

Equality Impact Assessment Form

1. Document Control

Control Details:

Title:	Statement of Intent under Energy Company Obligation
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Department:	Growth & City Development
Service Area:	Housing Strategy
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Strategic Budget EIA: Y/N (Does this EIA have an impact on the budget)	No
Exempt from publication: Y/N (Exemption criteria is available on the EIA section on the Intranet)	No

2. Document Amendment Record:

Version	Author	Date	Approved
1	Paul Flowers	15/8/2022	15/8/2022
2	Paul Flowers	6/10/2022	6/10/2022

3. Contributors/Reviewers (Anyone who has contributed to this document will need to be named):

Name	Position	Date

4. Glossary of Terms

Term	Description
Energy Company Obligation (ECO)	Insulation and heating upgrade programme funded by energy supply companies to meet carbon saving targets set by Central Government and the Office of Gas and Electricity Markets (OFGEM)
Energy Performance Certificate (EPC)	Document relating to single home showing Energy Efficiency Rating and works done or recommended as required.
Local Authority Flexible Eligibility (LAFlex).	Flexible eligibility criteria for ECO agreed at local level.
National Institute for Health and Care Excellence (NICE) Guidance	Provide for Central Government/National Health Service guidance and advice to improve health and social care

5. Summary

(Please provide a brief description of proposal / policy / service being assessed)

Nottingham City Council's previous ECO Statement of Intent and appendix were approved under Energy Company Obligation 3 (ECO3) that expired 1st July 2022.

OFGEM regulated Energy Company Obligation allows local authorities to individually approve wider eligibility criteria within their local area under Local Authority Flexible Eligibility (LAFlex). Those wider groups are under ECO4 prescribed by OFGEM. Nationally up to 50% of ECO4 could be through LAFlex.

Energy Company Obligation 4 (ECO4) offers a mix of insulation improvements such as under floor, wall and roof space, and heating upgrades such as gas boilers, electric heating and first time central heating as prescribed by OFGEM.

ECO4 runs from 1st July 2022 and until 31st March 2026 or a subsequent date advised by Central Government or OFGEM.

ECO4 is funded by energy supply companies with up to 450,000 owner occupiers or private landlord tenants in England and Wales.

The new ECO4 is subject to OFGEM 20/9/2022 published guidance which prescribes criteria which can be used under LAFlex.

6. Information used to analyse the effects on equality:

(Please include information about how you have consulted/ have data from the impacted groups)

Existing resident data such as local Fuel Poverty, Energy Performance Certificates and distribution of benefits such as Council Tax Benefit and Housing Benefit. These will be reviewed to identify potential eligibility or area focus required by ECO installers.

7. Impacts and Actions:

	Could particularly benefit X	May adversely impact X
People from different ethnic groups.	<input type="checkbox"/>	<input type="checkbox"/>
Men	<input type="checkbox"/>	<input type="checkbox"/>
Women	<input type="checkbox"/>	<input type="checkbox"/>
Trans	<input type="checkbox"/>	<input type="checkbox"/>
Disabled people or carers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy/ Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of different faiths/ beliefs and those with none.	<input type="checkbox"/>	<input type="checkbox"/>
Lesbian, gay or bisexual people.	<input type="checkbox"/>	<input type="checkbox"/>
Older	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Younger	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults).	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please underline the group(s) /issue more adversely affected or which benefits.</i>		

How different groups could be affected (Summary of impacts)	Details of actions to mitigate, remove or justify negative impact or increase positive impact (or why action isn't possible)																			
<p>Only owner occupier or private renters can be eligible under OFGEM national eligibility rules.</p> <p>Accessibility to the LАflex scheme will be through 4 different routes prescribed by OFGEM in its guidance and template.</p> <p>Route 1 - D-G energy efficiency rated homes where household income less than £31,000.</p> <p>Route 2 - E-G energy efficiency rated homes where household meet a combination of two of the following:</p> <ul style="list-style-type: none"> • Lower-layer Super Output Area Multiple Deprivation Index 1-3 (LSOA) which covers in 2019 127 Lower Super Output Areas of Nottingham's 182. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833970/File_1_-_IMD2019_Index_of_Multiple_Deprivation.xlsx • Receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates). • Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. NICE guidance includes people with cardiovascular conditions, people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma), people with mental health conditions, people with disabilities, older people (65 and older), young children (under 5), pregnant women, people who move in and out of homelessness, 	<p>Positive Impact: Purpose is to widen local resident accessibility to energy efficiency upgrades such as insulation to floors, walls and roof spaces, heating upgrades to gas boilers, electric heating and first time central heating.</p> <p>LАflex is designed to complement the core national ECO scheme eligibility which only includes means tested benefits list below where owner occupier homes are D, E, F or G rated and private rented homes are E, F or G rated.</p> <p>Core scheme includes means tested benefits where households would directly through ECO installers and energy supply companies.</p> <p>List of ECO core benefits eligible comprises:</p> <ul style="list-style-type: none"> • Income based jobseekers allowance • Income related Employment & Support • Pension Credit Guarantee Credit • Pension Credit Savings Credit • Working Tax Credit • Child Tax Credit • Universal Credit • Housing Benefit • Warm Home Discount Rebate (new winter 2022/23 scheme) <table border="1" data-bbox="1066 1133 1906 1393"> <thead> <tr> <th rowspan="2"><i>Child Benefit where:</i></th> <th colspan="4"><i>Number of children or qualifying young persons</i></th> </tr> <tr> <th><i>1</i></th> <th><i>2</i></th> <th><i>3</i></th> <th><i>4 or more</i></th> </tr> </thead> <tbody> <tr> <td>Single claimant</td> <td>£18,500</td> <td>£23,000</td> <td>£27,500</td> <td>£32,000</td> </tr> <tr> <td>Member of a couple</td> <td>£25,500</td> <td>£30,000</td> <td>£34,500</td> <td>£39,000</td> </tr> </tbody> </table>	<i>Child Benefit where:</i>	<i>Number of children or qualifying young persons</i>				<i>1</i>	<i>2</i>	<i>3</i>	<i>4 or more</i>	Single claimant	£18,500	£23,000	£27,500	£32,000	Member of a couple	£25,500	£30,000	£34,500	£39,000
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Member of a couple	£25,500	£30,000	£34,500	£39,000																

people with addictions, people who have attended hospital due to a fall, recent immigrants and asylum seekers.)

- Households receiving free school meals due to low-income.
- Households supporting low income and vulnerable households for the purposes of NICE Guidance. (NICE Guidance includes people with cardiovascular conditions, people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma), people with mental health conditions, people with disabilities, older people (65 and older), young children (under 5), pregnant women, people who move in and out of homelessness, people with addictions, people who have attended hospital due to a fall, recent immigrants and asylum seekers.)
(Proxy 1 and 5 cannot be used together)
- A household referred for support by their energy supplier or Citizens Advice because they have been identified as struggling to pay their electricity and gas bills.

Route 3 - D-G energy efficiency rated homes where household have been identified by NHS Foundation Trust, NHS Trust, NHS Health Board or a General Medical Practitioner as low-income and vulnerable, with an occupant whose health conditions may be impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

Route 4 - D-G energy efficiency rated home where household identified for Bespoke Targeting as a low income and vulnerable household, who are not already eligible under the existing routes.

8. Arrangements for future monitoring of equality impact of this proposal / policy / service:

Distribution of households benefiting will be regularly monitored and reported to the Nottingham City Council monthly partnership meetings of the Domestic Energy Efficiency & Fuel Poverty group.

If any equality impacts arise through the monitoring the EIA will be reviewed and updated to reflect the impacts along with mitigations. However the template eligibility is prescribed by OFGEM for all local authority use.

9. Outcome(s) of equality impact assessment:

<input checked="" type="checkbox"/>	No major change needed	<input type="checkbox"/>	Adjust the policy/proposal
<input type="checkbox"/>	Adverse impact but continue	<input type="checkbox"/>	Stop and remove the policy/proposal

10. Approved by (manager signature) and Date sent to equality team for publishing:

Approving Manager:	Date sent for advice: 18/8/2022
Approving Manager Signature:	Date of final approval:

Before you send your EIA to the Equality, Diversity & Inclusion Manager for scrutiny, have you:

1. Read the guidance and good practice EIA's
2. Clearly summarised your proposal/ policy/ service to be assessed.
3. Hyperlinked to the appropriate documents.
4. Written in clear user-friendly language, free from all jargon (spelling out acronyms).
5. Included appropriate data.
6. Consulted the relevant groups or citizens or stated clearly, when this is going to happen.
7. Clearly cross-referenced your impacts with SMART actions.

PLEASE NOTE: FINAL VERSION MUST BE SENT TO THE EDI MANAGER OTHERWISE RECORDS WILL REMAIN INCOMPLETE.