

# Equality Impact Assessment [version 2.9]



Title: Home Upgrade Grant	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Hannah Spungin
Service Area: Energy	Lead Officer role: Programme Manager

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The Home Upgrade Grant is a grant funded program installing energy efficiency measures and improvements to homes on low incomes with low energy efficiency ratings. We expect the funding made available to result in the following outcomes:

- Tackle fuel poverty by increasing low-income homes’ energy efficiency rating and reducing their energy bills – a key principle of the Fuel Poverty Strategy 2021.
- Deliver cost effective carbon savings to carbon budgets and progress towards BCC’s UK’s target for net zero by 2030
- Support clean growth and ensure homes are thermally comfortable, efficient, and well adapted to climate change.
- Support economic resilience and a green recovery in response to the economic impacts of Covid-19, supporting thousands of jobs.

### 1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

### 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If ‘No’ explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If ‘Yes’ complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	[please select]
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## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success> .

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
JSNA Chapter on Fuel Poverty in Bristol	This gives us a picture of Fuel Poverty in Bristol. The people it affects and the impacts it has <a href="#">JSNA Fuel poverty 2021.22 (bristol.gov.uk)</a>
EPC Data on the Energy Performance of domestic properties.	EPC data is useful in determining areas to target for the scheme by identifying areas with homes with poor energy efficiency that could likely benefit from the support of this scheme.
Parity Projects	Bristol City Council have purchased Parity Projects Data. Parity projects is a housing data analytics service and includes up to date RdSAP and EPC assessment data overlaid with existing data on IMD and areas of Fuel poverty. <a href="#">Home - Parity Projects</a>
<b>Additional comments:</b>	

### 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

### 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without

the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Whilst there is comprehensive diversity monitoring for some evidence sources e.g. Quality of Life survey there are gaps in our data for some protected characteristics that historically have not been included in census and statutory reporting, such as sexual orientation. There are gaps in the link between the EPC data and any protected characteristics.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We will be working with community groups that support/work with people with particular protected characteristics to promote the scheme and the overall support available for energy efficiency measures. We will promote the project to the community hubs that are involved with the We Are Bristol helpline and supporting vulnerable households across the city. We will promote the service through third sector organisations that we have close links with such as We Care, CSE and talking money as well as to our own internal teams who work with people who are more likely to be in Fuel Poverty.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The successful delivery of this scheme relies on us accessing some of citizens in Bristol from protected characteristic groups who have not historically engaged with similar schemes to the same extent. It is therefore essential that we engage with relevant stakeholders around the design and delivery of the scheme. We are currently in the process of recruiting a dedicated resource to work solely on engagement and ensuring we are accessing those most in need.

## Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

<b>GENERAL COMMENTS</b> (highlight any potential issues that might impact all or many groups)	
<p>We have not identified any significant adverse impacts on people based on their protected characteristic at this stage. However we are aware of existing disparities which we will aim to address where possible through inclusive and accessible design, communication and delivery of the Home Upgrade Grant programme.</p> <p>Where practicable mitigating actions will be taken by the contractor to minimise the impact of these works. Residents will be advised in writing of the work required and when it will be done, providing contact details so they can raise any impact concerns.</p> <p>As part of the quality scoring assessment for joining the Responsive Repairs Framework, providers will be required to demonstrate a good understanding of Equality Act 2010 requirements and the public sector equality duty; including that equality of opportunity is central to internal processes / workforce; and services will be regularly tailored and reviewed to meet the diverse needs of Bristol citizens.</p> <p>There will be ongoing quality assurance and monitoring of framework providers and the works will be carried out by skilled Contractors, who will have substantial experience of working on properties in the social housing sector. Contractors will be expected to communicate clearly with all tenants while the works are being carried out. Tenants will be kept fully informed about the process.</p>	
<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As Older people below - younger families may spend longer in their home, or be put off from building works because disruption
Mitigations:	See general comments above
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>- Poorer older people generally spend longer in their home than the “average” householder.</li> <li>- The vast majority of households have little or very basic understanding about how to control or adjust their heating systems.</li> <li>- Most households do not like the disturbance of building works, in general older people often put off work because of the disturbance factor</li> <li>- Many older and disabled people are put off the government’s energy efficiency programmes because of their complexity and fear of taking on debt<sup>1</sup>.</li> </ul>
Mitigations:	<p>In terms of engagement, we are using local support agencies to refer people into our services. We offer the online form, but we are also able to post out forms or have a member of staff call somebody. WE try to reduce as many barriers to accessing the scheme as possible as most people on the scheme are vulnerable and need additional support to undertake these works in their house.</p> <p>Support and advice is given to home owners around how to use their heating system or what the impact of the energy efficiency measures are. In this scheme we have employed the support of CSE and their energy advice service and where customers are vulnerable we intend to provide additional support and energy advice.</p>
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>- Many households that contain people with a physical disability generally spend longer in their home than the nondisabled households and require higher levels of heat.</li> <li>- Economic activity levels are much lower for the disabled people in Bristol than for nondisabled people. Three quarters (75.4%) of disabled people aged 16 and over are economically inactive compared to a quarter (24.9%) of those not disabled.</li> </ul>

<sup>1</sup> Sources: Department of Energy & Climate Change (2012) Annual Report on Fuel Poverty; National Energy Action (2012) Focus groups of older people, families and households with disabilities and long -term health conditions

	<ul style="list-style-type: none"> <li>- The vast majority of households have little or very basic understanding about how to control or adjust their heating systems. This is particularly compounded in households where the householder is physically disabled.</li> <li>- Households with mental health disability, especially where the householder has a mental health disability have significant compounded and multiple issues leading to these homes paying the highest fuel costs and not accessing support or utilising their heating systems efficiently resulting in them being the coldest homes in the city.</li> <li>- Many older and disabled people are put off the government's energy efficiency programmes because of their complexity and fear of taking on debt.</li> <li>- Most households do not like the disturbance of building works, in general households with a physical disability have a greater requirement to minimise disturbance and greater occupants needs that the "average" household.</li> </ul>
Mitigations:	Support and advice is given to home owners around how to use their heating system or what the impact of the energy efficiency measures are. In this scheme we have employed the support of CSE and their energy advice service and where customers are vulnerable we intend to provide additional support and energy advice.
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>- A number of LGB households value their home as a "safe space" and are extremely reticent about granting access<sup>2</sup>.</li> </ul>
Mitigations:	All of our subcontractors are aware of types of homes we work in and are conscientious in their approach to homeowners.
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>- Households having their first child often experience a utility shock, due to the unexpected increase in utility (heat, power, water) than before, which can lead to budgeting issues.</li> <li>- The likely disturbance of building works should be considered.</li> </ul>
Mitigations:	Support and advice is given to home owners around how to use their heating system or what the impact of the energy efficiency measures are. In this scheme we have employed the support of CSE and their energy advice service and where customers are vulnerable we intend to provide additional support and energy advice.
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>- The vast majority of households have little or very basic understanding about how to control or adjust their heating systems. This is particularly compounded in some Black, Asian and minority ethnic households where there can be a language or cultural barrier to the householder understanding their heating system. For example, 5.1% of households in Bristol did not have anyone living in them who had English as a main language.</li> <li>- Some Black, Asian and Minority Ethnic households have cultural and /or language issues leading to these homes paying the highest fuel costs and not accessing support.</li> </ul>

<sup>2</sup> Source: [http://www.shu.ac.uk/\\_assets/pdf/ceirLGBTcommunitiesexecutive-summaryNov2012.pdf](http://www.shu.ac.uk/_assets/pdf/ceirLGBTcommunitiesexecutive-summaryNov2012.pdf)

	<ul style="list-style-type: none"> <li>- Most households do not like the disturbance of building works, in some Black, Asian and minority ethnic household communities this is compounded by language barriers<sup>3</sup>.</li> <li>- Many Black, Asian and Minority Ethnic households live in the most poor-quality housing that costs more to heat than the “average” home.</li> </ul>
Mitigations:	In our feedback form we monitor protected characteristics. We will often benchmark this against the demographic in the area we are delivering. Where we are falling below the racial mix we will often take endeavours to improve our outreach. On previous schemes we have had success with local community groups and places of worship. We will also offer translation services and always print material to BCC standards of inclusivity.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There will be a disproportionately high impact on people living in deprivation because the programme aims to address the needs of people living in fuel poverty
Mitigations:	This is a positive thing and therefore we do not mitigate it.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Other groups</b> [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	The Gypsy & Traveller community are particularly challenged in terms of access to fuel at reasonable cost as compared to other households. Compounded by the community living in the most inefficient homes within the UK.
Mitigations:	Unfortunately this is not something we can mitigate for as the scheme will only support those living in permanent buildings. Where traveller communities may be in a house the scheme is open to them.

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

<sup>3</sup> Sources: - Kensington & Chelsea Community Enterprises CIC (2012) Switching household energy tariffs – an action research study - Centre for Sustainable Energy (2005) Developing effective energy advice for BME Communities, <http://www.cse.org.uk/pdf/pub1042.pdf> - Damon Gibbons & Rosanna Singler (2008) Cold Comfort: A review of coping strategies employed by households in fuel poverty - Equality & Human Rights Commission (2009) Race discrimination in the construction industry

This proposal will support those in Fuel Poverty. It is known from our JSNA chapter that those whose health is at highest risk from the harmful effects of living in a cold home include:

- older adults
- young children
- households with someone who is disabled or has a long-term limiting illness
- respiratory or circulatory disease
- mental health problems

Therefore, this proposal is most likely to support the individuals outlined above in a positive way. By supporting the improvements and living conditions of people with the above protected characteristics it can reduce the harmful effects of living in a cold home and increase quality of life. It can reduce household bills and increase school attainment. (evidenced in JSNA). This in turn would lead to minimising disadvantages suffered by people due to their protected characteristics.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

#### Summary of significant negative impacts and how they can be mitigated or justified:

No significant negative impact however there are existing disparities for equalities groups.

#### Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The nature of the grant funding means that people with protected characteristics will be supported by this bid and therefore minimising disadvantages suffered by people due to their protected characteristics.

The report highlights the need to connect with community groups and organisations to maximise the promotion of the scheme and ensure we access those more in need in the poorest efficiency homes.

### 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Recruit within the grant an officer to co-ordinate links with communities and organisation internally and externally	Hannah Spungin	31/03/2023


### 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- Achieving the number of homes.
- Improving links with local organisations
- Improving referrals from target groups.

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director<sup>4</sup>.

<b>Equality and Inclusion Team Review:</b> <b><i>Reviewed by Equality and Inclusion Team</i></b>	<b>Director Sign-Off:</b>  Peter Anderson Director of Property, Assets & Infrastructure
28/11/2022	Date: 29/11/2022

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<sup>4</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.