

Response ID ANON-JX62-7JRN-B

Submitted to **Fuel Poverty Strategy Consultation**

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Legislative Context

1 Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use AHC and MIS as means to measure fuel poverty in Scotland?

a) What, if any, challenges do you think this approach could present in enabling targeting of resources to those most vulnerable to fuel poverty?:

CRER believes there are more BME households will fall under the new definition of fuel poverty, BME communities may potentially benefit more from programmes and policies which target households in fuel poverty. Before housing costs, 30% of people from a BME background were in poverty; after housing costs, 35% were, according to the Scottish Government's Poverty Equality Analysis. As BME groups are more likely to be over-represented in the private rented sector and under-represented in the social housing and private ownership sectors, the cost of housing is a key concern. Using AHC instead of BHC in the definition may allow more BME households to be included and counted as experiencing fuel poverty.

However, the ultimate success of the redefinition will be in the implementation of these programmes and policies and the inclusion or exclusion of BME groups from these.

b) If this definition is to be used, how would you propose these challenges are overcome?:

2 Do you have any views on the proposal of using 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty?

Comments::

It is worth noting that according to the 2011 Scottish Census, all BME groups in Scotland have a younger age profile than white Scottish/British groups. 29% of white Scottish people were aged 16 to 39 compared to over 50% of Asian, African, or other ethnic groups. Only 1.0% of the Scottish population aged over 60 is BME, compared to 4% overall. Furthermore, there are 11,216 BME individuals aged over 60 in Scotland, and only 2,790 aged over 75; a high proportion of the older BME population will be affected by the change in age. The impact of this should be measured and more fully considered, as this issue was not addressed in the equality impact assessment.

Partnership working

5 Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty?

Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty? :

Regardless of the national partners, local delivery organisations, and third sector bodies involved in the identification and support of those at risk of fuel poverty, it will be important to ensure that BME individuals have been involved in the process and considered in engagement opportunities. There are lower levels of participation among BME communities compared to the white Scottish/British community, and BME individuals are under-represented in many decision-making structures, especially at a local level. As such, it will be important to ensure BME groups are involved and participating in this agenda and able to seek support and assistance if needed. This should be monitored and reported upon.

What would best support, or enable such partnerships?:

6 What can local partners do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty?

This might include sharing best practice or developing strategic approaches.:

7 How can SG support local delivery partners (e.g. third sector organisations and social enterprises) to measure their success?

Comments::

8 How can the Scottish Government best support local or community level organisations to accurately measure; report on; and ensure quality of provision of advice and support services and their outcomes?

Measure::

Report on::

Ensure quality of: :

Regardless of the method adopted to measure, report on, and ensure quality of provision of advice and support, local and community organisations (as well as other delivery partners) should ensure that engagement with BME groups is considered as part of the evaluation. In particular, evaluation should look at disparate outcomes and barriers to full participation in services and support. This may involve ethnic monitoring of service users and qualitative engagement with BME service users to identify any disparities or areas for concern.

9 How can the one-stop-shop approach be enhanced for the benefit of HES clients?

Comments::

In particular, are there any improvements that you think can be made to the HES service to further enable it to best reach the most vulnerable to fuel poverty client groups?:

Targets and indicators

10 What are your views on our proposal to set a new statutory target to eradicate fuel poverty in the Warm Homes Bill?

Comments::

CRER welcomes the proposal to set a new statutory target to eradicate fuel poverty through the Warm Homes Bill. We would ask that the measurement of this target take into consideration the disparate rate of poverty among equalities groups (BME groups, disabled people, women), which means that certain groups are more likely to experience fuel poverty. As such, measurement of the targets should be disaggregated by relevant protected characteristic.

For example, if the target to achieve a fuel poverty rate of less than 10% by 2040 is met, but a disproportionate amount of households experiencing fuel poverty are BME, we would not consider that the target has been fully met. Progress for many should not be seen as a proxy for progress for all, and targets set should require a disaggregated approach to measurement to ensure equalities groups are not being left behind.

11 What are your views on the proposed sub-targets?

a) What are your views on the proposed levels?:

b) What are your views on the proposed timeframe? :

12 What are your views on the proposed interim milestones?

a) What are your views on the proposed levels?:

12 b) What are your views on the proposed timeframe?:

Monitoring, evaluation and reporting

13 How should the new Fuel Poverty Advisory Panel and Fuel Poverty Partnership Forum monitor progress towards meeting the proposed sub-targets and interim milestones?

Comments::

The Fuel Poverty Advisory Panel and Partnership Forum should monitor progress towards meeting the proposed sub-targets and interim milestones in a way which captures the potentially disparate outcomes for equalities groups, including BME groups, disabled people, and women. There should be special consideration given to households most likely to experience fuel poverty and the panel and forum should ensure that vulnerable households and groups are not being left behind in progress towards meeting the target.

To achieve this, the panel and forum should ensure that they are engaging with and seeking input from BME communities and the groups that represent them so that any barriers and disparities can be noted and acted upon.

14 What do you think the Advisory Panel's priorities should be in its first year?

Comments::

15 What examples do you have of using proxies to identify fuel poor households?

a) Which proxies did you use? :

b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?:

It is worth noting that place-based measurements, such as SIMD, are not an effective means to capture the experiences of BME communities, as poorer BME households are not as concentrated in these areas as their white counterparts. Two-thirds of BME households living with income deprivation do not live in an SIMD area, meaning that utilising this indicator may fail to benefit BME households in the same way.

The 2012 report 'Hard-to-Reach or Easy-to-Ignore: A rapid review of place-based policies and equality' by Dr. Peter Matthews, Dr. Gina Netto, and Kirsten Besemer found that:

- In place-based policies, socio-economic inequality is much easier for policy makers to focus on than exclusion and deprivation faced by equalities groups;
- The different spatial distribution of equalities groups in Scotland suggest any future place-based policies should have equalities as a key focus; and,
- Place-based policies have routinely failed to meet the needs of equalities groups.

As such, CRER believes that indicators outside of (or in addition to) place-based indicators should be used to help identify fuel poor households.

16 What are the key lessons to be learnt from any existing approaches that apply proxies in door-to-door, on-the-ground assessments in this context?

Comments::

17 Do you have any concerns about the use of a doorstep tool, in particular the challenges around delivery of area based schemes?

Comments:

18 How can the Scottish Government most effectively work with Community Planning Partnerships in a collaborative manner to report on overall fuel poverty levels as part of the SHCS?

Comments::

It should be noted that BME voices are often left out of formal planning structures, including Community Planning Partnerships. Work to report on overall fuel poverty levels should be cognisant of this and should seek to engage BME and other under-represented groups to ensure they are not missing from the monitoring and planning.

Outcomes and Principles

19 What are your views on, or experience of how an outcomes-focused approach would work in practice?

Comments::

CRER welcomes the outcomes-focused approach, and would ask that one of the outcomes address eradication of the disparate rate of fuel poverty that BME groups (and some other equalities groups) face. This outcome should look to provide an analysis of fuel poverty disaggregated by ethnicity to ensure that no group faces fuel poverty at a disproportionate rate.

a) Would it encourage national and local policy and delivery partners to work together effectively, and if not, what alternative approach(es) do you propose could be used instead?:

20 Do you think the principles detailed in the 3 bullet points above are adequately reflected in the outcomes framework?

Comments::

21 In your opinion, would the proposed framework help to strengthen partnerships on-the-ground?

Not Answered

a) If so, how?:

b) If not, why?:

Assessing impacts

22 Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above?

Not Answered

If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?:

According to the 2011 Scottish Census, 3% of all households are BME, whereas 7.2% of homes without central heating are BME. This may suggest that BME communities are more susceptible to fuel poverty, particularly given their already disparate rates of poverty (35% for BME individuals compared to 18% for white British individual).

Data on fuel poverty in BME households in Scotland is extremely limited, and more work should be undertaken to address this. However the report "Forty Years of Struggle: A window on race and housing, disadvantage, and exclusion" published by the Human City Institute found that in England, BME households are more likely to live in older, fuel poor, and overcrowded housing. It is significant that BME households tend to live in older homes in poorer condition, as these will be harder to heat. In England, BME households are also twice as likely to live in fuel poor neighbourhoods as their white counterparts. CRER believes the same may likely hold true for Scotland.

In advance of the passage of the Warm Homes Bill, work is needed to understand fuel poverty in BME communities fully and to ensure that any particular impact on BME communities is noted, understood, and acted upon.

We believe that the new definition of fuel poverty and the accompanying Warm Homes Bill could have a positive impact for BME groups. As the equality impact assessment noted, the new definition would allow more BME households to fall within the scope of fuel poverty programmes and potentially benefit from such. However, we do note that care must be taken to ensure that measurement to achieve the target to lower fuel poverty considers BME communities. If only overall figures are monitored, disparate outcomes for BME communities (or for single parent households, households with one or more disabled members, etc.) could be missed out. It will be important to actively engage BME communities and organisations which represent them in consideration of the Warm Homes Bill and implementation of the Fuel Poverty Strategy to ensure that any barriers or negative disparate impacts are noted and addressed.

23 What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?

Comments::

24 Do you think any of these proposals will have an impact, positive or negative, on children's rights?

Not Answered

If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?:

About You

What is your name?

Name:

Rebecca Marek

What is your email address?

Email:

rebecca@crer.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Coalition for Racial Equality and Rights

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: