LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL
CALL FOR VIEWS

SUBMISSION FROM COALITION FOR RACIAL EQUALITY AND RIGHTS

The Coalition for Racial Equality and Rights (CRER) is a strategic anti-racism organisation which works to eliminate racial discrimination and promote racial justice across Scotland. Our primary concern in relation to the Fuel Poverty (Target, Definition, and Strategy) (Scotland) Bill is the impact it may have on Black and minority ethnic communities, who are twice as likely as their white British counterparts to live in poverty.

Do you agree with the Scottish Government’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5% of Scottish Households by 2040?

CRER welcomes the proposal to set a new statutory target to reduce fuel poverty through the Bill. However, we would ask that 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 5% by 2040 is reached, but a disproportionate amount of households still 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.

Do you agree with the Scottish Government’s proposals for a revised definition of fuel poverty?

CRER believes that as 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. A targeted approach to engaging with BME communities and other disadvantaged groups may be necessary to ensure the targets are met fully and inclusively.

Do you agree with provision 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?

CRER is supportive of the plan to require the Scottish Government to publish a fuel poverty strategy. However, we believe that the strategy should include a section addressing equality concerns, which details which steps will be taken to ensure that particular groups (e.g. BME groups, disabled people, women) are not disproportionately disadvantaged.

In terms of race, 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 (36% for BME individuals compared to 19% for white British individuals according to the Scottish Government’s “Poverty and Income Inequality in Scotland 2014-17”). 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.

The strategy should aim to better understand the reality of fuel poverty in BME communities to ensure that any particular impact on BME communities is noted, understood, and acted upon. It should also be accompanied by a robust Equality Impact Assessment.

In terms of the consultation requirements, we believe the Bill should be amended in line with the Child Poverty (Scotland) Act 2017 the Social Security (Scotland) Act 2018 so to include the following clause:

“In preparing a strategy, the Scottish Ministers must consult such persons who work with or represent individuals living in households whose income is adversely affected, or whose expenditure is increased, because a member of the household has one or more protected characteristics within the meaning of section 4 of the Equality Act 2010.”
This would be in keeping with recent anti-poverty legislation and would ensure that equalities groups are considered.

**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?**

CRER notes that the draft strategy does not include any information on equality.

The Bill’s accompanying equality impact assessment notes that the Scottish Government does not have fuel poverty data specific to minority ethnic households, outwith information about higher poverty rates and rates of living in urban areas.

We would ask that the strategy include plans to investigate the rate of fuel poverty for BME communities in Scotland to better understand any specific barriers facing this group. Following on from this, bespoke engagement and tailored support that may be needed to reduce fuel poverty in these communities.

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

We would also ask that the reporting requirements be amended to ensure that information on whether the 2040 target has been met and the percentage of households in fuel poverty by 2040 are disaggregated by equality group to ensure that progress has not left already disadvantaged groups further behind.

We would also suggest that the Scottish Government should report back to the Scottish Parliament on a three or five yearly basis, to ensure progress is being made. These report should also include disaggregated information.

**Conclusion**

CRER requests that the committee raise these issues during their scrutiny of the Bill. We must ensure that progress to eradicate inequality and poverty in Scotland does not leave BME groups behind.

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