

# EQUALITY IMPACT ASSESSMENT

Scaling up retrofit through Energy Company Obligation  
4 (ECO4) and Great British Insulation Scheme (GBIS)

Reference: EIA000423

Date: 19/04/2024

Submitted by: Richard Labran



### EIA Form – About your EIA

Reference number	EIA000423
Date Submitted	19/04/2024
Subject of the EIA	Scaling up retrofit through Energy Company Obligation 4 (ECO4) and Great British Insulation Scheme (GBIS)
Brief description of the policy, service or function covered by the EIA	The council are seeking to procure delivery partners in order to upscale the ECO and GBIS retrofit schemes across Birmingham. Both schemes offer energy efficiency measures and improvements adopting fabric first multi measures (ECO) or single measures (GBIS). The schemes are funded via big energy companies who leverage a charge on bills to cover the cost of fully funded insulation works targeted at homes with EPC ratings D or below that are occupied by low income households in receipt of means tested benefits.
Equality Assessment is in support of...	["New strategy", "New function"]
How frequently will you review impact and mitigation measures identified in this EIA?	Annually
Due date of the first review	2025-05-30

### Directorate, Division & Service Area

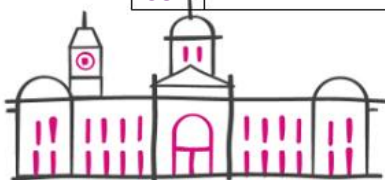
Which directorate(s) are responsible for this EIA?	["City Housing"]
Division	Strategy & Enabling
Service area	Housing Modernisation & Strategy
Budget Saving	No

### Officers

What is the responsible officer's name?	Richard Labran
What is the responsible officer's email address?	richard.labran@birmingham.gov.uk
What is the accountable officer's name?	Guy Chaundy
What is the accountable officer's email address?	guy.chaundy@birmingham.gov.uk

### Data Sources

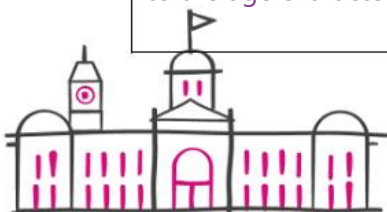
Data source	["Relevant reports/strategies", "Parity Projects "]
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Data source details	<p>Housing Strategy 2023-2028</p> <p>Asset Management Strategy 2024-2029</p> <p>National Energy Action</p> <p>DESNZ Fuel Poverty Factsheet 2024</p> <p><a href="https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/housing-with-damp-problems/latest/">https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/housing-with-damp-problems/latest/</a></p> <p><a href="https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability#:~:text=Over%20the%20past%20decade%2C%20housing%20affordability%20has%20declined,relative%20housing%20costs%20compared%20to%20white%20British%20people.">https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability#:~:text=Over%20the%20past%20decade%2C%20housing%20affordability%20has%20declined,relative%20housing%20costs%20compared%20to%20white%20British%20people.</a></p> <p><a href="https://www.theguardian.com/society/2022/nov/21/racial-inequality-hard-wired-housing-system-england-study">https://www.theguardian.com/society/2022/nov/21/racial-inequality-hard-wired-housing-system-england-study</a></p>

### Protected Characteristics

Protected Characteristic – Age	
Does this proposal impact people due to their age as per the Equality Act 2010?	Yes
What age groups are impacted by your proposal?	["0-9 years", "10-19 years", "20-29 years"]
Please describe any potential impact to the age characteristic	<p>DESNZ Fuel poverty tables indicate that young people aged 16-24 make up 25% of all households currently living in fuel poverty. Likewise single parents and couples with children are more likely to be fuel poor. Furthermore, Birmingham's HEDNA and Housing Strategy recognise that privately rented accommodation in Birmingham is generally occupied by people in their 20-30s, and those living in the private rented sector (24.1 of all PRS tenants) are most likely to be fuel poor, followed by those in the social rented sector (17.3% of tenants). Consequently, the upscaling of ECO and GBIS are likely to have greater benefits for younger cohorts as evidence suggest these groups are most likely to experience fuel poverty, which in part can be linked to income but also less purchasing power to occupy more energy efficient housing. Fabrication of their homes is likely to lead to reduced need to heat space, which in turn will lead to a reduction in fuel bills. This would mean more young people living in cold and damp homes.</p>
How could you mitigate against any negative impact to the age characteristic?	By rolling out the scheme and targeting households with children in receipt of means tested benefits alongside households in receipt of UC or housing benefit living in the private rented and socially rented sectors.



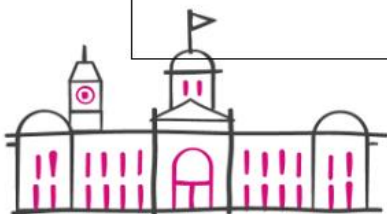
Please describe how this proposal does not impact people due to their age

### Protected Characteristic – Disability

Does this proposal impact those people with a disability as per the Equality Act 2010?	Yes
Please describe any potential impact to the disability characteristic	According to DESNZ fuel poverty tables, households containing someone living with a long term illness or disability are 6.6% more likely to be fuel poor. Furthermore data gathered in support of Birmingham's Housing Strategy 2023-2028 suggests 37% of households in Birmingham have someone living in the home with a long-term health condition or disability. This makes up a significantly large proportion of households that might be living in fuel poverty and energy inefficient homes. That said, disability benefit such as PIP or DLA are not qualifying benefit for ECO or GBIS, consequently consideration will need to be given as to how to target these groups to ensure they are able to access free energy efficiency measures through both schemes.
How could you mitigate against any negative impact to the disability characteristic?	Use relevant data from DWP Stat explore combined with council and City Observatory data to target households containing someone living with a disability alongside household members in receipt of qualifying means tested benefits for the ECO and GBIS schemes. Furthermore, it may be possible to target local VCS groups that support people living with a disability, so that they can promote both schemes to beneficiaries.
Please describe how this proposal does not impact people due to their disability	

### Protected Characteristic – Sex

Does this proposal impact citizens based on their sex as per the Equality Act 2010?	Yes
What sexes will be impacted by this proposal?	["Female"]
Please describe any potential impact to the sex characteristic	Data from DESNZ indicates that 29% of single parents are living in fuel poverty in England. Census data confirms that the majority of lone-parent families are lone-mother families (2.5 million, 84%). Consequently there is a higher likelihood that women are more affected by fuel poverty and are more likely to be living in cold, damp homes.



How could you mitigate against any negative impact to the sex characteristic?	Targeted IAG on both schemes through family support groups, women's sector organisations, and by making use of relevant data to promote the benefits of ECO and GBIS to single parents in receipt of child benefit and other child related benefits.
Please describe how this proposal does not impact people due to their sex	

### Protected Characteristic - Gender Reassignment

Does this proposal impact people who are proposing to undergo, undergoing or have undergone a process to reassign one's sex as per the Equality Act 2010?	No
Please describe any potential impact to the gender reassignment characteristic	
How could you mitigate against any negative impact to the gender reassignment characteristic?	
Please describe how this proposal does not impact people due to gender reassignment	There is no data that indicates those undergoing gender reassignment might experience additional positive or negative benefits from accelerating the ECO and GBIS schemes.

### Protected Characteristic - Marriage and Civil Partnership

Does this proposal impact people who are married or in a civil partnership as per the Equality Act 2010?	No
What legal marital or registered civil partnership status will be impacted by this proposal?	
Please describe any potential impact to the marriage and civil partnership characteristic	
How could you mitigate against any negative impact to the marriage and civil partnership characteristic?	
Please describe how this proposal does not impact	There is no data that indicates that people who are married might experience additional positive or negative benefits from accelerating the ECO and GBIS schemes.



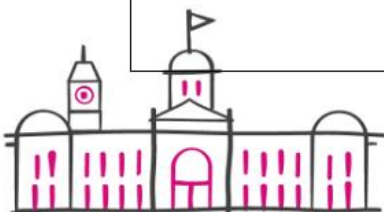
people who are married or in a civil partnership

### Protected Characteristic - Pregnancy and Maternity

Does this proposal impact people covered by the Equality Act 2010 under the protected characteristic of pregnancy and maternity?	No
Please describe any potential impact to the pregnancy and maternity characteristic	
How could you mitigate against any negative impact to the pregnancy and maternity characteristic?	
Please describe how this proposal does not impact people who are covered by the pregnancy and maternity characteristic	There is no data that indicates that pregnant women might experience additional positive or negative benefits from accelerating the ECO and GBIS schemes.

### Protected Characteristic - Ethnicity and Race

Does this proposal impact people due to their race as per the Equality Act 2010?	Yes
What ethnic groups would be impacted by this proposal?	["Bangladeshi", "Chinese", "Indian", "Pakistani", "Other Asian", "African", "Caribbean", "Black British", "Other Black", "Arab", "Latin American", "Irish", "Central and Eastern Europe", "Western and Southern Europe"]
Please describe any potential impact to the ethnicity and race characteristic	UK government data suggests Mixed White and Black Caribbean (13%), Bangladeshi (10%), Black African (9%) and Pakistani (8%) households were more likely to have damp problems than White British households (3%). A higher proportion of people in all minority ethnic groups have high relative housing costs compared to white British people, DESNZ data suggests ethnic minorities are 8% more likely to be fuel poor. The Health Foundation suggests over a fifth (22%) of people from black, black British, Caribbean or African groups as well as people from 'other' ethnic groups spend more than a third of their income on housing. This is also the case for 16% of people from mixed or multiple ethnic groups and 14% for people from Asian or Asian British groups. This compares to only 8% of white people. Furthermore cases like Grenfell and the case of Awaab Ishaak provide stark examples of the impact of housing inequality for ethnic minorities, both in their relations with



	social housing providers and the wider outcomes of discrimination. In the case of Awaab Ishaak, the impact of cold and damp within the home on his health was ignored by his social housing provider, these issues led to his death.
How could you mitigate against any negative impact to the ethnicity and race characteristic?	Ensure that schemes are promoted through appropriate community groups within Wards with higher concentrations of ethnic minority households in order to build confidence. Translate literature into community languages and ensure minority groups have somewhere to go to ask questions regarding each scheme. This may involve training individuals within local communities to provide IAG regarding the benefits of both ECO and GBIS.
Please describe how this proposal does not impact people due to their race	

### Protected Characteristic - Religion or Beliefs

Does this proposal impact people's religion or beliefs as per the Equality Act 2010?	No
What religions could be impacted by this proposal?	
Please describe any potential impact to the religion or beliefs characteristic	
How could you mitigate against any negative impact to the religion or beliefs characteristic?	
Please describe how this proposal does not impact people due to their religion or beliefs	There is no data that indicates that people of differing faiths might experience additional positive or negative benefits from accelerating the ECO and GBIS schemes.

### Protected Characteristic - Sexual Orientation

Does this proposal impact people's sexual orientation as per the Equality Act 2010?	No
What sexual orientations may be impacted by this proposal?	
Please describe any potential impact to the sexual orientation characteristic	
How could you mitigate against any negative impact	



to the sexual orientation characteristic?	
Please describe how this proposal does not impact people due to their sexual orientation	There is no data that indicates that people of differing sexual orientation might experience additional positive or negative benefits from accelerating the ECO and GBIS schemes.

### Monitoring

How will you ensure any adverse impact and mitigation measures are monitored?	We will ensure that the findings of this EIA are incorporated into our teams thinking so that any communications and awareness raising through digital and physical marketing, or any provision of retrofit IAG to residents considering or undergoing retrofit are fully accessible and targeted at groups most likely to be in need of energy efficiency measures. Furthermore, we will support relevant local community groups to develop awareness and trust and to support residents.
Please enter the email address for the officer responsible for monitoring impact and mitigation	richard.labran@birmingham.gov.uk

