

EQUALITY IMPACT ASSESSMENT - RESULTS

Title of Policy	The Energy Efficiency Standard for Social Housing (EESH)
Summary of aims and desired outcomes of Policy	The EESH aims to improve the energy efficiency of social housing in Scotland. It has a major part to play in achieving the wider Sustainable Housing Strategy vision for warm, high quality, affordable, low carbon homes.
Directorate: Division: team	Housing, Regeneration and Welfare: Housing Sustainability and Innovative Funding Division: Sustainability Strategy Unit

Executive summary

The EQIA process was initiated early on in the development of the Energy Efficiency Standard for Social Housing (EESH), consequently equality issues were considered as the new policy was developed. An interim Equality Impact Assessment was prepared alongside the EESH consultation document and all interested parties had the opportunity to take part in the consultation process which ran from 25th June to 28th September 2012. The views expressed in the responses were taken into account as the EESH was further developed and steps taken to ensure any concerns were addressed.

We do not believe that any direct or indirect discrimination will arise as a result to the new Standard being implemented.

Background

The Energy Efficiency Standard for Social Housing (ESSH) aims to improve the energy efficiency of social housing in Scotland. It will help to reduce energy consumption, fuel poverty and the emission of greenhouse gases. It will make a significant contribution to reducing carbon emissions by 42% by 2020 and 80% by 2050 in line with the requirements set out in the Climate Change (Scotland) Act 2009.

The wider Sustainable Housing Strategy sets out a vision for warm, high quality, affordable, low carbon homes and energy efficiency has a major part to play in achieving this vision. Energy used in our homes accounts for around a quarter of Scotland's total energy consumption, the reduction of greenhouse gas emissions from the social housing stock will lead the way for change in the wider housing sector.

By taking steps to improve the energy efficiency in the social housing stock across the country, the new Standard will contribute to the Scottish Government's Greener and Healthier Strategic Objectives.

Social landlords are well placed to act as pioneers for the housing sector because of their ability to plan and manage improvement programmes and offer economies of scale. They are in a good position to lead the way and encourage others through examples of good practice. Action is also required in private sector housing, a working group has therefore been set up to develop draft regulations for consultation, setting minimum energy efficiency standards in private sector housing.

Development of the ESSH has been directed by a stakeholder working group throughout, with representatives from local authority and RSL sectors together with COSLA, SFHA, GWSF and the Energy Saving Trust. Social landlords, individual tenants, tenant groups and other stakeholders had the opportunity to

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engage in the consultation '[Developing an Energy Efficiency Standard for Social Housing](#)', 86 responses were received. A [full analysis](#) of the consultation responses has been published on the Scottish Government website together with an analysis of [main findings](#) report. Views expressed in the responses were taken into account as the EESSH was further developed.

The Scope of the EQIA

The interim EQIA recognised that tenants may experience temporary inconvenience as energy efficiency measures are installed and guidance on how to use new technologies most effectively may be required. Some equality groups such as older and disabled tenants may experience more inconvenience and need more guidance than other tenants. Social landlords should be sensitive to these additional needs and ensure all steps are taken to ensure they are met. This is in line with the duty of care requirements placed on social landlords under the Scottish Social Housing Charter.

During the consultation process, concerns were raised around the cost attached to implementing the EESSH and what impact it may have on rent levels, particularly in light of the wider context of the UK Government's welfare changes. In an effort to address these concerns, a full [Business and Regulatory Impact Assessment](#) was undertaken

Whilst it is at the discretion of social landlords to set rent levels, it is not envisaged that the implementation of EESSH will result in increased rents. It is however recognised that the wider context of the UK Government's welfare changes and their possible impact on rents in the social housing sector poses a challenge for social landlords.

Key Findings

Stage 2 of the full Equalities Impact Assessment provides data relating to the individual protected equality groups: age, disability, sex, gender reassignment, sexual orientation, race and religion or belief . Most of this data was sourced from the Scottish House Condition Survey 2011.

Implementation of the EESSH has the potential to affect all those who live in social housing, it will impact on some protected characteristics more than others as outlined below -

Age - It is recognised that the elderly and single householders may suffer slightly more inconvenience when new technologies are being installed. However, these same groups are more likely to suffer from fuel poverty and may benefit most from the potential positive impact the implementation of the EESSH will have on fuel poverty levels.

Disability - Those suffering from health problems or disability may suffer slightly more inconvenience when new technologies are being installed and they may need more specific guidance on how to operate them. Social landlords should be sensitive to these additional needs and ensure all steps are taken to ensure they are met. These same groups are likely to benefit from an improved living environment due to the installation of energy efficiency measures.

Sex - Males and Females are likely to be similarly inconvenienced when new technologies are being installed. As a higher proportion of households are fuel poor where the female is the highest income householder (54% in the social rented sector), women may benefit slightly more than men as EESSH impacts on fuel poverty.

The level of works likely to be undertaken during the installation of energy efficiency measures has the potential to encourage gender equality in the construction environment.

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Gender reassignment - Transgender people are unlikely to be inconvenienced any more or less than others when new technologies are being installed. In common with others they will benefit from more energy efficient homes.

Sexual orientation - Sexual orientation is unlikely to be a factor in relation to the inconvenience experienced by tenants when new technologies are being installed. In common with others they will benefit from more energy efficient homes.

Race - Race is unlikely to be a factor in relation to the inconvenience experienced by tenants when new technologies are being installed. In common with others they will benefit from more energy efficient homes.

Religion of belief - Religion or belief is unlikely to be a factor in relation to the inconvenience experienced by tenants when new technologies are being installed. In common with others they will benefit from more energy efficient homes.

Recommendations and Conclusion

The interim EQIA was considered alongside the consultation document and issues raised during consultation were taken into account as the EESSH was further developed.

The full EQIA shows that it is unlikely any equality groups will be significantly disadvantaged due to the implementation of EESSH. In fact, it concludes that all social tenants, including those with protected characteristics are likely to benefit from the new standard as it aims to improve the energy efficiency of the social housing stock in Scotland. In particular, it has the potential to help those living in fuel poverty as they should be able to heat their homes more cost effectively.

In recognition that tenants may experience temporary inconvenience as works are carried out, the new standard will make reference to landlord's duty to tenants under in the Scottish Social Housing Standard. It states what landlords should achieve for all tenants regardless of age, disability, gender assignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation.

Social landlords are also expected to encourage gender equality as arrangements for works to install energy efficiency measures are planned. All such arrangements are, of course, required to comply with equality legislation.

The Energy Efficiency Standard for Social Housing is an inclusive policy. It will benefit social housing tenants as their homes will be easier and more cost effective to heat. There may be minimal inconvenience as new technologies are installed and it is recognised that vulnerable groups may experience more inconvenience than other tenants. Social landlords should be sensitive to any additional needs and ensure all steps are taken to ensure they are met. The benefits expected from the EESSH should hugely outweigh any temporary inconvenience.

Implementation of the EESSH is likely to benefit tenants in many ways: by reducing bills to the benefit of all but especially the fuel poor, by allowing people to heat their homes more easily and by raising awareness of the need to reduce CO2 emissions, it may give people of all ages the satisfaction that they are contributing to the efforts being made worldwide to address the challenges posed by climate change.

In conclusion, we do not believe that any direct or indirect discrimination will arise as a result to the new Standard being implemented.

Declaration

I am satisfied with the equality impact assessment that has been undertaken for the Energy Efficiency Standard for Social Housing (ESSH). I give my authorisation for this record of the assessment to be published on the Scottish Government's website and the dedicated ESSH website.

Name: C.A. Macleod

Position: Head of HEEPS Unit

Authorisation date: 21/10/2013

This document is available, on request, in audio,
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