

H&F Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	Q2 2024/25
Name and details of policy, strategy, function, project, activity, or programme	<p>Council Housing Retrofit Strategy (new)</p> <p>Short summary: This strategy sets out the council's approach to retrofitting its homes to be energy efficient and meet the council's objectives for net zero carbon and fuel poverty.</p>
Lead Officer	<p>Name: Jim Cunningham</p> <p>Position: Strategic Lead for Net Zero Housing</p> <p>Email: jim.cunningham@lbhf.gov.uk</p> <p>Telephone No: 07468 365829</p>
Date of completion of final EIA	05/06/2025

Section 02	Scoping of Full EIA		
Plan for completion			
Analyse the impact of the policy, strategy, function, project, activity, or programme	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.		
	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
	Age	<p>The result of the strategy will be homes that are more affordable to heat.</p> <p>There is a strong relationship between cold temperatures and illness, including:</p> <ul style="list-style-type: none">• Cardiovascular disease• Respiratory illness• Colds and flu	Positive

		<ul style="list-style-type: none"> • Exacerbating rheumatism and arthritis • Cold homes are linked with worse mental health <p>These illnesses pose a greater threat to older people and very young infants, who are more likely to have weaker immunity and for whom complications are more likely. With each 1C drop in temperature below 5C, GP consultations for respiratory illness in older people increase by 19%, and hospital admissions for Chronic Obstructive Pulmonary Disease (COPD), commonly linked with fuel poverty, are four times more likely to happen over winter.¹ Studies have also found that countries with more energy efficient housing have lower excess winter deaths, and that they are almost three times higher in the coldest quarter of housing than in the warmest quarter.²</p> <p>We hold data on the age of 30,607 of our council housing tenants. From this data, the age breakdown is as follows:</p> <ul style="list-style-type: none"> • 16% are aged 19 or under (5,009 tenants) • 54% are aged 20 to 59 (16,528 tenants) • 29% are aged 60 or over (8,894 tenants) <p>The proportion of people over 60 is considerably higher than that in the general population of H&F (12%).</p> <p>As with other capital works leaseholders may have to pay a proportion of the costs of retrofit where measures unavoidably include these properties, such as works to external elements of blocks. Demographic data are not held for council leaseholders as they are not obliged to share this information. The English Household Survey estimates that 22% of owner-occupier leaseholders in London are aged 65+, higher than in the general population in Hammersmith & Fulham but slightly lower than the proportion of all owner-occupiers nationally aged 65+ (29%).³</p>	
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¹ National Energy Action, Under One Roof: [NEA-Under-One-Roof-FULL-REPORT-FINAL-Feb-19-1.pdf](#)

² The Health Impacts of Cold Homes and Fuel Poverty: [Excess winter deaths and illness and the health risks associated with cold homes \(nice.org.uk\)](#)

³ English Housing Survey, 2021-22: [English Housing Survey 2021 to 2022: leasehold households - GOV.UK \(www.gov.uk\)](#)

	Disability	<p>As with age, impacts on health from cold homes can be exacerbated for people with certain kinds of disability. This includes long-term conditions which compromise immunity, and conditions which impede movement or reduce the ability to control or change one's environment, such as physical, mental or neurological conditions. The retrofit strategy is expected to reduce these impacts.</p> <p>The Housing Ombudsman Spotlight report on attitudes, respect and rights, published in January 2024, reports that more than half of households in social housing will include someone with a disability or long-term illness and 40% of social tenants report issues with mental health, compared to 16% of owner occupiers.</p> <p>According to our data, 4.5% of our residents have a recorded disability, although we expect that this is an underestimate and additional tenants will have disabilities of which we are unaware.</p>	Positive
	Gender reassignment	No anticipated impacts.	Neutral
	Marriage and Civil Partnership	No anticipated impacts.	Neutral
	Pregnancy and maternity	No anticipated impacts.	Neutral
	Race	<p>Fuel poverty disproportionately affects ethnic minority households⁴, particularly those in social housing. Ethnic minority households have also historically faced higher rates of fuel poverty compared to white households. The proportion of council tenants who identify as Black or Black British (36%) is much higher than the general population of H&F (12.3%).</p> <p>The committee on fuel poverty have also identified that Households with an ethnic minority Household Reference Person (HRP) had a higher proportion of</p>	Positive

⁴ [GOV.UK Ethnicity Facts and Figures](#).

		households in fuel poverty at 16.6% compared with 12.4% for households with a white HRP ⁵ . Given these disparities, this strategy is expected to positively impact this group by reducing energy bills and bringing the health benefits of warmer homes.	
	Religion/belief (including non-belief)	No anticipated impacts.	Neutral
	Sex	No anticipated impacts.	Neutral
	Sexual Orientation	No anticipated impacts.	Neutral
	Care Experienced as a Protected Characteristic	No anticipated impacts.	Neutral
<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>			

Section 03	<p>Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.</p>
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⁵ <https://www.gov.uk/government/publications/committee-on-fuel-poverty-annual-report-2024/can-fuel-poverty-be-ended-committee-on-fuel-poverty-annual-report-2024>

Documents and data reviewed	
New research	

Section 04	Consultation
Consultation	
Analysis of consultation outcomes	

Section 05	Analysis of impact and outcomes
Analysis	

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	

Section 07	Action Plan					
Action Plan						
	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan

Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Rehan Khan Position: Head of Asset Management and Compliance Data Email: Rehan.Khan@lbhf.gov.uk Telephone No: 07881820487
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 16 /06 / 25 Key equalities issues have been included: Yes
Equalities Advice (where involved)	Name: Position: Date advice / guidance given: Email: Telephone No: