

LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE**FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL
CALL FOR VIEWS****SUBMISSION FROM INCLUSION SCOTLAND****Introduction**

Inclusion Scotland is a 'Disabled People's Organisation' (DPO) – led by disabled people ourselves. Inclusion Scotland works to achieve positive changes to policy and practice, so that we disabled people are fully included throughout all Scottish society as equal citizens.

1. *Do you agree with the Scottish Government's proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040.*

Inclusion Scotland welcomes the setting of a target to reduce fuel poverty, but is concerned about the long timescale, of over 20 years, and lack of any sanctions should future Scottish Ministers fail to meet the target.

2. *Do you agree with the Scottish Government's proposals for a revised definition of fuel poverty*

Households where someone is living with a long-term illness or disability remain at relatively greater risk of fuel poverty than other households. According to Equality and Human Rights Commission's "Is Scotland Fairer 2018"¹:

Disabled people were more likely to live in poverty After Housing Costs compared with non-disabled people in 2015/16 (24.3% compared with 16.6%). Between 2010/11 and 2015/16, the percentage of disabled people living in poverty increased from 21.0%. Approximately 1 in 4 of those with mobility (21.5%); dexterity (22.2%); memory (25.0%); or learning, understanding or concentration (28.0%) impairments were likely to be living in poverty. The proportion of people with mental health conditions living in poverty (37.6%) was double that for non-disabled people (16.6%).

and

Disabled people were three times more likely to experience material deprivation compared with non-disabled people (31.6% compared with 10.3%). Over two in five people with impairments related to: memory (41.8%); mental health (47.8%); and learning, understanding or concentration (43.0%) experienced material deprivation.

¹ <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-2018-is-scotland-fairer.pdf>

Despite this, according to the Equality Impact Assessment accompanying the Bill, 64.000 of the 65.000 people who will no longer be captured by the new definition of fuel poverty are disabled or have long term conditions.² Inclusion Scotland therefore does not agree with the Policy Memorandum that that there “no negative impacts on the protected characteristics”. The new definition disproportionately affects people with the protected characteristic of disability, and as such may be in breach of the Equality Act.

Inclusion Scotland believes this may be as a result of including as income disability related benefits, such as DLA or PIP, whilst not taking account of the additional costs of disability that these benefits are intended to help mitigate.

Research and analysis by the disability charity Scope shows that on average disabled people across the UK face additional costs related to their impairment, or condition, of £570 a month. The costs vary geographically so that someone living in South East England faces additional costs of “only” £482 a month whilst a disabled person in Scotland faces much higher additional costs of £632 a month.³

This means that, after housing costs have been met, disabled people spend on average nearly half of their income (49%) on disability-related costs. This in turn results in their income not going as far to the extent that £100 of income for a non-disabled person is equivalent to just £67 for a disabled person.

Some additional costs such as heating are higher because a much higher proportion of disabled people are unemployed and thus at home all day at a time when others reduce their heating. Although disabled people in employment face less additional costs they are still substantial and on average, across the UK, amount to £492 a month. It should be borne in mind though that the costs for a Scottish disabled person in work are likely to be higher again.

However, disabled people also face other additional costs such as paying for specialised goods and services (e.g. assistive technology, wheelchairs and other mobility aids or adapted items of clothing); greater use of non-specialised goods and services (e.g. having to use taxis more frequently if public transport is inaccessible); and spending more on non-specialised goods and services (e.g. higher tariffs for accessible hotel rooms, or higher premiums on insurance products like travel insurance). DLA/PIP are intended to.

Whilst the Scottish Government has accepted the case to enhance the heating requirement for disabled people and those with long term illnesses, it has given no

² <https://www.gov.scot/publications/fuel-poverty-target-definition-strategy-scotland-bill-fuel-poverty-strategy-9781787810426/>

³ “The Disability Price Tag”, Anel Touchet and Minesh Patel for Scope, Feb 2018
<https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag>

satisfactory explanation for rejecting the recommendation of the Scottish Fuel Poverty Definition Review Panel that the Minimum Income Standard should be increased by £83 per week to take account of the additional costs of disability.⁴

Inclusion Scotland therefore asks the committee to recommend that the definition of fuel poverty be amended in line with the recommendation of the Review Panel. At the very least, further study should be undertaken on the reason why 64,000 households with a disabled person or someone with a long term illness will no longer be defined as in fuel poverty, and the extent to which disability related benefits have lifted these households above the minimum income standard.

3. Do you agree with provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

No comments.

4. A [draft fuel poverty strategy](#) was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Government's new target? Have lessons been learned from previous initiatives?

It is not clear why only one interim target, in 2030, is being set, and how progress towards meeting this can be measured in reporting to the Scottish Parliament and in informing the 5-yearly reviews of the Fuel Poverty Strategy. It would seem more sensible to have interim targets every 5 years in line with the reporting and review cycle.

Whilst we agree that Warmer Homes Scotland should be reviewed to help target support to those who need it most, Inclusion Scotland is concerned that the new fuel poverty definition may exclude many disabled people who are most in need of support from accessing it, as they may have been excluded from being defined as being fuel poor.

5. Do you have any views on the Scottish Government's reporting requirements to the Scottish Parliament, as set out in the Bill?

As stated above, interim targets for the fuel poverty strategy should be set at realistic intervals that enable the Scottish Parliament to effectively monitor progress and hold Ministers to account.

Iain Smith; Policy & Public Affairs Officer

⁴ <https://www.gov.scot/publications/new-definition-fuel-poverty-scotland-review-recent-evidence/>