

Screening Form

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Review of the Affordable Warmth Scheme - Proposals for change
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Is this an existing, revised or a new policy/policy area?

Existing	Revised	New
	X	

Brief Description

The Affordable Warmth Scheme is a targeted area based scheme in place from April 2015 and is the Department for Communities' main tool for tackling fuel poverty. The Department's Fuel Poverty Strategy "Warmer Healthier Homes" published in March 2011 gave a commitment to improve partnership working and to explore an area based approach to tackling fuel poverty.

The Scheme utilises a targeting algorithm developed by University of Ulster which uses a selection of variables which are proxies for fuel poverty to calculate eligibility of small areas for the Affordable Warmth Scheme. All the variables have been combined through a weighted algorithm, so that every small area in a Council area is assigned an eligibility score.

The Scheme:

- actively identifies areas where vulnerable people in the poorest housing are most likely to live;
- draws on local knowledge of Councils to provide people with the information they need to boost participation in the Scheme;
- relies on the experience of Housing Executive Grants Office staff to conduct technical assessments and approve the energy efficiency measures required.

The intention of the targeted Affordable Warmth Scheme is to direct fuel poverty interventions at those who need them most.

What is it trying to achieve?

A Ministerial request was made for the Affordable Warmth Scheme to be reviewed after one full year of operation to ensure that it continued to find and help those households most at risk of fuel poverty. The review of the Affordable Warmth Scheme examined 5 key themes:

1. Effectiveness and efficiency of processes
2. Appropriateness of delivery arrangements
3. Accuracy of the targeting model
4. Scheme performance in 2015/16
5. Scheme qualifying criteria

The review considered if any reasonable changes could be made that would improve the scheme and what the impact the changes would have. During this review stakeholders were given the opportunity to provide comments and feedback on the first year of operation, based on the 5 themes of the review.

The Department's review of the Affordable Warmth Scheme has identified 4 proposals for change which if agreed, have the potential to increase access to grants and make the process more streamlined:

Proposal 1: Scheme Delivery

The Department proposes that one installer managing the installation of all measures to the household is the preferred delivery method.

Proposal 2: Income Threshold

The Department proposes to raise the income threshold to £23,000 for households with more than one person and reducing it to £18,000 for all single households.

Proposal 3: Householders with Disabilities

The Department proposes that Disability Living Allowance, Attendance Allowance, Personal Independence Payment and Carers Allowance are not included in the calculation of income for the Affordable Warmth Scheme.

Proposal 4: Boiler Replacement Criteria

The Department proposes the removal of the additional boiler replacement criteria of a member of the household being over 65 or having a child under 16 years of age, or being in receipt of Disability Living Allowance.

Public consultation will be carried out to gauge opinion on the proposals.

**Are there any Section 75 categories which might be expected to benefit from the intended policy?
If YES, explain how.**

YES	NO	N/A
X		

This policy aims to target vulnerable households living in fuel poverty. If the proposals set out in this screening are accepted following public consultation, changes to the scheme such as the income threshold and the removal of certain benefits as being treated as income would provide the opportunity for more people within all Section 75 categories to be included in the scheme.

Occupants, especially those defined within Section 75 groups of age and disability, who are living in fuel poverty could potentially be among those who benefit most from the changes that are proposed to the Affordable Warmth Scheme as they are most likely to be in receipt of DLA/AA PIP/Carers Allowance and these would no longer be included in the income calculation for the Scheme.

Who initiated or wrote the policy?

The Department for Communities.

Who owns and who implements each element of the policy?

The Department for Communities is responsible for the development of the policy and associated legislation. Councils and NI Housing Executive Grants Offices are responsible for the delivery of the Affordable Warmth Scheme.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
X		

If YES, are they

Financial: YES (If YES, please detail)

The proposals for making changes to the Affordable Warmth Scheme have the potential to increase access to grants and also make the whole process more streamlined.

The current average spend per household is £4,500 on energy efficiency measures. Any inability to secure budget for the Affordable Warmth Scheme would detract from the intended outcomes of the policy.

The changes proposed seek to overcome constraints concerning the use of multiple installers making the process more sustainable.

Legislative: YES (If YES, please detail)

Without legislative amendment the policy cannot achieve its intended objectives. Any changes resulting from this public consultation cannot be put in to operation without Ministerial approval.

Other, please specify:

Insufficient engagement and agreement with key stakeholders could prevent the amendment of the current legislation. This would lead to the planned outcomes of the policy changes not being achieved.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

Staff:

Staff within DfC Housing Division are likely to be impacted as custodian of the policy with responsibility for associated legislation and operational oversight.

Service users:

Owner occupiers, private sector tenants and private sector landlords.

Other public sector organisations:

The policy may impact on staff within Grants Offices of the Northern Ireland Housing Executive who currently are responsible for practical implementation of the Policy. Northern Ireland local councils may also be impacted as they also have operational responsibilities.

Voluntary/community/trade unions:

None

Other, please specify:

Installers who carry out works installing energy efficiency measures in homes within the private sector, whom have received an Affordable Warmth grant.

Other policies with a bearing on this policy

What are they and who owns them?

The Department for Communities separately offers private sector grants for Disabled Facilities, Repairs, Homes of Multiple Occupancy, Common Parts, Renovation, Home Repairs Assistance, and Replacement Grants. The Boiler Replacement Scheme also offers grant assistance to householders wanting to replace an old inefficient boiler.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
All categories	<p>A former Minister for the Department for Social Development (DSD), Mervyn Storey MLA committed the Department to review the Affordable Warmth Scheme (AWS) after one full year of operation to ensure it continued to meet its objectives.</p> <p>The review provided an assessment of the impact of the AWS on the effects of fuel poverty and assisted with the development of future policy.</p> <p>The main objectives of the review were to:</p> <ul style="list-style-type: none"> • measure and document both the impacts and benefits of the Scheme, to determine if objectives have been met; • understand the effect of the Scheme and identify any opportunities to improve both the policy and programme delivery; • provide specific data to support future projections for the Scheme and help to identify resourcing requirements. <p>The review was conducted through statistical analysis of performance and process, key stakeholder inputs, fuel poverty expert advice and an Internal Audit review of Department for Communities (DfC) oversight arrangements. Inputs to the Review were considered within the context of 5 key themes;</p> <ol style="list-style-type: none"> 1. Scheme performance in 2015/16 2. Effectiveness and efficiency of processes 3. Accuracy of the targeting model. 4. Appropriateness of delivery arrangements 5. Qualifying criteria of the Scheme <p>Performance reports from both the Northern Ireland Housing Executive (NIHE) and local councils provided the basis for performance and process analysis. Mapping of the complete administrative arrangements, including the Building Control approval process was also examined.</p> <p>Key stakeholders were engaged through a series of workshops and meetings. This was an opportunity to provide comments and feedback, on the first year of operation, based on the five themes of the review. Stakeholders were asked to highlight both the positives and negatives within this first year, considering what, if any, reasonable changes could be made that would improve the Scheme. Consideration was given to the impact there would be if</p>

Section 75 Category	Details of Evidence/Information
	<p>changes were made, with particular focus on other factors within the Affordable Warmth Scheme (AWS), such as budget, resources or legislation. Stakeholders were separated into 4 groups-</p> <p><i>Scheme Partners:</i> University of Ulster, Northern Ireland Housing Executive, all 11 local Councils;</p> <p><i>Industry Representatives:</i> Phoenix Gas, National Insulation Federation, Firmus Energy;</p> <p><i>Government Departments:</i> Utility Regulator, Department for Economy, Public Health Agency, Department of Health, Department of Agriculture, Environment and Rural Affairs;</p> <p><i>Voluntary/Community Sector:</i> National Energy Action, Consumer Council, Fuel Poverty Coalition, Age Sector Platform.</p> <p>DfC also consulted with fuel poverty experts Dr. Brenda Boardman (Oxford University) and Professor Christine Liddell MBE (Ulster University). Both of these academics are considered to be foremost in their field within the UK.</p> <p>Proposal 1: Scheme Delivery</p> <p>Having multiple installers for different measures can be difficult for householders; stakeholders noted that a single installer completing all measures would be preferred.</p> <p>There have also been delays and confusion around the Building Control process, again one installer would make this much easier. 'Hand holding' a householder in choosing an installer is a very important part of the Scheme and should continue.</p> <p>Proposal 2: Income Threshold</p> <p>Stakeholders requested that consideration should be given to re-assessing the income thresholds based on the size of a household.</p> <p>When the Scheme was initially being developed the income threshold was set at £20,000. This was supported by the 2009/10 Family Resources Survey which showed that 44% of Northern Ireland households had a weekly income of less than £400. This report demonstrated there was a sufficient pool of householders with an annual income of less than £20,000 to avail of improving the energy efficiency of their home.</p> <p>The Department recognised that not every household consists of the same number of people and that varying household sizes leads to varying energy use and consequent costs. Equivalisation would help ensure fairness but could increase the complexity of the Scheme. A stepped threshold would be fairer to households with more than one occupant than the current single income threshold of £20,000 and would minimise the potential complexity of introducing full equivalisation.</p>

Section 75 Category	Details of Evidence/Information
	<p>Proposal 3: Householders with disabilities Disability Living Allowance is a tax free allowance paid to those with a disability to help them with extra costs because of their disability. At the time of the public consultation on the Affordable Warmth Scheme the Department considered that it was appropriate to include Disability Living Allowance when calculating household income. However, in other Government grant Schemes Disability Living Allowance is not included in the calculation of income. During this review there was broad support among stakeholders for Disability Living Allowance not to be included in the income calculation for at the Affordable Warmth Scheme. There has also been significant correspondence from elected representatives calling for Disability Living Allowance not to be included in the calculation. Similar requests have been made to exclude related benefits Attendance Allowance, Personal Independence Payment and Carers Allowance from the calculation. Other grants aimed at home improvements do not include disability benefits in the calculation of income.</p> <p>Proposal 4: Boiler Replacement Criteria The Department has considered the additional criteria to qualify for a replacement boiler under the Scheme. Currently, where an existing central heating boiler is at least 15 years old and there is a member of the household is either over 65 or under 16 years of age or is receipt of Disability Living Allowance, the Affordable Warmth Scheme will replace the boiler. The Department has considered the additional criteria to qualify for a replacement boiler under the Scheme. It seems reasonable that a household with an annual income of less than £20,000 would find it difficult to find the money to replace an old inefficient boiler, even with assistance through the Boiler Replacement Scheme. There was wide support during consultation with stakeholders that the age and disability restrictions should be removed.</p>

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories

Section 75 Category	Details of Needs/Experiences/Priorities
Disability	Evidence shows that people with disabilities are more likely to live in poverty ¹ and have greater potential to be subject to the impacts of fuel poverty. The draft Programme for Government states that people with disabilities are more likely to live in poverty, have greater potential to be subject to the impacts of fuel poverty, to be economically inactive and to face housing related difficulties. This policy will review the decision to include disability related benefits as income and proposes to no longer treat this as income for the purposes of assessing eligibility.
Age	Evidence shows that persons within vulnerable age brackets, for example the very old or the very young, may have differing needs from people within other section 75 categories in relation to affordable warmth. World Health Organization's standard for warmth says 18C (64F) is a suitable indoor temperature for healthy people however for the sick, disabled, very old or very young, a minimum of 20C (68F) is recommended. The original policy addressed this with an additional criteria included for households with a member under 16 or over 65 to qualify for a replacement boiler under the scheme. However, there was wide support from various stakeholders during consultation that the age and disability restriction should be removed and this is now proposed as an amendment. Removal of this criteria should enable many more low income households to qualify for the boiler replacement element of the Scheme.
Marital Status Dependents	The original income threshold, set at £20,000, failed to take into consideration and make allowance for the numbers of people living in the home. This single threshold of £20,000 could lead to the systematic exclusion of larger households from the Affordable Warmth Scheme. This was particularly so for households where

¹ Disability and poverty Why disability must be at the centre of poverty reduction, Adam Tinson, Hannah Aldridge, Theo Barry Born and Ceri Hughes August 2016

Section 75 Category	Details of Needs/Experiences/Priorities
<p>Gender</p> <p>Religious Belief</p> <p>Political Status</p> <p>Sexual Orientation</p> <p>Racial Group</p>	<p>there were several occupants but few sources of income (such as families with small children). Many of these households had additional expenses, for example child care, clothing, food, and laundry, as well as higher energy needs in order to keep young children warm. A single working adult is significantly more likely to be able to afford their energy needs on an income of £20,000 per annum, than is a family with 3 dependent children. This means that applying the same threshold to both types of household could be viewed as unreasonable therefore it is proposed to adjust the income threshold as follows:</p> <ul style="list-style-type: none"> • £18,000 per annum for single person households • £23,000 per annum for multiple person households <p>There is no evidence to suggest that persons in these categories have different needs, experience and priorities in relation to the policy.</p>

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief	We do not expect there to be any adverse impact on people of different religious belief.	None
Political opinion	We do not expect there to be any adverse impact on people of different political opinion.	None
Racial / ethnic group	We do not expect there to be any adverse impact on people of different racial/ethnic groups.	None
Age	In general, government intervention of this kind is normally targeted toward those most vulnerable groups. Households containing older or younger people have often benefitted more from grant assistance under the previous arrangements. Therefore, there is potential that the new arrangements may provide greater accessibility on the grounds of age in that removal of the age restriction criteria will open the scheme up to people of all ages who meet the criteria.	None
Marital status	Increasing the income threshold to £23,000 will have a positive impact on couples. Lowering the income threshold to £18,000 for single person households may exclude some individuals who may have previously qualified, however the targeting algorithm itself purposively identifies areas of low income and poor housing; any single person who earns £18,000 to £20,000 per annum who is living in those areas is going to be relatively well resourced, when compared to the majority of their neighbours. It could be reasonably argued that these relatively unusual cases are not in the intended target group, and lowering the income threshold will help ensure the scheme is more tightly targeted to those most in need.	Minor
Sexual orientation	We do not expect there to be any adverse impact on people of different sexual orientation.	None

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Men and women generally	We do not expect there to be any adverse impact on men and women generally.	None
Disability	The proposed amendment to no longer treat any disability linked benefits as an income is intended to open this scheme up to include more people with a disability.	None
Dependants	We do not expect there to be any adverse impact on people with dependants. Households with dependents such as young children or older residents are likely to benefit from the revised arrangements.	None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes , provide details	If No , provide reasons
Age Disability	If the proposals are accepted following consultation, and Ministerial approval is granted, occupants, especially those defined within Section 75 groups of age and disability, who are living in fuel poverty could potentially be among those who benefit most from the changes that are proposed to the Affordable Warmth Scheme as they are most likely to be in receipt of DLA/AA PIP/Carers Allowance and these would no longer be included in the income calculation for the Scheme.	

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? **Minor/Major/None**

Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief	The proposals are likely to have no impact on good relations between people of different religious belief.	None
Political opinion	The proposals are likely to have no impact on good relations between people of different political opinion.	None
Racial group	The proposals are likely to have no impact on good relations between people of different racial group.	None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes , provide details	If No , provide reasons
		It is not expected that the proposed revised policy and legislation will present opportunities to better promote good relations between people of different religious belief, political opinion or racial group.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Age and Disability

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

If the proposals are agreed following consultation, and Ministerial approval is granted, occupants, especially those defined within Section 75 groups of age and disability, who are living in fuel poverty could potentially be among those who benefit most from the changes that are proposed to the Affordable Warmth Scheme as they are most likely to be in receipt of DLA/AA PIP/Carers Allowance and these would no longer be included in the income calculation for the Scheme.

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should: (please underline one):

1. **Not be subject to an EQIA (with no mitigating measures required)**
2. **Not be subject to an EQIA (with mitigating measures /alternative policies)**
3. **Not be subject to an EQIA at this time**
4. **Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

A full EQIA is not considered necessary in this case given that the screening has not indicated any adverse impact on people within any of the Section 75 categories. The policy and proposed legislation will be kept under review to ensure that, as the need arises, mitigation will be considered and applied as necessary. The proposals will see assistance being made more widely available. There may be opportunities within the schemes to promote access and opportunity across Section 75 categories.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

The screening will be reviewed and revised, if necessary, following consultation.

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

The Department will include this screening template in the upcoming consultation and will use the responses received about the screening, comments received in response to the consultation proposals, and further analysis to re-examine the proposals. The screening will be reviewed and revised, if necessary, following consultation.

A consultation report, including responses to this screening and if necessary, a revised screening template will be published on the Department's website.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
Oliver McHugh	Deputy Principal	08/11/2017
Approved by:		
Deborah Brown	Director of Housing	10/11/2017

Note: A copy of the Screening Template, for each policy screened should be 'signed off' and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.