90% of the women we spoke to saying that the price increases which had the biggest impact on their household budget were energy bills. 78% said they felt cold or hungry or both as a result of cost-of-living increases. Without help they are very vulnerable to fuel poverty and the detrimental health impacts that accompany it.

2.1 Women and Poverty

We wish to highlight a range of reasons why women are more likely to experience poverty including fuel poverty:

- Women are more impacted by welfare reform policies;
- Women are more likely to be in receipt of social security benefits;
- Women have longer life expectancy;
- Women are more likely to be in low-paid, part-time and insecure work keeping their incomes lower over their lifetimes;
- Women are more likely to provide care either for children or other family members limiting their ability to undertake paid work;

[2] A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019
https://fabians.org.uk/a-female-face/
[3] Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023
https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf

- Women are more likely to have to make up for cuts to public services through unpaid work;
- Pension wealth for women is much lower than men and women are less likely to have retirement savings than men.

All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

As highlighted by the Gender Equality Strategy Expert Panel Report[4] there are strong links between low income, unemployment and fuel poverty. The expert panel report referred to data from the House Condition Survey 2016, which is now badly out of date, but it does indicate that more female households are likely to be in fuel poverty – 31% of households with a female household reference person are in fuel poverty compared to 16% of households with a male household reference person.

Providing unpaid care is a gendered issue with women more likely to provide this care. Nearly 60% of unpaid carers are women and women have a 70% chance of providing care in their adult life and are more likely to care early in their life.[5] Research into Carer Poverty in Northern Ireland shows that the poverty rate for carers in Northern Ireland is 28.3% – a rate which is higher than the poverty rate for carers in the rest of the UK (23.6%) and considerably higher than poverty rates amongst adults in Northern Ireland who do not have caring roles (17.4%).[6]

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[4] Report from the Gender Equality Strategy Expert Advisory Panel, published by the Department for Communities, March 2021
[Report from the Gender Equality Strategy Expert Advisory Panel | Department for Communities (communities-ni.gov.uk)]

[5] Career or Care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024
https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf

[6] Policy measures to tackle poverty among unpaid carers in Northern Ireland, A WPI Economics report for the Carer Poverty Commission NI, October 2023
https://wpieconomics.com/wp-content/uploads/2023/10/CPC-Report-Web.pdf

3.0 Specific Questions

Question 1

Given the limitations of funding, the Department proposes that households in receipt of the Personal Allowance of Universal Credit (for three consecutive periods) and those in receipt of Pension Credit are eligible for assistance.

In addition, income under a set threshold will also be used as an eligibility criterion. It proposes that the total household income threshold of the new Warm Healthy Homes Fund should be set at the rate of the National Living Wage which is currently £29,741.40, net of tax and national insurance, and that it should rise annually in line with the National Living Wage.

Under this proposal, the Department proposes to exclude disability and health related benefits and allowances and the winter fuel payment from the calculation of household income, as detailed above. Savings over £6k would be included in the calculation of income.

Do you agree with this proposal?

☒ **Yes**

☐ **No**

Please give reasons for your answer limited to 500 words

It is a challenging to develop eligibility criteria as there will always be households just above the income threshold who are experiencing/at risk of fuel poverty. However, we support the need to target the limited funding to those in the greatest need. We welcome the fact that the proposed income threshold is higher than the current Affordable Warmth Scheme which no longer reflects the realities of household finances.

Some of the women we spoke to in our focus group discussion on the proposals were concerned that households with two adults working on low incomes would most likely not be eligible for the Fund. This is despite the fact they have no money left after meeting essential expenses to carry out work to improve the warmth of their homes. Some felt that eligibility should be based on the state of the home but agreed that this could be difficult to implement as some households may have sufficient income but are choosing not to make the necessary changes to their homes.

There was a suggestion that the Department should consider a staggered or tiered system so that those with higher levels of income would be entitled to only some of the help within the Fund and those on lower incomes would be entitled to the full range of help which might help to extend those able to access the Fund.

We welcome the proposal to exclude disability and health related benefits and allowances when calculating household income which recognises that these households often have higher unavoidable costs. We also support the proposal to uprate the threshold annually in line with the National Living Wage to keep pace with the cost of living. We support the call from the FPC NI that the eligibility criteria should be kept under review to help ensure the Fund reaches those most in need and that any unintended gaps are identified and addressed.

In terms of eligibility, we echo the concerns of our colleagues in the Rural Community Network (RCN) who are concerned that reliance on Universal Credit as a passported benefit may unintentionally disadvantage rural households. Fluctuating incomes, self-employment and seasonal working are common characteristics of rural living and therefore income received during three consecutive Universal Credit assessment periods may not accurately reflect annual household income or financial vulnerability. We agree with RCN who have suggested that the Department are sufficiently flexible to recognise seasonal income patterns and should consider alternative methods of assessing annual household income where appropriate.

We agree with FPC NI that consistent implementation across NI will be important to ensure there is no postcode lottery in accessing the Fund and that where possible existing Government data should be used to verify entitlement rather than requiring applicants to provide information that Government already holds.

"You're hitting two parent families that are working. Me and my husband both work and we're over that threshold but by the time we pay all our bills and everything else there's nothing left to put into the house."

Question 2

In relation to the income threshold above, the Department proposes that if the applicant to the Warm Healthy Homes Fund is under 60 years of age, they may have a combined household personal savings of £6,000. For every £250 over the savings threshold, £1 per week for each complete £250 will be added to the calculation of your income. If the applicant to the Warm Healthy Homes Fund is 60 years of age or over, they may have a combined personal household savings of £6,000. For every £500 over the savings threshold, £1 per week for each complete £500 will be added to the calculation of your income.

Do you agree with this proposal?

☒ **Yes**

☐ **No**

Please give reasons for your answer limited to 500 words

The Women's Regional Consortium agrees with the proposed approach to savings as this approach aligns with the treatment of savings within Universal Credit. This approach helps to ensure that support is targeted to those in greatest need. The Family Resources Survey 2024/25[7] shows that 11% of households had no savings or investments and 37% of households had less than £3,000 of savings/investments. Therefore, we believe that this approach would help to target support to those with the least financial resources. Indeed, most of the women we spoke to in our focus group discussion on the proposals had no savings or minimal amounts of savings kept for specific purposes like the purchase of school uniforms.

[7] Family Resources Survey: Northern Ireland 2024/25, Department for Communities & NISRA, May 2026
https://datavis.nisra.gov.uk/communities/FRS_report_2425.html

However, we share a number of concerns raised by the FPC NI particularly that the Department should consider whether the proposed threshold appropriately reflects the level of savings that a household needs for financial resilience. We would also like to see the savings disregard regularly reviewed and uprated to take account of inflation.

"I'm working and on Universal Credit. I bought my house 5 years ago – there's no insulation and I have polystyrene roof tiles and I can't afford to fix any of it."

Question 3

Do you agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property?

☐ **Yes**

☐ **No**

Please give reasons for your answer limited to 500 words

The Women's Regional Consortium found it difficult to answer this question with a 'yes' or 'no' answer as our focus group discussion with women had varying opinions on this and we suggest other respondents may also have struggled with these limited options to respond.

Some of the women we discussed these proposals with were welcoming of prioritisation based on the energy rating of the property. They felt that because this is an energy efficiency scheme it should therefore be based primarily on the condition of the property.

"At the end of the day it's an energy efficiency scheme and should go on the state of the house."

"It should be on houses performing worse because this is an energy efficiency scheme."

"If the house is in bad condition, it needs the work done – they have a right to be prioritised if they have kids or not."

However, other women felt that prioritisation should not just be based on the energy rating of the property but should take into account other vulnerabilities within the household, for example, children or disability.

"If there are two identical houses and one person has kids and the other doesn't they should prioritise the house with kids."

Do you think that the Department should prioritise Warm Healthy Homes Fund applications based on another reason?

If so, please give reasons for your choice limited to 500 words.
The Women's Regional Consortium supports the FPC NI call for a more person-centred, multi-factor approach to better reflect the reality of fuel poverty. We agree that the energy efficiency of a property should be an important consideration within this multi-factor approach but should not be the primary basis for determining which households receive support.

There are some additional considerations around energy ratings which have been raised by the FPC NI. These include whether there are sufficient assessors to carry out the assessments without delays or backlogs, what is regarded as an up-to-date Energy Performance Certificate and if EPC assessments will be arranged and funded through the scheme or if applicants will be expected to organise and pay for it themselves.

We support FPC NI who have suggested building on the existing vulnerability matrix used in the Northern Ireland Sustainable Energy Programme which is already used to target support towards households most at risk. This matrix would enable prioritisation to reflect both the condition of the property and the circumstances of the household including age, dependents, health and disability.

"It should be based on the performance of the home and if you have children living in it."

"There should be a matrix or grid – if you have a disability, you get so many points, if you have kids so many points – almost like the housing list."

"You're at a big disadvantage if you have children. In a house with two adults and no children they can do overtime to get more money to repair a roof, etc. I can' t do that I'm on my own with a child."

"You could put something in for having children/having dependants. When looking at the criteria there should be something for dependants because you have childcare bills to pay. Childcare prices are so high – it takes a lot of your earnings. And even beyond that when the kids get older if you don't have childcare costs, you've got school fees, school uniforms, shoes, food, all of that to pay for."

Question 4

The Department proposes that Private Rented Sector landlords may access fully funded cavity and loft insulation, draught proofing, and ventilation, provided their tenant meets Warm Healthy Homes Fund eligibility criteria.

Do you agree with this proposal?

☒ **Yes**

☐ **No**

Should additional measures be included such as replacement windows, solar photovoltaic (PV) systems and electrical energy (battery) storage?

Do you agree with this addition?

☒ **Yes**

☐ **No**

If your answer is no to either of these questions, please give reasons for your answer limited to 500 words.

The Women's Regional Consortium agrees that private rented sector landlords should be able to access the full range of measures within the Fund where the tenant meets the Fund's eligibility criteria. Fuel poverty is a considerable issue within the private rented sector and we do not believe that tenants should be disadvantaged because they live in privately rented accommodation.

In discussing this proposal, women wanted to see safeguards put in place to protect tenants and to ensure that landlords were not taking advantage of the Fund where they had the resources to do this work themselves. They suggested the following:

- No qualifying period of tenancy before a tenant can apply to the Fund.
- Consideration should be given to the number of properties a landlord has and a limit placed on the number of properties they can get help with through the Fund.
- Landlords should not be allowed to evict tenants from the property after the work has completed for a certain length of time with suggestions ranging from two to five years.
- Landlords should not be allowed to increase the rent substantially as a result of the improvements to the property provided through the Fund.

"If the landlord is purposely not fixing things and telling the tenants to apply for the scheme then they're getting the benefit – they're getting the property fixed up for free. The Department need to get information on those landlords where they are purposely not repairing."

"Landlords should be made to commit to a certain length of tenancy when the work is done. They should allow the tenant to stay in the properly. The tenant can leave if they want but the landlord can't make them leave."

"There needs to be protections to put the landlord off pushing the tenant out of the home once the works are completed. The rent in the property should not be allowed to exceed a certain amount after the work has been done. It is benefiting the tenant and the landlord by improving their house."

"Tenants should be allowed to apply for the Fund no matter how long they have been in the property. You can't discriminate, what if someone is fleeing domestic violence and just new in the property. They should be able to get the help."

"There should be no restriction on how long a tenant has rented beforehand but a restriction after the work is done to try and protect tenants."

Question 5

The Department proposes setting a grant limit of £35,000 for the Warm Healthy Homes Fund that will allow for a fabric first, whole house approach including Air Source Heat Pump, solar photovoltaic (PV) systems and electrical energy (battery) storage. This will be increased to £45,000 to support those 'hard-to-

treat' properties. Up to £500 will be included within the grant limit for properties that require some general maintenance or remedial works before energy efficiency measures can be installed. It is anticipated that not all properties will require the full grant limit.

Do you agree with this proposal?

☒ **Yes**
☐ **No**

If your answer is no, please give reasons for your answer limited to 500 words
The Women's Regional Consortium agrees with the grant limits and particularly welcomes the increased grant limit for hard-to-treat properties. Many older and rural homes require greater investment to protect against fuel poverty and improve their energy efficiency therefore recognising these additional costs is an important part of supporting a fair and just transition.

We also really welcome the £500 grant for general maintenance or remedial works which may be needed before energy efficiency measures can be installed. In our focus group discussion, the women felt that this would be really helpful particularly where lofts need to be cleared or other work needs to be done before work begins and the householders are unable or need support to do this work themselves. As raised by the FPC NI it would be beneficial to have further clarity on what works this allowance will cover and how it will be applied in practice.

"I need to fix my polystyrene roof tiles and it needs plaster work. There's a good bit of work in it before I even get into the attic. I would need that grant to help me to do that work."

Question 6

The Department proposes that an applicant may apply only once to the Warm Healthy Homes Fund and that the Home Assessment will determine what support that property would benefit from.

Do you agree with this proposal?

☐ **Yes**

☒ **No**

If your answer is no, please give reasons for your answer limited to 500 words.
The Women's Regional Consortium agree with FPC NI that a blanket one-application rule is too rigid and does not reflect the realities of real life. We believe that it is necessary to allow exceptions to the one-application rule in certain circumstances. For example, it may not be practical or appropriate for all the recommended measures to be carried out at once meaning that a household may wish to apply again when they are ready for the rest of the measures to be implemented.

Similar to the call from the FPC NI we would also seek clarity on what the Department means by apply only once – does this mean one application per household or one application per property?

Question 7
It is proposed that a list of registered contractors would be provided to households to deliver the works identified by the Home Assessment, ensuring ease of access and a streamlined service for applicants.

Do you agree with this proposal?

☒ **Yes**

☐ **No**

Please give reasons for your answer limited to 500 words.
The Women's Regional Consortium welcomes this proposal. This is important for consumer protection and confidence that work will be completed safely and to a high standard. In our focus group discussion with women, they felt that this would be really beneficial for householders and help to make the process simpler. They reported how difficult it can be to find builders/contractors to do work and that having

a list provided would make it much easier. They also felt that it would help to provide protections against poor quality work and that it provides an element of safety knowing who will be coming into their home and that the required checks have been carried out.

We echo the calls from the FPC NI that the process for establishing and maintaining the list should be both fair and transparent. It should ensure that both large and small local businesses have an opportunity to participate. There must also be robust and regular monitoring of the contractors on the list to ensure that their work meets the required standards and if not that appropriate action is taken including the potential for removal from the list where there is evidence of poor performance.

"It's great having somewhere to go – having the list there ready. Trying to get people to do stuff is not easy so this is really good."

"If something goes wrong it's easier to go back and say they need to fix it. If they don't do that they can get struck off the list."

"Having a list would help to get rid of the cowboys who are taking advantage of people."

"It would make me feel safer if I had a list and know who's coming into the house and that they have been checked."

Question 8

It is proposed that initially registered Warm Healthy Homes Fund contractors will need to hold the following relevant accreditations and quality standards for the measures that they install:

- **Gas Safe (must be gas safe registered to install gas appliances)**
- **NICEIC (Electrical work)**
- **British Board of Agrément (BBA) (Loft, cavity wall, solid wall)**
- **Solid Wall Insulation Guarantee Agency (SWIGA) (Solid wall)**
- **National Insulation Association (NIA) (Loft, cavity wall)**
- **Cavity Insulation Guarantee Agency (CIGA) (cavity wall)**
- **Microgeneration Certification Scheme (MCS) (small-scale renewable energy systems)**
- **Installation Assurance Authority – (single compliance platform)**

As the Warm Healthy Homes Fund matures it is proposed that it will align with the accreditations and standards being used in other government schemes This may mean transitioning to PAS 2030 or PAS 2035 standards or similar.

Do you think that industry is ready to adopt or move to the principles of PAS 2030/2035?

- ☐ **Yes**
- ☐ **No**

Please give reasons for your answer limited to 500 words.

We do not have the required knowledge about the industry or these principles to answer this question.

Question 9

Are there any other alternative standards or accreditations that may be applied to contractors working on all government energy-efficiency schemes?

- ☐ **Yes**
- ☐ **No**

Please provide detail limited to 500 words.

Once again, we do not have the required knowledge to answer this question. However, we would agree with the FPC NI that alignment in accreditation and quality standards across all Government energy efficiency and low-carbon heat scheme is necessary. Providing a common framework for installer accreditation, quality assurance, aftercare and consumer redress would provide greater clarity for contractors, improve consumer confidence and support a more co-ordinated approach to retrofit delivery across Northern Ireland.

Question 10

It is proposed that initial aftercare advice will be available to all applicants. This will be a routine follow up between 6 and 12 weeks after installation to

ensure that equipment is being used correctly and effectively. It is anticipated that the Managing Agent will instigate the aftercare by telephone to establish if a follow up visit is required. Should a visit be needed then the contractor who completed the works should visit the property to address any concerns or issues. The Department will ensure that there is a clear pathway for redress should any issues occur, this will also align with the consumer protection and redress pathways offered by other energy efficiency schemes across government.

Do you think that the proposed aftercare arrangements are sufficient?

☐ **Yes**
☒ **No**

If you answered no, please provide additional detail (limit of 500 words) on any additional aftercare that the Managing Agent of the Warm Healthy Homes Fund should provide.

The Women's Regional Consortium do not believe that the proposed aftercare arrangements are sufficient. We agree with the FPC NI that a more comprehensive model is needed including quarterly check-ins throughout the first year after installation. We also agree that more comprehensive support provision should begin at the start of the process and continue throughout the customer journey.

We support the recommendations by the FPC NI that the Department provide for a freephone service for households to raise questions/concerns throughout the process and that the Managing Agent should have a dedicated aftercare team which acts as the main point of contact for households and landlords.

The Voluntary and Community Sector (VCS) have an important role in this process. VCS organisations provide vital support including to some of the most vulnerable and marginalised households in NI. They are trusted community-based organisations that understand the need in their local communities. The Managing Agent should work with these experienced organisations who can provide independent advice, manage expectations, support vulnerable households and reinforce key messages at all stages of the process.

Focus group feedback suggests that information should be put in community settings like Women's Centres. Women talked about the importance of the information provision/signposting work that goes on in places like Women's Centres in terms of awareness of the help available and the tools that exist to help manage energy costs.

We agree with both the FPC NI and the RCN that VCS organisations should be recognised as key partners in the delivery of the Fund including through promoting awareness, supporting applications, identifying hidden need, helping digitally excluded households and providing ongoing advice and support throughout the process. Integrating VCS organisations in this process will help to improve accessibility, increase uptake and help ensure the support reaches those who are most in need.

Our focus group discussion with women suggested a number of different ways of keeping in touch with people about the Fund. These included using social media, TV adverts and developing an App which contained all the details of the work, instructions for equipment and contact details in the event of any issues. They also suggested having a QR code which could be left in the property and this would allow householders to access all of the information and help about the Fund including instruction and problem-solving videos.

"They could have an App where you can get all the details of the work that has been done and how to contact people about it."

"A QR Code would be good. Just have everything on the QR code and stick it on the boiler. All you have to do is scan it and all the information is there. I love videos, I'm better following the videos. I don't have the focus for reading."

"They need to work with Women's Centres, since I've come to the Centre I've learned so much – unless the knowledge is out there and you know where to find out you can miss out."

Equality Considerations

Question 11

Please comment on any potential equality implications you feel may arise from the issues/proposals discussed in this consultation.

The Women's Regional Consortium welcomes the fact that the Department has carried out a Rural Needs Impact Assessment and has identified a range of issues impacting on rural households. However, it is essential that these considerations are reflected in the final design of the Fund, in its implementation and in ongoing monitoring to ensure that rural households are not disadvantaged. Rural proofing must continue throughout implementation rather than ending at policy design. The Department should work alongside trusted VCS organisations to ensure that eligibility and delivery mechanisms reflect rural circumstances. The Department must also ensure that application processes are accessible to those experiencing digital exclusion and provide alternative ways to access support.

We support the recommendation by RCN that the Department should routinely monitor rural outcomes including the number of applications received, successful applications, grant values, waiting times, customer satisfaction and completed installations. Analysing this information by rural and urban classification will help to identify any emerging inequalities and allow necessary adjustments to the scheme's delivery.

The Women's Regional Consortium supports the recommendation by the FPC NI that the Department should collect and monitor data on the Fund to understand who is aware of the Fund, who receives support and the outcomes achieved. This should help to identify whether particular groups are underrepresented and who are facing barriers to accessing the Fund. This follows Equality Commission guidance on mainstreaming statutory equality duties which means integrating equality considerations into the entire policy-making process (from initial design and screening through to implementation, monitoring and review) rather than treating it as a one-off task at the very beginning. We also support the FPC NI recommendation that the findings from this data should be reported through annual progress reports on the Fund and through the Minister's annual statement on Fuel Poverty.

Like our FPC NI colleagues we believe that accessibility should be built in to every stage of the customer journey. Information and communications about the Fund at each stage must be accessible to those with varying communication needs including those with no or limited digital capabilities.

The Women's Regional Consortium supports the FPC NI recommendation that the Department should subject the Fund to an Equality Impact Assessment (EQIA) rather than Section 75 screening. A full EQIA would provide a more comprehensive assessment of how Section 75 groups may experience the full customer journey. We welcome that the screening has identified that women are more likely to experience poverty including fuel poverty. We would like to see more opportunities identified to better promote equality of opportunity for women throughout the entire Fund process not just at application stage and this should include work with the VCS who are best placed to engage and support those who are the most marginalised.

While the screening document has listed some relevant policies, research and statistics we believe that there are some further documents which are relevant and should have been included. We note that the screening lists the Draft Anti-Poverty Strategy but stress that this is one of a suite of Social Inclusion Strategies where the original intention was that they would be progressed together rather than separately. We believe that the Expert Panel Reports from the remaining Social Inclusion Strategies should also form a consideration for the Department in bringing this Fund forward:

- Report from the Gender Equality Strategy Expert Advisory Panel, published by the Department for Communities, March 2021 [Report from the Gender Equality Strategy Expert Advisory Panel | Department for Communities (communities-ni.gov.uk)]
- Report from the Disability Strategy Expert Advisory Panel, published by the Department for Communities, March 2021

https://www.communities-ni.gov.uk/publications/report-disability-strategy-expert-advisory-panel#:~:text=The%20Disability%20Strategy%20Expert%20Advisory%20Panel%20was%20appointed%20in%20October,it%20should%20seek%20to%20address

- Report from the Sexual Orientation Strategy Expert Advisory Panel, published by the Department for Communities, March 2021 https://www.communities-ni.gov.uk/publications/report-sexual-orientation-strategy-expert-advisory-panel

We are also disappointed that the screening document does not refer to the following VCS research which points to the impact of financial insecurity and poverty on the lives of women. This research was carried out locally and could provide some useful data in relation to gender and other impacts which are relevant to this consultation:

- Mental Health Matters for Women, Women's Regional Consortium, May 2026 https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2026/05/Mental-Health-Matters-for-Women.pdf
- Women, Skills & Barriers to Work, Women's Regional Consortium, December 2024 https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf
- Career or care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024 Career or Care (womensregionalconsortiumni.org.uk)
- Women's experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023 Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf (womensregionalconsortiumni.org.uk)

Conclusion

In conclusion, the Women's Regional Consortium welcomes the development of the Warm Healthy Homes Fund and many of the proposals outlined in the consultation. Focus group discussions with women were largely supportive of the Fund but also suggested some changes to the proposals to help improve the scheme's design as we have outlined in our response.

> *"This is going to benefit so many people – people living in their homes, local tradespeople and skills. It's getting so hard to live with the cost of things, this will scheme will be a positive thing."*

We share the concerns raised by the FPC NI in relation to funding for the Fund which has not yet been confirmed. We have highlighted a number of areas where further consideration/change is needed including:

- Further considerations are needed for rural properties which face unique challenges including having less income available to heat homes, issues with Universal Credit due to seasonal and fluctuating working arrangements and factors which result in higher installation costs and more complexities to retrofit.
- Eligibility criteria should remain under review with engagement with VCS groups working with those in fuel poverty to ensure the Fund is reaching those most in need.
- A more person-centred, multi-factor approach is needed to prioritise Warm Health Homes Fund applications which includes the energy rating of the property alongside household vulnerabilities such as dependents and disability.
- A one-application rule is too rigid and does not reflect the realities of household circumstances therefore exceptions should be allowed to this rule in defined circumstances.
- People need support particularly where there are specific vulnerabilities and the VCS must play an important part in providing this support both in terms of raising awareness about the Fund but also in supporting households through the process.

- Comprehensive support should be provided at all stages of the process including at the start of the customer journey right through to after-care which should include quarterly check-ins throughout the first year after installation.

We include the following quotes from women from a number of focus group sessions in relation to fuel poverty and specific to these proposals which are useful for the Department to consider as part of this process.

"It's harder for people that own their own homes, there's no help. I've never found it as difficult as I do now to make ends meet."

"I bought my house, it's 60 years old and an ex-NIHE property. My boiler was leaking oil into the ground. I had to pay £5,000 to replace it and I'd only just bought the house. I had to put it all on the credit card, that's the knock on. I got a couple of hundred pounds back at the end but it's a massive, massive chunk of money that I just didn't have."

"It's essential things, essential maintenance. There isn't anywhere you can turn for help if you're working, you have to source all the money for it yourself."

"There's not enough help for people who are on low to middle incomes who are working. They get no Universal Credit, they get absolutely not help and support for anything."

"You're being punished for working and having kids, you get no help. I'd be better off if I didn't work."

"Because I work and get Universal Credit there are things I'm not entitled to. I'm damned if I do and damned if I don't."

"If you put everything down on paper you look like you should be making ends meet but you're not – things are spiralling up in terms of the cost of living and wages are not meting that. You're not getting any better, you still have to keep the upkeep n your house, you still have everything to pay for."

"People don't know where to go to find out the information they need. There is a real lack of awareness about things. I came to the Women's Centre and found out about lots of things."

"There is no support out there to get solar panels and I'd really like to get them. Everywhere we got to look for solar panels we don't meet the threshold for the criteria because we both work. Yet we've no money!"

"The cost of living is so high that realistically what we earn doesn't go too far. They need to set the earnings limit higher so that it reflects what it takes for the average person to live on/survive on."

"They should consider staggered or tiered help. Even partial funding for those earning over a certain amount. Different tiers – the most needy in Tier One get full support and then in Tier Two there is less support depending on your income."

"Childcare prices are so high, it takes a lot of your earnings. They need to consider that NI has really high childcare costs. It's crazy, even if you're earning well with childcare costs it doesn't leave you with much. Even though it's coming in, it's gone."

"Adding solar panels and batteries to this Scheme is really good, I think that's the biggest improvement with this Scheme."

"New builds have been thrown up and some are falling apart. The EPC needs to be up to date – being lived in is different from when it was first built - 5 years later the EPC could be different."

"If living rurally, where do you go to get guidance/support on fuel poverty – a lot of people don't know about the help and support that exists."

"High childcare costs can affect your ability to heat your home."

"What works in Fermanagh is going out to people's homes and having a chat. It's about trust and filtering around the knowledge. In the Community & Voluntary sector in rural areas they go the extra mile to ensure people are helped and supported even if they are a couple of pounds over the threshold."

"There is a need for outreach in deprived rural areas – it is needed but it can be difficult to get people to seek help because of stigma – it can be difficult no matter how much you advertise. There is a need to overcome this stigma.'

"I wouldn't be where I am without the help of my local Women's Centre. They can help me with foodbank vouchers, gas and electricity vouchers. They can help with so much even making phone calls on my behalf, helping with forms, etc."

"The trust is there in the community and voluntary sector. They're on the ground and they know their people."
"The support that communities need can be different – it needs careful engagement with local communities around these things."

"We're very lucky we have support here in the Women's Centre – you don't know about things exist unless you're here to find out about them."

"Women find out about help available through talking to each other and in places like the Women's Centres."