

Appendix 4

Heat Networks Strategy: Equality Impact Assessment

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health & wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Heat Networks Strategy
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Equality analysis author	Tom Vosper				
Strategic Director:	Michael Scorer				
Department	Housing and Modernisation	Division	Asset Management		
Period analysis undertaken	August 2021				
Date of review (if applicable)	N/A				
Sign-off	Dave Hodgson	Position	Director of Asset Management	Date	11 August 2021

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

A heat network is a series of insulated pipes, normally buried underground, used to carry heat from one place to another, usually via the medium of hot water or steam. Heat networks are useful because they mean not all properties need to have their own boiler. This has advantages in terms of installation cost, air quality, fuel price and ease of maintenance. It also makes it easier to switch heat supply to low carbon technologies.

The Council has over 100 heat networks on our housing estates serving 17,000 properties. Much of the infrastructure is in need of investment which is why the Council has prepared the Heat Networks Strategy to help us achieve our objectives of supplying reliable, affordable and low carbon heat to all of our residents. The strategy sets out our technical approach and investment principles for investing in the council's heat networks.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	This strategy is expected to impact every resident connected to one of the Council's heat networks – 17,000 homes. Not all of the Council's heat networks will be the subject of significant investment or change, however. The strategy lays out how investment will be prioritised to reach those networks which particularly need it.
Key stakeholders were/are involved in this policy/decision/business plan	An update paper was taken to cabinet in July 2019 and this outlined many of the principles subsequently crystallised in the Heat Networks Strategy. Since then the Council has undertaken three main strands of engagement and consultation with residents: Firstly, through a residents working group which permitted in depth conversations on a number of topics. Secondly, a borough-wide consultation exercise that received 800 responses. Thirdly, attendance at area housing forums, tenants council and homeowners forum.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat network strategy is deemed to have an overall positive impact on the protected characteristic of age in relation to economic issues due to the improved control and efficiency of the heat networks which should have the knock-on effect of lower heating bills. It was identified that implementing some low carbon technologies could lead to higher heating bills if this effect is not offset in some way. These issues will be dealt with on a case by case basis to minimise any negative effects. Age here is identified as a characteristic which would lead to	The heat networks strategy will have positive health impacts on the protected characteristic of age through improving the reliability and effectiveness of the Council's heat networks. Both young children and older people are susceptible to cold related illnesses, so making heat supply as affordable and reliable as possible will reduce health inequality.

<p>unequal impact due to older people needing, in general, more warmth in their homes to remain comfortable. Any change in the cost of heating (both positive and negative) would have an accentuated effect on older people. The Heat Networks Strategy Paper does not make specific recommendations on heat meter installations or policy (this will be dealt with in a separate paper) but it was identified that heat metering could lead to higher users paying more and this could affect older people more than others so will need to be considered carefully when more detailed heat metering policies and proposals are brought forward.</p>	
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<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>The heat network strategy is deemed to have an overall positive impact on the protected characteristic of disability in relation to economic issues due to the improved control and efficiency of the heat networks which should have the knock-on effect of lower heating bills. It was identified that implementing some low carbon technologies could lead to higher heating bills if this effect is not offset in some way. These issues will be dealt with on a case by case basis to minimise any negative effects. Disability here is identified as a characteristic which would lead to unequal impact due to people with disabilities sometimes needing more warmth in their homes to remain comfortable, though of course this depends greatly on the specific disability. Any change in the cost of heating (both positive and negative) would have an accentuated effect on people with disabilities that increased their need for warmth. The Heat Networks Strategy Paper does not make specific recommendations on</p>	<p>The heat networks strategy will have positive health impacts on the protected characteristic of disability through improving the reliability and effectiveness of the Council's heat networks. Some disabilities, particularly those related to mobility, leave people more susceptible to cold related impacts and illnesses. Making heat supply as affordable and reliable as possible will reduce health inequality.</p>

heat meter installations or policy (this will be dealt with in a separate paper) but it was identified that heat metering could lead to higher users paying more and this could affect people with mobility related disabilities more than others so will need to be considered carefully when more detailed heat metering policies and proposals are brought forward.	
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Gender reassignment – The process of transitioning from one gender to another	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of gender reassignment in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of gender reassignment in relation to health issues.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of marriage and civil partnership in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of marriage and civil partnership in relation to health issues.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of pregnancy and maternity in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of pregnancy and maternity in relation to health issues.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others Potential impacts (positive and negative) of proposed policy/decision/business plan Potential health impacts (positive and negative)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>The heat networks strategy is deemed to have a neutral / proportional impact on the protected characteristic of race locally in relation to societal and economic factors, because reliable, affordable and low carbon heating does not benefit people of one race more than another.</p> <p>Globally, however, the effects of climate change are felt unevenly around the world. It is well documented that the global south is disproportionately affected by climate change. The risk and impact of rising sea levels, floods, droughts, failed crops and other climate impacts is much higher in the global south, and this has been exacerbated by man-made climate change. The impact of these disasters can sometimes significantly impact societies and economies and with economic impact often follows adverse health impacts such as from malnutrition.</p> <p>The heat networks strategy, by laying out a pathway to decarbonise the council's heat networks will have a positive, if small in global terms, impact on the extent of man-made climate change.</p>	See left column.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of religion and belief in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of religion and belief in relation to health issues.

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of sex in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of sex in relation to health issues.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The heat networks strategy is deemed to have a neutral impact on the protected characteristic of sexual orientation in relation to societal and economic issues.	The heat networks strategy is deemed to have a neutral impact on the protected characteristic of sexual orientation in relation to health issues.

Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The Heat Networks Strategy is deemed to have a positive impact on the characteristic of socio-economic status in relation to quality of life and economic factors. Improving the reliability of heating and hot water within the home can increase a resident's quality of life in numerous ways – the ability to study and concentrate, mental	See left.

health, reduced stress and better sleep. While these things are true across the whole spectrum of socio-economic background, those who are disadvantaged may experience these effect more acutely and have fewer resources available to help them overcome such impacts. Any improvements in the affordability of heating and hot water within the home will have the obvious effect of reducing financial hardships experienced by economically disadvantaged persons.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

Not tackling climate change locally and globally can ultimately impact the Right to Life enshrined in the Humans Rights Act. One of the possible impacts in Southwark (as well as the rest of the UK) of global climate change, is hotter summers and colder winters both of which can lead to loss of life.

The Heat Networks Strategy lays out a pathway to decarbonise the council's heat networks, thus reducing the borough's contribution to man-made climate change and therefore the reducing the negative impacts of climate change felt globally and locally.

Information on which above analysis is based

The analysis of the need to tackle climate change is set out in the Council's climate change strategy published in July 2021.

Mitigating actions to be taken

Section 5: Further actions and objectives

5. Further actions

Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.

Number	Description of issue	Action	Timeframe
1	The installation of some low carbon technologies (e.g. heat pumps) could in some instances lead to increased heating bills. This could have an accentuated impact on older people and those with mobility related disabilities who need more warmth to be comfortable.	Seek to utilise grants and other funding mechanisms to minimise / eliminate any heating cost increases. Assess resident fuel bill impacts on a project by project basis where low carbon technologies are being considered.	Case by case basis linked to investments made to the heat networks.
2	The installation of heat meters could lead to increased heating bills for higher users. This could have an accentuated impact on older people and those with mobility related disabilities who need more warmth to be comfortable.	The Heat Networks Strategy does not include any specific proposals or policies with regards to heat meter installations or metered billing so there is not current action. However, further careful consideration of this issue will be carried out prior to detailed heat metering policies and proposals being brought forward (in a future paper)	Prior to / alongside the development of a heat metering policy in a future paper.
3			
4			

5. Equality objectives (for business plans)

Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

