

Equality Screening – Section 75 of Northern Ireland Act 1998

Policy title: Design Considerations for the development of A Smart Systems and Flexibility Plan (SSFP). The purpose of the SSFP will be to set a path for developing Northern Ireland’s energy systems to meet the needs of a decentralised, renewable energy system, and to meet the Energy Strategy and Climate Change Act (Northern Ireland) 2022 (CCA) target.

Policy screened out **without** mitigation or an alternative policy adopted.

Contact: Nigel Morris (nigel.morris@economy-ni.gov.uk)

Date of completion: 19 December 2023

For Equality Unit Completion:

Amendments requested? Yes

Date returned to Business Area: 18/12/23

Date final version received: 19/12/23

Content

Part 1. Policy scoping – asks public authorities to provide details about the policy, procedure, practice and/or decision being screened and what available evidence you have gathered to help assess the likely effect on equality of opportunity and good relations.

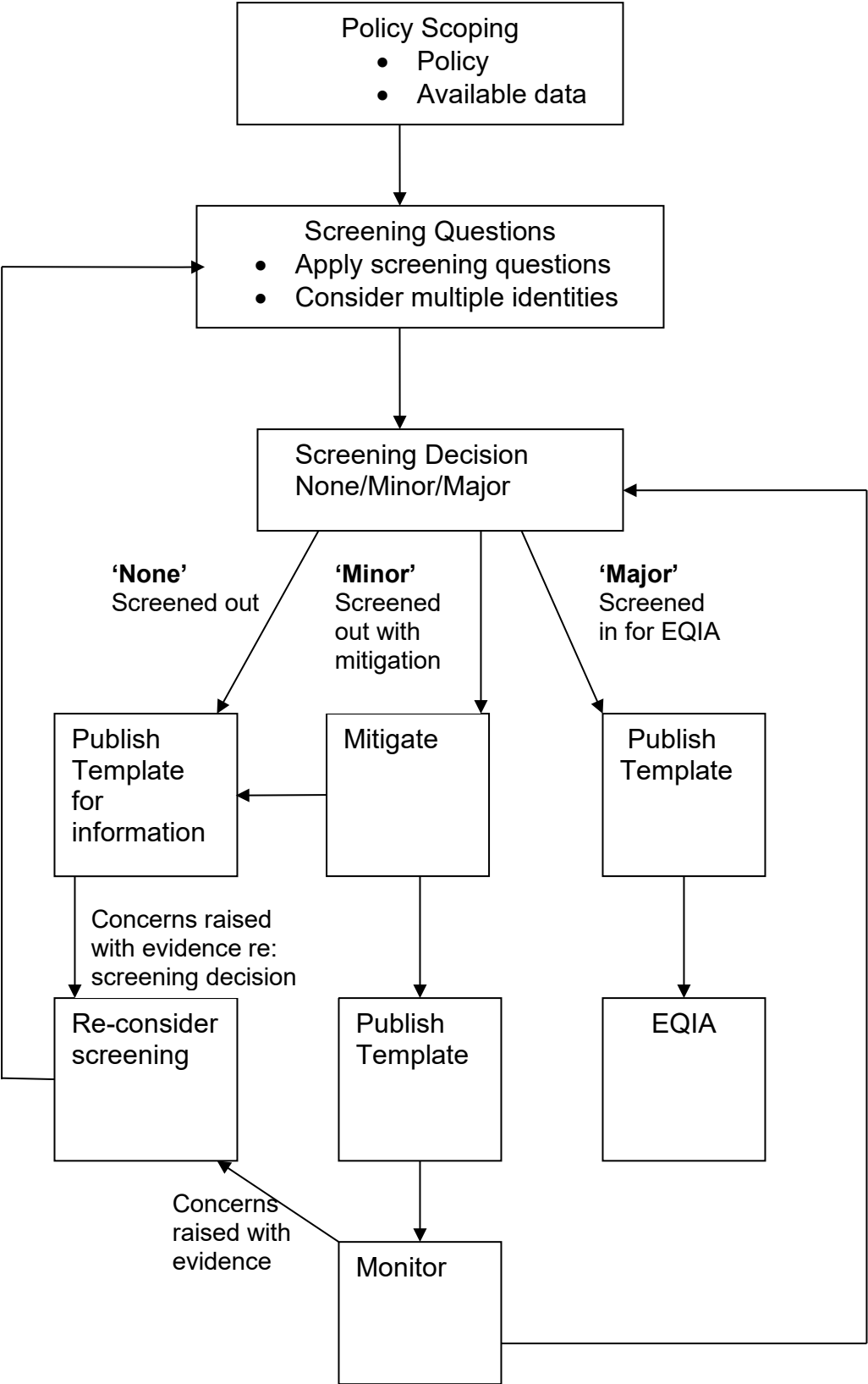
Part 2. Screening questions – asks about the extent of the likely effect of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely effect. This includes consideration of multiple identity and good relations issues.

Part 3. Screening decision – guides the public authority to reach a screening decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), or to introduce measures to mitigate the likely effect, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

Part 4. Monitoring – provides guidance to public authorities on monitoring for adverse effect and broader monitoring.

Part 5. Approval and authorisation – verifies the public authority’s approval of a screening decision by a senior manager responsible for the policy.

Flowchart for the equality screening process and decision.



Part 1. Policy scoping

Information about the policy

Name of the Policy

Design Considerations for the development of a Smart System and Flexibility Plan (**SSFP**)
The purpose of the SSFP will be to set a path for developing Northern Ireland's energy systems to meet the needs of a decentralised, renewable energy system, and to meet the Energy Strategy and Climate Change Act (Northern Ireland) 2022 (**CCA**) target.

Is this an existing, revised or a new policy?

New – One of the major objectives of the Northern Ireland Executive's [Energy Strategy](#)¹ published in December 2021 is to "Create a Flexible, Resilient and Integrated Energy System". DfE published an [Action Plan](#)² for the Energy Strategy in January 2022, of which Action 19 is to develop a SSFP.

The Department for the Economy (**we/the Department/DfE**) will be conducting a consultation to gain public input into its proposals for a Smart Systems and Flexibility Plan to assist Northern Ireland's energy networks deliver the Executive's Energy Strategy.

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

The intention of the SSFP is to set out a plan for an energy network that will provide NI consumers with a robust, efficient and cost effective energy system, while advancing the objectives of the Executive's [Energy Strategy](#).

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

We expect that the development of a robust and high quality SSFP will benefit all of the population in Northern Ireland relatively equally, including all Section 75 categories.

Through a move to cleaner sources of electricity, carbon emissions will be reduced along with energy costs, helping to tackle fuel poverty as well as reducing associated health problems.

Developing a robust SSFP will accelerate Northern Ireland's journey towards net zero, facilitating a more flexible, robust and cost effective electricity network and enabling more renewable electricity to be accepted onto the Northern Ireland electricity network.

¹ [The Path to Net Zero Energy. Safe. Affordable. Clean. \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-Strategy-for-Northern-Ireland-path-to-net-zero.pdf) <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-Strategy-for-Northern-Ireland-path-to-net-zero.pdf>

² [The Path to Net Zero Energy. Safe. Affordable. Clean.- Action Plan](https://www.economy-ni.gov.uk/sites/default/files/publications/economy/energy-strategy-path-to-net-zero-action-plan.pdf) <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/energy-strategy-path-to-net-zero-action-plan.pdf>

Who initiated or wrote the policy?

The DfE developed the Energy Strategy which the NI Executive considered and adopted. DfE then developed the Action Plan for delivery of the Energy Strategy, and the SSFP is one of the items of DfE's first Energy Strategy Action Plan.

The Department initiated the SSFP proposal. It engaged a Working Group of stakeholders with knowledge of the relevant issues likely to affect their constituencies. The Department and UR developed the SSFP in close consultation with the Working Group.

Who owns and who implements the policy?

DfE is responsible for delivery of the Energy Strategy and the related Action Plans.

Implementation factors

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

Legislative – Legislation will be necessary to implement many aspects of the Energy Strategy into Northern Ireland legislation. The slow pace of legislative change in Northern Ireland will affect the introduction.

DfE will use the responses to the consultation to review and assess the work streams which the SSFP recommends for DfE and other stakeholders.

Main stakeholders affected

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

- Utility Regulator;
- Electricity consumers in Northern Ireland;
- Consumer Council of NI;
- Electricity networks (SONI/NIEN);
- Single Electricity Market committee and operator;
- Energy supply chain sector;
- Renewable energy developers;
- Ancillary services providers.

Other policies with a bearing on this policy

The SSFP is a product of the NI Executive's [Energy Strategy](#)³. Therefore, the SSFP has been drafted to reflect the objectives of the Energy Strategy.

³ <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-Strategy-for-Northern-Ireland-path-to-net-zero.pdf>

The UK Government recently published the Net Zero Strategy⁴ and Energy White Paper.⁵ Whilst energy policy is largely devolved in NI, some relevant areas remain reserved matters. The proposed SSFP will further the policy objectives of both governments.

The SSFP also takes notice of policies, which will support and reflect the ambitions of the Executive's Energy Strategy, including:

- Programme for Government, TEO
- Investment Strategy for Northern Ireland, SIB
- Energy Management Strategy, DfE/SIB
- Vision for a 10X Economy, DfE
- Skills Strategy, DfE
- Circular Economy Strategic Framework, DfE
- Green Growth Strategy, DAERA
- Environment Strategy, DAERA
- Fuel Poverty Strategy, DfC

Available evidence

Much of the evidence available to the Department on the effects of energy policy on different categories of people comes from the responses to the Department's recent consultations and calls for evidence on the Executive's Energy Strategy which the Department developed.

The first stage of the strategy development was a Call for Evidence published in December 2019. This process also involved thematic workshops, stakeholder engagement and collaboration across government. A report on the Call for Evidence along with all the individual responses was published on 30 June 2020. Throughout the policy process the Department worked collaboratively with over 70 organisations represented on five working groups, established specific industry consultation groups, issued a monthly e-bulletin to over 600 stakeholders and established a cross governmental stakeholder group to align cross cutting policies.

The second stage was the Energy Strategy Policy Options Consultation Paper , launched on 31 March and closed on 02 July 2021. The Department carried out virtual, public stakeholder events as well as consumer focus groups and an online business survey. This commitment to collaboration is reflected in the high level of responses (283) to the policy options consultation resulting in stakeholders' feedback and views on policy proposals being reflected in Northern Ireland's new Energy Strategy.

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1026655/net-zero-strategy.pdf

5

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/2012_16_BEIS_EWP_Command_Paper_Accessible.pdf

In developing the proposed consultation document the Department worked closely with the stakeholders most likely to be significantly affected: the Utility Regulator, CCNI, and the two network operators in Northern Ireland, SONI and Northern Ireland Electricity Networks.

Religious belief evidence / information:

The 2021 Census found that 43.5% of the population in Northern Ireland came from a Protestant background and 45.7% from a Catholic background. The Equality Commission's Fair Employment Monitoring Report No. 31⁶ indicates that 50.2% of the (monitored) workforce are from a Protestant background and 49.8% from a Roman Catholic background.

No responses to the public consultation on the Executive's Energy Strategy identified religious belief as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Political Opinion evidence / information:

In 2020, 35% of respondents to a NI Life & Times Survey⁷ considered themselves to be unionist, 19% nationalist and 42% neither.

No responses to the public consultation on the Executive's Energy Strategy identified political opinion as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Racial Group evidence / information:

The 2021 Census reported that 96.55% of the total NI population was white.

No responses in the consultation on the Executive's Energy Strategy identified racial grouping as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Age evidence / information:

The Northern Ireland population continues to age. The 2021 Census⁸ shows:

- 0-14 years 19.20%
- 15-39 31.2%
- 40-64 32.40%
- 65+ 17.2%

No responses in the consultation on the Executive's Energy Strategy identified age as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP and the Department has no evidence to suggest that it should influence the effects of the proposed transposition.

⁶ [Fair Employment Monitoring Report No.31 \(equalityni.org\)](https://www.equalityni.org/Fair-Employment-Monitoring-Report-No-31)

⁷ [NI Life and Times Survey - 2020 : UNINATID \(ark.ac.uk\)](https://ark.ac.uk/NI-Life-and-Times-Survey-2020-UNINATID)

⁸ <https://www.nisra.gov.uk/publications/census-2021-main-statistics-demography-tables-age-and-sex>

Marital Status evidence / information:

The 2011 Census contains information in relation to the marital and civil partnership status of the population within Northern Ireland:



A large number of stakeholders participated in the evidence gathering aspect of the Energy Strategy but information on individuals was not collected based on marital status and no responses identified marital as a factor in differing effects of the strategy or specific policies such as the support scheme policy.

No information on individuals' marital status was collected in responses to the Executive's Energy Strategy, but no responses identified it as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP, and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Sexual Orientation evidence / information:

A large number of stakeholders participated in the evidence gathering aspect of the Energy Strategy but information on individuals was not collected based on sexual orientation.

No information on individuals' sexual orientation was collected in responses to the Executive's Energy Strategy, but no responses identified it as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP, and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Men & Women generally evidence / information:

NISRA population statistics for 2020 show that 50.7% are female with 49.3% male⁹. By 2031, projections are that the male/female balance will be 50/50 with that balance persisting to 2051.

The NISRA Labour Force Survey states that in 2020, of those aged 16-64 who were employed, 52% (432,000) were male¹⁰ compared to 48% of women (392,000). There are differences between the public and private sector. The public sector has a large majority of females within its composition (65%) whereas just under half (45%) of the private sector workforce is female. NISRA states that the 2020 population of Northern Ireland is made up of 961,400 females and 934,200¹¹ males, however our future workforce balance is estimated to be slightly male dominated as the current population split for ages 0-15 is 192,844 female with 203,081 male, a difference of 2.6%.

DAERA leads on the Just Transition within the Green Growth Strategy. QUB has published an independent think piece on “Mapping a Just Transition”¹² for Northern Ireland. This was grant funded by DfE.

A large number of stakeholders participated in the evidence gathering aspect of the Energy Strategy policy options consultation. No information on individuals’ gender was collected in responses to the Executive’s Energy Strategy, but no responses identified it as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP, and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Disability evidence / information:

The latest date from NISRA in 2018 report that 21.7% of the adult NI population are disabled¹³.

One of eight consumer focus groups conducted during the Path to Net Zero options consultation phase comprised people with disabilities. There were no discernible differences reported between the views expressed by people with disabilities or long-term illness and other focus group participants.

No information on individuals’ disability status was collected in responses to the Executive’s Energy Strategy, but no responses identified it as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP, and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Dependants evidence / information:

A large number of stakeholders participated in the evidence gathering aspect of the Path to Net Zero energy strategy options consultation phase.

⁹ [Registrar General Northern Ireland Annual Report 2020 \(nisra.gov.uk\)](https://www.nisra.gov.uk/annual-reports/2020)

¹⁰ [Labour Force Survey Annual Summary 2020 \(nisra.gov.uk\)](https://www.nisra.gov.uk/labour-force-survey-annual-summary-2020)

¹¹ [NI Population 2020.jpg \(2481×1749\) \(nisra.gov.uk\)](https://www.nisra.gov.uk/population-2020)

¹² <https://www.qub.ac.uk/research-centres/SECA/News/MappingaJustEnergyTransitioninNorthernIreland.html>

¹³ [August 2018 NI Wellbeing Report.pdf \(nisra.gov.uk\)](https://www.nisra.gov.uk/annual-reports/2018)

No information on individuals' dependants status was collected in responses to the Executive's Energy Strategy, but no responses identified it as a factor in differing effects of the Energy Strategy or specific energy policies such as the proposed SSFP, and the Department has no evidence to suggest that it should influence the effects of the proposed plan.

Needs, experiences, and priorities

Considering 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?

Religious belief

No differential effect has been identified in respect of energy policy in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP provisions will apply to everyone regardless of their religious belief.

Political Opinion

No differential effect has been identified in respect of energy policy in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their political opinion.

Racial Group

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their racial group.

Age

No differential effect has been identified in respect the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their age.

Marital status

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their marital status.

Sexual orientation

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their sexual orientation.

Men and Women Generally

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of whether they are man or woman.

Disability

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of their disability status.

Dependants

No differential effect has been identified in respect of the SSFP proposals in the responses to the Call for Evidence or the Energy Strategy Policy Options Consultation. The Department does not anticipate any difference in needs, experience, or priorities. The SSFP proposals will apply to everyone regardless of whether they have dependents.

Part 2. Screening questions

Screening questions

1. What is the likely effect on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories?

Details of the likely policy effects on **Religious belief**:

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Political Opinion**:

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Racial Group**:

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Age:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Marital Status:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Sexual Orientation:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Men and Women:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Disability:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

Details of the likely policy effects on **Dependants:**

The Department considers that the SSFP proposals are not likely to have any specific or different effect on this category. However, the Department will monitor responses to the SSFP consultation for any suggested differential effect.

What is the level of effect? None

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? Yes/No

Religious Belief –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Political Opinion –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Racial Group –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Age –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Marital Status –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Sexual Orientation –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Men and Women generally –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Disability –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

Dependants –

No. The SSFP proposals are likely to have no direct effect on the equality of opportunity for people of their background or circumstances.

3. To what extent is the policy likely to affect good relations between people of different religious belief, political opinion, or racial group?

Details of the likely policy effects on **Religious belief**:

The Department considers that the SSFP proposals are likely to have no direct effect on good relations between groups in this category.

What is the level of effect? None

Details of the likely policy effects on **Political Opinion**:

The Department considers that the SSFP proposals are likely to have no direct effect on good relations between groups in this category.

What is the level of effect? None

Details of the likely policy effects on **Racial Group**:

The Department considers that the SSFP proposals are likely to have no direct effect on good relations between groups in this category.

What is the level of effect? None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion, or racial group?

Religious Belief –

The Department considers that the SSFP proposals are likely to have no direct effect on promoting good relations between groups in this category.

Political Opinion –

The Department considers that the SSFP proposals are likely to have no direct effect on promoting good relations between groups in this category.

Racial Group –

The Department considers that the SSFP proposals are likely to have no direct effect on promoting good relations between groups in this category.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential effects 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).

No.

Part 3. Screening decision

If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

Policy screened out **without** mitigation or an alternative policy adopted.

We expect that the development of a robust and high quality SSFP will benefit all of the population in Northern Ireland relatively equally, including all Section 75 categories.

Through a move to cleaner sources of electricity, carbon emissions will be reduced along with energy costs, helping to tackle fuel poverty as well as reducing associated health problems.

Developing a robust SSFP will accelerate Northern Ireland's journey towards net zero, facilitating a more flexible, robust and cost effective electricity network and enabling more renewable electricity to be accepted onto the Northern Ireland electricity network.

If the decision is not to conduct an equality impact assessment the public authority should consider if the policy should be mitigated or an alternative policy be introduced - please provide details.

No adverse effect on equality of opportunity has been identified for any of the Section 75 categories.

If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.

Not applicable

Mitigation

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

Not applicable.

Part 4. Monitoring

Public authorities should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007).

The Department intends to consult on the SSFP and any information gathered during the consultation which indicates a negative impact upon any of the nine S75 categories will be used to inform the final policy. If any negative impacts are identified the Department will seek to mitigate for these and if required re-screen the final policy.

Once introduced Monitoring of the SSFP will be via existing and ongoing monitoring of fuel poverty and other social effects of energy costs on NI consumers. Such reports are conducted by the [NI Housing Executive](#), [UK Government](#), [CCNI](#) and [National Energy Action](#). The Department will review changes in fuel poverty data to assess whether the SSFP is contributing to changes in NI fuel poverty.

The effects of the SSFP will apply equally across all energy consumers in NI, primarily on electricity consumers. The Department's screening has not identified any areas of high likely impact on equality of opportunity, due in part to the effectively universal access to electricity, the common usages for electricity across all equality groups, and the uniform pricing of electricity across NI. The Department's primary monitoring will be in relation to fuel poverty statistics in NI. This is because increases or decreases in the cost of energy are likely to affect those in (or close to) fuel poverty disproportionately because they have less

discretionary income with which to meet increases, and, conversely, decreases in energy costs will free up proportionately more income for them given the high proportion of their disposable income which is spent on energy.

The effects of the SSFP are likely difficult to measure on individual communities or sectors, because the SSFP will not, of itself, develop new policies. Rather, it will determine the areas in which new policies will need to be developed.

Part 5 - Approval and authorisation

Screened by: Nigel Morris
Position/Job Title: Deputy Principal
Business Area/ Branch: Wholesale Electricity and Networks Team
Date: 18 December 2023

Approved by: Leo Strawbridge
Position/Job Title: Grade 7
Business Area/Branch: Wholesale Electricity and Networks Team
Date: 19 December 2023