

Enhanced Heating Regimes within the new definition of Fuel Poverty

Shelter Scotland
consultation
response

August 2019

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign so that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

Question 1: Do you agree or disagree that the Enhanced Heating Regime 1 (higher temperature for longer hours) should be applied to those households where a member of the household:

- a. has a long-term mental or physical illness lasting or expected to last 12 months or more AND they regularly spend more time in the home during winter**
- b. is in receipt of benefits received for a care need or disability AND they regularly spend more time in the home during winter**
- c. is age 75 and over AND they regularly spend more time in the home during winter**

Disagree

If you disagree, please give your reasons below

Shelter Scotland support the policy intention behind this proposal and the groups identified, but we believe the wording is confusing and potentially misleading.

We believe the intention is or should be to identify households who regularly spend long periods at home every day at the week (i.e. not just at the weekends), and therefore require the Enhanced Heating Regime with longer hours.

It may be that the terminology used is meant to imply the household spends more time *at home than outwith the home*. However we believe the current wording is misleading and implies the household spends more time at home *during winter than summer*. Someone who falls into any of these three groups might have a similar pattern on how much time they spend at home all year round. For example, an individual with a long-term physical disability might be housebound all year, but under our interpretation of the definition they arguably wouldn't fit the criteria for the extended hours heating regime.

We would recommend wording as follows: "AND spend long periods at home both at the weekend and during the week" or "AND spend long periods at home throughout the week". It might be better to define the 16 hours in the question rather than saying 'long periods'.

If the policy only wishes to understand patterns of time spent at home during winter, then it should be phrased 'During winter, do you regularly spend long periods at home throughout the week'? However, we have

concerns about this too given the length of poor weather conditions that can occur in Scotland – the enhanced heating regime should not be restricted for the months of December-February. We believe a fair assumption is that a person who spends more time at home in summer is likely to spend at least the same but likely more time at home during winter, and therefore the distinction in the question is not necessary.

Are there other households that you think we should consider and why? Please provide details and evidence supporting your view below:

No

Question 2: Do you agree or disagree that the Enhanced Heating Regime 2 (higher temperature with standard hours) should be applied to those households where a member of the household:

- a) has a long-term mental or physical illness lasting or expected to last 12 months or more but they DO NOT regularly spend more time in the home, on weekdays, during the winter.
- b) is in receipt of benefits received for a care need or disability but they DO NOT regularly spend more time in the home, on weekdays, during the winter
- c) is age 75 and over but they do not regularly spend more of their time in the home, on weekdays, during the winter.

Disagree

If you disagree, please give your reasons below

Similarly, the wording here is unclear and the reference to winter seems misleading. The criteria should be whether the individual spends or does not spend long periods in the home on weekdays. Thereby, the question should be to ascertain whether an individual fits within one of the three groups 'but they do not spend long periods (or define this explicitly as 16 hours) at home on weekdays'.

As covered in question 1, if the policy is only concerned with patterns of time spent at home during winter, then the question/statement should start with this caveat, rather than end, to avoid confusion: "During winter [the household fits into one of the three groups] but they do not spend long periods at home aside from weekends." As above, we have concerns about this too given the length of poor weather conditions that can occur in Scotland – the enhanced heating regime should not be restricted for the months of December-February. We believe a fair assumption is that a person who spends more time at home in summer is likely to spend at

least the same but likely more time at home during winter, and therefore the distinction in the question is not necessary.

Are there other households that you think we should consider and why? Please provide details and evidence supporting your view below:

No

Question: Do you agree or disagree that the Enhanced Heating Regime 3 (standard temperature with longer hours) should be applied to those households:

a) With a child under the age of 3 AND who regularly spend more time at home during the winter

Disagree

If you disagree, please give your reasons below:

Shelter Scotland support this acknowledgement that households with young children might be spending longer periods in the home and thereby may require increased hours of heating, in line with concerns we raised in our evidence submitted for the Fuel Poverty (Target, Definition and Strategy) Bill in November 2018.¹ We thereby strongly support the development of an enhanced heating regime acknowledging the increased hours of heating as a need separate from that of households requiring a higher heating temperature.

Whilst the independent panel recommended that households with children under 5 be considered as requiring an enhanced heating regime in terms of hours of heating required – we understand the Scottish Government’s rationale linking age to free childcare hours as outlined. However, we are aware of practical concerns about the uptake of free childcare places across Scotland and question the assumption that parents with children aged 3-5 are not in the home because they are using free childcare places (as raised, for example, by Energy Action Scotland in their response to this consultation). More evidence is required to clarify the extent of this in reality, and/or the definition should be extended to families with children

1

https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/evidence_on_the_fuel_poverty_target_definition_and_strategy_bill

under 5 years old to ensure that some groups in need are not discounted from requiring more hours of heating.

Are there other households that you think we should consider within this regime? Please provide details and evidence for your views below:

No

Contact: Lisa Borthwick, lisa_borthwick@shelter.org.uk

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

Please support us at shelterscotland.org

RH7439. Registered charity in England and Wales (263710) and in Scotland (SC002327)

Shelter Scotland
Scotiabank House
6 South Charlotte Street
Edinburgh EH2 4AW

shelterscotland.org