

**City of York Council
Equalities Impact Assessment**

Who is submitting the proposal?

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| Directorate: | Housing and Communities | | |
| Service Area: | Housing Services | | |
| Name of the proposal: | Energy Company Obligation Wave 4 (ECO4) and Great British Insulation Scheme (GBIS) LA Flex Arrangement | | |
| Lead officer: | Pauline Stuchfield | | |
| Date assessment completed: | 05/07/2024 | | |
| Names of those who contributed to the assessment: | | | |
| Name | Job title | Organisation | Area of expertise |
| Jennifer Linsley | Home Energy Efficiency Programme Manager | City of York Council | Domestic Energy Efficiency Retrofit |
| Anthony Dean | Healthy and Sustainable Homes Manager | City of York Council | Housing |

Step 1 – Aims and intended outcomes

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| 1.1 | What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon. |
| | The joining of the Energy Company Obligation, Wave 4 and Great British Insulation, Local Authority Flex scheme and a free partnership with application management company, Agility Eco, to widen eligibility criteria to vulnerable groups that cannot currently access the Energy Company Obligation and Great British Insulation Schemes. |
| 1.2 | Are there any external considerations? (Legislation/government directive/codes of practice etc.) |
| | Yes – The City of York Council has set a net zero target of 2030 for York. The City’s housing stock contributes around a third of the city’s carbon emissions. By opening-up ECO4 and GBIS schemes to a wider proportion of residents within York, not only will CYC be assisting customers to lower their energy bills and increase the comfort levels of their homes. The LA Flex arrangement will also facilitate the lowering of carbon emissions from the properties of successful applicants. |
| 1.3 | Who are the stakeholders and what are their interests? |
| | The key stakeholders are Owner-Occupiers in York that fit one of the four LA Flex routes for eligibility – those on low income, and those with medical conditions that make them more vulnerable to cold, extreme heat and dampness. Their interests are to reside in properties that are healthy, less expensive to run and that emit less carbon. |

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| 1.4 | What results/outcomes do we want to achieve and for whom? |
| | <p>It is Council policy to invest in decarbonisation. In 2019 City of York Council announced a Climate Emergency and have since set an ambition for York to be a net-zero carbon city by 2030. This proposal and the actions that arise from it, will help to achieve the following outcome of the Council Plan 2023 to 2027, One City for All:</p> <ol style="list-style-type: none"> 1. Sustainability: Cutting carbon, enhancing the environment for our future. York will be carbon neutral and contribute to the regional ambition to be carbon negative, with iconic green spaces to enjoy today and the environment protected for future generations to enjoy. <p>The Plan sets the following Objectives that are relevant to this proposal:</p> <ol style="list-style-type: none"> 1. Work with York’s Climate Commission and partners to deliver the Climate Change Strategy 2022-2032 2. Improve the Physical Environment 3. Increase Sources of Renewable Energy <p>These objectives are particularly important to this proposal, which seeks to ensure a reduction in carbon and an increase in renewable energy across the city.</p> <p>Key Measures of Achievement will be:</p> <ul style="list-style-type: none"> • Carbon emissions across the city reduced (kilotonnes of carbon dioxide equivalent) – (Calendar year) <p>In addition, to the above, this proposal and the actions that arise from it, will help to achieve the following objectives of the York Climate Change Strategy 2022 to 2032:</p> <ol style="list-style-type: none"> 1. Improve energy efficiency in existing buildings, |

2. Move away from gas heat systems,
3. Switch to energy efficient appliances and green energy tariffs,
4. Make our buildings climate resilient.

Step 2 – Gathering the information and feedback

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| 2.1 | What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? | |
| Source of data/supporting evidence | Reason for using | |
| Data Set 1: Energy Performance Certificates (EPC) Opendata | Domestic Energy Performance Certificates record the number of carbon emissions a property emits based on its energy efficiency. The aim is for all EPC scores in York to reach a C, indicating their efficiency. Currently the City-wide average is a D with a number of older and traditional properties rating E-G. | |
| Data Set 2: Indices of Multiple Deprivation (IMD) | The national Indices of Multiple Deprivation depict several areas of York that are classed as low-income. | |
| Data set 3: BRE Modelling | BRE Modelling software, that is used by the Housing Strategy Team, has cross- referenced both the IMD and EPC Opendata sets, finding that of the 63,053 households estimated to be in EPC Band D or below, 16.9% are estimated to also be low-income households. | |
| OFGEM ECO4 LA Flex Guidance | Detailing the scheme eligibility routes and the LA Flex scheme parameters which are defined and set by OFGEM and Central Government | |

Step 3 – Gaps in data and knowledge

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| 3.1 | What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with. | |
| Gaps in data or knowledge | | Action to deal with this |
| Although a defined a scheme, the amount of take-up of by customers, and therefore its effectiveness, is unknown. | | Barriers to up-take will be identified and steps made to overcome these barriers, within prescribed scheme parameters. |
| Lack of control over quality of works undertaken by installers may mean that we over-estimate the amount of money saved by residents on their bills and the number of carbon emissions reduced. | | ECO4 and GBIS guidance specifies that only Trustmark-registered installers can gain access to ECO/ GBIS funding from participating energy companies. As such, this should ensure the quality and compliance of all installs with national BSI standards. |
| Lack of control of subsidy amounts offered by installers may mean that we are unable to accurately quantify bill savings against payback periods. | | Cost caps on each scheme were introduced by OFGEM in 2023, ensuring that Installers do not overcharge customers and instead offer agreed, subsidised rates on measures. Using these cost caps, we should be able to quantify savings using the top figures set by OFGEM. |

Step 4 – Analysing the impacts or effects.

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| 4.1 | Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? |
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| Equality Groups and Human Rights. | Key Findings/Impacts | Positive (+) Negative (-) Neutral (0) | High (H) Medium (M) Low (L) |
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| Age | <p>Please note, throughout, that the criterion for the scheme is nationally determined and not subject to change by the Local Authority.</p> <p>The proposed LA Flex arrangement is not anticipated to have any adverse impact on specific age groups. It is believed that the project will instead have a positive impact, as the scheme will be available to all age groups that reside in owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Age is not a barrier to benefiting from the proposed LA Flex arrangement.</p> | Neutral | Medium |
| Disability | <p>Owner-Occupiers, that reside in York, whose disabilities may be exacerbated by cold or damp housing conditions, are a key stakeholder of the proposed LA Flex arrangement. The proposal seeks to ensure that ECO4 and GBIS application eligibility is extended to this demographic, by accepting referrals from GPs or care-boards as evidence of risk to health.</p> <p>The proposed LA Flex arrangement is not anticipated to have any adverse impact on specific disability groups. Though it is important that any communications in relation to the LA Flex arrangement or in the application of the project</p> | Positive | High |

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| | consider the accessibility of the content (language, reading ease, font size etc). | | |
| Gender | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any gender identities. It is believed that the project will instead have a positive impact, as the scheme will be available to all gender identities residing in owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Gender identification is not a barrier to benefiting from the proposed LA Flex arrangement. | Positive | Low |
| Gender Reassignment | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any gender identities. It is believed that the project will instead have a positive impact, as the scheme will be available to all gender identities residing in owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Gender identification is not a barrier to benefiting from the proposed LA Flex arrangement. | Neutral | Low |
| Marriage and civil partnership | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any persons, married or otherwise. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Marital status is not a barrier to benefiting from the proposed LA Flex arrangement. | Neutral | Low |

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| Pregnancy and maternity | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any pregnant persons or mothers. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Neither pregnancy nor maternity are barriers to benefiting from the proposed LA Flex arrangement. | Neutral | Low |
| Race | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any race. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Race is not a barrier to benefiting from the proposed LA Flex arrangement. | Neutral | Low |
| Religion and belief | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any persons' religion or belief. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Neither religion nor belief are barriers to benefiting from the proposed LA Flex arrangement. | Neutral | Low |
| Sexual orientation | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any sexual orientation. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied | Neutral | Low |

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| | households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Sexual orientation is not a barrier to benefiting from the proposed LA Flex arrangement. | | |
| Other Socio-economic groups including: | Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes? | | |
| Carer | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any Carers. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. Caring responsibilities are not a barrier to benefiting from the proposed LA Flex arrangement. | Neutral | Low |
| Low income groups | Low-income groups are a key stakeholder of the proposed scheme. The LA Flex arrangement seeks to ensure that all low-income groups are given access to ECO4 and GBIS funding and installation opportunities. | Positive | High |
| Veterans, Armed Forces Community | The proposed LA Flex arrangement is not anticipated to have any adverse impact on any veterans or members of the Armed Forces community. It is believed that the project will instead have a positive impact, as the scheme will be available to all owner-occupied households considered low-income or containing householders with disabilities exacerbated by cold or damp housing conditions. No occupation, nor former occupation, presents a barrier to benefiting from the proposed LA Flex arrangement. | Neutral | Low |

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| Impact on human rights: | | | |
| Human Rights Impact | The plan will ensure that York residents can enjoy a sustainable, affordable, and warm, good quality home. | Positive | High |

Step 5 - Mitigating adverse impacts and maximising positive impacts

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| 5.1 | Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is being done to optimise opportunities to advance equality or foster good relations? |
| <p>We do not identify any adverse impacts of the proposal. However, there is the potential for negative impacts associated with poor installation or workmanship of retrofit measures provided by installers on the ECO4 or GBIS schemes. This will be mitigated by Agility Eco and the Home Energy Efficiency Programme Manager when reviewing installs, by ensuring that completed works are compliant with PAS2030/2035 standards, which are the national BSI standard for the installation of retrofit measures.</p> <p>Positive Impacts</p> <ol style="list-style-type: none"> 1. Improvement of the energy efficiency of resident's homes 2. Decrease in City-wide carbon emissions. 3. Increase in health/ decrease in hospital admissions due to excess cold. <p>These positive impacts will be maximised by installers who will undertake their own marketing strategies to engage as many York residents as possible, in order to increase ECO4 and GBIS up-take by residents that are eligible under the LA Flex criterion. The realisation of these impacts/ benefits will be monitored monthly by the Home Energy Efficiency Programme Manager.</p> | |

Step 6 – Recommendations and conclusions of the assessment

| 6.1 | <p>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</p> |
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| <p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p> | |
| Option selected | Conclusions/justification |
| <p>No Major Change to the Proposal</p> | <p>The EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact, and we have taken all opportunities to advance equality and foster good relations.</p> <p>The current ECO4 and GBIS schemes are only open to owner-occupiers that are currently in receipt of means-tested income benefits. The LA Flex parameters broaden the reach of these schemes to achieve the maximum possible benefit for York residents. These parameters have been set by Central Government, with the intended purpose of assisting those that are on low income or have medically assessed, qualifying disabilities, irrespective of any other protected characteristics.</p> <p>We commit to continuing to monitor and review the LA Flex arrangement and its impact.</p> |

Step 7 – Summary of agreed actions resulting from the assessment

| 7.1 What action, by whom, will be undertaken as a result of the impact assessment. | | | |
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| Impact/issue | Action to be taken | Person responsible | Timescale |
| Modify the Plan to take account of changing needs and legislation | Review the impact of the Plan | Home Energy Efficiency Programme Manager | To be reviewed in March 2025. |

Step 8 - Monitor, review and improve

| 8. 1 | How will the impact of your proposal be monitored and improved upon going forward? |
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| | <p>The delivery of this proposal will be principally overseen by the Home Energy Efficiency Programme Manager, although the purpose of the partnership is to delegate the majority of responsibility for the implementation oversight, to Agility Eco. Regular progress meetings between the Home Energy Efficiency Manager and Agility Eco will be scheduled, at which, the impact of the arrangement on protected characteristics and other marginalised groups will be continually reviewed.</p> <p>Regular one-to-ones between the Home Energy Efficiency Programme Manager and Healthy and Sustainable Homes Manger, will help ensure that the scheme remains on track, with oversight and scrutiny provided by the Home Energy Retrofit Board which meets monthly.</p> <p>Quarterly reports to the Home Energy Retrofit Board will be reported to the York Climate Commission, via a series of KPIs, and to Executive Members.</p> |