

Blaenau Gwent County Borough Council - Integrated Impact Assessment (ECO4 Flex)

All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment.

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children’s Right “The Right Way”
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal

Lead Officer	Head of Service	Service Area & Department	Date
Mark Congreve	David Thompson	Housing & Environmental Health - Public Protection	22.02.23

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this.
What is the proposal that needs to be assessed?

This is a proposal to seek approval for adoption of an updated “statement of intent”, the signed governance document allowing delivery of the Energy Company Obligation, ECO4 Flex grant scheme in Blaenau Gwent. ECO4 Flex is a scheme by which energy companies invest funding to upgrade boilers and insulation measures in qualifying dwellings (identified by the proposed statement of intent). Blaenau Gwent have been allocated an energy partner (Zing Energy) who specialise in delivery of programmes designed to address fuel poverty in Wales. The Council will receive a fee of £150 from Zing Energy to cover council administrative costs associated with the process and to generate a sustainable income stream for the lifetime of the project. This will not be a council managed scheme and all activity regarding funding viability will be undertaken by Zing Energy who will be working at their own discretion but following national guidance issued by OFGEM.

Section 1
 Outline how the proposal will impact on any people or groups of people with protected characteristics, please refer to the Equalities Act 2010 (Wales) for further information [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and the EHRC guidance [The Essential Guide to the Public Sector Equality Duty: EHRC](#)
 Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Age (<i>people of all ages</i>)	Yes	No	Better targeted support to those individuals in greatest need living in poorly insulated properties (D, E, F & G EPC rated) will contribute to a more positive impact.
Disability (<i>people with disabilities/ long term conditions</i>)	Yes	No	As above.
Gender Reassignment (<i>anybody who's gender identity or gender expression is</i>	Yes	No	As above.

<i>different to the sex they were assigned at birth)</i>			
Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)	Yes	No	As above.
Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)	Yes	No	As above.
Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)	Yes	No	As above.
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	Yes	No	As above.
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	Yes	No	As above.

Sexual Orientation <i>(lesbian, gay, bisexual, heterosexual, other)</i>	Yes	No	As above.
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NOTE: Section 2 only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the [Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance](#).

Section 2 Socio-economic Duty (Strategic Decisions Only) <i>The Welsh Governments Socio-economic Duty provides a framework in order to ensure tackling inequality is at the forefront of decision making.</i>			
.Please consider the below vulnerable groups and consider how the proposal could affect them:			
<ul style="list-style-type: none"> ➢ Single parents and vulnerable families ➢ People with low literacy/numeracy ➢ Pensioners ➢ Looked after children ➢ Homeless people ➢ Carers ➢ Armed Forces Community ➢ Students ➢ Single adult households ➢ People misusing substances ➢ People who have experienced the asylum system ➢ People of all ages leaving a care setting ➢ People living in the most deprived areas in Wales (WIMD) ➢ People involved in the criminal justice system 			
Socio Economic disadvantage definitions.	Will the proposal have a positive, negative or neutral impacts on the below?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered.
Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Positive	No Impact Expected	Residents in receipt of savings on heating & fuel bills will also have greater levels of disposable income they may use to provide a boost to the local economy.

Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)	Positive	No Impact Expected	As Above.
Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)	Positive	No Impact Expected	As Above.
Area Deprivation (<i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i>)	Positive	No Impact Expected	As Above
Socio-economic Background (<i>social class i.e. parents education, employment and income</i>)	Positive	No Impact Expected	Previous iterations of the ECO Schemes have supported people in the community to live fulfilled lives, providing greater levels of disposable

			income. In turn, safeguarding the environment is key to ensuring communities and future generations can thrive.
Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i>	Neutral	No Impact Expected	

Section 3-Corporate Plan


Please outline any Corporate Plan linkages of the proposal -[BG Corporate Plan 22-27](#)





Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent	
Priority 2 - Respond to the nature and climate crisis and enable connected communities	Carbon emissions will be reduced from domestic properties by upgrading homes with more efficient heating systems. Home energy efficiency will be improved via increased insulation & better use of technology such as heating controls. Services previously unavailable will be provided to communities, enabling residents to do more for themselves i.e., upgrading of heating systems.

Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent	
Priority 3 - An ambitious and innovative council delivering quality services at the right time and in the right place	
Priority 4 - Empowering and supporting communities to be safe, independent and resilient	

Section 4-Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

Sustainable development principles. The WBFG Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)

Five Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Tern</p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>The scheme facilitates replacement of inefficient heating appliances and installation of energy efficiency measures such as insulation, reducing carbon emissions from domestic property. This in turn makes buildings more energy efficient and reduces likelihood of residents suffering from fuel poverty and securing their well-being.</p>

<p>Prevention</p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p>Report to agree to work in partnership with the Cardiff Capital Region CCR) and EDF through an agreed Memorandum of Understanding and to adopt and implement CCR’s joint “Statement of Intent” that will allow the Council to participate in the ECO4 Flex Scheme, thereby allowing vulnerable Blaenau Gwent residents experiencing fuel poverty access to funding under the Energy Company Obligation (ECO) Scheme should create conditions for this to happen.</p>
<p>Integration</p> 	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p>The impact of ECO4 Flex being unavailable in Blaenau Gwent will place additional pressure on statutory services (i.e., Environmental Health, Housing) provided by the Council.</p>
<p>Collaboration</p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p>The report sets out the different partners engaged in this work (BG’s Customer Experience & Transformation Dept, EDF, CCR and Zing Energy).</p>
<p>Involvement</p> 	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p>The council will not be actively involved in delivery of the scheme and will only take a minor administrative role. Impact on communities will be positive regarding reducing carbon emissions from domestic housing and reducing likelihood of residents suffering from fuel poverty. It will also positively impact the local economy providing Zing Energy make use of local contractors to undertake installation</p>

	<p>measures. Impact on communities could be negative regarding existing established business should ECO funding providers take away local trade. Mitigation: Specifying Zing Energy use local contractors will contribute to a more positive impact on the local economy.</p>
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How does your proposal link to the Welsh Governments Priorities for Wales? Please indicate below.

1. **A PROSPEROUS WALES** ... an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

The ECO Flex scheme will provide energy benefits to domestic property, whilst safeguard local jobs and growing regional income.

2. **A RESILIENT WALES ...** a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.

Adoption of ECO4 Flex will improve efficiency of dwellings and help reduce climate change by lowering carbon emissions from domestic property.

3. **A HEALTHIER WALES ...** a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

Blaenau Gwent residents at risk of fuel poverty may benefit from heating & insulation upgrades, delivering affordable warmth, improving health & wellbeing for young, elderly & disabled residents alike.

4. **A MORE EQUAL WALES ...** A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

The environment and climate crisis is a leveller – we are all responsible – we can all make a difference.

5. A WALES OF COHESIVE COMMUNITIES ... attractive, viable, safe and well-connected communities.

ECO4 Flex will support people in the community to live fulfilled lives, providing greater levels of disposable income. In turn, safeguarding the environment is key to ensuring communities and future generations can thrive.

6. A WALES OF VIBRANT CULTURE AND THRIVING ... a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

Our involvement in the Cardiff City Region Deal alongside 9 other LA's is uniquely Welsh – but pitches towards being world leading in areas of competitive strength. This enables a strong reflection on our rich culture and heritage which is drawn from our natural environment and resources.

7. A GLOBALLY RESPONSIBLE WALES ... a nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

The report is a demonstration of a Local Authority and CCR-wide responsibility to Wales.

Section 5-Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact that any proposal may have on opportunities to use the Welsh language. [Welsh Language Standards](#))



Requirement	Does the proposal have any positive, negative or neutral	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
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	impacts in regards to the below?		
<p>Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i></p>	Positive	The Statement of Intent and All promotional material will be provided in Welsh and English and any requests for information will be available in Welsh and English.	The Census data indicates a growing proportion of Welsh language users in Blaenau Gwent. The ability of residents to use and engage through the medium of Welsh will form a key part of the ECO4 Flex implementation.
<p>What opportunities are there to promote the Welsh Language? <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	Positive	There will be a range of opportunities to promote the Welsh language, through promotional material.	The Census data indicates a growing proportion of Welsh language users in Blaenau Gwent. The ability of residents to use and engage through the medium of Welsh will form a key part of the ECO4 Flex implementation.
<p>What opportunities are there for a person or person to use the Welsh Language? <i>e.g. staff, residents and visitors</i></p>	Positive	All persons will be able to use the Welsh language through engagement with the Council	The Census data indicates a growing proportion of Welsh language users in Blaenau Gwent. The ability of residents to use and engage through

		and Energy Supplier (Zing Energy).	the medium of Welsh will form a key part of the ECO4 Flex implementation.
Has the Welsh Language been considered in order to treat the Welsh language no less favourably than the English language?	Positive	All persons will be able to use the Welsh language through engagement with the Council and Energy Supplier (Zing Energy).	The Census data indicates a growing proportion of Welsh language users in Blaenau Gwent. The ability of residents to use and engage through the medium of Welsh will form a key part of the ECO4 Flex implementation.

Section 6 – Children’s Rights Approach - [The Right Way](#)

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
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Participation (child or young person as someone who actively contributes to society as a citizen)			
Provision (the basic rights of children and young people to survive and develop)			
Protection (children and young people are protected against exploitation, abuse or discrimination)			

Section 7– Community Safety

Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Crime (consider impact on each: victims, offenders and neighbourhoods)			
Anti-Social Behaviour and behaviour adversely affecting the local environment (consider impact on each: victims, offenders, neighbourhoods and green spaces)			
Misuse of drugs, alcohol and other substances (Think vulnerable children, adults, families and communities)			
Re-offending (Think young people and adults, victims, families, communities)			

Serious Violence (Think vulnerable young people, vulnerable adults, victims, families, communities)			
Counter Terrorism (People and places that are vulnerable to terrorism or violent extremism)			
Community Cohesion (Asylum seekers, Migrants, Victims or Hate Crime, Community tensions)			

Section 8- Armed Forces Covenant Duty [AFC Draft Statutory Guidance - Final.pdf](#)

<p>Section 8- Armed Forces Covenant Duty AFC Draft Statutory Guidance - Final.pdf</p>			
Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.

<p>Health</p> <ul style="list-style-type: none"> • Provision of services • Planning and funding • Co-operation between bodies and professionals <p>These healthcare functions are within scope of the Duty in the following settings:</p> <ul style="list-style-type: none"> • NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services. • NHS Secondary Care services, including urgent and emergency care, hospital and community services, specialist care, mental health services, and additional needs services (as applicable). 			

<ul style="list-style-type: none"> • Local authority-delivered healthcare services, including sexual health services and drug and alcohol misuse services 			
<p>Education</p> <ul style="list-style-type: none"> • Admissions • Educational attainment and curriculum • Child wellbeing • Transport • Attendance • Additional needs support • Use of Service Pupil Premium funding (England only) <p>These education functions are within scope of the Duty in compulsory education settings, that is, primary, secondary, and, for England only, compulsory further education. The Duty does not cover nursery (early years education), higher education, or other voluntary adult education settings</p>			

<p>Housing</p> <ul style="list-style-type: none"> • Allocations policy for social housing • Tenancy strategies (England only) • Homelessness • Disabled Facilities Grants 			
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<p>Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.</p>		
<p>Data/evidence –What data/evidence was used? - provide any links.</p>	<p>What were the key findings?</p>	<p>How has the data/evidence informed this proposal?</p>
<p>This is not a scheme / project developed by the local authority (Please click the link below for further info).</p> <p>Obligated suppliers are required to deliver measures under ECO4 and, where a supplier fails to meet the requirements of the ECO4 Order, Ofgem may take enforcement action. The Energy Company Obligation Order 20222 , or the “ECO4” scheme, covers the period from 1 April 2022 until 31 March 2026.</p> <p>ECO4 Flex is a household referral mechanism within the wider ECO4 Scheme which enables Councils to widen the eligibility</p>	<p>Currently there are 476,000 properties which register EPC D or below across Cardiff Capital Region (CCR):</p> <ul style="list-style-type: none"> • CCR target to reduce the number of properties rated an EPC D or below to less than 7000 by 2035. • Target to retrofit 42,000 hard to treat homes with internal or external insulation by 2035. 	<p>Welsh Government predicts 45% of Welsh households could be living in fuel poverty this winter (despite the energy efficiency price cap and other support measures being in place).</p> <p>The Energy Company Obligation focuses on supporting low-income and vulnerable and fuel poor households through installation of insulation and heating measures. This policy aims to reduce fuel poverty and energy bills in the long-term and reduce carbon emissions.</p>

<p>criteria for ECO, allowing them to tailor energy efficiency schemes to their respective sector.</p> <p>Web-Link - Ofgem (ECO4)</p>	<p>112,000 homes currently heated by fossil fuels:</p> <ul style="list-style-type: none"> • Target to install 33,000 low carbon heat pumps into existing properties by 2035. • Prioritise replacement of oil, LPG, and solid fuel heating systems. 	<p>Under ECO4 Flex, a participating LA can refer private tenure households that it considers to be living in fuel poverty or on a low income and vulnerable to the effects of living in a cold home.</p>
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Are there any data or information gaps and if so what are they and how do you intend to address them?

Not currently known – this will be identified as the scheme progresses.

Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.

Please consider the following questions; -

- 1. Who did you consult?**
- 2. When did the consultation take place and was adequate time given for a response?**
- 3. Was there enough information provided to respond effectively?**
- 4. What were the findings?**
- 5. Have the findings been considered in regards to the decision?**

Please see Section 9.



Dyngor Bwrdeistref Sirol

Blaenau Gwent

County Borough Council

Section 11-Monitoring and Review	
How will the implementation of the proposal be monitored, including the impacts or changes made?	Feedback from frontline staff involved in operation of the grant, councillor feedback and reviewing of any scheme complaints over time.
What monitoring tools will be used?	<ul style="list-style-type: none"> ➤ Customer Satisfaction data. ➤ Scheme data, to include: <ul style="list-style-type: none"> • Level of demand • Identification of vulnerability of the household • Identification of the type of property and measure(s) installed • The cost of the measure(s) installed. • The likely savings/per year of fuel energy. • The likely CO2/yr kg saving
How will the results be used for future development?	<p>To initiate changes to the current process of delivery.</p> <p>To inform the adoption and implementation of any future iterations of ECO Funding.</p>
How and when will it be reviewed?	The scheme will be monitored by Public Protection Managers and by way of relevant reports, including a review of the IIA to the Corporate Director of Regeneration & Community Services, CLT, Scrutiny and Executive Committee, as necessary.

Who is responsible for ensuring this happens?	Mark Congreve, Team Manager – Housing Solutions
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Section 12 - Decision

Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.

Continue with the proposal in its current form	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Name of person completing the IIA	
Name:	Mark Congreve
Job Title:	Team Manager – Housing Solutions
Date:	22 nd February 2023

Head of Service Approval	
Name:	David Thompson

Job Title:	Service Manager – Public Protection		
Signature:	D Thompson	Date:	22nd February 2023

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via lissa.friel@blaenau-gwent.gov.uk or emma.scherptong@blaenau-gwent.gov.uk.