

## 1. Introduction

<b>1.1 Service:</b>	Corporate Policy
<b>1.2 Name of proposal, policy, strategy or project:</b>	Environmental Sustainability Strategy: Proposed New Actions
<b>1.3 This is:</b>	A change to an existing policy or strategy <i>If other, please specify:</i> Click or tap here to enter text.
<b>1.4 Completing officer's name:</b>	Cath Rose
<b>1.5 Date initially completed:</b>	13/10/2021

## 2. About the proposal

**\*\* Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project \*\***

<b>2.1 What is the main purpose of the proposal?</b> <i>Please explain in one or two short paragraphs</i>
Addition of new actions to the existing Environmental Sustainability Action Plan. These new actions are proposed to ensure that the Council maximises its opportunities to facilitate positive progress towards sustainability and climate change objectives. Actions proposed are set out in the table below

New Action 1a	Work with partner organisations, residents, businesses and communities throughout the borough to encourage and facilitate the retrofit of homes to become more energy efficient
New Action 1b	Work with partner organisation, residents, businesses and communities to encourage and facilitate the retrofit of homes with low carbon technologies
New Action 2	Undertake work to better understand organisational scope 3 emissions and identify reduction initiatives relating to council operations
New Action 3	Continue to develop the Council's waste and recycling service taking into account the new requirements anticipated to be introduced by the Environment Bill and associated secondary legislation
New Action 4	The Sustainability Team will undertake work to engage council staff further, including about green working, commuting, saving energy and reducing waste
New Action 5	Update webpages to include more information and advice relating to climate change adaptation, such as limiting exposure to or impact from flood damage, keeping cool during heatwaves, etc.
New Action 6	Alone and in partnership with other organisations, continue to lobby government to ensure local authorities have the powers and resources to facilitate change

<b>2.2 Why is it being introduced / reviewed / changed now?</b> <i>This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.</i>
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The new actions are being proposed on the basis of work that has been undertaken by the team over the past year which has identified some gaps in the current action plan, and new opportunities for the council to get involved in other workstreams

### **2.3 Who is the intended audience or target group(s) for the proposal?**

Internal audience or group: All staff

External audience or group: Multiple (please specify below)

*If other, please specify. Please also use the section below to provide more details about the audience or target group(s):*

Residents, businesses, partner organisations

### 3. Assessment of potential impact

Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

**In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.**

#### Who could be affected by your proposal?

<b>3.1 Will the proposal affect people - service users, employees or the wider community?</b>	Yes	<i>If yes, please identify which group(s):</i> More than one of the above
<b>3.2 Will the proposal introduce a change which will significantly affect how services or functions are delivered?</b>	No	<i>Please briefly explain your answer:</i> Proposals relate to new or additional activity rather than changes to existing services or functions

#### Data and evidence

In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:

- Relevant information about service users held by your service
- Relevant information about staff (eg, the workforce equality information published on the [website](#), staff surveys etc)
- Relevant information about borough residents (eg the borough equality information published on the [website](#), service user surveys etc)
- Relevant information published by third party organisations (eg data, research studies etc)
- Feedback or information from organisations representing target equality groups

<b>3.3 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal</b>	Borough equality characteristics data, December 2020; Workforce equalities data, December 2020; information about the energy efficiency ratings of properties across the borough	
<b>3.4 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?</b>	No	<i>If yes, please explain what the gaps are and suggest how those gaps could be filled in the future</i> Resident views on sustainability issues – to be collected via residents’ survey in the future

### Potential impact

<b>3.5 Does your proposal relate to a service or function which information indicates is important to those with protected characteristics?</b>	Yes	<i>If yes, please outline the issues – these could include (for example) access to information or ability to use or access a service.</i> Indirectly as it includes supporting domestic retrofit programmes particularly targeted at the hardest to heat homes, which are likely to house some of our most vulnerable residents including those from protected characteristic groups. Similarly, vulnerable residents are likely to be most negatively impacted by the extreme weather events occurring as a result of climate change therefore may benefit most from information and advice from the council in relation to climate change adaptation
<b>3.6 Will the proposal intentionally target any particular protected characteristic group?</b>	Yes	<i>If yes, please identify the group and explain the reason for this and what the intended impact is.</i> In part, as domestic retrofit programmes are likely to be initially targeted at those living in the hardest to head homes, which are likely to house vulnerable residents including those with protected characteristics. The intended impact is to increase energy efficiency which will lead to reduced fuel bills and healthier living conditions (as well as carbon savings)
<b>3.7 Will the proposal intentionally exclude any particular protected characteristic group?</b>	No	<i>If yes, please identify the group and explain the reason for this and any direct or indirect impact on that group.</i> Not applicable

<b>3.8 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?</b>	May be barriers that could inhibit access	<i>Please identify any barriers. These could be physical, digital, social or cultural:</i> Some third party (eg Government) domestic retrofit funding streams may only be accessible to those living in the hardest to heat homes, thereby excluding those living in homes that are already energy efficient.
<b>3.9 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?</b>	Yes, Improve outcomes	<i>Please briefly explain your answer.</i> See 3.6 above

<b>3.10 Considering the above information, please summarise the likely impact on <a href="#">protected characteristic groups</a> (within the organisation, outside the organisation or both) This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information.</b>		
	<b>Nature of impact</b>	<b>Please briefly explain your answer</b>
<b>Age including children, young people or older people</b>	Neutral or positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable older residents in such homes, including by reducing heating bills and improving living conditions: <b>Positive impact</b></p> <p>Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact</b>. Advice will be provided for all residents about action they can take, however at the moment there is limited financial support available for those (regardless of age) who do not live in the hardest to heat homes: <b>Neutral impact</b>.</p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff regardless of age. It is recognised that different staff face different living and working circumstances, and advice will therefore be tailored accordingly: <b>Neutral impact</b></p>

		<p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable (including older residents) Council webpages (html) comply with digital accessibility standards: <b>Positive impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users: <b>No impact</b></p>
<p><b>Disability</b> including physical, sensory or learning disability or long-term health impairment</p>	Neutral or positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable residents in such homes, including those with disabilities, including by reducing heating bills and improving living conditions: <b>Positive impact</b> Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff - it is recognised that different staff may have different health needs, and advice will therefore be tailored accordingly: <b>Neutral impact</b></p> <p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable (including those with disabilities) Council webpages (html) comply with digital accessibility standards: <b>Positive impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users: <b>No impact</b></p>
<p><b>Gender reassignment</b></p>	Neutral or positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable residents including those going through or having undergone gender reassignment: <b>Positive impact</b> Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p>

		<p><b>Action 4:</b> Advice will be provided to staff - it is recognised that different staff may have different health needs, and advice will therefore be tailored accordingly: <b>Neutral impact</b></p> <p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable <b>Positive impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
<b>Marriage and civil partnership</b>	Neutral	<p><b>Action 1a and b:</b> The determining factor for targeting interventions will be the efficiency of residential buildings, therefore no differential impact: <b>Neutral impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff regardless of marital status, therefore no differential impact: <b>Neutral impact</b></p> <p><b>Action 5:</b> Information will be available via the website, no differential impact identified: <b>Neutral impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
<b>Pregnancy and maternity</b>	Neutral	<p><b>Action 1a and b:</b> The determining factor for targeting interventions will be the efficiency of residential buildings, therefore no differential impact: <b>Neutral impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff regardless of pregnancy or maternity status, therefore no differential impact: <b>Neutral impact</b></p> <p><b>Action 5:</b> Information will be available via the website, no differential impact identified: <b>Neutral impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
<b>Race or ethnicity</b>	Neutral or positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable residents in such homes, including those from minority ethnic groups, including by reducing heating bills and</p>

		<p>improving living conditions: <b>Positive impact</b> Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact</b>. At the moment there is limited financial support available for those (regardless of ethnicity) who do not live in the hardest to heat homes: <b>Neutral impact</b>.</p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff - it is recognised that our staff come from different ethnic backgrounds, and where appropriate advice will therefore be tailored accordingly: <b>Neutral impact</b></p> <p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable (including those from minority ethnic backgrounds). The Council offers a translation service for those who are unable to understand English: <b>Neutral/Positive impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users: <b>No impact</b></p>
<b>Religion or belief</b>	Neutral	<p><b>Action 1a and b:</b> The determining factor for targeting interventions will be the efficiency of residential buildings, therefore no differential impact: <b>Neutral impact</b>.</p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff regardless of religion or belief, therefore no differential impact: <b>Neutral impact</b></p> <p><b>Action 5:</b> Information will be available via the website, no differential impact identified: <b>Neutral impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
<b>Sex</b>	Neutral	<p><b>Action 1a and b:</b> The determining factor for targeting interventions will be the efficiency of residential buildings, therefore no differential impact: <b>Neutral impact</b>.</p>

		<p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff regardless of sex, therefore no differential impact: <b>Neutral impact</b></p> <p><b>Action 5:</b> Information will be available via the website, no differential impact identified: <b>Neutral impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
<b>Sexual orientation</b>	Neutral or positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable residents including LGBTQ residents: <b>Positive impact</b> Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff - it is recognised that different staff may have different health needs, and advice will therefore be tailored accordingly: <b>Neutral impact</b></p> <p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable <b>Positive impact</b></p> <p><b>Action 6:</b> Lobby activity will not affect staff or service users. <b>No impact</b></p>
<b>Deprivation</b>	Positive	<p><b>Action 1a and b:</b> Current government funding streams prioritise support for those living in hard to heat homes, which should benefit vulnerable residents: <b>Positive impact</b> Those living in social housing will benefit from joint working between the Council and Raven Housing Trust to retrofit affordable homes: <b>Positive impact.</b></p> <p><b>Action 2:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p>

	<p><b>Action 3:</b> No direct impact, the equalities implications of specific initiatives will be considered at the time these are developed: <b>No impact</b></p> <p><b>Action 4:</b> Advice will be provided to staff - it is recognised that different staff may have different health needs, and advice will therefore be tailored accordingly: <b>Neutral impact</b></p> <p><b>Action 5:</b> The impacts of climate change will be most severely felt by the most vulnerable in society. The provision of advice and information to residents will benefit all residents but particularly the more vulnerable <b>Positive impact</b></p> <p><b>Action 6:</b> Lobbying activity will not affect staff or service users. <b>No impact</b></p>
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<p><b>3.11 Has there been any consultation with relevant interested parties or is any consultation planned?</b>  <i>This could include consultation, further evidence gathering or changing or amended the proposed approach. Give consideration to both consultation within the Council (eg staff) and outside the Council (eg residents).</i></p>
<p>No</p>
<p><i>If yes, please explain the nature of the consultation that has been undertaken or is planned. If no, please explain why consultation is not considered necessary. How were protected characteristic groups consulted or how will they be consulted?</i></p> <p>Consultation may be undertaken for specific schemes or proposals where these impact on service provision or delivery; efforts will also be made to engage with protected characteristic groups when it comes to the provision of advice or information (see below)</p>

<p><b>3.12 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?</b> <i>This could include changing or amending the proposed approach.</i></p>
<p>It will be important to consider how information is communicated to ensure that the positive impacts for people with protected characteristics (who are often the most vulnerable and may therefore benefit most) are maximised. In particular the Council should:</p> <ul style="list-style-type: none"> <li>- ensure that in its work with partners around domestic retrofit, information is provided in accessible formats and appropriately targeted; and</li> <li>- ensure that in relation to climate adaptation information, the needs of different groups, and different means of providing support and accessible information are considered.</li> </ul>

<p><b>3.13 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?</b> <i>This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances</i></p>
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See 3.12

**3.15 Are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?** *For example, physical, cultural or information access issues that cannot be resolved.*

No

*If yes, please summarise which groups could be impacted and how.*

Click or tap here to enter text.

**3.16 Is any remaining negative impact legal or intended?** *The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see [here](#)). However, this should always be a last resort.*

No

*If yes, please explain further.*

Click or tap here to enter text.

**IMPORTANT:**

**Any remaining negative unintended impacts must be drawn to the attention of the decision-maker (for example, the relevant Board or Committee).**

**The following must be considered by decision-makers before any final decision is made:**

- **Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.**
- **Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:**
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.

## 4. Monitoring and review

**4.1 How do you proposed to monitor and review the impact of your proposal?** *Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)*

A residents' survey is being planned which will provide annual insight into different communities understanding of climate change and uptake of domestic measures. This will help enable the Council to understand any differential impacts and target future activity accordingly.