

Equalities Impact Assessment: Full Assessment

Before completing this form you should have completed an Equalities Screening Tool and had sign off from your Head of Service and the Strategy, Equalities and Communities service.

This Equality Impact Assessment should be completed where the Screening Tool identifies a potentially negative impact on one or more specific groups, or there is a large-scale proposal or impact, but it can also be used to highlight positive impacts.

However, please also note that large-scale projects in terms of cost or impact on residents and/or staff will require this full EQIA to be completed and in this case you can skip the Screening Tool. This is due to the fact that a screening tool is not a legal document, while the full EQIA is. We advise that any project involving costs over £500,000, or over £1 million for capital projects, will require a full EQIA for instance. If you are unsure, you can check in with the Strategy, Equalities and Communities service for guidance.

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.

Summary of proposal

Name of proposal: Change to the communal heating service for council homes

Reference number (if applicable):

Service area: Housing Strategic Business Planning and Investment, Homes and Neighbourhoods

Date assigned completed: 19/7/24

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

1.1. The communal heating service was amended in September 2022 in response to the energy crisis, which saw gas cost spiral, even with government caps, to over three times the costs residents were used to paying. Service hours and the heating season were reduced to achieve a greater balance between provision and affordability.

1.2. The council has a range of different systems that fall into the following categories:

- **Two pipe systems** – those where heat and hot water are delivered to the properties through the same pipework and cannot delivery heating and hot water services separately, but there is stored hot water available whilst the system is off.
- **Standard systems** – where heating and hot water can be delivered separately (either from the communal system or from a mixture of communal and individual provision)
- **HIU sites** – where there is no stored hot water, and heating and hot water are delivered together. These sites have a heat interface unit (HIU) in place, which allows a heat meter to be installed as part of our heat meter roll out programme.

1.3. Due to variance in system type it is not possible to have a truly consistent service, however the service approach has been designed to be as fair as possible for all residents. Minimising the time where the hot water supply is lacking or constrained and providing heating at the times of day when it is generally coldest and needed most. The service offered from September 2022 at these sites was:

- **Two pipe systems** – 13 hours of heating per day (in two sessions – with an off period during lunchtime), hot water being refreshed only during those heating hours, with stored hot water available in between.
- **Standard systems** – 13 hours of heating per day during the 30-week heating season. Hot water refreshed throughout the day (18 hours), with only stored hot water being available overnight.
- **HIU sites** – Provision of 18 hours of hot water and heating all year around – as it is not possible to provide any hot water when the heating is not also available. These are some of the newest and most efficient communal systems within the council's housing stock.

- 1.4. The proposal is that the option to increase the service offer from the current 13-hours of heating provision, to 13 hours of heating provision, plus a 'background' heating offer during the middle of the day, replacing the period where the heating would have been turned-off under the current heating service standard.
- 1.5. All residents will benefit from the change of service but the additional costs for tenants and leaseholders will impact those on low incomes most, especially those who do not receive any extra support with their heating costs.
- 1.6. The increase in service is designed to benefit residents who are most vulnerable to the cold and are at home during the middle of the day.
- 1.7. The change is seeking to slightly realign the balance between cost and service provision, now that the cost of gas has come down since April 2024.
- 1.8. The communal heating service is delivered to residents on a cost neutral basis, so that the council passes all costs on to residents, to prevent any subsidisation by those residents paying directly for their heating costs.

2. What impact will this change have on different groups of people?

This section of the assessment looks at the broad impacts of the proposed changes on different groups of people such as service users, local communities and businesses.

a. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, businesses, visitors to the borough or others? Please note impact on staff will be assessed separately below.
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

This change will impact on tenants, leaseholders and private renters living in communally heated council homes.

The impact will be a slightly enhanced service for residents, adding a background level of heat during the middle of the day, so that homes experience as large drop in temperatures, especially during cold periods.

Residents continue to have control of the heat in their homes and can turn this down or off when it is not needed. If they do this, they will help to keep the overall cost lower for themselves and others living in communally heated homes.

The increase in costs will be distributed on the basis of property size between all residents. The slightly enhanced service will cost between 1.7% and 4.6% more for leaseholders and will see a modest weekly increase for tenants.

b. What impact will this change have on staff?

Please consider:

- Who will be impacted? For example, which services, teams or buildings? How many staff?
- Broadly what will the impact be? For example, changes to organisational structure, changes to reporting lines, changes to staffing levels, changes to responsibilities, relocation, changes to access to facilities, new ways of working, development opportunities. This should be a broad overview, the specific impact on people with protected characteristics and/or from disadvantaged groups will be assessed later in the form.

NB: EQIAs should be completed as part of the council's [Organisational Change process](#). Please contact your [Strategic HR Business Partner](#) to discuss organisational change.

There are no expected staffing impacts of this change.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

a. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

4320 homes are communally heated and experience the service levels described in this EIA. 70% are tenants and 30% leaseholders.

Household information and diversity data for these groups is not complete. However, from the data that we do have we know that vulnerability levels amongst our population is high. As social housing in the borough is predominantly general needs, many residents who have support needs received floating support service in these general-needs homes, to help them with those needs.

To assess the impact of the proposed policy on our diverse community, we have utilised our latest statistical breakdown of service user demographics for all residents living in council homes. The borough of Islington is home to an approximate population of 200,000 adults and 40,000 children, there are significant numbers residing in council tenanted and leasehold properties: 55,040 and 12,613 individuals.

Among these residents, 7,141 people have presented to Islington with a vulnerability that could influence the type of services they require from Islington.

We have consulted residents about the communal heating service on a number of occasions and have heard from residents who find it more difficult to deal with the cold for a number of reasons including:

Poor physical health and mobility
Households with very young children
Older people who are at home a lot
Residents working at home with sedentary roles

These impacts are most likely to be experienced by those with physical disabilities, older people, young people and those with mental ill health. These groups will all benefit from the proposed changes. They will also benefit from the improved reliability of service promoted through reducing the number of times systems are switched on and off – meaning they are likely to experience fewer service outages

Cold homes have been linked to an increased risk of developing a wide range of health conditions, including asthma and pneumonia ([Public Health England, 2014 \[1\]](#)). There are several factors which increase vulnerability to health problems associated with cold homes. Vulnerable groups include people with heart or lung disease, people with mental health conditions, people with disabilities (particularly those that stop them from moving around to keep themselves warm or makes them more likely to develop chest infections), and older people ([NICE, 2015](#)). These groups may experience health impacts from cold homes at higher temperatures than in non-vulnerable groups – these can occur during 'normal' winter temperatures, not just extremely cold weather ([NICE, 2015](#)). It is these groups who are most vulnerable to cold who are also likely to spend more time indoors at home ([Public Health England, 2014 \[2\]](#)). There is good evidence that older people and those with chronic illnesses are more vulnerable to cold, and less able to regulate their body's temperature to respond to cold weather ([Public Health England, 2014 \[2\]](#)). It is therefore important to acknowledge that certain groups may require higher home temperatures to avoid negative health impacts.

A communal heating service can rarely meet the needs of all residents, unless it is completely open and therefore likely to be high cost and a burden for low-income households. Therefore, those with higher needs for heat are supplied with heaters to help with top ups during very cold weather or periods of higher need. This situation has been reduced by the proposal to slightly increase services, as homes will not call down as much in more extreme weather during the middle of the day.

- b. Assess the impacts on people with protected characteristics and from disadvantaged groups by answering questions for each of the groups

Please first identify whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place

Please use the following definitions as a guide:

- Neutral – The proposal has no impact on people with the identified protected characteristics
- Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics in relation to other people.
- Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics in relation to other people

i. Age (for example, young people under 25, older people over 65)

- a. What is the impact?

Positive

- b. If there are positive or negative impacts, what are they?

Positive effects for older and young people (infants) who are more affected by the cold.

- c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

Positive impacts can be enhanced by those who needed additional heating by the provision of electric heaters by the council, to help them deal with any longer periods or more extreme weather.

ii. Disability (include people with physical disabilities, people with learning disabilities, blind and partially sighted people, Deaf or hard of hearing people, neurodiverse people. This also includes carers.)

a. What is the impact?

Positive

b. If there are positive or negative impacts, what are they?

Positive effects for residents with mobility issues or health issues who are more affected by the cold.

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

Positive impacts can be enhanced by those who needed additional heating by the provision of electric heaters by the council, to help them deal with any prolonged periods or more extreme weather.

iii. Gender reassignment and identity (include people who identify across the trans umbrella, not only those who have undergone gender reassignment surgery. This is inclusive of girls and or/women, men and/or boys, non-binary and genderfluid people and people who are transitioning. Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.)

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

N/A

iv. Marriage and Civil Partnership

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

N/A

v. Pregnancy and Maternity (include people who are pregnant in or returning to the workplace after pregnancy. Could also include working parents.)

a. What is the impact?

Positive

b. If there are positive or negative impacts, what are they?

Positive effects for residents with infants who are less good at regulating their own temperature.

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

Positive impacts can be enhanced by those who needed additional heating by the provision of electric heaters by the council, to help them deal with any longer periods or more extreme weather.

vi. Race or ethnicity (include on the basis of colour, nationality, citizenship, ethnic or national origins) (for example, young people under 25, older people over 65)

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

N/A

vii. Religion or belief (include no faith)

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

N/A

viii. Sex (include trans girls and/or women and trans boys and/or men. Under the Equality Act 2010 a person's legal sex is their sex as recorded on their birth certificate. Someone can change their legal sex by obtaining a Gender Recognition Certificate.)

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

N/A

ix. Sexual Orientation (include people from across the LGBTQ+ umbrella, for example, people who are lesbian, gay, bisexual, pansexual or asexual.)

a. What is the impact?

Neutral

b. If there are positive or negative impacts, what are they?

N/A

- c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

NA

- x. **Other (e.g. people on low incomes, people living in poverty, looked-after children, people with care experience, people who are or have experienced homelessness, people who are prison leavers, people affected by menopause, people affected by menstruation and/or period poverty)**

- a. What is the impact?

Negative

- b. If there are positive or negative impacts, what are they?

Residents will have to pay slightly higher charges which will affect families on low incomes.

- c. How will potential benefits be enhanced or negative impacts be eliminated or reduced?

This is mitigated by the cost having come down from April and the increase for the enhanced service still being a lot less than paid in 2023/24.

The increase in service and cost is modest in recognition of the pressure from the cost of living.

4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

The mitigations have been built into the service design as described above.

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

If you are planning or completing key strategic participation and engagement work or if you need guidance and support, please get in touch with the Participation and Engagement team at engagement@islington.gov.uk.

If you have not completed any engagement activity and do not plan to, you should outline why this decision has been made.

- 1.9. All tenants and leaseholders were written to as part of the consultation process. They were provided with three means of voting, online through Let's Talk Islington, by email or by return of an enclosed freepost form.
- 1.10. A two-month consultation period was offered and throughout the consultation period, ward drop-ins were available and promoted, so that residents could ask council officers questions about the consultation.
- 1.11. An email address was also provided for any queries residents had about the consultation.

- 1.12. Residents used these facilities, but interest in the drop-ins and email address was much less than during previous consultation shortly after the original service change. As well as the numbers attending being reduced, the levels of concern expressed by attendees about service levels were significantly less compared with when the change was first introduced in the winter of 2022.
- 1.13. The number of opinions expressed by residents through the consultation, compared with the number of households eligible to provide a response was 13%.
- 1.14. As set out above, there was not a strong conclusive preference expressed overall by residents.
- 1.15. Two options were considered and presented to residents for consideration as part of a consultation exercise on the proposals. These were to continue with the existing 13-hours of heating, over a 30-week heating season (option 1) or to have the enhanced service offer, offering a 'background' level of heating during the switch off period of the day, also over a 30-week heating season (option 2). For tenants this service costs were set out as an amended weekly cost in the tables below:

Table 1 – weekly charges for tenants for both options:

Option 1 charges

	0 bed	1 bed	2 bed	3 bed	4 bed
Heating and Hot Water	12.87	14.25	16.90	19.88	22.52
Heating Only	7.72	8.55	10.14	11.93	13.51

Option 2 Charges

	0 bed	1 bed	2 bed	3 bed	4 bed
Heating and Hot Water	13.40	14.83	17.60	20.70	23.44
Heating Only	8.04	8.90	10.56	12.42	14.07

Leaseholders costs are bespoke to each boiler house, reflecting the amount of gas used by those boilers and therefore estimated percentage cost decreases, compared with their 2023/24 bill were provided.

Options 1 costs:

Gas prices have reduced and therefore for a similar heating year (i.e. with a similar winter climate), you can expect your costs to be about **31%** less in 2024/25 than the estimates for 2023/24.

For an annual bill of £1500 this would reduce to £1,035

Option 2 costs

For standard systems:

The enhanced service will cost about **1.7%** more than the current service.

For 2 pipe systems:

The enhanced service will cost about **4.6%** more than the current service.

For an annual bill of £1500 in 2023/24 this would reduce to £1,052.60 for a standard system and £1082.60 for a 2-pipe system.

- 1.16. The results of the consultation exercise did not provide a clear mandate from residents for either option. Once the options chosen were weighted to accurately reflect the populations of tenants and leaseholders within communally heated homes, there was on a **4%** difference in the popularity of the options put forward. The return rate was also low at 13% and therefore cannot be considered to be conclusive in respect of resident views. The results are set out below in table 1.
- 1.17. There was a stronger preference among leaseholders for option 1, which was the lower cost option and a slight preference among tenants for the slightly higher costs options 2. This was generally consistent with the feedback we received from leaseholders and tenants face-to-face at drop-in sessions and through correspondence, with leaseholders being more concerned about the costs they had experienced, feeling the current service was adequate and some tenants (usually the more vulnerable to the cold) being concerned about the midday close down and being happy to pay a bit more to a greater service and others feeling that the current service was adequate.

Table 2 – option preferences received from residents.

Results with no weighting

	Option 1	Option 2	Total
Tenant results	140 (44%)	180 (56%)	320
Leaseholders	170 (71%)	70 (29%)	240
Total	310 (55%)	250 (45%)	560

Applying the weighting based on the population size increases the numbers for tenant responses and decreases the numbers leaseholders.

	Option 1 weighted	Option 2 weighted
Tenant	171	220
Leaseholders	119	49
Total	291 (52%)	270 (48%)

- 1.18. We recognise that although the consultation materials included information for leaseholders about the likely costs of the heating service provision, we were not able to be specific about the cost of repairs and maintenance associated with additional 'wear and tear' of systems from more on-off periods within the day. However, these costs are also part of the overall costs experienced by leaseholders.
- 1.19. With the closeness of the overall weighted result outcome and the slight preference for option 2 expressed by tenants, coupled with the relatively low response rate to the survey and combined with the relative closeness of cost of the two service options, it is important that other factors are considered by the council in coming to a decision on the best universal service level for residents.

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

i. Action 1

- a. What is the impact?

We will continue to monitor the service and costs related to this on an ongoing basis, to ensure the most appropriate balance between costs and service provision.

- b. Who is the responsible team or officer?

Communal heating delivery team and the Service Improvement Team will do this jointly.

- c. What is the deadline?

On-going.

7. Quality checking and sign-off

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Strategy Equalities and Communities service. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

You are legally required to monitor and review the proposed changes after implementation to check they work as planned and to screen for unexpected equality impacts. In general, we expect that EQIA documents are revisited and reviewed between every 6 to 12 months. If you have additional information or unexpected impacts are found, you can update your EQIA and send to the Strategy, Equalities and Communities service again for quality checking and guidance.

Please complete the relevant sign-off below once the EQIA is complete:

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

i. Staff Member completing this form:

Name: Hannah Bowman

Signed: Hannah Bowman

Date: 19/7/24

ii. Strategy, Equalities and Communities service:

Name: Monika Milewska

Signed: Monika Milewska

Date: 31/7/24

iii. Director or Head of Service:

Name: Hannah Bowman

Signed: Hannah Bowman

Date: 1/8/24