



Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer

Organisation prepared for	Somerset West and Taunton		
Version	1.0	Date Completed	22/04/2022

Description of what is being impact assessed

Our proposals for a discretionary energy rebate scheme are being impact assessed.

On 3 February 2022, the Government announced measures to help protect millions of households from rising energy costs.

As part of these measures SWT were, in early April 2022, provided with £292k with which to develop a discretionary energy rebate scheme.

Part 15 of the *Council Tax rebate – frequently asked questions* document, sent to Councils on 16 March 2022, clarifies that 'Councils can determine how best to use their Discretionary Fund to support those suffering financial hardship as a result of the rising cost of living.

Where councils consider it the best means of supporting those in financial difficulty, they can use the discretionary fund to offer carefully targeted 'top-up' payments to the most vulnerable households in bands A -D (for example, those on means tested benefits), or to offer support exceeding £150 per household under their discretionary scheme. The Government expects that all support from the Discretionary Fund is targeted towards those most likely to be suffering hardship as a result of the rising cost of living'.

In designing our discretionary scheme we have focused on five objectives:

- Delivers on the Government and public's expectation of quickly mobilising and delivering support to hard pressed households.
- Uses the means-tested Council Tax Support (CTS) scheme as a consistent basis of identifying low income/low capital households, (and consequently those most likely to be impacted the most from rising energy bills).
- Manages expenditure within the funding provided.
- Is straightforward to administer.

- Ringfences some of the funds available for households in difficult circumstances which cannot be captured within a rules-based framework.

We designed our proposed discretionary scheme with three parts:

1. A single one-off payment of £150 will be awarded to any household who resides in a dwelling with a Council Tax band E to H **and** who are in receipt of CTS.
2. A single “top up” payment of £24 to all households within Council Tax Band A to H who receive a £150 Council Tax Energy Rebate from either the main or discretionary scheme **and** who are in receipt of CTS
3. A **General Energy Support Fund** of £5k plus the balance after making payment of 1) and 2) above for those not qualifying under (1) or (2) or a main scheme payment **and**
 - i. Is directly responsible for household energy bills; **and**
 - ii. Is experiencing financial hardship and struggling to meet their energy costs

The payment under this part will be £150 and will be made upon referral by a partner agency (such as the CAB for example)

Evidence

What data/information have you used to assess how this policy/service might impact on protected groups? Sources such as the [Office of National Statistics](#), [Somerset Intelligence Partnership](#), [Somerset’s Joint Strategic Needs Analysis \(JSNA\)](#), Staff and/ or [area profiles](#), should be detailed here

We have drawn upon published reports in relation to fuel poverty such as:

[Annual fuel poverty statistics report: 2022](#) (2020 data), [Fuel poverty factsheet](#) and [Sub-regional Fuel Poverty in England 2021 \(2019 data\)](#) in order to identify household characteristics /composition where fuel poverty is likely to be most prevalent.

In 2020, there were an estimated 13.2 per cent of households (3.16 million) in fuel poverty in England. The rate for the south west was lower at 10.6% and for SWT district was between 10% and 12%. This will have risen significantly during 2022 due to the huge rises in wholesale and retail energy prices.

Households that pay for their energy bills by prepayment are no longer the most likely to be fuel poor. The prepayment price cap contributed to this. Those on standard credit schemes (eg non-DD payers) are most likely to be fuel poor. Those who pay their energy bills by direct debit are least likely to be energy poor.

Household composition - Single parent households are most likely to be fuel poor. However, couples over 60 have the largest average gap (the reduction in fuel bill that the average fuel poor household needs in order to not be classed as fuel poor).

Tenure – Households living in privately rented accommodation are most likely to be fuel poor

Employment - Households where the household reference person is unemployed are three times more likely to be in fuel poverty than the national average. Only roughly half of adults with a disability are in employment, compared to around 80% of non-disabled people (Labour Force Survey, LFS)

We have also drawn on our own Council Tax data to identify households in receipt of means tested benefits. In particular our [CTS scheme](#) data. This is a local means tested benefit scheme for people who have to pay Council Tax and are on a low income, with modest levels of capital.

Our CTS caseload is split broadly 60:40 working age caseload to pensioner age caseload. We have a responsibility to foster good relationships between people who share a protected characteristic and those who do not. There is a risk of harming the relationship between pensioners and working age claimants if we were to focus the discretionary energy support on just one of these caseload groups. Our proposal therefore seeks to treat both of these caseload groups equally.

Having examined the CTS data there is a correlation between the recipient base and those most likely to be in fuel poverty. Single parents, unemployed people and people with disabilities in particular were heavily represented within our caseload. This provides some assurance that using the means tested CTS caseload as the basis for eligibility for our proposed discretionary energy rebate scheme has sound logic and will reasonably target energy support toward households most likely to be in need of that support.

We do recognise however that there are likely to be some households experiencing fuel poverty that are outside of the Council Tax system or indeed outside of the CTS scheme.

In particular, younger people are more likely than older people to reside in Houses of Multiple Occupation (HMO). We hold no records of the number of people in this position. However, in many of these instances the resident will not be liable for payment of Council Tax and will not therefore qualify for the mandatory £150 energy support payment. Many will however be responsible for the payment of energy bills (often through a pre-payment meter). Therefore, to provide a possible route for these households to receive some support, our proposals include a general energy support fund which is not dependent upon the household being liable for the payment of Council Tax.

Similarly, there are likely to be 'asset rich' but 'cash poor' households who do not qualify for CTS, that occupy large, often poorly insulated homes which require a significant portion of the household income to heat. The properties are often in the higher Council Tax bands that do not attract the mandatory £150 energy support payment. Often these are occupied by older, rather than younger people, in more rural locations. Again, the proposed general energy support fund will provide a possible route for these households to receive some support

Who have you consulted with to assess possible impact on protected groups? If you have not consulted other people, please explain why?

We have not undertaken public consultation. This scheme is designed within the pre-election period and is being approved using the urgent decisions process within our Constitution given the expectation of both Government and communities to distribute this assistance as quickly as possible to help with the present cost of living crisis; significantly caused by rising home energy prices.

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
<p>Age</p>	<p>It is believed the outcome of this scheme will have a positive impact on people of any age that are in receipt of CTS and are responsible for the payment of home energy bills, and will not negatively impact on people of particular ages or ranges or ages that fall outside of its scope.</p> <p>Some younger people however are more likely than older people to reside in Houses of Multiple Occupation (HMO). We hold no records of the number of people in this position. However, in many of these instances the resident will not be liable for payment of Council Tax and will not therefore qualify for the mandatory £150 energy support payment. Many will however be responsible for the payment of energy bills (often through a pre-payment meter). Therefore, to provide a possible route for these households to receive some support, our proposals include a general energy support fund which is not dependent upon the household being liable for the payment of Council Tax.</p> <p>Similarly, there are likely to be 'asset rich' but 'cash poor' households who do not qualify for CTS, that occupy large, often poorly insulated homes which require a significant portion of the household income to heat. The properties are often in the higher Council Tax bands that do not attract the mandatory £150 energy support payment. Often these are occupied by older, rather than younger people, in more rural locations. Again, the proposed general energy support fund will</p>			<p>X</p>

	provide a possible route for these households to receive some support.			
Disability	<p>People with a disability are less likely to be in full time paid employment and therefore be less resilient to the impact of significant increases in home energy bills and, as a consequence be more likely to be experiencing fuel poverty.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS, and are responsible for the payment of home energy bills, and will not negatively impact those within this group that fall outside of its scope.</p>			X
Gender reassignment	<p>We hold no data on our Council Tax system to identify the names or numbers of current CTS applicants who share this protected characteristic. Gender reassignment is not a factor in any part of the assessment of CTS, or this scheme, and it is not considered to be a characteristic which requires greater assistance when assessing support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope</p>			X
Marriage and civilpartnership	<p>Marital or civil partnership status is not currently a factor in determining CTS, or this scheme, as it is not considered to be a characteristic that requires greater assistance when assessing support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope</p>			X

<p>Pregnancy and maternity</p>	<p>Pregnancy alone is not a factor in the current assessment of CTS, or this scheme, as it is not considered to be a characteristic that requires a higher level of support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope.</p>			<p>X</p>
<p>Race and ethnicity</p>	<p>Race is not a factor in the assessment of CTS , or this scheme, and it is not considered to be a characteristic that requires greater assistance when assessing support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope</p>			<p>X</p>
<p>Religion or belief</p>	<p>We do not hold data on religion or belief within our Council Tax or CTS records.</p> <p>Religion and belief is not a factor in any part of the assessment of CTS , or this scheme, as it is not considered to be a characteristic which requires greater assistance when assessing support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope</p>			<p>X</p>
<p>Sex</p>	<p>There are a greater number of female recipients of CTS within our caseload (either single, lone parents or part of a couple) than male recipients.</p> <p>The majority of lone parents in receipt of CTS are female. Lone parent households have been identified as being at highest risk of experiencing fuel poverty.</p> <p>Consequently, more females than males will benefit from payments under this scheme. This is not deliberate but is simply a product of</p>			<p>X</p>

	<p>the makeup of our caseload. However, gender will not be a direct factor in any part of the assessment of CTS, or this scheme, as it is not considered to be a characteristic that requires greater assistance when assessing support.</p> <p>For both men and women that are in receipt of CTS and are responsible for the payment of home energy bills the impact of this scheme is expected to be positive and will not negatively impact those within this group that fall outside of its scope</p>			
<p>Sexual orientation</p>	<p>We do not hold details of people's sexual orientation on our Council Tax records. Sexual orientation is not a factor in any part of the assessment of CTS, or this scheme, as it is not considered to be a characteristic which requires a higher level of support.</p> <p>It is believed the outcome of this scheme will have a positive impact on those within this group that are in receipt of CTS and are responsible for the payment of home energy bills and will not negatively impact those within this group that fall outside of its scope</p>			<p>X</p>
<p>Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.</p>	<p>This scheme focuses on supporting those with low incomes and modest levels of capital that are, as a consequence, likely to be less resilient to the impact of significant increases in home energy bills and more likely to be experiencing fuel poverty. Consequently, those households on our Council Tax records that receive means tested CTS will be supported by this scheme. We do not believe this scheme will negatively impact those within these groups that fall outside of its scope.</p>			<p>X</p>

Negative outcomes action plan

Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
N/A				

If negative impacts remain, please provide an explanation below.

Completed by:

Paul Harding

Date

29 April 2022