

Inclusion London response to “Vulnerable Customer Safeguard Tariff”

We welcome the opportunity to respond to this consultation and to the proposal to introduce a safeguard tariff that will bring welcome relief to some one million people.

Below we make three main points in response to the consultation. We also support the more detailed response submitted by **Fuel Poverty Action**.

1) We consider that restricting eligibility to only those in receipt of the Warm Home Discount is too narrow and will mean many of those most in need miss out on the protection from the safeguard tariff.

Warm Home Discount is awarded automatically to pensioners on low incomes but people deemed “vulnerable” for other reasons – particularly disability or illness, or children aged 5 or under, can apply to their energy supplier and may get it, but it is “first come first served” with a limited pot, and all the suppliers have different requirements to say who qualifies, mostly based on what benefits you receive. Some smaller suppliers don’t offer Warm Home Discount at all. This means that despite being eligible, disabled people and children will often be excluded – not only from the discount itself, but now also from the cap.

The linking of WHD to receipt of certain benefits is also problematic at the current time where benefit assessments have such a high level of inaccuracy with over 60% of benefit assessment decisions over-turned at appeal for both Personal Independence Payment and Employment and Support Allowance¹. Disabled people wrongly denied benefits and left without essential income

¹ The percentage of initial decisions which were changed by a tribunal was 65% for both PIP and ESA i.e. 70,329 PIP decisions 45,697 ESA decisions were overturned during the financial year 2016/17. <https://www.gov.uk/government/statistics/tribunals-and-gender-recognition-certificate-statistics-quarterly-april-to-june-2017-and-2016-to-2017>

while awaiting tribunal hearings to over-turn the decisions are amongst those most in need of safeguarding against vulnerability.

We appreciate the rush towards implementation – lives are at stake as Winter approaches – but we see no reason why implementation could not be immediate for existing WHD recipients while proposals on how to widen eligibility are considered.

Para 4.15 says, “In addition, WHD recipients only make up a proportion of those who could be considered vulnerable based on our indicators set out above. Based on the CMA’s survey, there are around 1.7m WHD recipients on SVTs (including both prepayment and non-prepayment consumers), whereas we estimate that there may be around 5.6m households on SVTs containing at least one individual in receipt of income or disability-related benefits.”

Among the people who will miss out most are people below pension age (or over pension age but not in receipt of the guarantee element of pension credit) who are disabled or have a long term illness, yet this group of people:

- Are most likely to be fuel poor by reason not only of low income but of needing a lot of heat, whether because they may not be out at work in the daytime, and may in fact be home most of the time altogether, or whether because they need a more constant or higher temperature for medical reasons.
- Have borne the brunt of austerity cuts² and are amongst the most likely to live in poverty.³
- Will suffer most pain, injury, illness, and potentially even death if they cannot afford the heat they need.

We would therefore urge that the cap is not restricted to only those in receipt of the WHD but that a universal cap is instead introduced.

2) Many Deaf and Disabled people do not identify under the term “vulnerable” and yet are made vulnerable through fuel poverty. Publicity

² Research by the Centre for Welfare reform showed that Disabled people have been hit nine times harder than other groups of people by the cuts – for Disabled people with high support needs that figure rises to nineteen times harder. <https://www.gov.uk/government/statistics/tribunals-and-gender-recognition-certificate-statistics-quarterly-april-to-june-2017-and-2016-to-2017>

³ Research by the Joseph Rowntree Foundation found that almost half of people in poverty in the UK are disabled or live in a household with a disabled person:
http://www.npi.org.uk/files/7414/7087/2444/Disability_and_poverty_SUMMARY_REPORT_FINAL.pdf

about the safeguard tariff will need to use language sensitively and to clearly set out who is eligible in a way that does not rely on people automatically understanding that the term “vulnerable” applies to them.

3) Information about the safeguard tariff must be available in a range of accessible formats and promoted in ways that will reach Deaf and Disabled people who are isolated and not in touch with support services – indeed many are no longer eligible for support under stricter social care criteria and through closures of many frontline services.

This concludes our response.

For more information contact:

Email: Policy@inclusionlondon.org.uk

Telephone: 020 7237 3181

Inclusion London

Inclusion London is a London-wide user-led organisation which promotes equality for London’s Deaf and Disabled people and provides capacity-building support for over 70 Deaf and Disabled People’s Organisations (DDPOs) in London and through these organisations our reach extends to over 70,000 Disabled Londoners.

- Twenty-one per cent (13.3 million) of people reported a disability in 2015/16, an increase from 19 per cent (11.9 million) in 2013/14. Most of the change over the two years came from an increase in working-age adults reporting a disability (16 to 18 per cent).⁴
- There are approximately 1.2 million Disabled people living in London.⁵

⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/600465/family-resources-survey-2015-16.pdf

⁵ See ‘Disability data tables’ at: <https://www.gov.uk/government/statistics/family-resources-survey-financial-year-201516>