



## **The Utility Regulators Social Action Plan 2009 - 2014**

### **Disability Action's Response March 2009**

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## **INTRODUCTION**

- 1 Disability Action is a pioneering Northern Ireland charity working with and for people with disabilities. We work with our members to provide information, training, transport awareness programmes and representation for people regardless of their disability; whether that is physical, mental, sensory, hidden or learning disability.
- 2 21% (369,390) of adults and 6% (105,540) of children in Northern Ireland has a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community. In pursuit of our aims we serve 45,000 people each year.
- 4 Our network of services is provided via our Headquarters in Belfast and in three regional offices in Carrickfergus, Derry and Dungannon.
- 5 Disability Action welcomes the opportunity to respond to this draft and to aid our response has put the relevant page/paragraph of the draft in brackets at the end of our comments.

## **SPECIFIC COMMENTARY**

- 6 Disability Action would advise that information on the provision of this consultation document in alternative formats and language should have been placed in a prominent position such as on the front cover, or inside front cover.
- 7 Disability Action is disappointed that the contact details for Alison Farr do not contain a textphone or dedicated SMS mobile number to enable deaf people to have equal access to the Regulator as others. (Page 10, para 2.8)
- 8 We are dismayed that this document is not offered in alternative formats, a duty of reasonable adjustment under the Disability Discrimination Act 1995. (Page 10, para 2.8)

- 9 Disability Action believes this draft Social Action Plan should have been EQIA'd as fuel and water poverty issues are of particular importance to most of the section 75 affected groups. In addition, an EQIA would also assist the Regulator to examine issues of multiple identity. (Page 11, question 1)
- 10 Disability Action agrees with the Regulator that there is an alternative way to frame issues of fuel and water poverty. (Page 13, para 3.9)
- 11 Additional reasons why disabled people may be vulnerable utility customers are:
- Disabled people may need to use more water than someone of comparable circumstances e.g. due to reasons of incontinence, skin disorders.
  - People as an effect of disability or ill health may require higher levels of heating than others.
  - 75% of disabled people are older people and so the issue of multiple characteristics/ intensifies. (Page 14, Table 1, and Question 2)
- 12 The point that Northern Ireland experiences high levels of disability – 21% of adults have a disability and 1 family in 4 is directly affected should be added to the reason for Northern Ireland's levels of fuel poverty. (Page 16, para 3.15)
- 13 The language used by Northern Ireland Water to describe disabled people is neither modern, consistent nor positive. The Regulator should advise Northern Ireland Water of this and ensure that the terminology used in Codes of Practice is more appropriate. (Page 22,, Table 6)
- 14 In relation to question 3, Disability Action would make the following points.
- Disability Action believes that the same service of priority warning about disruptions to gas supply should be given to customers as with water and electricity. Disability Action would recommend that a central register is developed for customers who have special requirements. This would negate to need for disabled people to fill in separate forms and

contact separate agencies about specialist requirements with each utility supplier. Disability Action would be willing to assist with the development of this.

- Disability Action also recommends that critical care provision should be extended to ensure that the vulnerable customers on this register are not disconnected for non-payment of bill until all repayment options have been exhausted.
- Disability Action would advise against giving a list of medical conditions that require a continuous supply of gas as each individual's circumstances are so different.

- 15 Energy providers have duties under section 75 of the Northern Ireland Act 1995 and consequently should already have a policy relating to the provision of documentation in alternative languages. (Page 23, para 4.13)
- 16 Disability Action is a partner in the delivery of NIE's "For Your Benefit" programme and commends it as an effective means of increasing benefit income. (Page 24, para 5.4)
- 17 Disability Action supports the introduction of social tariffs and generally agrees with the content of Table 7. (Page 28, paras 5.24 – 5.27)
- 18 Disability Action advises that the Regulator should as a matter of urgency develop direct links with affected groups to ensure that issues of water and fuel poverty are put directly to him by those who are the greatest experts on this issue – those who are water and/ or fuel poor. (Page 30, para 5.33)
- 19 In relation to questions, 4, 5, 6 and 7, Disability Action would make the following comments:
- Disability Action would point out that the current definition of fuel poverty does not take into account the extra costs that most disabled people face. There is also evidence that disabled people spend a greater proportion of their household income on utility costs than people without a disability (<sup>1</sup>).

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<sup>1</sup> "Disability, household, income and expenditure: a follow up survey of disabled adults in the Family Expenditure Series". DWP

- Many disabled people and their carers are also reliant on social security benefits which are mostly paid fortnightly or monthly. This makes it very difficult to budget if customers are paying a quarterly bill.
- Anecdotal evidence from Disability Action's client base would also suggest that many disabled people and their carers do not have access to a bank account and use a Post Office account to receive benefit payments. There is not any option for direct debits payments from this type of account and therefore access to savings on utility costs.
- Research in England has also shown that one of the groups most likely to have a prepayment meter is those who have a long-term illness or disability. Disability Action has also experienced a growing number of customers contacting us because of rising utility costs that they simply cannot meet.
- As part of looking at how customers can make payment Disability Action would also urge that when setting domestic tariffs Utility Companies should look at not penalising those with higher usage and introducing some type of concession payment for those dependent on means tested benefits.

Recent evidence also showed that disabled people who are in debt will cut back on utility costs to try to meet other payments. We would encourage the Regulator and the Utility Companies to engage with agencies such as Disability Action to develop a way forward to ensure the most vulnerable customers are not disconnected due to debt.

(Page 30-33, paras 5.35 – 5.45)

- 20 In relation to bullet point 1, freephone, textphones or dedicated SMS mobiles should be provided for use by deaf people. (Page 35, para 6.11)
- 21 All providers and the Regulator should undertake disability awareness raising exercises. To that end all their websites should conform with European AAA Guidelines on Accessibility for Disabled People. In addition providers should pay organisations in the disability, health and age (both young and old) sectors to carry such information. (Page 36, para 6.12 and question 8)

- 22 The Utility Regulator needs to look at the issues of accessible information and alternative formats as well as provision in other languages. (page 38, para 7.6)
- 23 The panel should include those directly affected and their representative groups. (page 39, para 7.12)
- 24 The Regulator could also commission qualitative research directly from affected groups. (page 39, para 7.13)

## **CONCLUSION**

- 25 Disability Action has welcomed the opportunity to contribute to this important consultation.