

Equality Impact Assessment / Equality Analysis

(updated May 2021)

Title of service or policy	Energy Rebate Discretionary Scheme
Name of directorate and service	Business Finance and Pensions, Welfare Support
Name and role of officers completing the EIA	Damian Peak
Date of assessment	21/03/2022

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1. Identify the aims of the policy or service and how it is implemented.		
	Key questions	Answers / Notes
1.1	Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	This scheme will be administered by the Welfare Support team. It is a scheme of financial support for residents who do not qualify for the Main Energy Rebate scheme but are still vulnerable to rising energy prices.
1.2	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	It is a new policy which will operate from 01/04/2022 to 30/11/2022. It is a national requirement. There are some conditions which are set out in DLUHC guidance, such as beneficiaries must be directly liable for energy costs, but detailed rules on which residents should qualify for support are at the discretion of Local Authorities.
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	There is some overlap with the council’s Welfare Support Policy, in that financial support should be provided to residents in financial crisis.

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, sex, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	None
2.2	What is the equalities profile of service users?	Residents who do not live in council tax bands A-D, Low income households, those who receive income related benefits and those with a household member who receives a Disability Benefit.
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	No.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	The council's S151 Officer, Other Local Authorities, the Fair Food Alliance.
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will	N/A

you include equalities considerations within this?

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Issues relating to all groups and protected characteristics	The scheme is not limited to low-income households, or those on income-related benefits. Households with a member who receives certain disability benefits will also qualify.	There will be some households in bands E and above who do not qualify for this support because they do not fulfil any of the eligibility criteria but are still exposed to rising energy costs. This should be mitigated by the fact that they can afford these increased costs.
3.2	Sex – identify the impact/potential impact of the policy on women and men.	Men and women are not disadvantaged by this policy, either can apply for this support, however there can only be one award per household.	N/A
3.3	Pregnancy and maternity	Access to the scheme is not dependant on whether residents are pregnant or not.	N/A
3.4	Gender reassignment – identify the impact/potential impact of the policy on transgender people	This is not relevant to whether residents will qualify for this support	N/A

3.5	Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	The scheme can be accessed through entitlement to Disability benefits, whether or not the person liable to pay energy costs is on benefits or has a low income. This is because certain disabilities, particularly those which affect mobility mean that residents will have higher heating costs and will therefore be more exposed to rising energy costs. Access to the scheme will be provided by web-form, but where residents are unable to access this a mediated application can be taken over the telephone or in person at the council's One Stop Shops. A paper form is also available to residents upon request.	There may be disabled residents who do not actually receive disability benefits who will therefore not be entitled to this support. However, it would be impossible for un-trained members of staff to carry out a capability assessment as to the level of disability for applicants, and so entitlement to the scheme through this route must be on the basis that there is an entitlement to a disability benefit.
3.6	Age – identify the impact/potential impact of the policy on different age groups	There is no upper or lower age limit to the scheme, however residents must be directly exposed to rising energy costs.	N/A
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.7	Race – identify the impact/potential impact on across different ethnic groups	There is no impact on residents of different ethnic groups. The amount of each award will be £150 per property regardless of the ethnicity of applicants.	N/A
3.8	Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	There is no impact on residents because of their sexual orientation.	N/A
3.9	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Yes, the support will be a flat rate of £150 per household so whether applicants are married or not will have no impact on the award made.	N/A

3.10	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	There will be no impact on residents benefitting from this scheme depending on their religious beliefs or lack of.	N/A
3.11	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	The policy intention behind the scheme – as set out in the DLUHC letter of 16/03/2022 is to support residents in financial difficulty. Eligibility criteria has therefore been set as receipt of income -related benefits, and for those who do not receive benefits, combined income from benefits and pensions of less than £500 per week. This is set at the level of the Benefit cap for social security benefits.	N/A
3.12	Rural communities* identify the impact / potential impact on people living in rural communities	Heating oil and coal will also be considered as eligible energy costs, so residents who live in rural communities who heat their homes in this way will not be disadvantaged	N/A
3.13	Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services will soon be required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove		Liable parties of Armed Forces accommodation which is exempt under council tax exemption class O will be ineligible for this scheme, as set out in the DLUHC guidance. The MOD will have equivalent provision for residents in this position.

disadvantage and consider special provision).		
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, when the Armed Forces Bill becomes law there will be a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: D Peak

Date: 01/04/2022