

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Affordable Energy Strategy
Service area	Carbon Management
Officer completing assessment	Gill Cox
Equalities/ HR Advisor	Alisha Muhmood
Cabinet meeting date (if applicable)	12 November 2019
Director/Assistant Director	Dan Hawthorn/Emma Williamson

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

This five-year Affordable Energy Strategy (2020-2025) replaces the previous Affordable Warmth Strategy (2009-2019). This is in recognition that fuel poverty or 'energy vulnerability' goes beyond cold homes and related health effects, for example it can exacerbate existing health conditions such as circulatory or respiratory problems (e.g. asthma), diabetes, arthritis, depression and anxiety. The risks are even higher for people with certain disabilities, children and the elderly.

The strategy sets out the vision and action plan for reducing fuel poverty in the borough which has increased to 14.5% in 2018.

The Vision - To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:

- Improving the energy efficiency of housing and reducing overheating risks,
- Connecting residents to support services and initiatives to overcome the many causes of energy vulnerability, such as energy prices, low incomes and unemployment.

To deliver this vision, there are three key objectives each with their own action plan:

- Objective 1. Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution
- Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Objective 3. Maximise the funding and resources secured within Haringey to alleviate energy vulnerability

Key stakeholders engaged as part of the Strategy development:

Internal stakeholders include Housing, Public Health, Carbon Management, and the Private Rented Enforcement team.

External stakeholders include community organisations already working with those on low incomes or long-term health conditions and residents struggling to afford to adequately power their homes.

This was undertaken through the following events as well as public discussions:

- Haringey's new Affordable Energy Strategy is the result of a joint enquiry between researchers from Durham University and Haringey's Carbon Management team.

- Durham has been researching Haringey's approach to fuel poverty since 2015 and have interviewed council staff, partner organisations delivering energy doctor services and community organisation staff to investigate how to find and interact with people most in need of support.
- They listened to members of the local voluntary sector talk about their relations with residents living in energy inefficient homes and studied how these organisations helped people deal with negative impacts on income, health and wellbeing. Households were visited homes to better understand problems faced by residents at risk of spending too great a proportion of income on energy.
- On 22 May 2019 a Fuel poverty community workshop was held with Durham University and SHINE London to discuss the proposed strategy, engagement and support available for residents in the borough. A cross section of community representatives attended including those supporting residents with mental health issues, low income families, carers, learning disabilities and food poverty.

The strategy will be presented to Cabinet in November 2019 for approval to proceed to public consultation.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

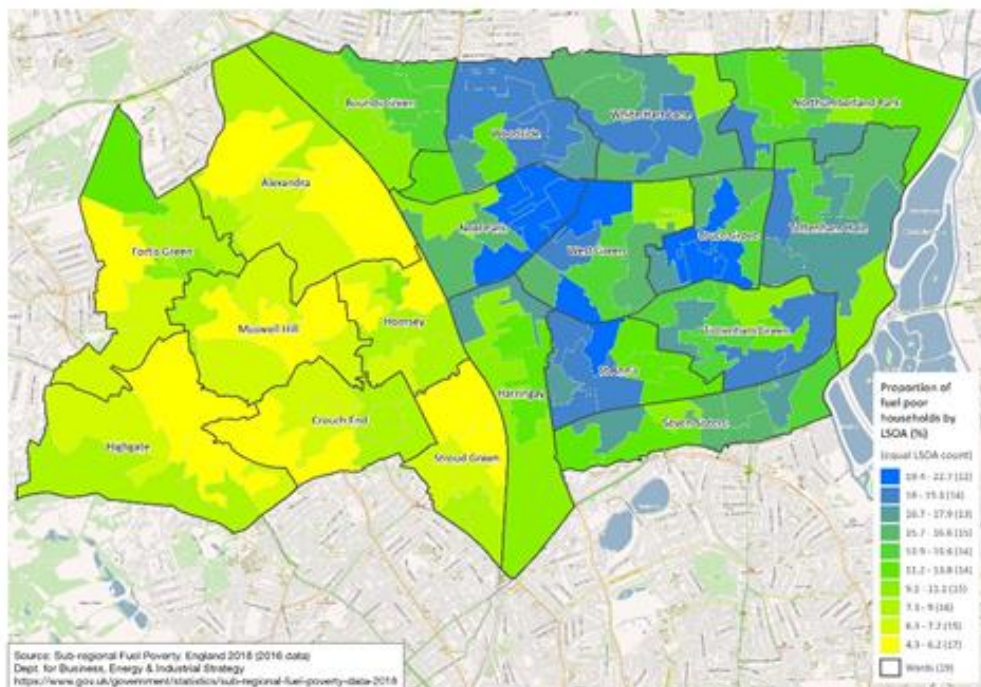
Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
Gender Reassignment	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
Age	BEIS Fuel poverty statistics Haringey Borough Profile	N/a
Disability	Haringey Borough profile and Institute for Fiscal Studies (2018), 'Living standards, poverty and inequality in the UK: 2018'	N/a
Race & Ethnicity	Haringey Borough Profile	N/a

	BEIS Ethnicity facts and figures Fuel Poverty data	
Sexual Orientation	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
Religion or Belief (or No Belief)	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
Pregnancy & Maternity	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
Marriage and Civil Partnership	There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.	N/a
<p>Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?</p> <p><i>Explain how you will overcome this within the proposal.</i></p> <p><i>Further information on how to do data analysis can be found in the guidance.</i></p>		
<p>Summary of Key Findings</p> <p>In 2017 there were 15,189 households living in fuel poverty in Haringey i.e. 14.5% of the households in the borough. This is the 4th highest percentage in London and substantially above the London average (11.8%).* (BEIS Fuel poverty sub-regional statistics 2017)</p>		

At LSOA level, the proportion of households in fuel poverty is highest in the east of the borough particularly Noel Park and Bruce Grove wards. There are no LSOAs in the west of the borough within the top quartile (greater than 16.8%).



Properties at most risk of fuel poverty are those: - *BEIS Fuel poverty sub-regional statistics 2017

- with an energy performance certificate (EPC) rating of E, F or G.
- built pre 1944
- in the private rented sector
- fitted with an electricity pre-payment meter.

Properties at most risk of overheating are: -

- Converted flats or newly built blocks of flats
- Flats facing east/west/south and with a single aspect

In both situations the households most at risk include those with:

- low incomes.
- elderly occupants
- children under the age of 16.
- disabilities or suffering from a long-term illness.
- Those confined to home during long periods of the day

Fuel poverty is measured by the Low-Income High Cost indicator. This ensures that residents qualify for support based on the energy efficiency of their home and their income. Use of property Energy Performance Certificate data will ensure that targeting covers anyone affected by fuel poverty, regardless of tenure, to improve the energy efficiency of their home, reduce the price they pay for energy and to refer them to support services specific to their needs.

The strategy promotes developing a people centred solution to fuel poverty which could reduce inequality and promote fairness in the borough. It sets out to ensure that assistance schemes are communicated to all areas of the community with specific reference to the “hard-to-reach groups”. This may be sections of the population that are not engaged fully in an active participatory citizenship process and fail to access services, either through choice, or the design of the engagement process.

Key Findings

On Sex:

Within Haringey, there is a roughly 50/50 split of males and females. In all age groups up to age 49, males outnumber females, however at aged 50+ this trend is reversed, and females outnumber males in each bracket. This is particularly evident among those aged 85+, where 62% of residents are female and 38% of residents are male. With a greater number of women in the age 50+ group, and as the elderly are more likely to be affected by fuel poverty, this means women would be disproportionately affected by fuel poverty. The strategy will take this into account i.e. it is likely to have a positive impact on women who are disproportionately affected by fuel poverty. This will be reflected through targeted messaging to this group, and when installing measures for home-owners.

Should uptake data from the Shine and Leap referral services indicates unfair representation our targeting and communication methods will be modified.

On disability:

Research has found that people living with a long-term condition aged 24-54 are 50 per cent more likely to be living in poverty than their able-bodied peers. (Institute for Fiscal Studies (2018), ‘Living standards, poverty and inequality in the UK: 2018’, p. 59)

- Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64.
- In Haringey 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.
- In Haringey 12% of residents with a long-term health problem or disability that limits their day-to-day activities a lot are in employment, while 32% of those whose day-to-day activities are limited a little are in employment. This compares to 69% of residents whose day-to-day activities are not limited by any long-term illness or disability. 2011 Census ONS

The strategy sets out an ambition to improve the energy efficiency of all fuel poor households. It also aims to ensure all residents have access to cheaper energy tariffs. This will improve the comfort of disabled residents many of whom spend long periods of the day at home whilst reducing energy bills. It also sets out to conduct awareness campaigns with the health sector which should ensure that disabled residents have the opportunity to benefit from any initiatives/grant funding which is made available.

On age:

This strategy makes a commitment to ensure that the referral network reaches all age groups. However, Haringey has a relatively large child population with 20% of the population being under 16 years old. It is acknowledged that living in a fuel poor home

can adversely affect a child's academic attainment* Fuel Poverty, National children's bureau. To ensure that families with children under the age of 16 are aware of any fuel poverty initiatives the strategy suggests specific communications with education services.

Over two thirds of the Haringey population are of working age (70.1%). However the strategy acknowledges that those with long term health conditions are adversely affected by living in cold homes and looks to source funding to reduce demands on the health services. In Great Britain in 2011, the proportion of people aged 16-44 reporting a limiting long-term illness was 12%, compared to 47% in those aged 75 and over. Health and Social Care Information Centre (2014) Focus on the health and social care of older people.*Leeds: Health and Social Care Information Centre. As ill health is more prevalent in older age it may appear that the older population are more likely to benefit from fuel poverty interventions. In addition, the depth of fuel poverty is increases with age. The proportion of households living in fuel poverty is highest where the oldest person in the household is aged 16 to 24. However, the 'depth' of fuel poverty increases with age, with those households where the oldest person is aged 60+ having the largest fuel poverty gap. BEIS 2016 / Annual Fuel Poverty Statistics 2015, DECC.

On Ethnicity:

In 2017, 10.9% of all households in England (2.53 million households) were in fuel poverty. In every year from 2003 to 2017, households in the White ethnic group were less likely to be in fuel poverty than those from the other ethnic groups (made up of all other ethnic groups combined). The strategy will therefore have a positive impact on these non-white groups as these will be the groups that will most benefit from the interventions and measures.

On Sexual Orientation:

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. Within this group just over half identify as Gay or Lesbian, just over one in four identify as Bisexual, and around one in seven identify as 'Other'. While there is no known correlation between the LGBT community and fuel poverty. The projects that will be delivered as part of the Affordable Warmth Strategy will be installed and delivered with the resident and occupier in mind. All delivery mechanisms and communications lead by the Council and partner organisations, will be designed to ensure that the needs of the LGBT community are reflected. So that delivery agents such as installers reflect the needs and sensitivities of this community.

On Religion and Belief:

Christian residents make up the predominant group in all tenure types and are broadly as likely to social rent as they are to private rent or be owner occupiers. Those of no religion and Jewish residents are more likely to be homeowners. Muslim residents are over-represented in the social rented market (which includes both council housing and housing association stock) and under-represented as homeowners. Alongside this regional and national data suggests that Muslim residents are more likely to have no qualifications and less likely to earn LLW; with Buddhist and Muslim residents most likely to be unemployed. As the Strategy has identified the rented sector of the community the Council will need to target for communications and measures, the strategy will have positive impact on these religious groups.

On Pregnancy & Maternity:

There is no known data on pregnancy and maternity relating to Housing and Place or fuel poverty.

On Gender Reassignment:

There is very little robust data on Haringey or the UK's trans population. However, it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK. According to the LGBT Survey 2018, younger trans people are more likely to identify as non-binary, with 57% of all trans respondents aged under 35 identifying as non-binary. The age at which transitioning is started tends to be younger, with 81% of people starting transitioning at 34 or younger, compared to 19% transitioning at 35 and over. Of those who identify as trans in the UK the largest group are of White ethnicity, representing 90% of this group. Trans people report lower levels of pay and a lower likelihood of having been in paid work and these individuals will benefit measures proposed from the strategy. And all communications will ensure that this community is not excluded, and that the Council will work with installers to that the installers understand this groups needs and sensitivities.

On Marital status and Civil Partnership:

- According to the 2011 census, 1,191 residents were in a same-sex civil partnership. ONS Census 2011
- 33.3% of residents aged over 16 are married. ONS Census 2011

The data we hold across the key Borough Plan areas of Housing, People, Place, Economy and Your Council do not indicate any inequalities in the area of Marriage & Civil Partnership. We will continue to fulfil our commitments against this protected characteristic, and if any inequalities in this area emerge we will take the necessary steps to fix them.

Recommendations and Conclusion

The EQIA process did not identify any issues which would have an adverse or differential impact on protected groups. We will continue to monitor for any equalities implications and modify our initiatives to mitigate any issues which arise.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

The strategy will go out for public consultation and we will hold drop-in sessions at local libraries across the borough and conduct information sessions for Homes for Haringey residents.

We have also put together a directory of community organisations working within the borough and will offer them the opportunity to comment on the strategy. This includes

those working with the elderly, those with long term health conditions and those with children under the age of 16.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The consultation will ask questions around the 3 key objectives of the strategy :-

- Objective 1. Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution
- Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Objective 3. Maximise the funding and resources secured within Haringey to alleviate energy vulnerability

These questions will be designed to ensure:-

- We have understood how residents are experiencing fuel poverty
- Our recommendations will have a positive impact

Where appropriate the strategy will be revised to incorporate comments and suggestions received. This EqlA will also be reviewed as a result of the consultation and updated accordingly. It will then be recommended that the strategy is adopted.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

The eligibility criteria for any fuel poverty initiatives undertaken as a result of this strategy will not be based on gender. Assisting residents of either sex will have the potential to improve the comfort level of their homes and improve their health and wellbeing.

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

There is a commitment to reduce fuel poverty in the borough, especially those from disadvantaged backgrounds and with additional needs. The needs of trans people should be addressed when putting these initiatives into place, while acknowledging that data on this group is often limited.

Positive	X	Negative		Neutral impact		Unknown Impact	
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3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any household. Young and old people are more affected by living in a cold home so improvements will have a positive impact on these residents.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Certain impairments and conditions require additional heating, either at higher temperatures, or for longer (or both). There are other factors that may also increase energy needs, for example energy to run nebulisers, stair lifts and hoists, for charging wheelchairs, and having to undertake additional washing and drying. Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact.

Positive	X	Negative		Neutral impact		Unknown Impact	
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5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

The eligibility criteria for any fuel poverty initiatives undertaken as a result of this strategy will not be based on race. However non-white ethnic residents are more likely to be in fuel poverty. Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Positive	X	Negative		Neutral impact		Unknown Impact	
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6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Positive	x	Negative		Neutral impact		Unknown Impact	
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7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty. This will be particularly important to the unemployed or on low incomes, the evidence indicates that Muslim and Buddhist households are more likely to be unemployed.

Positive	X	Negative		Neutral impact		Unknown Impact	
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8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Positive	X	Negative		Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Positive	X	Negative		Neutral impact		Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The strategy will not discriminate any particular group. It endeavours to tackle the social determinants of fuel poverty ie Housing (age, location, building type, tenure), income, employment, age and mobility (how often in the home and for how long each day) to reduce inequality and promote fairness in the borough.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty			
Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
n/a			
<p>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</p>			
n/a			
6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:			
<p>We will review:-</p> <ul style="list-style-type: none"> • Referrals to the energy advice service • Allocation of grants for energy efficiency measures <p>To ensure that support is being apportioned across the borough. Where an issue is identified we will review the referral network to ensure the strategy and subsequent initiatives are reaching the whole community.</p>			

7. Authorisation	
EqlA approved by (Assistant Director/ Director)	Date

8. Publication
<i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>

Please contact the Policy & Strategy Team for any feedback on the EqlA process.