



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-usersⁱ. They analyse how all our work as a council might impact differently on different groupsⁱⁱ. They help us make good decisions and evidence how we have reached these decisionsⁱⁱⁱ.

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.

Title of EIA	Elwyn Jones Court- Heating & Hot Water Upgrade
Team/Department	Housing Sustainability & Mechanical & Electrical Teams Miles Davidson Housing Sustainability & Affordable Warmth Manager, Interim Manager M&E Team Dan Goodchild – Home Energy Efficiency Project Manager
Date of Checklist	15.11.2019
Focus of EIA^{iv}	The focus of this EIA is on the impact of works on heating and hot water upgrade at Elwyn Jones Court. It also allows us to examine the potential impacts on groups resulting from the installation of a new heating and hot water system.

Scope of Works:

The works will encompass the provision of a new heating and hot water supply to communal areas and domestic dwellings at Elwyn Jones Court

Options considered are Ground Source Heat Pump, Air Source Heat Pump with a wet central heating system

Alternatively an electric heating upgrade limited to replacement of night storage heaters with more modern electric panel heaters.

(Preferred option of a ground source heat pump will be presented to Housing Committee in January 2020, this option will form the basis of this assessment)

- The works would include the drilling of up to 40 bore holes in the grounds of EJC and installation of ground source heat pump infrastructure.
- Removal of existing night storage heaters (communal and flats), point of use heaters and electrically heated hot water storage tanks in flats.
- Installation of new wet distribution system and radiators in flats and communal areas.
- Installation of individual heat pumps into existing storage cupboard in each flat.
- Conversion of existing unused communal area and old staff office for plant.
- There will be making good and redecorations to all disturbed areas.

The proposed works will provide residents with a new heating and hot water supply both connected to the landlord electricity supply, residents

will be therefore pay for all hot water and heating through service charges.

There will be disruption to residents during the works as follows:

- Access to the grounds surrounding the building will be restricted in a phased manner during the drilling of the bore holes.
- There will be some disruption in communal areas to allow for the installation of new pipe runs and radiators.
- There will be some disruption in individual flats during the installation of individual heat pumps, pipework and radiators.
- A storage container will be located in a designated parking bay in the main car park area.
- The main entrance will be subject to restricted access during material movement

Age	Findings / Evidence / Comments	Suggested actions
Proposal		
<p>There is a clear pattern of increasing depth of fuel poverty in older households (Annual Fuel Poverty Statistics Report 2015). In 2013, people in England aged 75 or over had the largest average fuel poverty gap.</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 & Hove (for the three years of 2010/11 to 2012/13) 50% EWD of were in people aged 85 or over.</p> <p>The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD</p>		
Works		
<p>Lack of communication about the proposed work and timescales causes problems for tenants and residents. Creating issues with physical access to parts of the building and grounds, and anxiety.</p>	<p>Residents are unable to plan ahead and put measures in place to reduce the impact this work will have.</p>	<p>The project lead, site manager and resident liaison officer (RLO) will meet with the residents prior to work starting. Regular residents meetings and newsletters will be provided during the works providing details of any planned or likely disruptions to access.</p>
<p>Building work is disruptive and noisy and tenants and residents have told us that this can be very distressing</p>	<p>The nature of some of the works does create noise and this must be</p>	<p>Working hours on site are 08:00 – 16:00, noisy works and the use of noisy tools is</p>

to live with for long periods of time.	addressed.	restricted to 09.00-16.00. Work will be concentrated in areas, so only certain parts of the site will be affected at any one time
--	------------	--

Disability

Proposal

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 & 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 & 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.

Disabled people are more likely to need a warmer home environment to maintain their health; some disabled people may need to use benefits intended to support their independence to ensure their home is warm enough.

The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD

Works	Findings / Evidence / Comments	Suggested areas for development
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.	The project team will liaise directly with residents or via scheme managers and can within reason work around these issues. Whilst we would not be able to hold up a programme due to individual requirements on a long-term basis we will provide as much assistance as possible.
Dust and debris can have an adverse effect on tenants with respiratory conditions such as Asthma or Chronic Obstructive Pulmonary Disease (COPD).	The nature of some works – external borehole drilling, concrete repairs, brickwork repointing – will produce levels of dust we will endeavour to keep this to a minimum.	Any residents with particular respiratory conditions will be met by the RLO and arrangements will be made to assist. At the end of the working day all dust and debris will be cleaned and cleared.
Some residents have told us that they find our signage and information difficult to read and understand and it	Residents are not aware of important information especially around health and	Information/signage will be written clearly and where possible in pictorial form so it's

has been placed too high.	safety issues.	easier for a range of people with different needs to understand. It will be placed at a height that can be read by someone in a wheelchair. Where a resident has told us that they have difficulty with reading we will visit them individually to provide the information in person.
Residents have expressed concerns that the addition of a storage container, a waste skip and contractor's vehicles will reduce available parking spaces which are invaluable to residents and visitors such as wheelchair users or other mobility issues.	Elwyn Jones Court car park has 12 marked parking bays. It is proposed to use the bays currently (Nov 2019) used for storage related to the installation of the new lift shaft. The temporary loss of 2 bays can be considered acceptable to enable works. Measures should be undertaken to eliminate further loss of bays.	Visiting contractors will be allowed to unload tools and materials but will be asked to park off site on local roads during the working day.

66

Gender Reassignment	Findings / Evidence / Comments	Suggested areas for development
Proposal		
<p>The Brighton & 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>The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD</p>		
Works		

<p>We will consider the needs of the trans community during the works.</p>	<p>No specific feedback received relating to this group.</p>	<p>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.</p>
<p>Race and Ethnicity & Religion and Belief</p>	<p>Findings / Evidence / Comments</p>	<p>Suggested areas for development</p>
<p>Proposal</p>		
<p>People in England (2013) who are of minority ethnic origin are more likely to be fuel poor (18%) than people who are of white ethnic origin (9%) (Dept. of Energy and Climate Change 2013).</p>		
<p>The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD</p>		
<p>Works</p>		
<p>Where English is not their first language residents may have difficulty reading and understanding the content of letters and posters relating to the planned major works.</p> <p>Some religions or religious beliefs prevent gender mixing.</p>	<p>Residents will not be aware of the works and how this will impact on them.</p> <p>Contractors or staff visiting a tenant may need to be of the same sex.</p>	<p>We will be utilising the services of a translation / interpreting service should this be a requirement</p> <p>Where we know it's a requirement of the resident's religious belief for the contractor to be of the same sex we try to accommodate this.</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>

100

--	--	--

Sex / Gender	Findings / Evidence / Comments	Suggested areas for development
Proposal		
In Brighton & Hove (for the three years of 2010/11 to 2012/13) there were 373 EWD. Of these, 58% were female. Of EWD in Brighton & Hove of people aged 85 years or over, 79% were female.		
The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD		
Works		
No specific feedback received relating to this group.	Women may feel anxious or have negative perceptions about contractors.	Ensure that all contractors abide by BHCC and the main contractors code of conduct and are courteous and polite to all residents.

Sexual Orientation	Findings / Evidence / Comments	Suggested areas for development
Proposal		
No specific impacts identified		
Works		
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 people who are lesbian, gay or bisexual and do not make assumptions about the gender of partners.

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

	identified for this group.	
Other Relevant Groups	Findings / Evidence / Comments	Suggested areas for development
<p>Proposal Unemployed households in England have the highest rates of fuel poverty across all economic activity groups, but have smaller average fuel poverty gaps.</p> <p>The installation of a new heating and hot water system will provide a more reliable, controllable and potentially cheaper source of heating to residents. Reducing likelihood/depth of fuel poverty and EWD</p>		
Works		
<p>Key safes are extremely important to enable carers to access properties.</p> <p>Restricting existing onsite parking causes problems with carers and hospital transport.</p>	<p>The removal of key safes without prior notice can cause serious issues for tenant's care needs.</p> <p>Tenants may miss hospital and carers appointments.</p>	<p>Give residents prior notice if removing a key safe and ensure that alternative arrangements are made for the safe storage of tenant's spare keys.</p> <p>Be flexible around scheduling to allow access for health workers/carers where possible. Discuss the needs of the resident to ensure that this is considered.</p> <p>The complaints and enquiry procedure is issued with the monthly newsletter.</p>
<p>Hoarding is a sensitive issue and major work at a block may cause added stress for residents that hoard.</p>	<p>Residents may not allow access to their property, holding up the work and the improvements to their flat.</p>	<p>Where Housing officers are aware of a resident who hoards they will liaise directly with the Tenancy Sustainment Team.</p>

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

Lead Equality Impact Assessment officer:

Dan Goodchild

Date: 15th November 2019

Team Manager:

Miles Davidson

Date: 15th November 2019

Source of data

The data has been obtained from BHCC Open Housing Management System (OHMS) as of date of this document and the data used to inform the EIA for the Brighton & Hove Fuel Poverty & Affordable Warmth Strategy 2016-20.

Data

Gender Identity	
Category	No. of Residents
Female	38
Male	37
Unknown	
Total	75

Sexual Orientation	
Category	No. Residents
Heterosexual	29
Lesbian	1
Gay	1
Bisexual	1
Other	1
Prefer not to say	5
Unknown	37
TOTAL	75

Ethnic Group	
Category	No. Residents
White	66
Mixed Race	
Asian or Asian British	4
Black or Black British	
Other Ethnic Group	1
Unknown	4
TOTAL	75

Age	
Category	No. Residents
16-24	
25-34	
35-44	
45-54	2
55-64	9
65-74	21
75-84	31
85-94	10
95 & Over	2
Unknown	
Total	75

Disabilities	
Category	No. Residents
Has disability or long term health problem	31
None or unknown	44
TOTAL	75

Religion	
Category	No. of Residents
Christian	31
Buddhist	
Hindu	2
Jewish	
Muslim	
Sikh	
Other religion	2
No religion	4
Prefer not to say	2
Unknown	34
Total	75

ⁱ 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.

ii **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.

iv **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.

