



## Equality Impact and Outcome Assessment (EIA)

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>i</sup>. They analyse how all our work as a council might impact differently on different groups<sup>ii</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>iii</sup>.

We aim to work closely with residents before, during and after works. For projects such as this we discuss options and proposals with residents as early as possible to ensure we capture their priorities, so we can feed this into any proposals where possible. We also write to tenants following works to ask for their feedback on how the project went and whether the work made a difference. We intend to increase the information we gather to include asking whether we have met the tenants individual needs during the period of the works.

<b>Title of EIA</b>	HRA Solar PV programme 2020-23 <b>Reference number: HNC47</b>
<b>Team/Department</b>	Housing Sustainability & Affordable Warmth Miles Davidson Housing Sustainability & Affordable Warmth Manager, Interim Manager M&E Team Dan Goodchild – Home Energy Efficiency Project Manager
<b>Date of EIA</b>	18.05.2020
<b>Focus of EIA<sup>iv</sup></b>	The focus of this EIA is on the proposed HRA solar PV programme on up to 500 homes 2020-23. It also allows us to examine the potential impacts on groups resulting from the installation of a solar PV panels on roofs of up to 500 homes across the city.

#### Scope of Works:

HRA solar PV programme on up to 500 homes across the city 2020-23. It is proposed to install an average system size of 8 panels (approx. 2.4kW), it is expected that tenants will save up to £150 and 0.6tCO<sub>2</sub>e per annum depending on their consumption habits. This represents a total lifetime saving from the panels of £2.48m on tenants' energy bills and a year one carbon saving of 300tCO<sub>2</sub>e

Tenants will be able to opt out of the programme by informing the council in writing and reverse this decision in the same manner.

It is proposed to filter and prioritise properties for installation based on the reasoning set out below.

#### Technical feasibility criteria

The following must all be true for a house or bungalow to be considered technically feasible for installation:

Reason for exclusion	Justification	Notes
Property is not a house or bungalow	Unsuitable for solar PV system	SOLARISE project aims to benefit tenants within blocks.

Property does <b>not</b> have an East, South or West-facing roof	Yield from solar panels facing North not cost effective in terms of generation potential	Very few houses only have a North facing roof (i.e. most will also have a south facing roof).
Needs reroofing	Not cost effective to remove panels for reroofing in medium-term	Could install solar PV when reroofing occurs as part of re-roofing programme (not currently part of the reroofing specification) or as part of a future solar PV programme
Structural issues with the roof	Unsuitable for solar PV system	Unlikely that there is a cost-effective resolution to this but potential to re-visit if structural issues are addressed
UKPN reject grid connection application due to capacity constraints in the area*	Unsuitable for solar PV system	In due course, UKPN will upgrade the distribution network in an area, at which point installs can recommence locally. Practically the entire city is classed as having 'limited capacity' and so this is a risk across all areas

*\*note that as there is a cost to make a grid connection application, this will not be known until **after** the prioritisation and tenant engagement work has been conducted.*

Technically feasible properties will then be prioritised based on a range of measures that indicate that the occupant is more likely to be paying higher energy bills or struggling to pay their energy bills but based on property type and area rather than specific householder eligibility:

	<b>Priority</b>	<b>Justification</b>
1.	Property's current EPC is D or worse	Fuel bills likely to be higher than majority of the Council Housing stock. This can be revised (i.e. to EPC C) once most Eligible D and E properties are completed
2.	Property has electric heating	Fuel bills likely to be higher than properties heated with gas, and potential for greater benefit from the generated electricity
3.	Priority for properties in an LSOA within the city's top 29 for Indices of Deprivation	Tenants at greater risk of fuel poverty

No prioritisation will be based on:

- Roof orientation, height or shading...all of which impact on:
- System performance

- Location (aside from fuel poor areas)

**Note:** We have not proposed a more specific targeting approach based on individual eligibility of householders i.e. in receipt of certain benefits due to the potential for labelling those households via the solar PV install. The above property based approach also ensures that the property itself is future-proofed for reducing fuel bills for future occupants in addition to existing occupants.

Age	Findings / Evidence / Comments	Suggested actions
<b>Proposal</b>		
<p>Couples over 60 have the highest average fuel poverty gap of £393 p.a. (Annual Fuel Poverty Statistics Report 2020)</p> <p>Excess winter deaths (EWD) are higher among people aged 65+. In 2013/14 51% of cold related deaths were among people aged 85 and older; 27% were among those aged between 75 and 84; 22% were among people under 75. ('Statistical bulletin: excess winter mortality in England and Wales, 2013/14'). In Brighton &amp; Hove (for the three years of 2010/11 to 2012/13) 50% EWD of were in people aged 85 or over.</p> <p>Older households who receive the installations will have the potential to reduce their energy bills thus reducing the fuel poverty gap and enabling more affordable heat across their energy supplies.</p>		
<b>Works</b>		
The scope of works is largely external so small impact on householders.	Residents are unable to plan ahead and put measures in place to reduce the impact this work will have.	The proposal includes project support to enable liaison and communication with residents, including how to maximise the benefits of the installation.
<b>Disability</b>		
<b>Proposal</b>		
<p>People in England (2013) who have a long-term illness or disability are more likely to be fuel poor (12%) than those who do not (10%). In Brighton &amp; Hove, Health Counts Survey respondents who had a limiting long-term illness or disability were significantly more likely to be unable to keep their home warm in winter. 16.3% of people living in Brighton &amp; Hove have their daily activities limited a little or a lot by a long-term health problem or disability (Census 2011). Nationally, disabled people are more likely to live on low incomes and experience poverty than non-disabled people.</p> <p>Disabled people are more likely to need a warmer home environment to maintain their health; some disabled people may need to use benefits</p>		

intended to support their independence to ensure their home is warm enough.

Solar PV will reduce the householder's energy bills overall, reducing the likelihood/depth and impact of fuel poverty and EWD.

<b>Works</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
Tenants have told us that there are days when their health issues restrict what they are able to do or may mean they require more care.	Residents may need flexibility around scheduling to allow for health issues (bad days) and other commitments such as Occupational Health visitors or carers.	Project management will liaise directly with residents re. the scheduling of works around individual's needs.

<b>Gender Reassignment</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<p><b>Proposal</b></p> <p>The Brighton &amp; Hove Trans Needs Assessment found that the trans community have more people with a disability or long-term health need than the general population. 44% of respondents reported that they have a limiting long-term illness or disability, compared with 26% of all respondents to the Health Counts Survey.</p> <p>Solar PV will reduce the householder's energy bills overall, reducing the likelihood/depth and impact of fuel poverty and EWD.</p>		

<b>Works</b>		
We will consider the needs of the trans community during the works.	No specific feedback received relating to this group.	No specific actions identified for this group. All contractors will be respectful of people who are trans or non-binary and will use the names and pronouns (like 'he', 'she', they) that the person uses.

<b>Race and Ethnicity &amp; Religion and Belief</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<p><b>Proposal</b></p> <p>In 2018, the median income for ethnic minority households was, on average, lower than the income for white households which partly explains their higher likelihood of fuel poverty 17.7% of households compared to 9.3% of white households.</p> <p>Solar PV will reduce the householder's energy bills overall, reducing the likelihood/depth and impact of fuel poverty and EWD.</p>		

<p><b>Works</b></p> <p>Where English is not their first language residents may have difficulty reading and understanding the content of letters relating to the works.</p>	<p>Residents will not be aware of the works and how this will impact on them including how they might best benefit from the generated electricity.</p>	<p>We will be utilising the services of a translation / interpreting service should this be a requirement.</p> <p>Contractors will be sensitive to religious dress codes and ensure they are not dressed in a manner that could give offence, e.g. bare arms and shorts.</p> <p>Ensure that staff and contractors are aware of significant religious holidays and cultural events for all faiths, where these mean that people will not want to meet with visitors or will be observing religious rituals.</p>

<b>Sex / Gender</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<p><b>Proposal</b></p> <p>In Brighton &amp; Hove (for the three years of 2010/11 to 2012/13) there were 373 EWD. Of these, 58% were female. Of EWD in Brighton &amp; Hove of people aged 85 years or over, 79% were female.</p> <p>Solar PV will reduce the householder's energy bills overall, reducing the likelihood/depth and impact of fuel poverty and EWD.</p>		
<p><b>Works</b></p> <p>No specific feedback received relating to this group.</p>	<p>Some women may have negative perceptions about contractors.</p>	<p>Ensure that all contractors abide by BHCC and the main contractors code of conduct and are courteous and polite to all residents.</p>

<b>Sexual Orientation</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<b>Proposal</b> No specific impacts identified		
<b>Works</b>		
No specific feedback received relating to this group.	No specific positive or negative impacts identified for this group.	Ensure that all staff are respectful of residents who are lesbian, gay or bisexual and do not make assumptions about the gender of partners.

<b>Marriage and Civil Partnership</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<b>Proposal</b> No specific feedback received relating to this group.		
<b>Works</b>		
No specific feedback received relating to this group.	No specific positive or negative impacts identified for this group.	No specific actions identified for this group.

<b>Other Relevant Groups</b>	<b>Findings / Evidence / Comments</b>	<b>Suggested areas for development</b>
<b>Proposal</b> Unemployed households in England have the highest rates of fuel poverty across all economic activity groups but have smaller average fuel poverty gaps.  Solar PV will reduce the householder's energy bills overall, reducing the likelihood/depth and impact of fuel poverty and EWD.		

**EIA sign-off:** (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Lead Equality Impact Assessment officer:**

**Dan Goodchild**

**Date: 15<sup>th</sup> May 2020**

**Team Manager:**

**Miles Davidson**

**Date: 15<sup>th</sup> May 2020**

<sup>i</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

## <sup>ii</sup> **Our duties in the Equality Act 2010**

---

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice
  - Promote understanding

iii EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

---

<sup>iv</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time – eg: ‘Equality Impact Assessment (EIA)’

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.