



Equality Screening Template – Section 75 of Northern Ireland Act 1998

Please complete the coversheet details below:

Policy title: Revocation of EU Guarantees of Origin (GoOs) and Combined Heat and Power GoOs – Public Consultation

Decision (delete as appropriate)

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

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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 make an assessment of the likely impact on equality of opportunity and good relations.

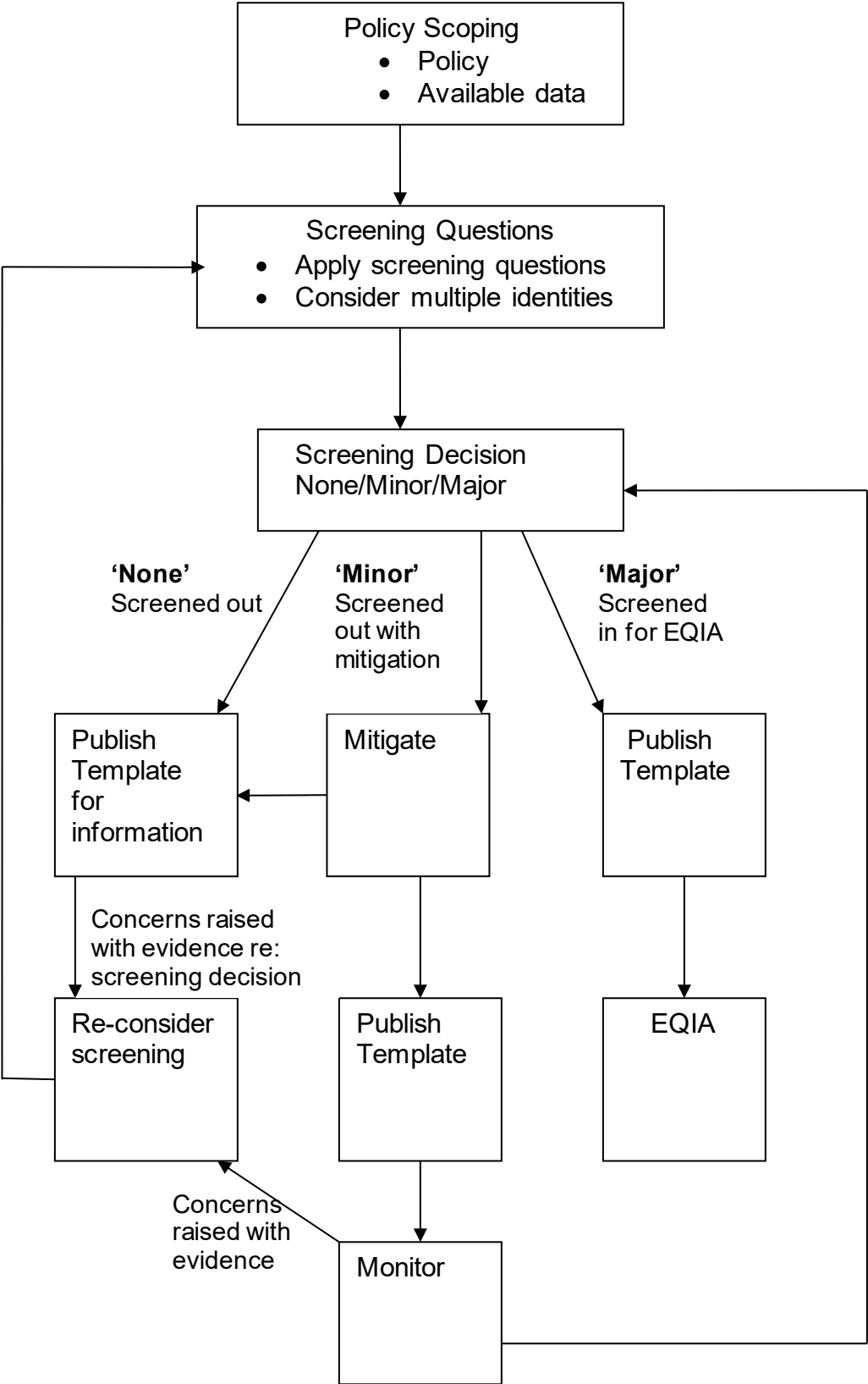
Part 2. Screening questions – asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely impact. This includes consideration of multiple identity and good relations issues.

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 impact, 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 impact 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

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

Revocation of EU Guarantees of Origin (GoOs) and Combined Heat & Power GoOs - Public Consultation

Is this an existing, revised or a new policy?

Revised - The Department for Business, Energy & Industrial Strategy (BEIS) recently consulted within Great Britain to end the policy of accepting EU Guarantees of Origin (GoOs) and intend to introduce legislation later this year revoking that arrangement. BEIS also intend to revoke Combined Heat & Power GoOs in the same legislation. The Department will undertake a consultation to seek the views of stakeholders in Northern Ireland on how they envisage the revocation of EU GoOs and CHP GoOs may affect them. The consultation will consider 3 options:

- Revoke EU GoOs and CHP GoOs through inclusion in the BEIS legislation;
- Revoke EU GoOs and CHP GoOs via amending NI legislation; or
- Do nothing – allow EU GoOs to continue to be tradeable within NI without reciprocity.

The Department's preferred option is to revoke EU GoOs and CHP GoOs. This is in line with the position being taken in the rest of the UK.

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

As of 1 January 2021, the EU no longer recognises UK GoOs (known as REGOs). As a result, there is currently an asymmetry, whereby the UK recognises EU GoOs issued in the EU, while the EU no longer recognises REGOs issued in the UK. BEIS intends to cease the recognition of EU GoOs through legislation so that, longer term, domestic recognition of GoOs issued in EU countries will take place only on a reciprocal basis. The Department for the Economy (DfE) is asking the view of relevant stakeholders on how revocation of EU GoOs and CHP GoOs will affect Northern Ireland.

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

If so, explain how.

No. This will potentially impact on companies who trade REGO's and EU GoO's. The Department is aware that in 2021 there were 8 companies in Northern Ireland that traded REGOs to meet their Fuel Mix Disclosure, 4 of which also traded EU GoOs.

Who initiated or wrote the policy?

Each EU member state was required to introduce a Guarantees of Origin Scheme. The UK scheme is called Renewable Energy Guarantees of Origin (REGO). BEIS wrote the REGO policy and Ofgem administer the scheme on behalf of Northern Ireland.

Who owns and who implements the policy?

Ofgem administer the scheme on behalf of NI although as energy is devolved NI has its own REGO legislation.

Implementation factors

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

If yes, are they (please delete as appropriate)

legislative

DfE, via legislation being introduced by BEIS, will amend existing NI secondary legislation to revoke EU GoO's and CHP GoO's.

Main stakeholders affected

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

other, please specify :

There are 8 NI electricity suppliers that trade in REGOs, 4 of which trade in EU GoOs. _____

Other policies with a bearing on this policy N/A

- what are they?
- who owns them?

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. The Commission has produced this guide to [signpost to S75 data](#).

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

Religious belief evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Political Opinion evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Racial Group evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Age evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Marital Status evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Sexual Orientation evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Men & Women generally evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Disability evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

Dependants evidence / information:

There is no evidence to suggest that people within this group will be differentially impacted by the aims of the policy

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 of the needs, experiences and priorities for each of the Section 75 categories below:

Religious belief

No specific needs have been identified for this group in relation to the proposed policy

Political Opinion

No specific needs have been identified for this group in relation to the proposed policy

Racial Group

No specific needs have been identified for this group in relation to the proposed policy

Age

No specific needs have been identified for this group in relation to the proposed policy

Marital status

No specific needs have been identified for this group in relation to the proposed policy

Sexual orientation

No specific needs have been identified for this group in relation to the proposed policy

Men and Women Generally

No specific needs have been identified for this group in relation to the proposed policy

Disability

No specific needs have been identified for this group in relation to the proposed

Dependants

No specific needs have been identified for this group in relation to the proposed

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 Screening Questions 1-4, which follow.

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?

Please provide details of the likely policy impacts and determine the level of impact for each S75 categories below i.e. either minor, major or none.

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

(insert text here)

What is the level of impact? None

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

(insert text here)

What is the level of impact? None

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

(insert text here)

What is the level of impact? None

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

What is the level of impact? None

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

(insert text here)

What is the level of impact? None

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

(insert text here)

What is the level of impact? None

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

(insert text here)

What is the level of impact? None

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

What is the level of impact? None

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

What is the level of impact? None

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

Detail opportunities of how this policy could promote equality of opportunity for people within each of the Section 75 Categories below:

Religious Belief –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Political Opinion –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Racial Group –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Age –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Marital Status –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Sexual Orientation –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Men and Women generally –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Disability –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

Dependants –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote equality of opportunity.

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

Please provide details of the likely policy impact and determine the level of impact for each of the categories below i.e. either minor, major or none.

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

There is no evidence of possible impact on good relations

What is the level of impact? None

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

There is no evidence of possible impact on good relations

What is the level of impact? None

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

There is no evidence of possible impact on good relations

What is the level of impact? None

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

Detail opportunities of how this policy could better promote good relations for people within each of the Section 75 Categories below:

Religious Belief –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote good relations.

Political Opinion –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote good relations.

Racial Group –

If Yes, provide details:

If No, provide reasons: The policy aims to revoke EU GoO's and CHP GoO's as such it does not provide opportunities to better promote good relations.

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.

N/A

Part 3. Screening decision

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

The policy being considered is to remain in line with the rest of the UK in revoking EU Guarantees of Origin and CHP Guarantees of Origin as the UK equivalent (REGOs) are not recognised within the EU since 1 January 2021. The revocation of the GoOs will not have an impact on the Section 75 categories.

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.

The alternative policy is for the status quo to remain which would leave NI out of sync with the rest of the UK. REGOs would still not be tradeable within the EU but EU GoOs would remain tradeable within NI but not GB.

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

All public authorities' equality schemes must state the authority's arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity. The Commission recommends screening and equality impact assessment as the tools to be utilised for such assessments. Further advice on equality impact assessment may be found in a separate Commission publication: Practical Guidance on Equality Impact Assessment.

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.

N/A

Timetabling and prioritising

Factors to be considered in timetabling and prioritising policies for equality impact assessment.

If the policy has been '**screened in**' for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion – Rating (1-3)

Effect on equality of opportunity and good relations – N/A

Social need – N/A

Effect on people's daily lives – N/A

Relevance to a public authority's functions – N/A

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the public authority in timetabling. Details of the Public Authority's Equality Impact Assessment Timetable should be included in the quarterly Screening Report.

Is the policy affected by timetables established by other relevant public authorities?

If yes, please provide details.

N/A

Part 4. Monitoring

Public authorities 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, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and policy development.

Consultation will take place to allow stakeholders the opportunity to express their view on the revocation of EU GoOs within Northern Ireland (NI).

Part 5 - Approval and authorisation

Screened by: Darren Colville
Position/Job Title: Deputy Principal
Business Area/ Branch: Renewable Electricity Branch
Date: 7 July 2022

Approved by: Peter Russell
Position/Job Title: Head of Directorate
Business Area/Branch: Heat, Energy Efficiency and Renewables
Date: 7 July 2022

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.