A MANIFESTO FOR LOW INCOME CONSUMERS

The United Kingdom in the 1990s is a country in which the poor pay more. A place where there is a price to pay for living on a low income. There is a price to pay in terms of monetary cost, quality of services and value for money. There are policies, rules and systems which compound the disadvantages that people living on a low income face.

The double disadvantage of having less money and getting less for it, in terms of both quality and quantity, has been called consumer detriment. This detriment applies to goods and services paid for directly by consumers, and to public services which consumers pay for indirectly. The wide-ranging nature of the problems low income consumers face is reflected in the ten service sectors covered in this manifesto. These are housing, energy and fuel, consumption, food and nutrition, health and welfare, education, transport, high street goods and services, social security, credit and debt, and legal services.

Disadvantage and detriment permeate daily lives and restrict opportunities from birth until old age. At the day to day level those on low incomes spend proportionately more (and in some cases more in actual money) on household goods and services, fuel and power, and food, than those who are better off. Despite spending so much on these basics, many people still live in damp houses that are difficult to heat, and eat food which is nutritionally inadequate.

Children growing up in households with low incomes often leave school with fewer qualifications and, as they move into adult life, have very restricted levels of mobility, poorer health and lower life expectancy. Dependence on social security benefits is unavoidable for many, and shortage of money forces people to borrow at high rates of interest, which may ultimately lead to debt. When problems arise, redress is often hard to get in situations ranging from exchanging a faulty toaster to getting compensation for an injury. Access to legal services is very difficult and too expensive for many people.

There are a number of social trends that have played a part in determining how many people are living on a low income and who those people are. Britain has an ageing population; since the late 1970s the number of people aged over 75 has steadily increased and by 1991 represented 7% of the population. About 60% of these over 75-year-olds were women. Although not all people of pensionable age are living on low incomes, pensioners are represented most strongly in the lowest 30% of household income distribution. Coupled with this ageing trend is a decrease in household size: 14% of the population were living alone in 1991. There has also been an increase in single-parent families so that they now represent almost a fifth of all families.

Changes in economic conditions are also important. Part-time workers now constitute almost a quarter of those in employment in the UK. The proportion of gross household income from benefits has risen since the early 1980s and there has been an increasing inequality in incomes. Although average incomes have grown, those at the bottom end of the income scale have only grown by a very small amount. The Joseph Rowntree Foundation reported in February 1995 that income inequality has grown to a greater extent and at a faster pace in Britain since the late 1970s than in any other comparable industrialised country. The value of hourly wages for the lowest-paid men fell in real terms between 1975 and 1992, while those of middle earners rose by 35% and high earners grew by 50%

We in Scotland, more than anyone, should face up to these issues because Scotland has a higher proportion of people living on low incomes than the UK average. In 1990/91, 32% of households in the UK had less than £175 per week, compared to 41% in Scotland. Similarly, more full-time workers in Scotland (32%) fell below the low pay threshold in 1992 than in Britain as a whole (27%). The proportion of household income derived from social security benefits is higher in Scotland (17%) than the UK average (13%). In 1992 Scotland had an average weekly disposable household income of £257 compared with the UK average of £280 per week.

This manifesto seeks to outline the costs of living on a low income, examine the causes and, most importantly, propose changes to tackle these problems. This document presents an agenda for action to change the policies, rules and systems which disadvantage poorer consumers. This agenda for change can be used to promote change at a variety of levels. It is about ironing out flaws which result in inequity and create a trap which hinders people trying to climb out of poverty.
In May 1994 the Scottish Consumer Council published *Poor and Paying for It: the price of living on a low income* in which policy experts from various sectors analysed the problems faced by low income consumers in Scotland today. It is from that book - and all the expert advice which fed into the editorial process - that we have been able to draw up an agenda for change. Of necessity, the arguments presented in the book have been substantially condensed for this manifesto. Although the manifesto is drawn directly from the factual evidence in the book, the agenda for action presented is the Scottish Consumer Council’s.

Common themes emerge throughout the book despite the diverse nature of the issues examined. Consumer detriment experienced by low income consumers works in a number of ways. The most common characteristics are described below.

**LACK OF CAPITAL**

First and foremost, those on low incomes are at a disadvantage simply because they lack capital. They cannot afford to spend large sums of money at any one time. This limits their capacity to economise by buying in bulk or taking advantage of special offers. Equally, they find it difficult to purchase consumer durables which could ultimately save them money, such as a freezer, a car or a washing machine.

**POOR ACCESS**

A second characteristic of consumer detriment is poor access to all types of goods and services. This is most often due to problems of physical access, where services are unavailable in places which low income consumers can get to with ease and at minimal cost (on foot or by public transport). Problems of access, however, may also be created by a language barrier, by professional jargon or by the intimidation many people experience in dealing with bureaucracy.

**LACK OF CHOICE**

Low income consumers may also experience detriment through lack of choice. Low income consumers are limited in their ability to “shop around” for consumer goods because of lack of capital or poor access. In relation to public sector services, like health or education, consumers often find that there are barriers to exercising their theoretical right to choose. There may, for example, be hidden costs incurred in exercising choice, such as the extra cost of travelling to a different school. Such barriers can make choice difficult if not impossible.

**INADEQUATE INFORMATION, ADVICE, REPRESENTATION AND REDRESS**

A further feature of consumer detriment is that low income consumers often cannot afford to pay for independent advice and information or are not aware of their rights or how to go about enforcing them. Similarly, a lack of representation of the interests of low income consumers can lead to detriment. Those on low incomes particularly need to have their voice heard as they have a very restricted range of options available to them. Low income consumers may face more problems in getting full redress when things go wrong than the rest of the population.

**DISCRIMINATORY RULES**

One final cause of the disadvantage experienced by low income consumers is the discriminatory rules operated by some service providers. Such rules include the pricing policies of fuel companies which mean that the less fuel you use the more you pay per unit, chiefly because of uniform standing charges. Equally there are welfare rules which effectively trap people in poverty.

The agenda in this manifesto is based on the principle that those on low incomes cannot participate equally or fairly under market conditions and they need and have the right to continuing support and protection.

It is clear that people on low incomes face a wide, complex and interconnected range of problems. Imaginative and far-sighted solutions are required at national level to overcome this level of detriment. This should include a wide-ranging review of the measures currently in place to support the poorest in Britain. The underlying causes of poverty in the UK are beyond the scope of the SCC, but implementing the solutions suggested in this manifesto could help to alleviate the problems of double detriment faced by consumers on low incomes.

*Poor and Paying for It: the price of living on a low income.*


Price £13.95. ISBN 0 11 495206 X
BRIEFING: TRANSPORT

Scots living on low incomes have very restricted levels of mobility, and are consequently restricted in their daily lives. For most people, transport of some kind is essential for getting to work, going shopping, visiting friends and pursuing leisure activities.

Few people on low incomes own or have access to a car. Members of households without a car make fewer journeys to a narrower range of places than car owning families. Car ownership in Scotland is generally low but the national average hides wide variations throughout the country. Car ownership rates are very low, for example, in Glasgow (34.5% of households in 1991) compared with some rural areas, for example, Gordon District (83.4%), which has a very high level of car ownership. Car ownership in rural areas does not necessarily reflect higher incomes, as cars are often essential possessions in rural areas for which sacrifices are made in other areas of domestic expenditure.

Those without cars make more use of buses for travelling. Bus users, however, may face confusing and frequent changes to bus services. In Strathclyde, for example, there were 1,259 changes to registered bus services in 1990/91. Bus users have no representative body to turn to when things go wrong, unlike the users of rail, ferry and air transport, despite the fact that the majority of journeys by public transport are made by bus. Those on low incomes use buses more than those who are better off, and an independent users’ body would help to represent their interests more directly.

Fares for both bus and rail users are likely to increase in the future. Costs of car ownership are also likely to rise as a result of legislation aimed at reducing environmental impact and increasing tax revenue. Low income car owners, especially those living in rural and remote areas, will bear a disproportionately greater burden as a result of these increases.

Sixty percent of Scottish households with a gross weekly income of less than £200 spend less than £1 per week on bus fares, although three quarters of this income group do not have a car. Less than £1 per week probably represents no more than one adult return fare. For those living in rural areas or peripheral housing estates, mobility which is constrained to this extent strongly suggests a restricted quality of life.

Some people on low incomes, such as pensioners and people with disabilities, benefit considerably from concessionary fare schemes operated by Regional Councils, while others, such as those who are unemployed, continue to pay standard fares. Discounted fares, notably for students or pensioners, are not well suited to those on low incomes, because of the initial outlay involved.

Currently, the main constraint on public transport use is disposable income rather than the availability of public services. It is unclear how the situation will change in the future - much is dependent on the debate about car use, environmental impact and urban congestion.

Based on: Farrington, John, Transport in Poor and Paying for It: the price of living on a low income.


Price £13.95. ISBN 0 11 495206 X.
AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- The Scottish Office should establish a statutory body to represent the interests of bus users, or consider including the representation of bus users within the remit of the Rail Users Consultative Committee for Scotland.

- Local authorities should consider expanding concessionary fare schemes to other groups on low incomes, such as people who are unemployed.

- Local authorities should continue to monitor transport networks and subsidise socially necessary routes and services for all modes of transport.

- Franchises for private rail operators should require franchisees to offer discount fare schemes to those groups currently eligible for discounts.

- Transport operators should consider providing alternative payment methods which would allow those on low incomes to take advantage of discounted fares. Payment in instalments (without a financial penalty) rather than in one large sum might, for instance, allow greater take-up of discounts by those on low incomes.

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There is no specific allocation for food in welfare benefits. This makes it difficult to assess whether benefits include an adequate amount to cover a diet that meets basic nutritional standards. But research suggests that current levels allowed for in welfare benefits are inadequate. The Retail Price Index, to which benefit increases are linked, does not adequately reflect the changes in the cost of living which are experienced by low income households. Healthy diet plans for low income consumers, devised by government, are unrealistic about life on a low income, and often expect a degree of change in eating patterns which is difficult to attain, for example, the recommendation to eat five portions of fruit and vegetables a day (excluding potatoes).

In Scotland, 70% of food is bought in large supermarkets, many of which are out-of-town. Consumers living on low incomes in Scotland’s peripheral estates, or in rural or remote areas, are virtually excluded from access to a supermarket by the cost, time and effort involved in getting there by public transport.

Low income consumers who do have access to supermarkets are hindered by the fact that, to gain most advantage, purchasers need to be able to buy in larger quantities, and to be equipped to store food appropriately. Many low income households lack the money to be able to bulk buy or do not have adequate facilities to store bulk purchases, for example in a freezer.

Smaller local shops, therefore, compete with supermarkets mainly in terms of convenience. Prices are higher, they offer less choice and quality is often poorer. Taken together these amount to major barriers to low income shoppers purchasing nutritious and affordable food.

As in other sectors, retailing has responded to the demands of the majority of consumers, within the context of the free market. There has been, however, a growing awareness of the limits of this laissez-faire approach to retailing as the impact on certain disadvantaged groups of consumers has become evident.

The dominance of free market principles is ironic when it is considered that the market for food and agricultural commodities is, in reality, far from free. Extensive controls on the production and distribution of foodstuffs in Europe exist, in the form of the Common Agricultural Policy (CAP). United Kingdom consumers pay for the CAP, which operates, in effect, as a food tax. People on low incomes - who spend more of their income on food - pay proportionally more for the CAP. With such a major intervention in place to protect producers, arguments against protection for disadvantaged consumers are difficult to maintain.

Food co-operatives have been one community response to the problems of food poverty. These groups bulk buy food items and pass on the savings to all co-operative members. Many food co-operatives have emphasised healthy eating and the supply of fresh fruit and vegetables. The scale of food co-operative activity in Scotland, however, remains minimal. A number of other food poverty initiatives have been implemented by local authorities and health boards but these also remain marginal to the needs of the majority of low income consumers.

Based on: Killeen, Damian. Food and Nutrition in Poor and Paying for It: the price of living on a low income


Price £13.95. ISBN 0 11 495206 X
AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- To improve the nutrition of children, the Scottish Office and local authorities should urgently review policies affecting the provision and nutritional standards of school meals.
- The DSS should review benefit levels to take account of the actual purchasing power of family budgets.
- The government should continue to press for further reform of the Common Agricultural Policy of the European Union, which continues to result in artificially inflated food prices for consumers, which hit low income consumers hardest.
- The Scottish Office Education Department and the Scottish Consultative Council on the Curriculum should ensure that the school curriculum addresses issues relating to food and nutrition. This should include coverage of healthy eating issues and cookery skills.
- Planning authorities should consider the needs of less affluent and less mobile consumers when taking decisions affecting food retailing developments.
- Local authorities and the retail industry should continue to support and develop food co-operatives and other community-led initiatives which can bring savings to those on low incomes.
- Supermarkets need to play a more positive role by, for example, promoting a range of staple foods, including fresh produce, and allowing the purchase of small quantities at affordable prices.
- The Scottish Diet Action Group should pay particular regard to the problems likely to be encountered by low income families in reaching dietary targets.

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BRIEFING: HEALTH AND WELFARE SERVICES

Scotland's health is, to quote the Scottish Office, "a challenge to us all". Among developed countries Scotland has the highest death rates from heart disease and cancer, and Scottish women have the world's highest death rates from lung cancer. More people die prematurely in some parts of Scotland than in any area of England and Wales. There are also marked differences in health experiences within Scotland. You are, for example, likely to die three and a half years earlier if you live in Glasgow rather than Edinburgh.

It is widely recognised that a major factor in explaining these health differences is the socio-economic conditions in which people live. Patterns of death and ill health are strongly associated with patterns of deprivation. Death rates of people from birth to 64 years of age in deprived areas are more than double those in the most affluent areas. The gap is even wider for deaths between the ages of 25 and 44.

A great deal of academic debate surrounds the explanation of these inequalities in health, and it is clear that the exact mechanisms are complex. Living on a low income is relevant, not only because it stops people obtaining basic necessities essential to health, such as warmth and food, but also because it increases the likelihood of exposure to health hazards such as poor housing and pollution. Poverty also restricts social life, and if people are isolated from social support this can leave them feeling powerless. Evidence suggests that a strong social support network can help protect against illness and promote health.

Health-related behaviours are also associated with deprivation, the most important of these being smoking. It appears that smoking is part of a coping strategy when living in poverty. Other research has shown that there are certain constraints on health-related choices which make it more difficult for low income consumers to make behavioural changes. These obstacles may include the cost of a healthy diet if you live in a peripheral housing estate, or the costs of going for a swim.

Low income consumers may be disadvantaged in terms of health and welfare services in a number of ways:

- They may experience difficulty in accessing services because of their distribution or delivery (location of surgeries, outpatients clinics etc) and because of their lack of mobility.
- Charges introduced or increased for aspects of health care (eye test charges, prescription charges, dental charges) result in reductions in the use of the service. The 1990 dental contract may result in exclusion from care on the grounds of income, as dentists find themselves unable to provide NHS services within the budget allocated.
- There is some evidence that people living in the most deprived areas experience services which are poorer in quality.

The development of the internal market in the NHS has created a purchasing process which offers Health Boards an opportunity to assess the health needs of the population and contract providers to meet these needs. At the same time, they may specify standards of service with which the service providers should comply.

The Patient's Charter sets out entitlements for patients in Scotland which include their having a say in how a Health Board proposes to improve the health of its local population. Strategies to increase the involvement of patients and other users and carers in the planning and delivery of services are particularly important in the process of making services accessible and appropriate to
disadvantaged consumers. Clear structures to encourage user participation, however, are generally lacking. The need for greater public accountability is illustrated by the record of NHS Trusts across the UK as a whole. While required by legislation to hold public meetings within their first year, 50% of first wave Trusts and 60% of second wave Trusts did not do so.

Health promotion strategies need to take into account the particular problems of those on low incomes.

Based on: Curtice, Lisa, Health and Welfare Services in Poor and Paying for It: the price of living on a low income.
Price £13.95. ISBN 0 11 495206 X.

AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- Health Boards, NHS Trusts and local authorities should include equity as a priority in their objectives, policies and strategies. This is essential if they are to achieve the greatest health and social gain for the population.

- The Scottish Office, Health Boards, NHS Trusts, other agencies and local authorities should collaborate to produce multi-sectoral policy responses to promote health. Such responses are essential because many of the factors affecting health lie largely outside the health sector.

- The Scottish Office should ensure that resource allocation formulae take into account the additional costs of providing services in areas where the population is sparse.

- Those purchasing and providing preventive care and health promotion services should include strategies targeted specifically at lower income consumers. Siting programmes in settings such as the neighbourhood, the workplace, or the health-promoting hospital are methods of using and developing existing social resources and networks to improve the quality of people's everyday lives.

- The use of more accurate measures of health need in resource allocation decisions would enable resources to be targeted more effectively between and within Health Boards. Similarly, the health needs of a general practice population should be assessed, and information fed into the contracting process.

- Participation of users in service development should be actively encouraged by Health Boards, NHS Trusts and local authorities, and the many available methods for involving users should be utilised.

- Health Boards and local authorities should provide consumers with clear information on how health care and social care are defined in their local area, and whether or not they may be expected to pay.

- The NHS Management Executive in Scotland should continue to promote the use of "patient's supporter" schemes throughout Scottish health services.

- Mechanisms for selecting members of Health Boards, NHS Trusts and Local Health Councils should ensure that they are more representative of low income consumers.

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BRIEFING: EDUCATION

Despite efforts by Scottish education authorities to equalise educational opportunity, there continues to be a strong association between children's social circumstances and their level of educational attainment. Recent government education policy has emphasised parental choice and professional accountability, based on the central assumption that everyone is equally capable of making free choices in the education market place.

It is clear that social background and schooling both play a role in children's educational attainment. Studies suggest that, at least to some extent, schools can compensate for social deprivation, given appropriate forms of leadership, organisation and instruction. Key characteristics of highly effective schools include teachers' high expectations, clear school goals, a strong leadership role adopted by the headteacher and lessons which are clearly focused and give pupils maximum time on task. Higher levels of spending per pupil and smaller class sizes, although likely to be beneficial, do not automatically produce better results. Preferential funding of lower socio-economic status schools can lessen, although not eradicate, the detrimental effects of social deprivation, but there are also more complex underlying causes of social deprivation.

There is evidence that some ethnic minority groups in Scotland experience material and social disadvantage, which is generally associated with lower educational attainment.

The proportion of young people gaining a place in higher education has increased but is still less than a quarter of the age group. Among those who attain the minimum qualification for entry to higher education, working class pupils are less likely to apply (65%) than middle class pupils (90%), although having applied, they are as likely to be accepted. In 1988 only 3% of those entering higher education were from families who were in semi-skilled and unskilled occupations.

In Scotland, the evidence suggests that comprehensive education, while not removing social inequality, began to narrow the gap in attainment between working class and middle class pupils. It also appears that the encouragement of market forces in education may hinder the equalisation process: the detrimental effect of parental choice on those pupils left at schools considered less desirable is likely to be considerable. Similarly, the publication of exam results, attendance and truancy, while in some ways helpful indicators of school performance, will give no indication of pupil progress (the so-called added value) and might therefore further erode confidence in schools in lower socio-economic status areas.

Another threat to the process of equalisation associated with comprehensive reorganisation in Scotland is the possibility that schools in disadvantaged areas will have current levels of funding reduced under Devolved School Management which is due to be introduced into all Scottish schools by April 1996. Traditionally, education authorities have managed budgets centrally and schools in disadvantaged areas have received more funding per capita than schools in advantaged areas. The Scottish Office Education Department has expressed the view that the allocation of funds should, in future, be assessed "by reference predominantly to pupil numbers". One possible implication of this is that schools in disadvantaged areas will not only be faced with falling roles, but will have their current levels of funding reduced.

It is questionable whether the process of equalisation in Scottish education, begun in the 1960s and 1970s, will be sustained through the 1990s.

Based on: Riddell, Sheila, Education in Poor and Paying for It: the price of living on a low income.


Price £13.95. ISBN 0 11 495206 X.
AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- The Scottish Office Education Department, education authorities and schools should include equity as a priority in their policies, objectives and strategies. The education system should maximise the full potential of each child.

- The Scottish Office should ensure that there are adequate resources for support strategies for special needs provision and for schools in areas of deprivation.

- The Scottish Office should refine the use of published statistics, for example to reflect added value, so that areas of poor school performance can be identified and tackled.

- The Scottish Office Education Department and the Scottish Consultative Council on the Curriculum should monitor issues of choice within a school (for example, the subjects offered) particularly in schools serving areas of deprivation.

- The Secretary of State should look at the effectiveness of the careers service in motivating young people.

- There is an urgent need for research to identify those factors which influence educational outcomes and school effectiveness.

- There is a need for more research into the disadvantage that children from ethnic minority groups face in Scottish schools, including the need for pre-school instruction in English as a second language.

- Local authorities should examine the effectiveness of compensatory education including homework clubs which give children access to somewhere to do homework if they do not have room at home.

- The Department of Employment should develop childcare provision for children under five years old and out of school care for older children.

- The careers service should ensure that they encourage applications to higher education courses from pupils from low income families.

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Legal services in Scotland are provided by solicitors and advocates in private practice, but there are other sources of advice and assistance, for example, citizens advice bureaux, community law centres, and the variety of advice centres dealing with particular subject areas, such as consumer or housing advice.

Legal services are necessary to help people resolve some kind of dispute with someone else, whether it is to do with compensation for injury caused in an accident, a claim for welfare benefits, what to do about damp housing, or getting a divorce. The state has set up courts and tribunals for resolving disputes, within the overall structure of the Scottish legal system. It is within the context of the legal system and these courts and tribunals that the legal services presently available to consumers have developed. However there is no minister with sole responsibility for the entire system of justice, as there is in England and Wales.

The courts in Scotland are inaccessible because the process can be very expensive, and because the formalities of the procedures are often perceived as confusing and intimidating. Recent increases in court fees have acted as a further disincentive to those who may not qualify for legal aid.

However, legal services are in some ways different to other services in that the very poorest are not always in the worst position, and the greatest difficulties in accessing legal services are experienced by those who fail to qualify for help from the Legal Aid scheme. Because of increasing restrictions on eligibility for legal aid, the scheme no longer fulfils the original stated philosophy of covering all persons “of small and moderate means”. While the poorest continue to have their full legal costs met, many people are expected to make a contribution towards their costs, which effectively puts legal services outwith their reach. For example, a single person earning £58.85 a week, who before 1 April 1993 would have qualified for free legal aid, would have had to make a contribution of £282 after that date. Furthermore, for many people legal aid is effectively a loan, because they may find themselves having to pay back a proportion of the money or property recovered by legal action under what is called the “statutory charge”. In practice, this could mean that the Scottish Legal Aid Board could take a standard security over the family home.

One approach to improving the accessibility of justice has been through the development of alternatives to traditional court procedures, such as tribunals and the small claims procedure, which enable ordinary people to present their case in an informal setting without the need for legal representation. However, there is evidence that in both these areas, low income consumers find themselves at a disadvantage if their opponent does have representation, as a represented person is more likely to succeed against an unrepresented person. The disadvantage of the unrepresented party is exacerbated by the increasing formalisation and “legalisation”, caused by the presence of lawyers, in proceedings which were intended to be informal. Legal aid is not available in such proceedings, and would not be needed if these proceedings were operating in the way that was intended.

Low income consumers may be disadvantaged by the fact that lawyers have not, in general, developed any expertise in areas of law which focus most closely on the needs of low income consumers - for instance social welfare law or housing law. In such areas, it is important that alternative sources of advice are available and adequately funded.

There are also problems in remote and rural areas of Scotland, where a significant percentage of the population do not have access to two or more firms of solicitors, an important factor in avoiding a conflict of interest when one firm represents two opposing clients. Research has also suggested a significant area of unmet legal need in remote and rural areas in relation to particular areas of law, including social welfare law.

Much could be done to improve access of all consumers to legal services by providing better information about legal rights and legal services.
The work of community law centres in areas of social deprivation has shown how public funds can be used to support a salaried staff able to provide a wide range of legal services to the community, and develop expertise in areas which may be lacking in private practice. Community law centres may also employ, or work effectively with, non-legally qualified advisors and are able to look beyond the boundaries of a single case to the legal and social needs of a particular community.

In England and Wales, there have been experiments with advice agencies providing legal services being financed by the Legal Aid Board. This is a trend which is set to continue and to grow, and may eventually extend to Scotland.

Based on: Macdonald, Elizabeth, Legal Services in Poor and Paying for It: the price of living on a low income.
Price £13.95.
ISBN 0 11 495206 X.

AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- There should be a separate Department of Legal Affairs within the Scottish Office, combining the responsibilities of the Scottish Courts Administration, the Scottish Courts Service, the Crown Office, and the relevant parts of the Scottish Home and Health Department. One government minister should be responsible for all issues to do with the administration of the justice system and should have no other ministerial responsibilities.

- The needs of low income consumers should be protected by:

  - ensuring the development of useful and effective publicly funded legal services;

  - ensuring the quality of publicly funded legal services;

  - developing public information about legal rights and the availability of legal services in Scotland;

  - developing pilot projects and experimenting with different methods of legal service provision, including salaried solicitors employed by advice agencies, law centres, multidoor dispute resolution centres, in-count advice services, and alternative methods of resolving disputes; and

  - conducting research into the need for legal services, and the best method of meeting those needs.

These functions should be carried out by the Scottish Legal Aid Board, or by the Department of Legal Affairs itself.

- There should be a wide-ranging review of the civil justice system to consider how the whole system should be changed to make it more accessible to those who need to use it.

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BRIEFING: SOCIAL SECURITY

In 1992, social security payments made up 17% of gross household income in Scotland compared with 13% in the UK. Social security consumed 30% of central government expenditure in 1992/93.

Britain's social security system was designed for very different times to the ones we find ourselves in now. Some of the key assumptions underpinning the welfare state - such as full male employment, and that the main role of women would be in the home - no longer hold true. Social security has been the subject of great debate in all political parties in recent years. Whether it is seen as producing "perverse incentives" or as trapping people in poverty, it is a subject that has come in for a great deal of cross-party scrutiny.

Since the social security reforms of the mid to late 1980s, a number of significant changes have taken place which have meant the exclusion of groups of people from the social security system. For example, most 16 and 17 year olds are no longer entitled to benefit, those whose income rises just about the income support level have a restricted entitlement to benefit, and there have been changes in the conditions for benefit for those who are unemployed. These restrictions appear to have had minimal impact on public expenditure on benefits, but have had a very significant impact on the lives of those who depend upon social security to bring their income up to a minimal level.

How minimal social security benefits are is apparent to those who have to live on them, but is often forgotten by the rest of the population. The adequacy of benefits can be judged against an absolute standard or relative to the standard of living of the rest of the population. In real terms, the value of National Insurance retirement pension and unemployment benefit has doubled since 1948. This absolute measure of the value of benefits is misleading, however, since it is based on the Retail Price Index (RPI). But, although benefits have increased in real terms, they have not been increasing in line with the general rise in living standards. National Insurance unemployment benefit for an unemployed couple represented 31% of the average earnings of male manual workers in 1948, but by 1991 had decreased to 26% of average male manual worker's earnings.

In contrast to other countries, and to Beveridge's intentions, the British social security system is increasingly characterised by its use of means testing. This reliance upon income related benefits produces distortions within the system and leads to the poverty trap and the unemployment trap. The rapid rate of withdrawal of means tested benefits above a certain level of income creates a trap for those who should be climbing out of poverty. People may also find themselves trapped in unemployment as, for many, the financial benefit of employment is negated by the additional costs relating to work, such as child care, clothing, travel and food, when the withdrawal of benefits is taken into account. This problem is particularly acute for single parents. The impact of the unemployment trap will grow as more people are encouraged to take work at low levels of pay, and wages protection is abolished.

A new pensions trap is being created alongside the poverty and unemployment traps as small occupational pensions reduce pensioners' entitlement to means tested housing benefits or income support. The value of their occupational pension is not to them, as they remain on a low income, but to the state, in savings in benefit payments.

The Social Fund, set up to provide flexibility in dealing with special one-off needs which the basic benefit cannot be expected to meet, provides loans, which are then repaid by direct deduction from benefits. In practice, what this means is that people can be considered too poor to receive a loan, and such people may then have to resort to credit in its most expensive form. The flexibility and discretion upon which the fund is based has also resulted in inconsistent treatment for claimants.

A further element of detriment which is produced by the divide between National Insurance and means tested benefit is the treatment of claimants - claiming means tested benefit (for example, income support) involves greater intrusion into the claimant's life.

Over the past ten years there has been an increased emphasis on occupational benefits such as occupational pensions. These benefits represent part of an employee's overall package which reflects their status at work and adds to an already privileged position. There are also benefits, such as statutory sick pay and maternity pay, which are state financed but are delivered by the employer. Without
effective control, these benefits are open to abuse by employers. The long term effect of transferring the administration of benefits to employers is to reduce the ability of the most marginal workers to ensure their rights. Occupational benefits have been accurately described as upside down benefits which benefit the better off rather than the poorest.

In recent years benefit rules have become increasingly complex. This can create problems in understanding the system, and some claimants having to wait longer to receive benefit. There has also been an increase in the length of time that it takes for appeals to be heard in Scotland. One of the hidden administration costs of the social security system is in the advice services that are often paid for by local and central government rather than the DSS. All sources of free advice for claimants are limited, and problems in obtaining good quality, independent advice are often particularly severe in rural areas and peripheral housing estates.


AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- The DSS should review the basis on which benefits are calculated, taking into account living standards as well as the cost of living.

- The DSS should review the threshold at which benefits begin to be withdrawn and the rate at which they are withdrawn.

- The DSS should review the operation of the Social Fund to ensure that it is consistent and fair. It should also be revised to ensure that the poorest applicants are not refused assistance on the grounds of being too poor to receive a loan which officers judge to be legitimate.

- The DSS should undertake a thorough cost/benefit analysis of a system of benefits based on categorical entitlements as opposed to one reliant on means testing.

- In moves to encourage occupational and personal pensions, the present and future needs of low income consumers and their entitlement to other benefits should be taken into account.

- The Benefits Agency should ensure that claimants do not suffer while claims for benefits are under appeal.

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However, these changes have been aimed chiefly at consumers who have two main attributes: they are affluent and mobile. Thus retail developments have been located near these sectors of the community. The net result is that areas characterised by high levels of public sector housing have been neglected in terms of modern retail development, leading to a cycle of decline. Consumers with lower mobility, either because of the lack of access to public transport or the lack of access to private cars, become “trapped”. The shops which these trapped consumers have access to tend to be characterised by declining investment, monopoly pricing, a limited range of merchandise and poor quality goods.

There is also some evidence that low income groups pay more for a number of reasons, including not being able to buy in bulk, not being able to take advantage of special offers and having to pay public transport costs if they do not have access to a car. Any promotional campaign encouraging and rewarding increased expenditure (for example, two for the price of one) is bound to discriminate against low income groups.

Low income consumers may also be disadvantaged in that access to impartial sources of consumer information, such as Which? magazine, are not usually free. As a result, low income consumers may be more reliant on commercial information and advertising. Similarly, a lack of mobility and cost considerations restrict their ability to “shop around”.

Poorer consumers are more reliant on market stalls, discount outlets and second hand shops. The nature of these outlets is such that the chances of full redress, if there are problems with purchases, are significantly weakened. It may be, for example, that a market stall owner has moved on by the time that a consumer returns to complain.

People living on low incomes, although they have benefited in some respects from the recent retail revolution, are in a position of relative disadvantage as consumers of high street goods and services. Poorer consumers experience problems with poor access to goods and services, a limited choice and weakened chances of redress.

Based on: Davies, Keri, and Gabbott, Mark, High Street Goods and Services in Poor and Paying for It: the price of living on a low income.


Price £13.95. ISBN 0 11 495206 X.
AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- Government, both national and local, should take responsibility for improving access to all types of shops. This may be through better, more appropriate public transport systems or through influencing retail location decisions.

- Government, both national and local, should encourage small local shops in remote and rural areas, and, peripheral housing estates. This encouragement should include the use of subsidies.

- Local authorities should provide special help for those with particular needs such as the elderly. Help could include, for example, subsidised travel fares, special buses or help with shopping.

- Retailers should be encouraged to allow the purchase of small quantities and volumes without a price disadvantage.

- Retailers should provide information to consumers on their legal rights.

- The availability of extended warranties should not be used to undermine consumer confidence in their statutory rights or their perceived likelihood of obtaining redress.

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BRIEFING: ENERGY AND FUEL CONSUMPTION

Everyone needs fuel for heating, lighting and cooking. Those who are less well off pay proportionately more for their fuel than those at the upper end of the income scale. For those in the lowest 20% of the income distribution, fuel accounted for 13% of weekly spending in 1991, compared to 4% of weekly spending for those in the richest 20% of the UK population. Pensioners living alone and single parents with children under five spend proportionately more of their income on fuel than other groups - approximately three and a half times more of their income than the average UK household. Any increase in fuel prices has a regressive effect on low income consumers. The imposition of VAT on domestic fuel has been estimated to have an impact on the poorest 10% of households seven times greater than the impact on the richest 10%.

Low income households must either cut back on other household spending, use less fuel and go cold, or maintain fuel consumption and consequently run up debts. A 1992 survey found, for example, that a quarter of elderly people gave up other items, mainly food, to stay warm, and that over 80% of room temperatures in the survey were below World Health Organisation guidelines. This is compounded by the nature of the Scottish climate - all Scottish climatic regions are colder than the UK average - and by the quality of the housing stock.

For most households the prime concern is warmth, and heating accounts for 55% of Scottish domestic consumption. Despite high energy consumption, those on low incomes may still find their homes are inadequately heated due to poor insulation and inefficient or expensive to use heating systems.

High levels of basic insulation such as loft insulation can be found in all types of homes, but other more effective forms of insulation such as cavity wall insulation are less common. Private rented dwellings, in particular, have low levels of insulation and low levels of central heating. One definition of a house is a "place independent of external weather". Many Scottish dwellings fall outside that definition because of their poor insulation and heating characteristics.

One alternative to improving heating and insulation standards is the provision of fuel subsidies. Currently the only subsidy is £7 per week under the Severe Weather Payment Scheme. This is not available to all low income households, and even in Scotland the most paid out in any one area in any one year has been £36, and usually much less.

Low income households are more likely to rely on more expensive forms of heating. Those who spend a disproportionately high amount of their income on fuel, and are least likely to be able to afford to pay more, are most likely to live in homes that need above average expenditure on fuel to obtain reasonable temperatures.

High levels of spending on fuel leads to problems in paying bills. In Glasgow, for example, debts to fuel utilities are the second largest household debt after rent arrears. The use of "power card" meters, "fuel direct", and the number of disconnections reflect the scale of affordability problems. Although prepayment meters and "fuel direct" allow people to budget and pay off arrears, the increase (by over three times since 1977) in the number of households using them indicates difficulty in paying in the same way as everyone else. Self disconnection is the consequence of not being able to pay through a prepayment meter. Those who have to use prepayment meters because of difficulties in paying bills also have to pay the extra charge imposed by the utilities for providing a prepayment meter.

Condensation, damp and mould affect around one fifth of the Scottish housing stock. Disparity between the Scottish Tolerable Standard and the English Fitness Standard means that many Scots live in damp, mouldy homes with condensation problems for which their English counterparts could claim legal redress. Respiratory and gastric illnesses, particularly in the elderly and the very young, are linked to living in such homes. Excess deaths in the winter months indicate the extreme consequences of cold and damp.

Despite spending a high proportion of their income on fuel, the poorest households in Scotland experience low comfort levels, and risk ill-health and debts.

Based on: Sheldrick, Bill Energy and Fuel Consumption in Poor and Paying for It: the price of living on a low income.
Price £13.95. ISBN 0 11 495206 X
AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- The government should develop policies to address the problem of fuel poverty bearing in mind the greater cost of heating houses in Scotland due to the climate and the generally poorer quality of the housing stock.

- Improvements should be followed up by customised energy advice packages.

- The reintroduction of heating subsidies for houses with particular heating problems should be considered.

- The government should make the Scottish Tolerable Standard comparable to the English Fitness Standard, thereby allowing households suffering from dampness prejudicial to health to seek legal redress for the consequences of living in damp homes.

- Fuel companies should not impose an additional charge for providing a prepayment meter.

- Those involved in the construction of homes in Scotland should take proper account of the Scottish climate and ensure that the insulation and heating characteristics of houses are such that they can meet the definition of a house as being “a place independent of external weather”.

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Briefing: Housing

In the late 1970s those on low incomes often got better value for their housing than other people. This was largely because high quality subsidised council housing was available. Since then the situation for those on low incomes has changed markedly.

Traditionally, low levels of home ownership in Scotland (about 35% in 1979), coupled with high levels of public renting, provided scope for government policies to increase home ownership, to attempt to revive the private rented sector, expand housing associations and reduce public spending on housing.

Home ownership in Scotland has increased by 512,000 between 1979 and 1993 and now accounts for over 50% of the housing stock. The public rented stock has decreased by 303,000 dwellings in the same period mainly as a result of sales to sitting tenants through the Right to Buy scheme. The private rented stock has also decreased resulting in a 24% reduction in rented housing overall. Although housing associations have increased their number of homes, this has not compensated for the overall loss of housing for rent.

Home ownership has extended housing choices for many consumers, yet the poorest households still depend on rented housing and face a decreasing choice of properties. Those on low incomes are also more likely to have trouble keeping up with mortgage repayments. Most sales of council houses have been of more desirable houses leaving over 50% of the stock as flats in 1990.

Homeless statistics indicate an increasing difficulty with access to rented housing in Scotland. The number of homeless households has more than doubled since the early 1980s as a result of social, economic and legislative changes. Poor and often younger households face little choice in relation to housing either because they are homeless or have a low priority in council housing allocation policies.

Considerable progress has been made in improving housing conditions as far as basic amenities, such as a private bath, are concerned. However, the poorest households live mainly in flats, which are less popular, and fewer have central heating. In 1991/92 some 95,000 homes in Scotland were below the Tolerable Standard set by Parliament, mainly as a result of damp and condensation. These conditions are familiar to more poor households, mainly those living in public rented housing.

There is now more emphasis on providing housing for people with special needs and the move towards care in the community has highlighted the need for suitable housing for different groups. Currently, there are large shortfalls in special needs housing in many parts of Scotland.

Those on low incomes, therefore, face living in public rented housing that has decreased in quality and offers less choice of accommodation. Low income households also experience some of the worst housing conditions in the private rented sector and also in some owner occupied housing.

Despite this apparently bleak picture, many council house tenants have good quality housing. Some tenants with the worst housing conditions have voted to transfer ownership of their homes to housing associations or co-operatives, which has enabled capital investment to take place.

For council tenants, rents have risen and there is some concern about the position of those whose incomes are just above the level for full housing benefit. Only 926 new public sector homes were completed in 1993 compared to 8,966 in 1987. Although the very poorest households are protected from high housing costs by benefits, those with slightly higher income face severe affordability problems.

Low income consumers often require more information about housing and are less likely to be able to pay for it than those who are better off. Gaps in the provision of advice and information arise through uneven geographical coverage of services, variations in the type of information provided and the type of housing problem involved. Although it is not possible to evaluate how housing advice and information services have changed in the last 20 years, low income consumers need better services more suited to their needs.


Price £13.95. ISBN 0 11 495206 X
The Scottish Consumer Council recommends that:

- The government and other agencies should establish policies to improve the quality and supply of the existing rented stock in the public and private sector more quickly and more widely.

- The government and other agencies should develop policies to redress the shortfall in special needs housing currently experienced in many parts of Scotland, including the provision of barrier-free housing.

- The role of housing authorities as information providers should be clarified by the Scottish Office in order to enable them to draw up local strategies for information and advice. This should draw on the experience of the pilot authorities assisted by Scottish Homes' Homepoint project, and ensure that the voluntary sector is able to play a complementary role.

- Scottish Homes' co-ordination and development role in relation to housing information should be carried out with the needs of low income consumers in mind.

- Local authorities should reassess their housing allocation policies to ensure that those on low incomes are not concentrated disproportionately in one area and should try to achieve a mix of tenants.

- Local authorities should ensure that their planning policies for new housing developments take account of the needs of low income consumers, particularly in relation to the size of developments and the infrastructure of the area.

- Housing authorities and housing associations should consider co-operating in the administration of joint waiting lists, and should regularly review their arrangements for authorities to nominate applicants for housing association housing.

- Housing authorities, housing associations, social work and health authorities should evaluate their community care policies to ensure they assist the most vulnerable on low incomes.

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BRIEFING: CREDIT AND DEBT

In the UK there has been an enormous expansion in the amount of consumer credit extended in recent years. The rate of increase has now slowed, and between 1984 and 1991 the amount of consumer credit extended (excluding bank loans and loans for home purchase) increased almost three-fold. Particularly significant were the increases in unsecured building society loans, since the relaxation of restrictions on unsecured loans in 1986. Even more important, however, is the rise in the amount of credit advanced through bank credit cards - some 24.9 million credit cards were in circulation in the UK by 1988.

At the same time, the amount of credit outstanding more than doubled. By 1991 it had reached £53.6 billion, and substantial numbers of people have found themselves unable to make the required repayments.

The developments in consumer credit in recent years have been very welcome for many consumers, who have benefited from cheaper, more convenient and flexible credit arrangements. Many such developments, however, require bank accounts or a sufficiently regular income to qualify, and are, therefore, of little advantage to poorer consumers.

The increased reliance of lenders on credit referencing and scoring systems to check the creditworthiness of potential borrowers has allowed credit to be extended to a wider section of the public without the price of credit becoming prohibitive. There are concerns, however, that credit scoring systems may disadvantage low income consumers in two ways.

The first of these, unfair discrimination, can occur as a result of using information about third parties, such as flatmates or previous occupants, to make judgments. Poorer consumers are more likely to be mobile and to share accommodation, making them more vulnerable, in general, to third party judgments. The area in which a person lives is frequently taken into account as one variable in the credit scoring equation, and discrimination may take place in the form of "redlining" low income areas and refusing credit to those who live there.

The second way in which credit scoring systems may act against the interest of low income consumers is that credit may be offered to people who cannot afford it. This may occur because of gaps in the credit scoring information and because "ability to pay" is not included as a criterion by many lenders. Although large scale lenders can assess a borrower's ability to pay, smaller lenders do not have access to expensive credit scoring systems and have to rely on less accurate methods. Thus, smaller lenders tend to offer comparatively small loans to those on lower incomes and to charge high interest rates, the net result being that those on low incomes are often forced to use the more expensive forms of credit.

Among the population as a whole, low income is not related to indebtedness, because pensioners, despite having low incomes, do not often get into serious debt. If pensioners are excluded from the analysis, income becomes a much more significant factor in determining whether people have debt problems. Living in poverty is known to be a factor involved in getting into debt. Another important reason people get into debt is a sudden, adverse change in circumstances. The impact of suddenly finding oneself in bad times caused by job loss, marital breakdown or long-term illness is clearly exacerbated for people who were borrowing to their limits during the good times. Many experiencing such a change in circumstances, or living on the margins of poverty, are forced to borrow more on less favourable terms to avoid the consequences of failing to keep on top of credit they already have. For such people the consumer credit boom has magnified, not reduced, their problems.

There has been a massive increase in the number of requests for money advice and debt counselling from advice agencies, so much so that the available resources are stretched to breaking point.

There has been a relative decline, during the 1980s, in the use of the courts as a means of debt enforcement. The courts are seen as cumbersome and expensive, and there has been a shift towards private forms of debt enforcement. These include charging higher interest rates, withdrawing or refusing further credit and selling debts to debt collecting agencies. Little is known about the impact of this overall shift in debt enforcement. Since low income consumers have less access to modern credit arrangements, however, they are less likely to have benefited from this shift. As a result, court actions are directed more than ever at low income consumers.
One way in which low income consumers may get access to comparatively cheap credit is through savings and loans co-operatives known as credit unions. Credit unions have been relatively slow to take off in Scotland, although recent evidence suggests that they have now begun to grow more quickly. Even among their own members, however, credit unions are not always the main form of credit. Thus, while they can be of assistance, they do not necessarily serve people’s entire credit needs.

There are some developments aimed at helping low income consumers which may, in practice, make matters worse. Direct deductions from social security benefits may impose very severe financial problems on those affected since the value of social security benefits has declined. Similarly, the use of pre-payment facilities for electricity users deprives them of credit (except short term emergency credit), and makes them liable to end up without electricity.


AGENDA FOR ACTION

The Scottish Consumer Council recommends that:

- The government should replace “extortionate credit”, in the regulation of consumer credit, with the legal concept of an “unjust credit transaction” as proposed by the Office of Fair Trading.
- The Office of Fair Trading should monitor changes in debt enforcement practices and assess their impact on low income consumers.
- The government should implement the proposals for credit unions, under the deregulation initiative, to relax the restrictions relating to common bond requirements, and the limits on savings, loans and membership.
- While local authorities should maintain the strategic responsibility for organising, co-ordinating and running an effective system of debt advice in Scotland, the credit industry must be encouraged to provide more funds.
- Lenders should follow the guidance of the Office of Fair Trading and take “ability to pay” into account, including the consumer’s existing commitments, when considering offering credit.
- The private sector should be encouraged to set up credit unions for the benefit of low paid workers.

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