

Stage 1: Equality Impact Assessment Collective Switching

1. What are the main aims purpose and outcomes of the Policy and how do these fit with the wider aims of the organization?

The purpose is to help the households who do not switch their electricity and/or gas supplier to ascertain whether they could save money by switching and to support the switching process. We hope collective switching will help households have lower fuel costs, that it may help reduce fuel poverty and supports the Council's priority for Maidstone to be a decent place to live.

2. How do these aims affect our duty to:

- **Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the act.**
- **Advance equality of opportunity between people who share a protected characteristic and those who do not.**
- **Foster good relations between people who share a protected characteristic and those who do not.**

This scheme is open to all however those who experience barriers to comparing the market, which may include people without access to the internet, people lacking literacy or numeracy skills, and people with learning disabilities may benefit from it more than those who do not experience these barriers.

Some people with disabilities and older people may have a greater need to keep their home warm. This scheme may help them reduce the costs of the energy to heat their homes so making warmth more affordable.

3. What aspects of the policy including how it is delivered or accessed could contribute to inequality?

The proposed plan will not contribute to inequality.

4. Will the policy have an impact (positive or negative) upon the lives of people, including particular communities and groups who have protected characteristics ? What evidence do you have for this?

This scheme could help people of all communities access lower energy bills. However, it will be marketed so the message reaches people without access to the internet and will use the call centre and Gateway to allow people to register for the service by phone and in person. By providing this additional support we will be helping people without access to the internet or lacking numeracy, literacy and with learning disabilities to compare the market, and switch to a cheaper supplier, which they

may not be able to do without assistance.

If the answer to the second question has identified potential impacts and you have answered yes to any of the remaining questions then you should carry out a full EQIA set out as stage 2 below.

Stage 2: Equality Impact Assessment

Name of Policy/Service/Function
Collective Switching
Purpose
What are you trying to achieve with the policy / service / function?
<p>The purpose is to help the households who do not compare the energy market and switch their electricity and/or gas supplier to ascertain whether they could save money by switching and support the switching process.</p> <p>To compare the market householders generally use the internet, or it is possible by phone but this is a very time consuming process, be numerate and literate, and be able to understand their fuel bills.</p> <p>We hope this will help households have lower fuel costs and may help reduce fuel poverty.</p>
Who defines and manages it?
<p>There is no statutory obligation on the Council to provide or signpost to a collective switching scheme. However, the Council has made a commitment to reducing fuel poverty and reducing fuel costs is a way to tackling fuel poverty.</p> <p>The scheme will be provided by a third party following a robust procurement process. They will project manage the project and report to the Council on a monthly basis.</p> <p>The Council will run the marketing for the scheme and so can target vulnerable groups in an aim to encourage vulnerable households to participate. The Council will support the registration service for people that phone or visit and do paper registration for those unable to use the internet.</p>
Who do you intend to benefit from it and how?
All householders can benefit from using the scheme to compare the energy market. We expect that households who already compare the market and switch

are less likely to be made an offer that saves them money and that households that have never switched are most likely to be made an offer that would save them money.

Households who experience barriers to switching, which may include people without access to the internet, people lacking literacy or numeracy skills and people with learning disabilities will benefit from the supported switching services.

People who need to keep their home warmer, including some older people of people with disabilities, may benefit more from lower fuel bills.

What could prevent people from getting the most out of the policy / service / function?

Some people may struggle to provide the information required to register for collective switching due to lack of literacy, numeracy or difficulty in understanding their energy bill.

Some people may not regard energy prices as important and may not wish to compare the market.

How will you get your customers involved in the analysis and how will you tell people about it?

The scheme provider will carry out an evaluation after each registration period so learning can be applied to the subsequent round.

Evidence

How will you know if the policy delivers its intended outcome / benefits?

The scheme provider will provide data on the number and characteristics of householders that register and then choose to switch.

How satisfied are your customers and how do you know?

We have not begun this scheme yet and do not have a current customer base.

What existing data do you have on the people that use the service and the wider population?

None. Our only data source is general, not local. OFGEM state that less than 20% of the population switched energy supplier in 2011 and then proportion of households that switch supplier has slowly declined since the energy market was

opened to competition.

Collective Switching is relatively new in the UK and so there is little data to show what the scheme take up would be.

What other information would it be useful to have? How could you get this?

A list of community groups to liaise with and promote the scheme. I will ask colleagues to gain local information.

Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)?

No. We do not propose to ask people registering for the scheme for data regarding equality groups.

Are you using partners, stakeholders, and councillors to get information and feedback?

Not at present but we will be seeking feedback from these sources as well and the quantitative feedback from the scheme provider once the first round of switching is completed to inform the subsequent round.

Impact

Are some people benefiting more – or less - than others? If so, why might this be?

People with access to the internet are more likely to register as it is easiest for them to do so. People with no access to the internet will be invited to telephone or visit to register for the scheme. Without collective switching people without access to the internet have very limited opportunity to compare the market to inform switching their supplier.

People who have never switched before are more likely to be offered a new tariff that saves them money. People who have switched before are more likely to be on a competitive tariff already and so less likely to be offered a new tariff that will save them money.

Actions

If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?

This scheme is open to all but the people most likely to benefit are those who have not switched before. OFGEM state that one reason that people do not

compare the market and switch is lack of access to the internet so it is likely that people without access to the internet may benefit more from this scheme than people who do have access to the internet.

This scheme will also benefit those who have not approached switching before due to lack of literacy, numeracy or learning disabilities as both the Council and the scheme provider will provide support in the way that a purely internet based comparison website cannot.

Is it discriminatory in any way?

This scheme is not available to people using domestic fuel oil. This may disadvantage people living in rural areas of the gas network. It is not discriminatory to any groups of people with protected characteristics.

Is there a possible impact in relationships or perceptions between different parts of the community?

The scheme is open to all households so it should not impact on relationships or perceptions in the community. There may be some feelings of a lack of fairness that the scheme is not available for domestic fuel oil. The Council is carrying out work to identify ways to help households using fuel oil as a separate project.

What measures can you put in place to reduce disadvantages?

Ensuring the scheme is available to all by procuring a scheme that is available to those who do not use the internet and using our call centre and Gateway services to actively support those who wish to register by phone or in person.

Do you need to consult further?

No

Have you identified any potential improvements to customer service?

No, but we will evaluate after the first switching round to search for ways to improve the scheme.

Who should you tell about the outcomes of this analysis?

Corporate Leaders Team, Cabinet member.

Have you built the actions into your Service Plan or Policy Implementation Plan with a clear timescale?

No. The service provider will provide a project plan.

When will this assessment need to be repeated?

NA

