



# Section 75 Screening Form

## **Part 1. Policy scoping**

The first stage of the screening process involves scoping the policy under consideration. 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.

Public authorities 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**

Warm Healthy Homes Fund (Replacing Affordable Warmth Scheme ending in March 2028)

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### **Is this an existing, revised or a new policy?**

Revised

### **What is it trying to achieve? (intended aims/outcomes)**

The Department for Communities' long-term ambition is to improve the energy efficiency of Northern Ireland's housing stock, thereby reducing carbon emissions and helping to keep homes comfortably warm at an affordable cost. To do this it plans to introduce a new fuel poverty energy efficiency scheme as the Department's main fuel poverty intervention and energy efficiency scheme for private sector dwellings. The new scheme will be introduced in Northern Ireland in April 2027 and will replace the current Affordable Warmth Scheme (business

case approval until March 2028) and will be known as the 'Warm Healthy Homes Fund' (WHHF).

The WHHF will not be available for social homes as these properties are the responsibility of The NI Housing Executive (NIHE), which is the statutory regional housing authority, established under the Housing (Northern Ireland) Order 1981, which sets out its core functions, including the management, maintenance and improvement of the social housing stock.

The Partnership Agreement between DfC and NIHE further defines the governance framework within which NIHE operates and reinforces its responsibility to ensure that its housing stock meets required standards, including those relating to condition and energy performance.

Since 2001, an energy efficiency support scheme has been the Department's main tool in tackling fuel poverty. The WHHF will have a dual policy focus – to continue to assist the most vulnerable lower-income households, in the owner-occupier and private rented sectors, by improving the energy efficiency of their homes, and also to contribute to a reduction of energy consumption and emissions levels within the residential sector.

There are numerous factors that contribute to making energy unaffordable, including energy efficiency of homes, household energy needs, energy costs and household income. Tackling fuel poverty will help protect people, particularly those most vulnerable, from the effects of cold and damp living conditions. Doing so sustainably will also make a positive contribution to carbon reduction targets. In addition to providing continued support to those in fuel poverty, the new scheme will also contribute to reducing emissions, in line with our climate change commitments.

Proposals for the WHHF were included in the consultation (12 December 2024 to 6 March 2025) for the Warm Healthy Homes Strategy (as draft Fuel Poverty Strategy). A wide range of partners including the voluntary and community sector, energy companies, statutory bodies, and the public contributed to stakeholder engagement workshops to inform the new scheme.

The current WHHF consultation focuses on specific questions based on analysis of the Strategy consultation, collaboration with Executive departments and engagement with industry and other stakeholders. This will ensure a coordinated approach to the design of WHHF to ensure help is available to those who need it most.

The objectives for the Warm Healthy Homes Fund are:

- Improve energy efficiency by installing energy efficiency measures to enhance the energy well-being of occupants and reduce energy costs in fuel poor households living in the private sector.
- Enhance energy security for low-income households by reducing dependence on fossil fuels and lowering carbon emissions.
- Support a 'just transition' by supporting low-income households through the installation of energy-efficiency measures to reduce carbon emissions in the residential sector and contribute towards NI Climate Action Plan and Net Zero targets.

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**Are there any Section 75 categories which might be expected to benefit from the intended policy?**

Yes

**If Yes, explain how.**

With the launch of the new Warm Healthy Homes Fund, the intention is for a positive impact on all Section 75 groups.

**Who initiated or wrote the policy?**

Climate Change Division within the Department for Communities.

**Who owns and who implements the policy?**

The Department for Communities is responsible for the development of the policy and associated legislation related to the WHHF. A Managing Agent will be appointed to administer the scheme on the Department's behalf.

**Implementation factors**

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

If yes, are they

- financial
- legislative
- other, please specify \_\_\_\_\_

### **Main stakeholders affected**

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

- staff
- service users
- other public sector organisations
- voluntary/community
- other, please specify \_\_\_\_\_

### **Other policies with a bearing on this policy**

#### **What are they and who owns them?**

The new WHHF scheme must align with the Energy and Green Growth Strategies, Climate Change Act and fulfil the vision and principles of the Warm Healthy Homes Strategy 2026-2036: A new Fuel Poverty Strategy for Northern Ireland (WHHS). It must also align with the Department for the Economy (DfE) low carbon heat and energy efficiency scheme, to ensure that there are no gaps in eligibility and that those on the lowest incomes are afforded the same opportunities as those who can afford to pay. In summary, all linked relevant policies are:

- Climate Change Act (Northern Ireland) 2022 – DAERA
- Draft Climate Action Plan 2023-2027
- Draft Green Growth Strategy - DAERA
- Energy Strategy for Northern Ireland - DfE
- Housing Supply Strategy - DfC

- Draft Anti-Poverty Strategy for Northern Ireland - DfC
- People and Place Strategic Framework - DfC
- Making Life Better: A Public Health Strategy - DoH
- Draft Investment Strategy for Northern Ireland – Cross-government responsibility
- Programme for Government – Cross-government responsibility
- Active Aging Strategy – 2016/2022 – DfC
- Support for low carbon heat in the residential sector – DfE consultation response January 2026

## **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 **each** of the Section 75 categories.

As part of the Warm Healthy Homes Strategy consultation, views were sought on the policy intent for the Warm Healthy Homes Fund. There was widespread agreement that the scheme should prioritise low-income and vulnerable households living in the poorest-performing properties, who are least able to pay for improvements themselves. In addition, the Warm Healthy Homes Strategy includes a commitment to strengthen the capacity of trusted partners, so that households seeking help are signposted to the full range of support available.

### **Fuel Poverty**

Fuel poverty is the inability to heat or power a home to an adequate degree at a reasonable cost. It is affected by household income, the cost of energy and how much energy is needed in the home. The most recent modelled fuel poverty estimate using the 2016 baseline data as reported in the NI House Condition Survey estimated a fuel poverty figure of 27% in 2022.

In Northern Ireland fuel poor households are those needing to pay more than 10% of their full household income to maintain a satisfactory heating regime at an affordable cost. Households needing to spend 15-20% of their income on all fuel use are considered to be in severe fuel poverty, with those households needing to spend more than 20% of their income are considered to be in extreme fuel poverty.

In February 2026 the Warm Healthy Homes Strategy suggested a basket of indicators which includes reporting on number of households in fuel poverty, the proportion of population able to keep their home damp free, adequately heat their home in cold weather and able to pay bills, including gas, electricity or oil, without cutting back on essentials.

<https://www.nihe.gov.uk/working-with-us/research/house-condition-survey>

### **Residential Buildings Sector**

The residential buildings sector within the Climate Action Plan reports that residential building emissions account for 92.2% of building emissions. It reports

that despite an increase in the number of homes; residential buildings emissions have fallen from the 1990 baseline figure. There are several factors leading to the reduction in the residential buildings sector emissions including switching from solid fuels and oil to natural gas. However, it is recognised that fuel switching to natural gas is not a sustainable long-term approach and that a more progressive plan to increase energy efficiency and reduce reliance on fossil fuels to heat our homes is needed in order to meet medium and longer-term carbon reduction targets. This also aligns with the Warm Healthy Homes Strategy in terms of reducing the health risks associated with living in a cold damp home and ensuring that households have access to essential, affordable and secure energy.

[Greenhouse Gas Inventories for England, Scotland, Wales & Northern Ireland: 1990-2022 | National Atmospheric Emissions Inventory](#)

The Continuous Household Survey Heat and Insulation results 2024/25 [CHS-Heat-and-Insulation-202425.knit](#) reported:

- In 2024/25, the majority of households (61%) reported oil central heating as their primary method of household heating, a statistically significant decrease from 65% in 2023/24.
- Just over one-third (36%) of households reported gas as the primary method of heating their home. This is statistically significantly higher than the 32% reported in 2023/24.
- In 2024/25, four-fifths (80%) of households with more than one heating method reported using an open/closed fire or stove as their secondary method compared to 78% in 2023/24. This year-on-year difference is not statistically significant.
- Of those households burning solid fuels in an open/closed fire or stove as the secondary method of home heating, 45% reported burning wood logs (seasoned and unseasoned), just over a quarter (26%) smokeless coal and just under a quarter (24%) ordinary household coal as the main fuel.
- In 2024/25, 96% of households reported that some or all their windows were double-glazed, while 3% had some or all triple-glazed windows. Nearly three-quarters (73%) had some form of loft insulation, just over a fifth (21%) reported having some form of roof insulation, and almost three-fifths (58%) had wall insulation.

For comparative purposes the Republic of Ireland's Climate Action Plan targets rapid decarbonisation of residential heat, with 2030 targets for deep retrofits (500,000 homes to BER  $\geq$ B2), large-scale heat-pump deployment (400,000 in existing dwellings), and district heating (up to 2.7 TWh/yr).

[A review of residential heat decarbonisation in Ireland | ESRI](#)

The UK Government's Warm Homes Fund will have £5 billion of capital for investment via financial transactions and could deliver a massive increase in the investment going into low carbon technologies by overcoming barriers to deployment and adoption, such as upfront costs.

[Warm Homes Fund: innovative finance for investments and loans - GOV.UK](#)

From April – June 2024, the Home Energy and Fuel Poverty Branches hosted a series of stakeholder engagement workshops and focus groups across Northern Ireland. The aim was to gather opinions and real-life experiences to support the development of the Warm Healthy Homes Strategy and explore initial priorities for the new Warm Healthy Homes Fund.

From January – February 2025, the Home Energy Branch also fed into several online consultation events held by the Fuel Poverty Branch on their Warm Healthy Homes Strategy.

From September 2024 – December 2025 several industry-based workshops were held by the Home Energy Branch. The feedback from which has been used to inform scheme design, including the energy efficiency measures to be considered in the new scheme along with best practices, quality standards and consumer protection.

Engagement workshops were also hosted from April – October 2025 by the Home Energy Branch and involved stakeholders including the Northern Ireland Housing Executive who deliver the current AWS and colleagues from across Housing Division within DfC and others across government. These were opportunities to learn from the successes of current energy interventions and to determine potential gaps in service provision and areas for improvement.

From February 2026 the Home Energy Branch has been working closely with colleagues from the energy efficiency and heat policy branches in the Department for the Economy. These workshops are helping to inform key policy decisions and to ensure alignment across all government energy efficiency schemes.

Section 75 category	Details of evidence/information
<b>Religious belief</b>	There is no available evidence/information specifically in relation to the religious belief.
<b>Political opinion</b>	There is no available evidence/information specifically in relation to political opinion.
<b>Racial group</b>	<p>Impact of Brexit on the minority ethnic and migrant people in Northern Ireland Report  <a href="#">Impact of Brexit on minority ethnic and migrant people in Northern Ireland</a></p> <p>The experiences of minority ethnic and migrant people in Northern Ireland  <a href="#">The experiences of minority ethnic and migrant people in Northern Ireland</a></p> <p>The University of York report on Housing and Communities' Inequalities in Northern Ireland  <a href="#">HousingInequalities-SummaryReport.pdf</a></p> <p>NI Census 2021 <a href="#">Census 2021 main statistics ethnicity tables   Northern Ireland Statistics and Research Agency</a></p> <p>Equality NI <a href="#">Census 2021 - Briefing</a>.</p>
<b>Age</b>	<p>Northern Ireland House Condition Survey 2023 <a href="#">The Housing Executive - House Condition Survey</a></p> <p>Winter Mortality in Northern Ireland, - Excess Winter Deaths (EWD) figures for 2023-24, provided by the Northern Ireland Statistics and Research Agency (NISRA) <a href="#">Weekly Deaths in Northern Ireland</a></p> <p>Winter Mortality in Northern Ireland, Excess Winter Deaths (EWD) figures for 2024/25 provided by the Northern Ireland Statistics and Research Agency (NISRA) <a href="#">Weekly Deaths in Northern Ireland</a></p>

Section 75 category	Details of evidence/information
	Dept for Communities Active Aging Strategy 2016-2022 - <a href="#">Active Ageing   Department for Communities</a>
<b>Marital status</b>	<a href="#">Households below average income: for financial years ending 1995 to 2024 - GOV.UK</a> Northern Ireland Poverty and Income Inequality report 2021-22 <a href="#">Northern Ireland Poverty and Income Inequality Report 2021-22</a>
<b>Sexual orientation</b>	There is no available evidence/information specifically in relation to the sexual orientation.
<b>Men and women generally</b>	Northern Ireland Poverty and Income Inequality report 2021-22 <a href="#">Northern Ireland Poverty and Income Inequality Report 2021-22</a> Northern Ireland House Condition Survey <a href="#">The Housing Executive - House Condition Survey</a> Labour Market – Women in Northern Ireland report 2023 <a href="#">Women in Northern Ireland 2023</a> Gender Pay Gaps in Northern Ireland 2024 - <a href="#">Gender pay gaps in Northern Ireland   Northern Ireland Statistics and Research Agency</a>
<b>Disability</b>	The experiences of poverty among unpaid carers in Northern Ireland - A report from the Carer Poverty Commission NI <a href="#">the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf</a> Winter Mortality in Northern Ireland, - Excess Winter Deaths (EWD) figures for 2023-24, provided by the Northern Ireland Statistics and Research Agency (NISRA) <a href="#">Weekly Deaths in Northern Ireland</a> Winter Mortality in Northern Ireland, Excess Winter Deaths (EWD) figures for 2024/25 provided by the Northern Ireland Statistics and Research Agency (NISRA) <a href="#">Weekly Deaths in Northern Ireland</a> Family Resource Survey <a href="#">Family Resources Survey: Northern Ireland 2023/24</a>

Section 75 category	Details of evidence/information
	<p>Energy Hardship: Consumer Lived Experiences 2024 - summary report – Utility Regulator - <a href="#">Energy Hardship - Consumer Lived Experience - summary report.pdf</a></p> <p>The Health Impacts of Cold Homes and Fuel Poverty – Marmot Review - <a href="#">the-health-impacts-of-cold-homes-and-fuel-poverty.pdf</a></p> <p>NISRA report on Disability Pay Gaps in Northern Ireland 2024 <a href="#">Disability pay gaps in Northern Ireland   Northern Ireland Statistics and Research Agency</a></p> <p>Northern Ireland House Condition Survey <a href="#">The Housing Executive - House Condition Survey</a></p>
<b>Dependants</b>	<p>Northern Ireland Poverty and Income Inequality report 2021-22 <a href="#">Northern Ireland Poverty and Income Inequality Repot 2021-22</a></p> <p>NICCY Child Poverty statistics including technical report <a href="#">Child Poverty - Niccy</a></p> <p>NICCY Child Poverty Briefing <a href="#">niccy-child-poverty-briefing-october-2017.pdf</a></p> <p>Northern Ireland House Condition Survey <a href="#">The Housing Executive - House Condition Survey</a></p>

**Note to reader** - If you are aware of and would like the Department to take into account any further evidence or information relevant to this policy, please send this to [heb@communities-ni.gov.uk](mailto:heb@communities-ni.gov.uk)

## 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

<b>Section 75 category</b>	<b>Details of needs/experiences/priorities</b>
Religious belief	There is no evidence of any different needs, experiences and priorities for people within this Section 75 category in relation to this policy.
Political opinion	There is no evidence of any different needs, experiences and priorities for people within this Section 75 category in relation to this policy.
Racial group	<p>During the pre-consultation and consultation phases of the Department for Communities Warm Healthy Homes Strategy (Fuel Poverty Strategy) development, several workshops were held with focus groups including Step NI who represented several interests: BAME, Irish Travellers Support, Migrant NI, Migrant Communities and Roma Support Group.</p> <p>Discussion highlighted key needs of the cohort:</p> <p>Language &amp; Literacy: Support including translation services in the Voluntary and Community Sector is limited and location specific. Digital services present a barrier to literacy with in-person support being more effective.</p> <p>Capacity: Unnecessary confusion can be caused through navigation of complex systems.</p> <p>Available Research:</p> <p>Research from <a href="#">Impact of Brexit on minority ethnic and migrant people in Northern Ireland</a> found “providers of public services often lacked understanding of the entitlements of different groups of people. Third sector organisations supporting minority ethnic and</p>

Section 75 category	Details of needs/experiences/priorities
	<p><i>migrant people were completely overwhelmed with requests for help and lacked the resources to provide this adequately. While only a small sample and not the focus of this study, we found extremely concerning levels of poverty and vulnerability amongst asylum seekers and refugees, including children” and “Minority ethnic communities may be largely invisible to policy makers for another reason, too: the lack of ethnic monitoring and data on the population. This concern was identified frequently by witnesses during our inquiry, and in this regard Northern Ireland trails behind the rest of the UK”.</i></p> <p>As less quantitative data is available, targeted focus groups were used to capture the real-life experiences to inform policy decision making.</p> <p>The University of York report on Housing and Communities’ Inequalities in Northern Ireland reported that <a href="#">HousingInequalities-SummaryReport.pdf</a> - The composition of Northern Ireland shifted significantly between 2001 and 2011, with a much expanded minority ethnic population and new ethnically White migrant populations arising from EU expansion. These new minority ethnic and migrants’ groups lack homogeneity, with different socio-economic circumstances and patterns of household formation. Data limitations constrain the precise understanding of how similar or divergent different ethnic groups’ housing circumstances may be, but the data and literature review highlighted lower proportions of Black residents and those from the EU Accession countries are in homeownership and among minority ethnic and migrant groups there is a higher prevalence of private renting.</p> <p>The main research report notes the positive aspects of the private rented sector, including that there are higher levels of satisfaction with the services provided by private landlords in Northern Ireland than in England. However, common weaknesses in the private rented sector include limited security of tenure, high housing costs, poor housing management, and for some but not all households there are poorer housing conditions</p> <p>Data from the NI Census 2021 main statistics on housing and accommodation shows that households belonging to minority ethnic groups are more likely to rent, either from private landlords or social housing providers (like the NIHE), compared to White households, which have higher rates of outright ownership.</p>

Section 75 category	Details of needs/experiences/priorities
	<p><a href="#">Census 2021 main statistics ethnicity tables   Northern Ireland Statistics and Research Agency</a></p> <p>Equality Commission NI <a href="#">Census 2021 - Briefing</a> reported that according to the Northern Ireland Census 2021 data, while the majority of the population belongs to the White ethnic group (96.55%), minority ethnic groups made up 3.45% (65,604 people) of usual residents. The data shows that households with minority ethnic group residents are generally more likely to live in rented accommodation compared to the overall population</p>
Age	<p>During the pre-consultation phase of the Warm Healthy Homes Strategy (Fuel Poverty Strategy), several workshops and focus groups were held including with Age NI to discuss the issues that many older people face including limiting heat and light use to save money which can lead to weather related illnesses or trips and falls.</p> <p>The Northern Ireland House Condition Survey 2016 <a href="#">Estimates of fuel poverty in Northern Ireland in 2017 and 2018 revised</a> reports that almost two-fifths (38%) of households headed by an older person (75 plus) were in fuel poverty and one-third (34%) of older household types were fuel poor.</p> <p>Compounding the issue in many households, Family Resources Survey: Northern Ireland 2023/24 reports that 49% of adults over State Pension age also has a disability and people with disabilities often have increased energy and heating costs relating to their disabilities.</p> <p>The NI Commissioner for Older People <a href="#">February-2025-COPNI-response-to-Consultation-on-a-draft-Fuel-Poverty-Strategy.pdf</a> identified energy prices to be a key drivers and impact of fuel poverty. <i>High oil prices are a major factor, as NI has a higher reliance on home heating oil than other parts of the UK.</i></p> <p><a href="https://www.nisra.gov.uk/publications/ct0136-lone-parents-aged-16-74-sex-and-dependent-child-family-indicator">https://www.nisra.gov.uk/publications/ct0136-lone-parents-aged-16-74-sex-and-dependent-child-family-indicator</a></p> <p>The Institute of Health Equity Report published the <a href="#">the-health-impacts-of-cold-homes-and-fuel-poverty.pdf</a> that reported in relation to older people “<i>The effects of cold housing were evident in terms of higher mortality risk, physical health and mental health. Improving the energy efficiency of the existing stock is a long-term,</i></p>

Section 75 category	Details of needs/experiences/priorities
	<p><i>sustainable way of ensuring multiple gains, including environmental, health and social gains”.</i></p> <p>The NI Assembly Topical Digest on Older People in NI 2024 reported further that fuel poverty among older people in Northern Ireland is a critical, worsening issue, with recent estimates suggesting that around 40% of households with people aged 60+ are either in poverty or just above the poverty line, struggling to cover essential costs. <a href="#">raise-topical-digest-older-people.pdf</a></p> <p>The Joseph Rowntree Foundation reported in 2025 <a href="#">Poverty in Northern Ireland 2025   Joseph Rowntree Foundation</a> that the key data and trends for 2024/25 were:</p> <p><b>Widespread Fuel Poverty:</b> Approximately 40% of households in NI were estimated to be in fuel poverty by late 2024, with older people disproportionately affected.</p> <p><b>Highest Risk Group:</b> Northern Ireland is unique in the UK in that fuel poverty is more prevalent for those over 65.</p> <p><b>Severe Hardship:</b> Around 1 in 5 households of people aged 60+ are in such severe fuel poverty that their home conditions threaten their health.</p> <p><b>Increasing Vulnerability:</b> Research in late 2024 showed a "continued rise" in dangerous coping mechanisms, with 27% of households having gone without heating or electricity, 70% reducing central heating use, and 36% wearing coats indoors.</p> <p><b>Pensioner Poverty Rates:</b> While general pensioner poverty has seen improvements, 13% of older people (approx. 40,000) are living in relative poverty.</p> <p>The NI Commissioner for Older People <a href="#">February-2025-COPNI-response-to-Consultation-on-a-draft-Fuel-Poverty-Strategy.pdf</a> identifies key drivers and impacts of this to be :</p> <p><b>Energy Prices:</b> High oil prices are a major factor, as NI has a higher reliance on home heating oil than other parts of the UK.</p> <p><b>Low Incomes:</b> Many older people live on low-to-modest fixed incomes, with 34% of older households experiencing fuel poverty even if they are not in receipt of benefits.</p>

Section 75 category	Details of needs/experiences/priorities
	<p><b>Health Implications:</b> Fuel poverty among the elderly directly correlates with poor health, high excess winter mortality, and the need to choose between heating and eating.</p> <p><b>Loss of Support:</b> The reduction in cost-of-living payments and changes to the Winter Fuel Payment have compounded financial strain.</p>
Marital status	<p>Single parent households are disproportionately affected by poverty and fuel poverty. Data from <a href="#">Households below average income: for financial years ending 1995 to 2024 - GOV.UK</a> report show that lone parent families are among the most economically vulnerable. These households are more likely to fall below the poverty threshold, particularly after housing costs are considered. The HBAI report indicates that 31% of children live in relative low income households and 26% in absolute low-income households, with lone parent families overrepresented.</p> <p>The Department for Communities <a href="#">Northern Ireland Poverty and Income Inequality report 2022-23</a>   reports that 24% of children in Northern Ireland were living in relative poverty in 2022/23, up from 18% the previous year and that 19% of children were in absolute poverty, up from 15% the previous year. The report also notes that lone parent households are consistently among the most economically disadvantaged groups and are more likely to fall below the poverty threshold, especially when housing costs are considered.</p> <p>This is evidenced by the fact that ‘single with children’ households face the highest risk of relative poverty, at 35% rising energy and housing costs place additional pressure on already limited incomes, increasing the risk of fuel poverty. The HBAI reports that material deprivation affects 28% of children, with lone parent households facing difficult choices between heating, food, and other essentials. These conditions have long term consequences for children's health and development.</p>
Sexual orientation	There is no evidence of any different needs, experiences and priorities for people within this Section 75 category in relation to this policy.

Section 75 category	Details of needs/experiences/priorities
Men and women generally	<p>The NI Census 2021 shows that 93% of single parent have a female lone parent compared to 7% for men.</p> <p>Based on the <a href="#">Women in Northern Ireland 2023</a> report from NISRA, single mothers are particularly vulnerable to fuel poverty due to lower income levels driven by reduced working hours and limited access to higher-paying employment. The report highlights that only 60% of employed women with dependent children work full-time, compared to 96% of employed men with dependent children. This disparity in working patterns directly affects earnings, as part-time and flexible roles, more commonly held by women tend to offer lower wages and fewer opportunities for advancement.</p> <p>In addition to this, women in Northern Ireland earned 7.8% less than men on average in 2023, meaning they received 92p for every £1 earned by male counterparts. These income limitations, combined with higher rates of economic inactivity among women, make single mothers more susceptible to financial hardship and fuel poverty, as they often lack the disposable income needed to manage rising energy costs and household expenses</p> <p><a href="#">Northern Ireland Fuel Poverty Action Guide (Edition 2) - National Energy Action (NEA)</a> reports '<i>Low income is one of the main causes of fuel poverty. Part of the long-term solution to fuel poverty lies in ensuring that families and individuals are as financially secure as possible and receiving all the benefits to which they are entitled.</i>'</p>
Disability	<p><a href="#">Family Resources Survey: Northern Ireland 2023/24</a> reports that approximately one in four people reported a disability in Northern Ireland. In 2023/24, 8% of the population were informal carers and 37% of informal carers provided 20 hours a week of care or more. In addition, 49% of adults over State Pension age have a disability.</p> <p>During the pre-consultation phase and consultation phase of the Warm Healthy Homes Strategy (Fuel Poverty Strategy), workshops and focus groups we held including with a men's Disability Action Group, a women's Disability Action Group, Carers NI and one focusing on supporting people with a terminal illness.</p> <p>A common theme described issues were the associated costs with living with a disability and life-threatening illnesses. It was highlighted that for many illnesses there is a greater need to keep warm as more time is spent leading to high energy usage and thus higher bills. Central heating helps manage the disability and prevent</p>

Section 75 category	Details of needs/experiences/priorities
	<p>the condition deteriorating. In addition, there are associated costs relating to the running of equipment such as dialysis machines, hoists, sensory equipment, a need for continuous lighting for those with low vision, etc.</p> <p>Many of the same issues were raised in the <a href="#">Energy Hardship - Consumer Lived Experience - summary report.pdf</a> The summary report highlighted that many people with disabilities relied on medical equipment that used a lot of electricity or had illnesses or disabilities which required their home to be heated to certain temperatures for health and wellbeing purposes. This point has been backed up with research conducted by <a href="#">the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf</a> which suggests that one in four unpaid carers in Northern Ireland (25%) are living in poverty due to the inescapable extra costs of providing care, including additional food, energy and transportation costs.</p> <p><a href="#">Winter Mortality in Northern Ireland, 2022-23</a> noted that respiratory disease and circulatory disease contributed to just over half of the additional winter deaths in 2022/23 and fuel poverty has a direct link with respiratory disease and circulatory disease. The Winter Mortality report for 2023/24 <a href="#">Weekly Deaths in Northern Ireland</a> show a similar figure with it contributing to 52.5% of deaths.</p> <p>The <a href="#">House Condition Survey Main Report 2016</a> reports that 78% of all households in fuel poverty had incomes of £15,599 per annum or less and this ties in with NISRA’s report on Disability Pay Gaps in Northern Ireland 2024 who have found that “disabled employees earned 17.6% less than non-disabled employees”.</p>
Dependants	<p>Pre consultation engagement workshops described the impact that poverty and fuel poverty has on young children. The points raised from those discussions showed poverty to have an impact on children’s education. This has been backed up in the NICCY Poverty Briefing 2017 <a href="#">niccy-child-poverty-briefing-october-2017.pdf</a> which has shown that young people entitled to free school meals are almost twice as likely to leave school without five good GCSEs (55.2%) compared with young people who are not (24.2%).</p> <p>Another point raised was the health implications on children who are living in poverty and the long term issues that will persist with the person throughout their lifetime, again this was backed up in the NICCY Poverty Briefing 2017 which has shown that infant mortality is 16% higher in the most deprived areas than in the least; mental</p>

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	<p>ill-health is twice the rate in most deprived areas than least; children in poverty statistically live shorter lives (women -4.4years, men -7.0 years) and children in poverty statistically have fewer years of good health (women -14.6 years, men -12.2 years).</p> <p>It was further raised that such high numbers of children living in poverty and its effects will have a negative impact on wider society if the trend continues. This was supported by <a href="#">House Condition Survey Main Report 2016</a> which reported that 78% of all households in fuel poverty had incomes of £15,599 per annum or less – for households with dependent children this equates to 297,400 homes. It also reports that households with dependent child(ren) under 16; includes lone parent households) is 30% or 222,660 which makes up a large percentage of those households living in fuel poverty.</p>

## **Part 2. Screening questions**

### **Introduction**

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the public authority should consider its answers to the questions 1-4 which are given on pages 66-68 of this Guide.

If the public authority's conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the public authority may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, a public authority should give details of the reasons for the decision taken.

If the public authority's conclusion is **major** in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

If the public authority's conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

- measures to mitigate the adverse impact; or
- the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

### **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 it would be appropriate to conduct an equality impact assessment in order to better assess them;
- 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 amongst 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 evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions given overleaf and indicate the level of 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 equality categories? minor/major/none

Section 75 category	Details of policy impact	Level of impact? minor/major/none
Religious belief	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to all sections of the community.</p>	None
Political opinion	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to all sections of the community.</p>	None
Racial group	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to all racial groups.</p>	None

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>Data has shown that the minority ethnic groups living in NI are more likely to live within the private rented sector. The WHHF will have a positive impact on this cohort as the WHHF will support the private rented sector through the provision of fully funded loft and cavity wall insulation and solar panels and batteries.</p> <p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first- approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.</p>	
Age	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>The WHHF will assist those low-income households who are at risk of fuel poverty.</p> <p>To ensure that all households in the private sector, can benefit from the scheme,</p>	Minor – mitigations in place

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>eligibility criteria has been widened in relation to the household income threshold currently in place in the Affordable Warmth Scheme (AWS) (£23,000 or less).</p> <p>The WHHF is open to applicants who are in receipt of Universal Credit or Pension Credit, or their total/gross household income must be equivalent to or less than the current rate of National Living Wage, which is currently set at £29,741.40.</p> <p>The income threshold will increase annually each April in line with National Living Wage rate. This is to ensure that the income threshold for the WHHF is flexible and reflects cost of living. All income will be included in the calculation of income aside from disability and health related benefits and the Winter Fuel Payment.</p> <p>Throughout the engagement process, the subject of savings was raised by participants, with many stating that savings should be included in the calculation of income. Some stakeholders did express the view that some savings should be considered an 'essential expense' as people needed something to fall back on if problems arise, and therefore it would be fair to set a savings threshold, perhaps with a sliding scale approach within the scheme eligibility criteria that would allow for this. Some respondents stated that there should be a clear definition of savings e.g. savings over a certain threshold, having a second property etc.</p> <p>Whilst the current AWS does not take into consideration any savings a household may have when determining if they are eligible to support, it has been identified as a lesson learned from the outgoing scheme, whereby some applicants to the scheme satisfied the eligibility criteria despite having substantial</p>	

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>savings. It would also align with the policy intent of the WHHF to assist those low-income households most in need.</p> <p>The Department has considered the views and looked at other departmental grants that are administered such as Disabled Facilities Grant (DFG) and has made the following proposal. The calculation presented is that used by Universal Credit, Pension Credit and DFG when considering savings in the calculation of income. The Department proposes that:</p> <p><i>If the applicant to WHHF is under 60 years of age that they may have a combined household personal savings of £6,000. For every £250 over the savings threshold, £1 per week for each complete £250 will be added to the calculation of your income.</i></p> <p><i>If the applicant to WHHF is 60 years of age or over they may have a combined personal household savings of £6,000. For every £500 over the savings threshold, £1 per week for each complete £500 will be added to the calculation of your income.</i></p> <p>Adopting a more generous savings allowance for people over 60 reflects that they may have more savings due to retirement while still ensuring that the fund is targeted at low incomes.</p> <p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are</p>	

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first- approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.</p> <p>. Lessons learned from the outgoing AWS are that occasionally additional support may be required by some applicants whose properties require some general maintenance or remedial works before energy efficiency measures can be installed.</p> <p>These applicants may be unable to pay for or complete remedial work themselves and historically would have been exempt from benefitting from AWS. It is therefore suggested that a maintenance grant of £500 should be built into the grant limit to support such households as it is important for the Department to identify and reduce barriers that prevent access to the scheme.</p> <p>WHHF contractors and sub-contractors must have undertaken training in working with vulnerable customers and be Access NI checked.</p> <p>Initial aftercare advice will be available, with follow up 6 weeks or 12 weeks after installation to ensure that equipment is being used correctly and effectively. It is anticipated that the Managing Agent will instigate the aftercare by telephone to establish if a follow up visit is required.</p> <p>The Department will ensure that there is a clear pathway for redress should any issues occur.</p>	

Section 75 category	Details of policy impact	Level of impact? minor/major/none
Marital status	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to this group.</p> <p>The WHHF will assist those low-income households who are at risk of fuel poverty.</p> <p>To ensure that all households in the private sector, can benefit from the scheme, eligibility criteria has been widened in relation to the household income threshold currently in place in the Affordable Warmth Scheme (£23,000 or less) and to include eligibility to universal credit and pension credit.</p>	Minor – Mitigations in place
Sexual orientation	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to this group.</p>	None
Men and women generally	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a</p>	None

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to both men and women.</p> <p>The WHHF will assist those low-income households who are at risk of fuel poverty.</p>	
Disability	<p>The WHHF will assist those low-income households who are at risk of fuel poverty.</p> <p>The income threshold will increase annually each April in line with National Living wage rate. This is to ensure that the income threshold for the WHHF is flexible and reflects cost of living. All income will be included in the calculation of income aside from disability and health related benefits and the Winter Fuel Payment. MoD disability benefits will also be excluded from the calculation of income. This will ensure a more consistent treatment of disabled applicants to WHHF.</p> <p>The Department has considered the views and looked at other departmental grants that are administered such as Disabled Facilities Grant (DFG). The calculation presented is that used by Universal Credit, Pension Credit and DFG when considering savings in the calculation of income.</p> <p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul>	Minor – Mitigations in place

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	<p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first- approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.</p> <p>Lessons learned from the outgoing AWS are that occasionally additional support may be required by some applicants whose properties require some general maintenance or remedial works before energy efficiency measures can be installed.</p> <p>These applicants may be unable to pay for or complete remedial work themselves and historically would have been exempt from benefitting from AWS. It is therefore suggested that a maintenance grant of £500 should be built into the grant limit to support such households as it is important for the Department to identify and reduce barriers that prevent access to the scheme.</p> <p>WHHF contractors and sub-contractors must have undertaken training in working with vulnerable customers/be Access NI checked.</p> <p>Initial aftercare advice will be available, with follow up 6 weeks or 12 weeks after installation to ensure that equipment is being used correctly and effectively. It is anticipated that the Managing Agent will instigate the aftercare by telephone to establish if a follow up visit is required.</p>	

Section 75 category	Details of policy impact	Level of impact? minor/major/none
	The Department will ensure that there is a clear pathway for redress should any issues occur.	
Dependants	<p>The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.</p> <p>To this end, the WHHF is considered to be beneficial to dependents living in a household as the total household income relates to eligibility for grant funding from the scheme.</p> <p>The WHHF will assist those low-income households who are at risk of fuel poverty.</p> <p>To ensure that all households in the private sector, can benefit from the scheme, eligibility criteria has been widened in relation to the household income threshold currently in place in the Affordable Warmth Scheme (£23,00 or less).</p> <p>The WHHF has considered benefits that may be disregarded and have included Disability Living Allowance (DLA) which includes dependents in receipt of DLA and Carers Allowance.</p>	Minor – Mitigations in place

**2. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?**

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief		The policy does not present any opportunities to better promote equality of opportunity.
Political opinion		The policy does not present any opportunities to better promote equality of opportunity.
Racial group	<p>Through discussions with focus groups, workshops and consultation responses it was highlighted that some racial groups find it difficult to navigate and understand the support that is available to them. They are impacted by language barriers and their capacity to deal with often complex pathways for help and accessing support online and the fear and stigma attached to seeking help prevents the uptake of support. The opportunities that are presented should therefore come with added support for those who are dealing with the above issues.</p> <p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print</p>	

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
	<p>and other formats. While the scheme is expected to adopt a 'digital-first-approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.</p>	
Age	<p>Through discussions with focus groups, workshops and consultation responses it was highlighted that older people find it difficult to navigate and understand the support that is available to them. Their capacity to deal with often complex pathways for help and accessing support online prevents the uptake of support. The opportunities that are presented should therefore come with added support for those who are dealing with the above issues.</p> <p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first-approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing</p>	

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
	with additional support such as translation services and sign-language assistance where required.	
Marital status	Through discussions with focus groups, workshops and consultation responses it was highlighted that single parent households find it difficult to navigate and understand the support that is available to them. Their capacity to deal with often complex pathways for help and accessing support online and the fear and stigma attached to seeking help prevents the uptake of support. The opportunities that are presented should therefore come with added support for those who are dealing with the above issues.	
Sexual orientation		The policy does not present any opportunities to better promote equality of opportunity.
Men and women generally	<p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first-approach, it is recognised that applications must also be available</p>	

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
	through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.	
Disability	<p>For ease of accessibility and application it is intended that applicants may apply to the WHHF via the following means.</p> <ul style="list-style-type: none"> <li>• Contact NI Energy Advice Service by telephone/email</li> <li>• Online applications</li> </ul> <p>It is intended that all scheme materials will adhere to accessibility standards and are straightforward for applicants to use. This will include providing information in large print and other formats. While the scheme is expected to adopt a 'digital-first-approach, it is recognised that applications must also be available through non-digital channels, including by telephone or in writing with additional support such as translation services and sign-language assistance where required.</p>	
Dependants	Through discussions with focus groups, workshops and consultation responses it was highlighted that single parent households find it difficult to navigate and understand the support that is available to them. Their capacity to deal with often complex pathways for help and accessing support online and the fear and stigma attached to seeking help prevents the uptake of support. The opportunities that are presented should therefore come with added	

Section 75 category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
	support for those who are dealing with the above issues.	

**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	Not applicable.	None
Political opinion	Not applicable.	None
Racial group	Not applicable.	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 <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief		Not applicable.

Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Political opinion		Not applicable.
Racial group		Not applicable.

## **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).*

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

The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets.

We have considered people with multiple identities, including the following groups:

- Marital status and Dependents
  - We have considered the impacts of the proposed policy on these multiple groups, namely, married couples with dependents, and have mitigations/proposals in place to reduce the impact on this group
  
- Age and Disability
  - We have considered the impacts of the proposed policy on these multiple groups and have put in place mitigation measures such as proposing disregards including disability benefits and Winter Fuel payments, which should act as a mitigation for this multiple identity group.

### **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
2. **Not be subject to an EQIA (with mitigating measures /alternative policies highlighted above)**
3. Be subject to an EQIA

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

The policy intent of the WHHF is to address fuel poverty in Northern Ireland which will help protect people, particularly the most vulnerable, from the effects of living in a cold, damp home. Doing this sustainably will also make a positive contribution to carbon reduction targets. We are consulting on the proposals and have provided options that mitigate against potential equality impacts. We will continue to monitor these mitigations, and the rest of the Section 75 groups, to ensure that no negative impacts are felt and if this changes, we will consider further mitigations to be put in place.

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

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## Mitigation

When the public authority concludes that the likely impact is 'minor' and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

If so, **give the reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

### **Age:**

We have considered the impacts on older people and have proposed mitigation options within the consultation where certain health benefit payments will be 'disregarded', including Attendance Allowance and Winter Fuel Payments (which are specifically claimed by older people).

There is also an option proposed where Pension Credit would be an automatic pathway onto the scheme.

### **Disability:**

As a mitigation, we have proposed that disability benefits would be 'disregarded' from the income calculation for the WHHF.

### **Dependents:**

The WHHF has considered benefits that may be disregarded and have included Disability Living Allowance (DLA) and Carers Allowance, which would mitigate against any potential impact of the WHHF on households with dependents in receipt of DLA.

### **Marital status and Dependents**

We have considered the impacts of the proposed policy on these multiple groups, namely, married couples with dependents, and have mitigations/proposals in place to reduce the impact on this group

There is also the mitigation of an option proposed that would mean that being in receipt of the person element of Universal Credit would be an eligibility criterion, this would mean that

people with low incomes, who potentially have dependent children in their household, would be able to claim.

### **Age and Disability**

We have considered the impacts of the proposed policy on these multiple groups and have put in place mitigation measures such as proposing disregards including disability benefits and Winter Fuel payments, which should act as a mitigation for this multiple identity group.

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## **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:**

- We will report the number of households assisted and measures installed
- We will report the increase in EPC (or equivalent) rating and carbon saved
- We will report on a customer satisfaction survey, which will include questions such as 'is your home warmer?', 'have your household energy bills reduced?', 'has your health improved post installation of measures?' to help build and learn from lived experience
- We will contribute to the Warm Healthy Homes Strategy 'basket of indicators' and Ministers Annual Statement
- We will report on a social return on investment – the short-, medium- and long-term impacts, such as direct investment for Government of £x for every £1 invested, Social Value of £x for every £1 invested.

The high-level scheme design for WHHF will be further shaped by this public consultation and stakeholder engagement and therefore may be subject to further changes from outlined above.

The Department wishes to include a review period after three years of operation to the proposed Domestic Energy Efficiency Regulations (Warm Healthy Homes Fund) 2026 which is the associated legislation to introduce the Warm Healthy Homes Fund.

## **Part 5 - Approval and authorisation**

<b>Screened by:</b>	<b>Position/Job Title</b>	<b>Date</b>
Janine Coey	Deputy Principal	02/04/2026
<b>Approved by:</b>		
Angus Kerr	Director (G5)	18/05/2026

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 the public authority's website as soon as possible following completion and made available on request.