



# Equality Impact Assessment

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## Guidance Notes

### What is an Equality Impact Assessment (EqIA)?

An Equality Impact Assessment (EqIA) is a tool that helps Sefton Council make sure our policies, strategies, procedures and practices do what they are intended to do and are inclusive for staff, service users and cabinet members. For the purpose of this guidance, any reference to 'policy', covers the full range of functions, activities and decisions for which Sefton Council is responsible – essentially everything we do. It includes both current policies and those under development.

Carrying out an EqIA helps support inclusive and good decision making. It involves systematically assessing the likely (or actual) effects of our activities on people relating to the nine protected characteristics defined in the Equality Act 2010 and Sefton have chosen to add care leavers as an additional protected characteristic. The protected characteristics are:

- Age
- Disability (including physical and mental wellbeing, Neurodivergence and D/deaf Identity)
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or belief
- Sex (including caring responsibilities)
- Sexual Orientation
- Care Leavers

The EqIA process should also consider challenges faced by:

- Socio-Economic background

Within the EqIA, it is key that you think about intersectionality when gathering and analysing data and assessing impact; the way in which inequality can combine when people have multiple protected characteristics.

The EqIA process looks for ways to support fairness and equality that might have been overlooked or could be improved, as well as identifying negative or adverse impacts that can be removed or mitigated, where possible. If any

negative or adverse impacts amount to unlawful discrimination they must be removed.

EqlAs help Sefton Council to fulfil its commitments under the Public Sector Equality Duty and helps us to fulfil our ambitions within our corporate and transformational plans.

The following guidance explains how to carry out an EqlA and should be read alongside the EqlA form.

### When should an EqlA be Carried Out?

An EqlA should be carried out whenever you are developing (and regularly reviewing) any major activity, for example, a new policy, process, strategy, programme, or campaign.

The point at which you carry it out will vary according to the work you are doing. If you are reviewing an existing policy, there might already be an EqlA in place which you can update.

You should carry out the EqlA after any preparation work has been done and an initial draft of the policy has been developed. If you are carrying out a pilot of a policy, you should wait until it has finished, as the outcome will provide evidence which will help you to assess the impact. The EqlA can also be done as part of a consultation process. In all cases, it should be done early enough to allow amendments to be made to the policy if the EqlA finds any negative impacts.

### Who should Carry Out an EqlA?

An EqlA should be carried out by the person/people who developed the policy and other team members and service users, as appropriate.

Representatives from staff networks, trades unions and any stakeholders who will be involved in implementing the policy can also be included in the working group carrying out the EqlA. This could also include representatives from HR or other Council departments and cabinet members depending on who is affected by the policy.

## Involvement and Consultation

Consultation is an important part of the EqlA process. People with minoritised (including protected) characteristics most likely to be affected must always be involved. The scale of the consultation will vary: the higher

the potential for negative impact the more comprehensive the consultation will need to be.

Where there is a potentially negative impact, the consultation should include any proposals or suggestions for reducing this impact.

Consultation with these groups can include inviting representatives to join the working group carrying out the EqlA, involving them in the whole process. If they are not a part of the group, other methods of consultation include:

- Focus groups
- Questionnaires
- Targeted emails
- Posters & leaflets
- Viva Exchange
- Intranet

## Gathering Data and Evidence

The EqlA process is evidence based, so you will need to utilise quantitative and qualitative data. It is important to gather data in a way which is appropriate and proportionate. You will need to consider what data is needed to provide evidence of potential positive or negative/adverse impacts in relation to the different underrepresented characteristics listed in above.

- You should begin by identifying what data is already available. Sefton holds a lot of data centrally, and staff data broken down by protected characteristics are held by HR. This includes information on staff recruitment, staff in post, and turnover.
- Use national, local and sector data for benchmarking. For example, national and regional census data can be found on the Office for National Statistics website or [here](#). Click on the link to access the [Cost of Living Index Dashboard](#).
- You might be able to use research which has been carried out by the government, third sector organisations or charities working in the same area as the new policy.

## Assessing the Impact

Once the data and evidence have been gathered, including filling any gaps identified, the next step is to use this information to assess whether the

policy has, or is likely to have, a different impact on people with any minoritised characteristics.

You should also think about intersectionality; the way in which inequality can compound when people have multiple protected characteristics (e.g., a young woman, a black gay man). If the policy will have no impact on a characteristic, please note this.

One of five possible outcomes should be identified and recorded for each protected characteristic.

1. Positive impact - The evidence demonstrates that the policy is robust; there is no potential for discrimination or any negative impact. All opportunities to promote equality have been taken. Examples of positive impacts could include:
  - A policy to make Sefton internal and external communications available in different formats will have a positive impact on the characteristic of Disability.
  - A policy to introduce quiet rooms in Council buildings will have a positive impact on the characteristics of Religion and Belief as well as Disability, providing a safe space for contemplation, thought, prayer and de-stimulation.
2. Negative impact - The evidence identifies potential problems or missed opportunities. This might mean that the policy could potentially be discriminatory or adversely impact minoritised groups. Where necessary, changes to the policy should be designed to minimise negative effects and improve positive impacts. An example of a negative impact may include:
  - If Sefton Council's placement policies do not adequately consider and address accessibility needs, this could have a disproportionately negative impact on individuals with the protected characteristic of Disability, potentially leading to inequality of access to services and support
3. Some positive and some negative impacts - The evidence finds some examples of positive impacts, but also potential negative impacts which could affect some characteristics. For example:
  - Online applications can speed up processing and improve independence for tech-literate users (positive impact on younger age groups) but may disadvantage older adults, people with learning disabilities and/ or neurodivergent individuals who may

struggle with digital systems, online interaction and content (negative impact on Age, Disability and Neurodivergence).

4. Neutral impact - The evidence shows that the policy will have an impact on protected characteristics, but it does not advantage or disadvantage them in any way. For example:
  - A proposal to renovate a communal building will have an impact on all protected characteristics, as the building will be open to everybody. However, the impact on the protected characteristic of Sexual Orientation will not be an advantage or a disadvantage, so the impact is Neutral.
5. No impact - The evidence shows that the policy will not have any impact on a protected characteristic. For example:
  - A policy to translate University documents into a range of languages is likely to have no impact on the protected characteristic of Marriage and Civil Partnership.

## Action Planning

If the EqIA shows that there is actual or potential unlawful discrimination, you must pause the policy while you make changes and remove it altogether if there is no way to eliminate the discrimination.

If any negative impacts or potentially negative impacts are found, you will need to:

- Identify changes to the policy which will reduce or eliminate the negative impact(s) found.
- Consider what evidence would be needed to show that the changes have or will work and building these into the revised policy.
- Consult affected groups where possible—especially those with relevant protected characteristics.

You should then create an action plan to implement the changes:

- Document and record the changes and actions identified.
- Assign responsibility for the completion of each action to a key officer/team.
- Set deadlines to ensure actions are completed in a timely way.
- Establish monitoring to review progress regularly and ensure accountability.

## Justifying the Policy

Potential negative impact can be addressed by adapting the initiative as necessary, or finding another way to meet your objectives. Make sure that your course of action to alleviate a negative impact on a particular equality group does not result in an adverse impact on another group.

Some policies are targeted at particular groups and these will, by definition, affect different groups in different ways. This can be justified as part of a wider strategy of positive action in relation to particular groups.

Positive Action means addressing barriers which adversely impact people from minoritised (under-represented) groups. e.g. shortlisting all disabled applicants who meet the job criteria; leadership development programmes for ethnically minoritised people who are under-represented at senior level; advertising job vacancies on diversity-specific job boards. Positive action is lawful in the UK as it seeks to 'level the playing field' and achieve equity.

Positive Discrimination, on the other hand, is unlawful as it means selecting or making an employment decision based solely on a protected characteristic e.g. shortlisting someone who doesn't meet the job criteria purely because you need more women in senior roles; hiring an ethnically minoritised person exclusively to fill a quota.

If the policy can't be changed, you must explain why the negative impact is justifiable (acceptable)

This explanation needs to show two things:

1. The policy is important for reasons that have nothing to do with discrimination, and
2. There was no other way to meet the policy's aims without causing a negative impact for one or more protected/minoritised characteristic.

Possible justifications could include:

- If the policy can be demonstrated to be a proportionate means of achieving a legitimate aim i.e. a fair and reasonable way to achieve an important aim. This may include:
  - If the policy is or contributes to a legal obligation.
  - Where positive action is being taken.
  - Reasons of health and safety.

It is vital to demonstrate that all alternatives have been explored before deciding that the negative impact is justified, and that this is documented. If you are considering this approach, please contact the EDI Team.

## Approval and Publishing

Before an EqlA is published, it should be signed off by the lead officer responsible for the EqlA and a member of the EDI team. A record should be kept of the date it was carried out, along with the date when the policy and the EqlA will be reviewed. This is normally every two years, but it could be sooner if there is a change in the law or policy before the review date.

When it is completed, the EqlA form should be sent to the EDI Team for record keeping at [Equality@sefton.gov.uk](mailto:Equality@sefton.gov.uk).

## General Public Sector Equality Duty (PSED)

| PSED                                                    | Simple definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Eliminate discrimination, harassment, and victimisation | <p>Where one or more groups who share a protected characteristic are treated less favourably than another group, or experience an impact on their dignity, as a result of the application of a council policy or function.</p> <p>Typically, evidence comes from 'complaints', 'grievances', 'anecdotal evidence', statistical analysis.</p> <p>How do we ensure people are treated fairly and respectfully? Here are some simple examples:</p> <ul style="list-style-type: none"> <li>- Ensure staff are trained on EDI key topics and have an awareness of how to meet the needs of minoritised/underrepresented groups.</li> <li>- Make anticipatory reasonable adjustments for disabled people.</li> <li>- Provide language services for people who do not have English as their first language.</li> </ul> |
| Advance equality of opportunity                         | <p>Equality of opportunity means that people who share different protected characteristics have equal access to information, opportunities, services, and employment.</p> <p>Here are 3 simple ways to consider equality of opportunity:</p> <ul style="list-style-type: none"> <li>- Equality of access – can I get in?</li> <li>- Equality of quality – once in, what will my experience be? Will I be respected as an individual?</li> <li>- Equality of outcome – will decisions about me be based on objective evidence or influenced by prejudicial bias towards my protected characteristics?</li> </ul>                                                                                                                                                                                                 |

|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <p>Fostering good relations between different people</p> | <p>Good relations exist in a community where people from underrepresented and minoritised backgrounds have a sense of belonging, are valued, appreciated, and have similar life opportunities.</p> <p>How do we ensure we foster good relations?</p> <p>Identify opportunities:</p> <ul style="list-style-type: none"> <li>- to bring people from different backgrounds and communities together</li> <li>- to develop strong and positive relationships</li> <li>- to increase inclusivity and mutual understanding</li> </ul> |
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## EqlA Tool

Before carrying out an Equality Impact Assessment (EqlA), you should familiarise yourself with the guidance notes to help you fill in this form. Please contact the EDI Team for further assistance if required.

An EqlA should be carried out whenever you are starting (and regularly reviewing) any major activity, for example, a new policy, process, strategy, programme, or campaign.

For the purpose of the EqlA form, any reference to 'policy' refers to the full range of functions, strategies, activities and decisions for which Sefton Council is responsible.

| Version Number | Author       | Purpose/Change         | Date     |
|----------------|--------------|------------------------|----------|
| 1              | Julia Thorpe | Warm Homes Local Grant | 16.09.25 |
|                |              |                        |          |
|                |              |                        |          |

### Section 1: Person completing the EqlA

Name: Julia Thorpe

Job title: Project Officer - Retrofit

Department / Service area: Property Services

Involvement in the policy: Working on delivery of Warm Homes Local Grant

Other team members involved (If required)

Name(s): Christina Chislett

Job title(s): Retrofit Project Manager

Department / Service area: Property Services

## Section 2: About the Policy

Title of the policy: **Warm Homes Local Grant**

The proposal is a (delete as appropriate):

- Project

The proposal is (delete as appropriate):

- New

The aim and purpose of the policy, (please use no more than 100 words):

This Equality Impact Assessment is to evaluate the impact of Sefton Council's delivery of Warm Homes Local Grant provided by Government (Department of Energy Security and Net Zero) to fund Retrofit improvements to eligible privately owned and privately rented homes across the Borough.

The grant funding will pay for energy efficiency improvements such as insulation, solar PV and low carbon heating.

The £5.5m enables us to deliver works to approximately 389 properties in the Borough over the next 3 years (1/04/2025 – 31/03/2028).

The Government have detailed guidance and set the eligibility criteria which governs the grant. The Council cannot change this high-level policy. However, the Council does have autonomy in some areas which could have an equality impact if not suitably considered. E.g. communication, application process, prioritisation policy.

Key stakeholders involved in the development of the policy:

The high-level policy of Warm Homes Local Grant has been developed by DESNZ, not Sefton Council. The Council's role in delivery mean that we can shape allocations (due to over demand) and impact the customer journey. Therefore, consultation and sign off from Cabinet Member was sought to ensure fair delivery in line with PSED principles.

Who will be affected by the policy:

The Warm Homes Local Grant policy has been designed specifically to target low-income residents living in the most energy inefficient homes – thus at most risk of fuel poverty. Fuel poverty is a consequence of underlying socio-economic factors, such as having a low income, renting in the private sector, and living in a poorly quality home, which are often components of a broader socio-economic background.

### Section 3: Involvement and Consultation

What involvement and consultation activity has been undertaken or is planned on this policy? Who have you consulted with?

Consultation in detail is not required as we are delivering a national grant scheme at a local level. The rules and criteria are set by the Department of Energy Security and Net Zero (DESNZ) and are not subject to change.

However, the groups identified in this impact assessment will be engaged with through open events (e.g. Keep Warm Keep Well) and direct contact to promote the scheme to eligible residents. No prior engagement has yet occurred for this scheme; however similar schemes such as Sustainable Warmth Fund and Home Upgrade Grant have been successfully conducted in the past through a strong communication campaign and community involvement.

The Equality, Diversity and Inclusion Officer at Sefton Council has been consulted on this EIA. As well as experienced Retrofit Team staff who have experience of delivering similar schemes with fuel poor communities.

### Section 4: Gathering data and evidence

What data and evidence did you use to assess the impact of the policy? Please state how you collected it and how you used it. If you used information collected outside the Sefton Council, please state the source of the information.

[Annual Fuel Poverty Statistics report 2025](#)

[Sustainable warmth: protecting vulnerable households in England](#)

[How life has changed in Sefton: Census 2021](#)

[Census Information 2021](#)

[Youth unemployment statistics - House of Commons Library](#)

[Toolkit for supporting care leavers into work | Local Government Association](#)

[Cost of Living Index Dashboard](#)

[Sefton Housing Strategy 2022 to 2027](#)

[Sefton Housing Strategy 2022-2027 – Action Plan \(Spring 2024\)](#)

[Sefton Council's Equality, Diversity and Inclusion Strategy 2023 - 2027](#)

## Section 5: Assessing the Impact

Please specify all the impacts you have identified for each of the following characteristics, whether positive, negative or neutral. **You should also think about intersectionality**; the way in which inequality can compound when people have multiple protected characteristics (e.g., a young woman, a black gay man). If the policy will have no impact on a characteristic, please note this.

| Protected group | Positive impacts                                                                                                                                                                                                                                                                                                                                        | Potential negative impacts and barriers                                                                                                                                                                                                                      | Mitigations and adaptations                                                                                                                                                                                                                                                                                                                        | Indicators and monitoring                                                                                                                                                                                                                                                                                                  |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age             | <p>Certain groups of children are at higher risk of living in poverty, including disabled children and those from single parent families. Therefore, they could be at higher risk of exposure to fuel poverty. The WHLG funding aims to support such households.</p> <p>Younger people are more likely to be unemployed than adults aged between 25</p> | <p>A potential barrier to accessing the WHLG linking to age is that elderly residents may find it a struggle to understand the complexity of the scheme, its application process and delivery of works. In addition, many cannot access online services.</p> | <p>Application process designed by the Council from the outset with elderly service users in mind. Applications can be made over the phone with a Retrofit Officer, or in person.</p> <p>The installer has a dedicated Resident Liaison Officer for this project, they will be able to visit vulnerable residents in their homes to guide them</p> | <p>LCRCA who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log</p> |

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|            | <p>and 64 and are more likely to face higher housing costs, relative to income. Therefore, they could be at higher risk of exposure to fuel poverty. The WHLG funding aims to support such households.</p> <p>Low income elderly people are at a high risk of fuel poverty and poor health outcomes as a result. Sefton has a high elderly population. The WHLG funding aims to support such households.</p> |                                                                           | <p>through the process.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> | <p>along with customer complaints or concerns.</p> <p>Sefton's Retrofit Team experienced in dealing with all age groups.</p> |
| Disability | Those with a disability/health condition which are exacerbated by living in a                                                                                                                                                                                                                                                                                                                                | Construction within the home – my cause temporary noise, dust and limited | The installer has a dedicated Resident Liaison Officer for this project                                                                                                                                                                                                                                                                                                                      | LCRCA who are the lead grant recipient, will advise on E+D questionnaire                                                     |

|  |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                 |
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|  | <p>cold home (e.g. COPD) will be positively impacted by the scheme. A number of means tested benefits pre-qualify residents for eligibility.</p> <p>Non-means tested disability income is not classed towards household income when assessing eligibility based on income. Therefore, receiving a disability benefit wont disadvantage applications.</p> | <p>access to parts of the house especially for disabled people with limited mobility</p> <p>Stress or disruption that could exacerbate physical or mental health issues</p> <p>Disruption to accessibility to home for disabled people</p> | <p>who will be able to visit vulnerable residents in their home to provide guidance and help throughout each stage of the project, if required.</p> <p>Retrofit Information, Support and Expertise (RISE) have been appointed by DESNZ to support delivery of the scheme. Retrofit staff members of the have attended the training and information sessions run by RISE, which provide education on the issues residents may face as part of the project and ways to help mitigate this.</p> | <p>es to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> <p>Sefton's Retrofit Team experienced in dealing with this protected group.</p> |
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|  |  |  | <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> <p>Services in BSL are available from these specialist organisations: Deafability Productions c/o Merseyside</p> |  |
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|                     |                                                                                                                                                                                                   |                                                                                                                                      | <p>Society for Deaf People (MSDP), and Action on Hearing Loss.</p> <p>Documents in Braille can be provided by RNIB for Braille users.</p>                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                    |
| Gender reassignment | <p>There is not a specific impact on this group.</p> <p>Funding is allocated based on property type and income. Gender information is not specifically sought/collected at application stage.</p> | <p>The only adverse impact identified could be staff/Installer behaviour when entering the home or in prioritisation of funding.</p> | <p>Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints</p> | <p>LCRCA who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed.</p> |

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|                                |                                                                                      |  | <p>Procedures in place.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> | Tracked via a Query Log along with customer complaints or concerns.      |
| Marriage and civil partnership | No specific impact, although single person households are more likely to be eligible |  | Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized                                                                                                                                                                                                                                                                                              | LCRCA who are the lead grant recipient, will advise on E+D questionnaire |

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|  | <p>for the scheme, as a sole income more likely to be under the qualifying income threshold.</p> |  | <p>following agreed (by Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda</p> | <p>es to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> |
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|                         |                                                                                                                                                                                                                                                                          |  | Group) have received Equality, Diversity and Inclusion (ED&I) training and take responsibility for ED&I outcomes set out in the ED&I policy.                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                            |
| Pregnancy and maternity | <p>No specific impact</p> <p>Funding is allocated based on property type and income.</p> <p>Pregnancy is a qualifying criteria for the funding, if coupled with a low income or health based vulnerability (The rules followed are the same as for Route 2 Eco Flex)</p> |  | <p>Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> | <p>LCRCA who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log</p> |

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|                    |                                                                                                   |                                                                                                                 | <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> | along with customer complaints or concerns.                                                   |
| Race and Ethnicity | <p>No specific impact</p> <p>Funding is allocated based on property type and income; race and</p> | A barrier for those residents whose first language is not English. They may struggle to understand communicatio | Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by                                                                                                                                                                                                                                             | LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to residents |

|  |                                                                                         |                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                           |
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|  | <p>ethnicity information is not specifically sought/collected at application stage.</p> | <p>ns, applications and the process.</p> | <p>Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> <p>Sefton Council have access to translation services, and this will be utilised when required. DA Languages are Sefton's preferred supplier for language interpretation and translation services.</p> <p>All of Sefton's Retrofit Team undertake corporate</p> | <p>(including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> |
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|                    |                                                                                                                                             |  | <p>mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> |                                                                                                                                                              |
| Religion or belief | <p>No specific impact</p> <p>Funding is allocated based on property type and income; religion or belief information is not specifically</p> |  | <p>Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by Cabinet Member) Allocation Policy. Therefore,</p>                                                                                                                                      | <p>LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to</p> |

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|  | <p>sought/collected at application stage.</p> |  | <p>there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take</p> | <p>test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> |
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|     |                                                                                                                                                                     |                                                                                                                                                                                   | responsibility for ED&I outcomes set out in the ED&I policy.                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                         |
| Sex | <p>No specific impact</p> <p>Funding is allocated based on property type and income; sex information is not specifically sought/collected at application stage.</p> | <p>There are no barriers in terms of application based on sex; there may be reservations by women in accessing the service due to male retrofit operatives entering the home.</p> | <p>Installer has employed a female Retrofit Assessor (surveyor) for the project who can be requested to residents who would feel more comfortable with this. Also employed a female Resident Liaison Officer who is available to support residents on site.</p> <p>Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by Cabinet Member) Allocation</p> | <p>LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> |

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|  |  |  | <p>Policy.<br/>Therefore,<br/>there is no<br/>scope for<br/>individual staff<br/>members to<br/>make<br/>individual<br/>judgements.</p> <p>Sefton and<br/>Installer have<br/>robust<br/>Customer<br/>Complaints<br/>Procedures in<br/>place.</p> <p>All of Sefton's<br/>Retrofit Team<br/>undertake<br/>corporate<br/>mandatory<br/>training<br/>'Equality &amp;<br/>Diversity<br/>Awareness'<br/>annually.</p> <p>All employees<br/>of the<br/>procured<br/>installer -<br/>Ecogee (part<br/>of the<br/>Regenda<br/>Group) have<br/>received<br/>Equality,<br/>Diversity and<br/>Inclusion</p> |  |
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|                    |                                                                                                                                                                                    |  | <p>(ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> <p>All Ecogee Staff are DBS checked</p>                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                        |
| Sexual orientation | <p>No specific impact</p> <p>Funding is allocated based on property type and income; sexual orientation information is not specifically sought/collected at application stage.</p> |  | <p>Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following agreed (by Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> | <p>LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with</p> |

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|              |                                                                                                          |  | <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> | customer complaints or concerns.                                                    |
| Care leavers | As part of the social value derived from Warm Homes: Local Grant, the installer will support pathways to |  | Properties are allocated for funding based on eligibility criteria set by DESNZ and prioritized following                                                                                                                                                                                                                                                        | LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to |

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|  | <p>green jobs for local residents, which could benefit Care leavers in Sefton who often face additional challenges in finding and sustaining work.</p> <p>Funding is allocated based on property type and income; Care leaver information is not specifically sought/collected at application stage.</p> |  | <p>agreed (by Cabinet Member) Allocation Policy. Therefore, there is no scope for individual staff members to make individual judgements.</p> <p>Sefton and Installer have robust Customer Complaints Procedures in place.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have</p> | <p>residents (including those not successful in securing funding) to test the impact.</p> <p>Monitor as part of Social Value Contract management- at regular contractor meetings.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with customer complaints or concerns.</p> |
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|                           |                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                           | received Equality, Diversity and Inclusion (ED&I) training and take responsibility for ED&I outcomes set out in the ED&I policy.                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                        |
| Socio-economic background | <p>Low-income households are the target group for this funding (household income below £36k gross PA).</p> <p>Especially when coupled with other protected characteristics (intersectionality) e.g. A single mother on a low income.</p> <p>The resident does not contribute to the cost of the works. It is 100% funded.</p> | <p>Communication barrier that may prevent people on a low income taking up the scheme. For example, if residents of low socio-economic backgrounds have lower literacy levels and therefore cannot complete the application process.</p> <p>Adverse impact identified could be staff/Installer behaviour when entering the home or in</p> | <p>The Retrofit team will work with the Communications Team to produce any tailored communication to ensure that the terms of the grant are clear from the outset and can provide assistance with the application form. Ensuring communications reach the right audience.</p> <p>All of Sefton's Retrofit Team undertake corporate mandatory</p> | <p>LCRCA, who are the lead grant recipient, will advise on E+D questionnaires to go to residents (including those not successful in securing funding) to test the impact.</p> <p>Weekly Sefton council/installer meetings – to discuss particular cases where additional support may be needed. Tracked via a Query Log along with</p> |

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|  |  | <p>prioritisation of funding.</p> | <p>training 'Equality &amp; Diversity Awareness' annually.</p> <p>All employees of the procured installer - Ecogee (part of the Regenda Group) have received Equality, Diversity and Inclusion (ED&amp;I) training and take responsibility for ED&amp;I outcomes set out in the ED&amp;I policy.</p> <p>Residents living in low income areas (IMD 1&amp;2) will be classed as eligible postcodes and automatically qualify for the scheme (subject to property survey).</p> | <p>customer complaints or concerns.</p> <p>Retrofit Team experienced in dealing with this protected group.</p> |
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## Section 6: Action Planning

Please describe the actions you will take following this assessment to eliminate any negative impact, including the timescale for each action and who will be responsible for the action. You might find it useful to make a more detailed action plan on a separate document which you can attach to this form.

| Action                                                                                                                                              | Responsibility                                      | Timescale                                                                | Comments |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------------------------------|----------|
| Monitor the impact of the scheme against this Equality Impact Assessment by undertaking LCRCA's Equality and Diversity questionnaire for residents. | Retrofit Project Manager                            | TBC (currently working on this with LCRCA)                               |          |
| Monitor the cases where residents from protected groups need support or make complaints – through the Query Log / Installer meetings.               | Retrofit Project Manager / Retrofit Project Officer | Weekly Meetings (standing agenda item)                                   |          |
| During pathway to Green Job's creation, specifically consider routes for Care Leavers and other                                                     | Retrofit Project Manager                            | TBC (currently working on this with Procurement/Fusion 21 and Installer) |          |

|                                                                                                                                             |                                                     |                                                  |  |
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| protected groups                                                                                                                            |                                                     |                                                  |  |
| Ensure WHLG pages of the Council's website, notes that the Council have access to a Translator should it be requested.                      | Retrofit Project Manager / Retrofit Project Officer | October 2025                                     |  |
| Installer employ a Resident Liaison Officer for the duration of the project to ensure additional support is available for protected groups. | Retrofit Project Manager / Installer                | Complete. Resident Liaison Officer employed.     |  |
| Review the Equality Impact Assessment mid-way through the project                                                                           | Retrofit Project Manager / Retrofit Project Officer | September 2026                                   |  |
| Corporate Mandatory Training Equality & Diversity Awareness Training                                                                        | All of Sefton's Retrofit Team                       | Annually                                         |  |
| Equality, Diversity & Inclusion Training                                                                                                    | All of staff employed by installer Ecogee           | On employment with refresher course periodically |  |

## Section 7: Justifying the policy

If the policy cannot be changed, please note the justification of any negative impact. Please contact the EDI Team before taking this approach at [Equality@sefton.gov.uk](mailto:Equality@sefton.gov.uk).

The findings show that the Warm Homes Local Grant projects will impact positively on groups with protected characteristics through the reduction in energy bills and health inequalities. Therefore, there are no changes to the policy required. Some small changes to the delivery approach, noted in the tables above, allow for the scheme to further positively impact those with protected characteristics.

## Section 8: Approval and publishing

Name of person responsible for this EqlA: Christina Chislett

Date the EqlA was carried out: 02/10/2025

Date the EqlA was forwarded to the EDI: 02/10/2025

EDI Team Sign Off: 15/10/2025

Date the policy and the EqlA will be reviewed: 2/10/2026

