



## **Scottish Women's Convention response to the Scottish Government's: Winter Heating Benefits– Low Income Winter Heating Assistance.**

**February 2022**

### **Premise**

The Scottish Government has now committed to replacing the UK Government's Cold Weather Payment (CWP) of £25 for every 7-day period of very cold weather, with a new £50 winter heating payment paid annually to those low-income households currently eligible for the CWP. This will be an investment of £20 million every year and support 400,000 households, giving eligible low-income households guaranteed support with energy bills.

They are therefore consulting on the policy intention behind the delivery of this new Low Income Winter Heating Assistance (LIWHA). This consultation aims to provide an overview of the new payments aim, its key eligibility criteria and format. It will lay out how they intend to deliver this new benefit through Social Security Scotland to provide assistance to individuals to help towards meeting heating costs in winter.

This consultation asks questions on whether the policy intent set out in the Scottish approach to replacing CWPs will best meet the needs of those it is intended to help. They would like to gather views to ensure they have identified the best possible approach to delivering this assistance before they draft the benefit regulations.

### **The Scottish Women's Convention (SWC)**

The Scottish Women's Convention (SWC) is funded to engage with women throughout Scotland in order that their views might influence public policy. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at both a Scottish and UK level.

The SWC engages with women using a range of methods, including roadshow events, thematic conferences, and regional contact groups. This submission provides the views of women, reflecting their opinions and experiences in key areas relevant to women's equality.

The SWC is currently engaging with women through digital roadshows, online surveys, asking women to comment by email, and by telephoning those who want to talk. We are also using our wide network to ask women to collate views in their local communities and forward these

to us on a regular basis. We are continuing to review innovative ways of engaging with women throughout Scotland using whichever medium is appropriate to them.

### Consultation questions

Do you agree or disagree with the proposal to replace Cold Weather Payment with a new benefit whose eligibility is based solely on receipt of a low-income benefit and not on reaching a specific temperature for a period of time?

Most women said yes, they agreed but a few women from income brackets who just do not qualify for benefits and women from the Highlands and Islands said no as they would be affected by this for the following reasons:

- May not be on low-income benefits but may be experiencing in work poverty and their fuel costs over cold snaps would mean they wouldn't be entitled to a payment but potentially pushed further into poverty due to increased energy costs.
- May be entitled to benefits but experience many cold weather spells in their location which affects their income and payments on energy costs.
- May not claim benefits due to being unaware if they are entitled or not.

Do you agree or disagree that this approach is an effective way for the Scottish Government to tackle winter heating costs for people on low incomes?

Many women agree to the approach as they thought that for those on the lowest income this would help when fuel and energy costs are at their highest and would take some pressure off these energy costs and allow them to spend money on the basic needs such as food, warm clothes etc.

Do you agree or disagree with the proposal to name the replacement for Cold Weather Payment (CWP) in Scotland "Low Income Winter Heating Assistance" (LIWHA)?

Many women we spoke to thought Cold Weather Payment used more positive language than Low Income Winter Heating Assistance, so they disagreed. The reasons were as stated:

- Stigma of using the term Low Income as this gave the impression that they were not earning enough and that they were claiming benefits.
- The language was more negative as it created a judgement that you needed help with paying your energy bills.
- Women liked the term Cold Winter Payment as they felt there were no assumptions around the language, and they said it felt like most people could apply so there was no stigma or discrimination around it as it did not infer this was a benefit or handout.

Do you agree or disagree with the proposal to remove the requirement for a 'cold spell' to be identified in order for a client to receive a payment?

Although most women agreed with the proposal as they would not need a significant cold spell to receive the benefit, there were some women who were worried that this could plunge some communities into poverty as they may not be eligible for the payment under the proposed guidance but lived in some of the coldest parts of the country.

- Real concerns about the substantial number of potential losers in Highland and Islands areas.
- Some areas in the country have had more than 2 episodes of cold weather which would have elicited the payment, but some will not receive this now under proposed guidelines and will be worse off as only getting the equivalent of 2 payments when they could have had potentially more in a given year.

Do you agree or disagree with the proposal to have a one off, annual payment for LIWHA?

Most women we spoke too agreed and were happy that they would receive a one off, annual payment for LIWHA as they would know when this payment was due and could factor this in to paying their energy bills but as advised women in remote and rural areas such as the Highlands and Islands have raised concerns that this would not be enough to help them with their heating in the winter months due to the number of cold periods they encounter.

Do you agree or disagree that our approach to identifying eligibility should be through the use of qualifying benefits?

Women in whole agreed that the approach to identifying eligibility should be through the use of qualifying benefits but that there had to be flexibility around this as many people are not claiming benefits they are entitled too. Women felt there was a greater need in improving take-up of benefits namely disability benefits and pension credits. Women were worried that issues with benefits such as universal credit and tax credits also need to be considered as these are not always easy to apply for and receive and sometimes benefits would be taken away until they proved that they were eligible, and this could change depending on hours worked or family situation.

Do you agree or disagree with the proposal to retain the current qualifying benefits to indicate eligibility for this new payment?

Although most women agreed that the proposal to retain the current qualifying benefits was beneficial, they highlighted that some women would not be able to apply for this payment due to the current criteria which is already in place. They felt there should be the option for discretion and that certain circumstances should be considered examples were given of:

- Women fleeing violence where benefits were jointly held or if they were experiencing economic abuse.
- Women with no recourse to public funds
- Older women who are affected by pension reform and not entitled to pension credits.

Do you agree or disagree that the eligibility criteria for the LIWHA are clear?

The women we spoke to felt that they agreed that the eligibility criteria for the LIWHA was clear, but they felt more people would miss out on receiving this benefit than those who would receive it. Women want to see the great majority receiving this payment but can also see people being disadvantaged and as they said this could be thousands of people. This was due to the following reasons:

- Benefits being stopped incorrectly especially disability or universal credit
- Not claiming benefits in which you were entitled to, examples given of pension credit with around 7000 people missing out on these payments.
- Having no recourse to public funds but living in areas which are affected by cold weather on a regular basis
- Living in properties which were not energy efficient and sub-standard.
- Digital poverty so may not be able to claim benefits online in which they may be entitled.

Do you agree or disagree that the proposed rate of £50 for LIWHA is appropriate?

On the whole the women we spoke to disagreed that the proposed rate of £50 for LIWHA was enough. The Scottish Government Winter Support Fund has arisen as an allocation of consequential' s from Westminster. This seems an uncertain allocation to rely on or budget against. The total scale of the package in Scotland is modest. £10million for energy payments given the scale of the current energy crisis and increases to average fuel bills.

Women raised real concerns about the significant number of potential losers in highland and islands areas. Women who fall under the weather stations at certain areas would have been worse off in aggregate over the past decade under LIWHA than under CWPs.

All but one of those areas are predominantly remote rural so dealing with the rural premium already. All but one is off-gas, so paying more for fuel already. All but one has a higher than average % of homes in EPC F and G.

The proposed benefit isn't targeted to people in the poorest circumstances with the lowest incomes in the hardest to heat homes. The costs of heating homes across Scotland are far from equitable. The average energy costs in Orkney/Shetland/Western Isles are significantly higher, double the GB average. Not all about climate but also to do with thermal efficiency, pass through costs, all electric heating. £1 in different areas buys different levels of comfort for households.

Those in receipt of disability components of means tested benefits are in the poorest circumstances on the lowest incomes. The costs in rural areas like the Highlands and Islands are a significant additional cost over the higher-than-average fuel costs that many disabled women already face. Therefore those in those areas they may need additional help but would not receive these under the new proposals but would have received more money under the current CWP.

Some households will be worse off under the LIWHA some up to the value of £200 so women suggested the Scottish Government may need to rethink this amount especially because of the increasing fuel costs across Scotland which will affect all households.

Do you agree or disagree with the proposal for LIWHA to be given to clients in the form of a cash payment and not another form?

Women agreed that a form of cash payment would be better due to the following:

- They could use the money for clothes and other forms of heating which would help reduce energy costs
- They may be in overdrafts and if this money was paid into a bank, it may be taken off and have no real benefit so another system such as vouchers was suggested.
- If this payment were made to an energy provider this may only take this amount off existing arrears and they would not receive the energy they need at that time they needed it. An example was given as pre-payment meters.
- Vouchers used when bank accounts are not available due to economic abuse or no bank accounts.

Do you agree or disagree with the proposal to pay LIWHA as an annual one-off payment each winter?

The women we spoke with agreed that a one-off annual payment for LIWHA would be better as they would know when this was due and could budget accordingly to ensure they had the best opportunity to ensure they were warmer during these periods.

Do you agree or disagree with the proposal to set a 'qualifying week' during which eligible clients for LIWHA will be identified?

Women agreed that there is a need to put a logical model in place, and more detailed monitoring and evaluation before the policy is implemented.

Women asked around equality impact assessments being done on the protected characteristics, who would be worse off and who could claim this benefit and which groups this new policy would adversely impact.

- Women in precarious work where benefits fluctuate throughout the year.
  - Hospitality workers with lots of hours at Christmas may have their benefits reduced or taken away because they earned too much the month before and if the qualifying week happened that month, they would not receive the payment
- Women fleeing violence and domestic abuse situations

- Women fleeing violence may not be able to claim this payment due to a lack of paperwork or being constricted by benefits being paid to their abuser Universal credits can take 6-8 weeks to receive when applied for if this fell during this qualifying week then they wouldn't be entitled
- Women who may lose means tested benefits due to outside influences
  - Disabled women who have their disability benefit removed as they are deemed fit to work. May have no access to benefits at this time they may be appealing the process but because they are not entitled during this week, they would receive no benefit.

Women felt it was important that there was flexibility around this qualifying week and that it was not rigid as this could exclude many women from this payment because of the way the current benefit system works.

Women felt that lone parents and qualifying benefits should be carefully considered. They advised that they did not think having a qualifying week was helpful and they felt that picking one specific point in time would penalise many women who this benefit is designed to help.

Do you agree or disagree with the proposal to make LIWHA payments to clients in February each year?

Women agreed it made sense to make the payment in February each year. The reasons for this were that billing for most households is frequent. They felt payments should always be made closer to the event or advent of the winter period so that households have the funds to purchase either heat, food, or clothing.

Please write any information you wish to share on the impact of Low-Income Winter Heating Assistance on groups who share protected characteristics in this text box.

EQIA's need to be running as a live document throughout the whole process and be continually reassessed. This is due to the intersectionality that many women with protected characteristics face.

By evaluating these you can see the unintended consequences that the new policy creates within these groups and also shows the most affected by the policy change. This will allow for processes to be refined and changed to ensure that the most vulnerable are receiving the benefits they should be receiving.

## Conclusion

The SWC is grateful for the opportunity to respond to the Scottish Government's consultation on Assessment of Well-being – draft statutory guidance. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to such legislation and the effect of this on women's equality.

For further information, please contact

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