

COFNOD O BENDERFYNIAD WEDI'I DDIRPRWYO GAN SWYDDOG
RECORD OF DELEGATED OFFICER DECISION

Penderfyniad Allweddol | Key Decision ✓

PWNC | SUBJECT:

Energy Company Obligation (ECO) 4 – Local Authority Flexible Eligibility Criteria 'Eco Flex' And Agreement to Deliver to Residents of Rhondda Cynon Taf County Borough Council.

DIBEN YR ADRODDIAD | PURPOSE OF THE REPORT:


In accordance with the Council's Scheme of Delegation, this report has been prepared to accompany the intended officer decision of the Director of Prosperity and Development as described below:

The purpose of the report is to provide details on the Energy Company Obligation (ECO) Local Authority Flexible Eligibility Scheme and set out how the scheme will be delivered under the ECO 4 programme, across the County Borough.

PENDERFYNIAD WEDI'I DDIRPRWYO | DELEGATED DECISION:

It is AGREED that:

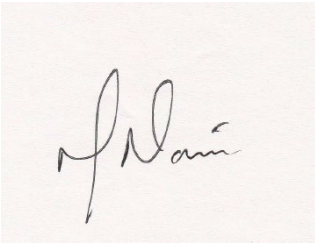
The Council proceeds with the delivery of the flexible eligibility scheme under the ECO 4 programme and also publish the Joint Statement of Intent (Sol) on the Authority's website outlining the eligibility criteria for the ECO 4 Flex part of the programme, enabling the Authority to assess eligibility against the Sol criteria and issue Declarations to Installers/Agents for eligible applications.

 <p>Llofnod y Prif Swyddog Chief Officer Signature</p>	<p>Simon Gale</p> <p>Enw (priflythrennau) Name (Print Name)</p>	<p>8th September 2023</p> <p>Dyddiad Date</p>
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Mae'r penderfyniad yn cael ei wneud yn unol ag Adran 15 o Ddeddf Llywodraeth Leol 2000 (Swyddogaethau'r Corff Gweithredol) ac yn y cylch gorchwyl sy wedi'i nodi yn Adran 5 o Ran 3 o Gyfansoddiad y Cyngor.

The decision is taken in accordance with Section 15 of the Local Government Act, 2000 (Executive Functions) and in the terms set out in Section 5 of Part 3 of the Council's Constitution.

YMGYNGHORI | CONSULTATION



08.09.23

LLOFNOD YR AELOD YMGYNGHOROL O'R CABINET
CONSULTEE CABINET MEMBER SIGNATURE

DYDDIAD | DATE

LLOFNOD SWYDDOG YMGYNGHOROL
CONSULTEE OFFICER SIGNATURE

DYDDIAD | DATE

RHEOLAU'R WEITHDREFN GALW-I-MEWN | CALL IN PROCEDURE RULES.

A YW'R PENDERFYNIAD YN UN BRYN A HEB FOD YN DESTUN PROSES GALW-I-MEWN GAN Y PWYLLGOR TROSOLWG A CHRAFFU?:

IS THE DECISION DEEMED URGENT AND NOT SUBJECT TO CALL-IN BY THE OVERVIEW AND SCRUTINY COMMITTEE:

YDY | YES NAC YDY | NO ✓

Rheswm dros fod yn fater brys | Reason for Urgency:

Os yw'n cael ei ystyried yn fater brys - Ilofnod y Llywydd, y Dirprwy Lywydd neu Bennaeth y Gwasanaeth Cyflogedig yn cadarnhau cytundeb fod y penderfyniad arfaethedig yn rhesymol yn yr holl amgylchiadau iddo gael ei drin fel mater brys, yn unol â rheol gweithdrefn trosolwg a chraffu 17.2:

If deemed urgent - signature of Presiding Member or Deputy Presiding Member or Head of Paid Service confirming agreement that the proposed decision is reasonable in all the circumstances for it being treated as a matter of urgency, in accordance with the overview and scrutiny procedure rule 17.2:

.....
(Llywydd | Presiding Member)

.....
(Dyddiad | Date)

DS - Os yw hwn yn benderfyniad sy'n cael ei ail-ystyried yna does dim modd galw'r penderfyniad i mewn a bydd y penderfyniad yn dod i rym o'r dyddiad mae'r penderfyniad wedi'i lofnodi.

NB - If this is a reconsidered decision then the decision Cannot be Called In and the decision will take effect from the date the decision is signed.

AT DDEFNYDD Y SWYDDFA YN UNIG | FOR OFFICE USE ONLY

DYDDIADAU CYHOEDDI A GWEITHREDU | PUBLICATION & IMPLEMENTATION DATES

CYHOEDDI | PUBLICATION

Cyhoeddi ar Wefan y Cyngor | Publication on the Council's Website:- _____08.09.23_____

DYDDIAD | DATE

GWEITHREDU'R PENDERFYNIAD | IMPLEMENTATION OF THE DECISION

Nodwch: Fydd y penderfyniad hwn ddim yn dod i rym nac yn cael ei weithredu'n llawn nes cyn pen 3 diwrnod gwaith ar ôl ei gyhoeddi. Nod hyn yw ei alluogi i gael ei "Alw i Mewn" yn unol â Rheol 17.1, Rheolau Gweithdrefn Trosolwg a Chraffu.

Note: This decision will not come into force and may not be implemented until the expiry of 3 clear working days after its publication to enable it to be the subject to the Call-In Procedure in Rule 17.1 of the Overview and Scrutiny Procedure Rules.

Yn amodol ar y drefn "Galw i Mewn", caiff y penderfyniad ei roi ar waith ar / Subject to Call In the implementation date will be:

14.09.23

DYDDIAD / DATE

WEDI'I GYMERADWYO I'W GYHOEDDI | APPROVED FOR PUBLICATION

Rhagor o wybodaeth | Further Information:

Cyfadran Directorate:	Prosperity and Development
Enw'r Person Cyswllt Contact Name:	Derek James
Swydd Designation:	Service Director
Rhif Ffôn Telephone Number:	01443 281114

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

KEY DELEGATED DECISION

**A REPORT TO ACCOMPANY A DECISION OF THE DIRECTOR OF
PROSPERITY AND DEVELOPMENT**

SEPTEMBER 2023

**ENERGY COMPANY OBLIGATION (ECO) 4 – LOCAL AUTHORITY FLEXIBLE
ELIGIBILITY CRITERIA ‘ECO Flex’ and AGREEMENT TO DELIVER TO
RESIDENTS OF RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**AUTHOR: DEREK JAMES, SERVICE DIRECTOR OF PROSPERITY &
DEVELOPMENT**

1.0 PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide details on the Energy Company Obligation (ECO) Local Authority Flexible Eligibility Scheme and set out how the scheme will be delivered under the ECO 4 programme, across the County Borough.

2.0 RECOMMENDATIONS

It is recommended that:

- 2.1 Authorisation is given to proceed with the delivery of the flexible eligibility scheme under the ECO 4 programme.
- 2.2 The proposed Joint Statement of Intent (Sol) is agreed and published on the Authority’s website outlining the eligibility criteria for the ECO 4 Flex part of the programme, enabling the Authority to assess eligibility against the Sol criteria and issue Declarations to Installers/Agents for eligible applications.

3.0 REASON FOR RECOMMENDATIONS

- 3.1 Delivery of ECO 4 Flex will give RCT residents an opportunity to access external investment under the ECO Programme to install energy efficiency measures in their homes.
- 3.2 If approved, the recommendations will support the Council’s commitment to mitigating the impacts of fuel poverty and enabling warmer homes by improving the energy efficiency of homes within the borough and reducing carbon emissions.

- 3.3 Welsh Government estimates that approximately 45% of households in Wales are currently in fuel poverty amid the cost-of-living crisis. ECO 4 Flex provides funding for households that are not in receipt of means tested benefits but are also affected by the same risks of fuel poverty such as low incomes, health conditions and poor energy efficiency of homes.

4.0 BACKGROUND

- 4.1 In October 2019, Warmer Homes: A Fuel Poverty Strategy was approved by Cabinet. The strategy identifies three main strategic objectives to help mitigate the effects of fuel poverty for Rhondda Cynon Taf residents. These are:

1. Provide advice and assistance to maximise household disposable income.
2. Reduce energy prices.
3. Improve the energy efficiency of homes and decarbonisation.

- 4.2 In order to achieve maximum impact for residents whilst also ensuring value for money, one of the key actions is to attract external funding to support households to reduce their energy consumption, improve the energy performance of homes and reduce the money spent on energy bills.

- 4.3 The Covid-19 pandemic and the current cost of living crisis has further impacted on households through a reduction of incomes, an increase in energy bills and an increase in debts. The impact of these is significant, with households not being able to afford heating bills, resulting in them under heating their homes which can then have a detrimental effect on cold related health conditions.

- 4.4 Upgrading the energy efficiency of homes is one of the most effective ways of tackling fuel poverty and meeting Government's legally binding carbon targets by reducing energy demand in the residential sector (which is currently responsible for a significant share of the UK's greenhouse gas emissions). Energy efficient homes also help lower energy bills and improve energy security, thus improving thermal comfort and subsequent health outcomes, whilst supporting jobs and growth.

Energy Company Obligation (ECO) 4

- 4.5 The ECO was first introduced in 2013 and is an energy efficiency scheme for the UK that places legal obligations on larger energy suppliers to deliver funded or part funded energy efficiency measures to reduce carbon emissions from residential homes. At present, there are 15 ECO obligated energy suppliers across the UK who will have targets to meet and as such will be offering funding in the marketplace. The new ECO period, namely ECO 4, covers the period between April 2022 to the 31st March 2026.

- 4.6 The ECO 4 Programme is worth approximately £4billion over the 4 year period and is split into two parts:

- The ECO 4 Home Heating Cost Reduction Obligation (HHCRO) - this part of the programme is aimed at households in receipt of means tested benefits and living in energy inefficient homes.
- The ECO 4 Flex - is available for households with low incomes and/or whereby household members are considered to be vulnerable and living in cold homes.

4.7 The ECO 4 Flex aims to deliver multiple energy measures in homes to raise the energy performance EPC level by two bands or for some homes at least one band. **Appendix A** sets out the energy measures that are eligible as part of the scheme. In order to determine the recommended energy measures a survey needs to be carried out on the home.

4.8 The levels of funding available for energy measures are based on carbon savings achieved and the individual targets of each obligated supplier. The Council has no control over funding levels. Funding levels are known to fluctuate throughout the scheme period and vary between different suppliers, resulting in measures ranging from fully funded to partially funded measures.

4.9 The Council has been delivering ECO Flex schemes for the past 5 years. The previous ECO 3 scheme (2019-2023) was severely impacted by Covid 19, but despite this, the scheme still successfully delivered **92** energy efficiency measures to **52** homes across RCT.

5.0 PROPOSAL

5.1 The ECO Flex Scheme is discretionary and in order to participate, Local Authorities must voluntarily publish a Statement of Intent (Sol) (**Appendix B**). The Sol is a public statement setting out the criteria that the Local Authority intends to use to identify households that meet eligibility criteria under ECO Flex 4 and must be published on the Council's website. The Local authority can then provide 'Declarations' to Installers for households that meet the scheme criteria, thereby allowing installers to access potential funding from energy suppliers.

5.2 The Council's proposed Statement of Intent (Sol) has been developed using the Ofgem template, which LA's are required to use in order to be able to participate in ECO 4 Flex Scheme. The criteria and referral routes are therefore set by Ofgem. The SOI confirms that each of the households declared will adhere to at least **one** of the available referral routes outlined in the below table:

Route/Pathway	Household Eligibility	EPC rating/Tenure
1: Income	Households with a gross annual income of less than £31K (National figure based on average poverty levels across the UK set by Government, the LA has no direct influence over the figure). The household is defined as all occupants including non-dependants.	Owner occupied homes with EPC rating (SAP band) D to G or private rented sector homes with EPC (SAP band) E to G
2: Proxies Must meet a combination of two of the following proxies but proxy 1 and 3 cannot be used together	<p>Proxy 1: Homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019</p> <p>Proxy 2: Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates)</p> <p>Proxy 3: Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income</p> <p>Proxy 4: A householder receiving free school meals due to low-income</p> <p>Proxy 5: Currently unavailable</p> <p>Proxy 6: A person living at the premises has been referred to the LA for support by their energy supplier, Citizen Advice because they have been identified by the referrer as struggling to pay their gas or electricity bills.</p>	Owner occupied homes or private rented homes with EPC rating (SAP band) E to G
3: NHS Referral	Households living in and where a household member is suffering from a severe and/or long-term health condition that is adversely affected by living in a cold home.	Owner occupied homes with EPC rating (SAP band) D to G and private rented sector with EPC rating (SAP band) E to G

N.B Social housing can be included where rent is above market rates and it will therefore, meet the 'premises test' of the scheme.

- 5.3 Whilst households can be referred for ECO 4 Flex funding, they can also apply directly themselves via an online application process or via telephone where the Heat & Save team can then support them through the application process. Once the Heat & Save team receive the application, all key information will be

reviewed in order to ensure that the applicant receives the best funding option available to make their home more energy efficient and save money on their bills. This could include a number of the grants available through the Council such as ECO 4 Flex, Nest, RCT Heating grant and the RCT Solar Panel grant.

- 5.4 If the best funding option for the applicant is ECO 4 Flex and they meet the eligibility criteria, then the Heat & Save team will confirm this with the applicant. The applicant will then confirm the installer of their choice and the Heat & Save team will issue a declaration to the Installer. The issue of a declaration will not however guarantee installation of a measure, this decision rests with the energy supplier. Once the energy supplier has accepted the declaration, then the installer will carry out a survey on the home, recommend any energy measures and then once agreed with the applicant, install the measures. The funding for the installation of the measures will be sought by the installer who will draw down ECO 4 Flex funding from the energy supplier to carry out the works. Where fully funding is not available the applicant is responsible for the shortfall in costs, however they can seek other financial assistance from loans or grants from the Council or any other external financial assistance available suitable to their circumstances in order to cover this funding gap.
- 5.5 The Council has an established Approved Providers List (APL), which will remain open whilst the ECO 4 Flex Scheme is live in order to assist residents who are unable to find a trusted contractor to carry out the works on their home. The APL is available for residents to check best value of funding rates and select their own choice of installer/s, thus promoting customer choice. There are no formal contracts in place between the Council and the Installer and the APL operates only as a vetting process to help reduce level of risk (wherever possible) for residents.
- 5.6 In order to raise awareness of the scheme, the Council will promote it through the existing Heat & Save Service, advertising campaigns through social media and the Council's website, along with targeted marketing including community engagement events to households most likely to be at risk of fuel poverty.
- 5.7 As part of the Scheme Guidance, the Council has the opportunity to receive referral fees from the installers (not the applicant). The current market rate being charged is £300 per application. This fee income will provide an opportunity to fund staffing resources to maximise numbers of applications processed and support marketing and engagement to help reach as many potentially eligible residents as possible. The Scheme guidance specifically states that under no circumstances is this costs to be passed on to the customer/resident.

6.0 EQUALITY AND DIVERSITY IMPLICATIONS/SOCIO-ECONOMIC DUTY

- 6.1 An Equality Impact Assessment (EqIA) screening form is attached in **Appendix C**. There were no disproportionate negative or neutral impacts identified for any particular group and so no further actions are required to reduce or mitigate.

7.0 CONSULTATION/INVOLVEMENT

7.1 There are no formal consultation requirements arising from these proposals as the Scheme is a UK Government national scheme with prescribed eligibility criteria and all necessary consultation was undertaken during the scheme development stage.

8.0 WELSH LANGUAGE IMPLICATIONS

8.1 A Welsh Language Impact Assessment has been completed and it was found that the delivery of this Scheme will have a positive impact on the Welsh Language. A copy of the Assessment is attached in Appendix D, the main findings are as follows;

- Actively promote Welsh language options to residents and installers through delivery of the scheme to offer language choice.
- All promotional and engagement materials available for residents to be bilingually with Welsh first, with the Council supporting installers to achieve this.
- Providing a summary sheet of the standards requirement by commissioned partners to help raise understanding and awareness.
- Promotion of Welsh language training courses to Council staff and installers.

9.0 FINANCIAL IMPLICATION(S)

9.1 The Council has no financial obligations in respect of this scheme but does need to consider sufficient staffing resource to administer the scheme and report progress. Recent WG Guidance confirms that each Council in Wales will receive £10k revenue funding to assist with establishing an ECO 4 Flex Scheme and additional staffing costs are to be absorbed by the Council. There will also be a £300 referral fee per application which is charged to the Installer and will also assist with generating income towards staffing costs for administering and delivery of the scheme.

9.2 The Council does have other grant assistance available that can be delivered alongside ECO 4 Flex to assist residents with any shortfall funding for partially funded ECO 4 Flex measures to maximise take up rates and allow value for money of council investment. ECO funding will always be sourced in the first instance.

10.0 LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

10.1 There are no legal implications to be considered at this time as all contractual relationships are between the applicant and the installer of their choice and the Council is the administrator of the Scheme.

11.0 LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELL-BEING OF FUTURE GENERATIONS ACT

- 11.1 Delivery of this Scheme contributes to many of the goals of the Well-being of Future Generations Act, in particular the delivery of a prosperous, resilient and healthier Wales.
- 11.2 Improving the energy efficiency of homes reduces the risk of fuel poverty and can also help increase household disposable income making residents more resilient to future energy bills rises. Improving energy performance also reduces carbon emissions and the impact of climate change. The project proposals make a positive contribution towards the Council's Corporate Plan 'Making a Difference 2020 – 2024' priorities of promoting people to be independent, healthy and prosperous, along with the Council's 'Think Climate RCT' Making Rhondda Cynon Taf Carbon Neutral by 2030.

12.0 STRATEGIC OR RELEVANT TO ELECTORAL WARDS

- 12.1 The ECO 4 FLEX Scheme has strategic importance across the whole of RCT.

13.0 CONCLUSION

- 13.1 This report has set outlined the Energy Company Obligation (ECO) Local Authority Flexible Eligibility Scheme and how the scheme will be delivered under the ECO 4 programme, across the County Borough.
- 13.2 Delivering an ECO 4 Flex Scheme provides an opportunity to lever external funding into RCT to mitigate the impact of fuel poverty for residents by saving money on energy bills and making homes warmer and more energy efficient, while also supporting other economic and regeneration objectives. Improving the energy performance of homes also helps future proof homes against fuel poverty and safeguard future generations towards climate change by reducing carbon emissions.

Other Information: -

Relevant Scrutiny Committee

Climate Change, Frontline Services and Prosperity Scrutiny Committee

Contact Office: Derek James Tel: (01443) 281114

Energy Company Obligation (ECO4): Measures table

Version 1.1 Published 10/11/2022

This measure table provides information on the energy efficiency measures which suppliers can install to meet their obligations during ECO4 scheme. The requirements table provides information on how to meet the pre-installation insulation and minimum requirements. The requirements table must be used in conjunction with the measures table. Furthermore, we may add further columns when new information becomes available. It is the responsibility of each person using this table to read the provisions of the Electricity and Gas (Energy Company Obligation) Order 2022 and subsequent amendments to understand how those provisions apply to them. This table is not intended to be a definitive guide to those provisions.

For LA-Flex projects local authorities must ensure that the property is a private domestic premises for which the pre-project SAP band is D, E, F or G for owner-occupied homes or E, F or G for privately rented homes. Further, under route 2, regardless of the private tenure home, only SAP band E, F or G are eligible. For route 4 DO D-G and PRS E-G can qualify if they meet the conditions from ECO4 Order - s.22(1)(a) to (c). OO E-G and PRS E-G qualify if they meet conditions from s.22(2)(a) to (c).

ESH and Electric Heating Systems are not classed as renewable heating systems, even when installed alongside Solar PV. Hydronic heat pumps are classed as renewable heating systems whether or not alongside Solar PV.

For heating measures in off/on gas premises follow relevant measure hierarchy in the ECO4 Delivery Guidance.

Projects in PRS E-G premises must include at least one of SWI, Renewable heating, FTCH or DHC.

For SAM/DLM eligibility is subject to the specific SAM/DLM type. For example, a SAM which is a heating control has the same eligibility as other heating control measures.

Electric room heaters to electric storage heaters is not an eligible measure in ECO4.

Measure Category	Measure Type	ECO4 Measure Name	Tenure				
			Owner Occupied D	Owner Occupied E-G	PRS E-G	Social E-G	Social D
Boiler	Boiler - Upgrade to a non-renewable heating system s	B_Upgrade_nopreHCs / B_Upgrade_preHCs	✓	✓	No	No	No
	Boiler - Upgrade to a renewable heating system s	B_Upgrade_nopreHCs / B_Upgrade_preHCs	✓	✓	✓	✓	✓
	First time central heating	B_First_Time_CH	✓	✓	✓	✓	✓
Fixed Value Increase	Boiler - Repair of a broken heating system s	B_Broken_Repair	✓	✓	No	No	No
	Boiler - Replacement of a broken efficient heating system s	B_Broken_Replace	✓	✓	No	✓	✓
Electric Storage Heating	ESH - Upgrade of an inefficient electric storage heater	ESH_Upgrade	✓	✓	No	No	No
Fixed Value Increase	ESH - Repair or replacement of a broken efficient ESH	ESH_Broken_Repair	✓	✓	No	No	No
	ESH - Repair or replacement of a broken efficient ESH	ESH_Broken_Replace	✓	✓	No	No	No
District Heating Connection	Connection to a district heating system	DHS_connection_nopreHCs / DHS_connection_preHCs	✓	✓	✓	✓	No
Heating Controls	Programmer & room thermostat	P&RT	✓	✓	✓	✓	✓
	Smart Thermostat	Smarttherm	✓	✓	✓	✓	✓
	TRV	TRV	✓	✓	✓	✓	✓
	Time and temperature zone control	TTZC	✓	✓	✓	✓	✓
	Compensation (Pre HC / nopreHC)	Compensation nopreHCs / Compensation preHCs	✓	✓	✓	✓	✓
Micro-Generation	Solar PV	Solar PV	✓	✓	✓	✓	✓
Cavity Wall Insulation	Cavity wall insulation- partial fill	CWI_partial_fill	✓	✓	✓	✓	✓
	Party cavity wall insulation	PWI_Cavity	✓	✓	✓	✓	✓
	Cavity wall insulation	CWI_(relevant variant)	✓	✓	✓	✓	✓
External/Internal Wall Insulation	External / Hybrid / Internal insulation of a solid wall	E / H / IWI_solid (Relevant variant)	✓	✓	✓	✓	✓
	External / Hybrid / Internal wall insulation of a cavity wall	E / H / IWI_cavity (Relevant variant)	✓	✓	✓	✓	✓
Loft Insulation	Loft insulation where there is less than or equal to 100mm pre-existing insulation	LI_lesseq100	✓	✓	✓	✓	✓
	Loft insulation where there is greater than 100mm pre-existing insulation	LI_greater100	✓	✓	✓	✓	✓
Other Insulation	Flat roof insulation	FRI	✓	✓	✓	✓	✓
	Pitched roof insulation	PRI	✓	✓	✓	✓	✓
	Room-in-roof insulation insulated	RIRI_res_in	✓	✓	✓	✓	✓
	Room-in-roof insulation uninsulated	RIRI_res_unin	✓	✓	✓	✓	✓
	Solid floor insulation	SFI	✓	✓	✓	✓	✓
	Underfloor insulation	UFI	✓	✓	✓	✓	✓
	Window glazing - single to double	WG_singletoDOUBLE	✓	✓	✓	✓	✓
	Window glazing - improved double glazing	WG_improveddouble	✓	✓	✓	✓	✓
	Draught proofing	DP	✓	✓	✓	✓	✓
	Higher performance external doors	HPED	✓	✓	✓	✓	✓
Park home insulation	PHI	✓	✓	✓	✓	✓	

1 Eligible only if one of the following is carried out as part of the same project: insulation of a solid wall, a renewable heating system, FTCH or DHC.

2 Eligible if the property is heated by a hydronic heat pump, ESH or EHS with a SAP responsiveness of ≥ 0.8, or if one of these heating measures is installed as a part of the same project (note that normal eligibility rules for ESH and EHS must still be followed e.g. ESH cannot be installed in PRS or Social, even with PV).

3 Eligible in order to meet the minimum insulation requirement for a heating measure, or where part of the same ECO4 Project as insulation of a solid wall, a renewable heating system, FTCH or DHC.

4 Social Band D Premises may only receive innovation measures and if receiving an innovation measure which is a heating measure, any insulation measures required in order to meet the minimum insulation requirement.

5 Boiler measures include the installation of the following renewable heat sources: Air to Water ASHP, GSHP, Biomass Boiler and Fuel Cell mCHP.

6 Eligible if carried out as part of the installation of FTCH, DHC, or a renewable heating system, or if an innovation measure.

7 Eligible only if a renewable heating measure or an innovation measure.

Rhondda Cynon Taf County Borough Council ECO 4 Flexible Eligibility Statement of Intent

Local Authority name: Rhondda Cynon Taf County Borough Council

Publication Date: 1st September 2023

Version Number: 1.0

Publication on website: xxxx

This statement sets out Rhondda Cynon Taf County Borough Council's (RCTCBC) flexible eligibility criteria for the Energy Company Obligation (ECO 4) Scheme from date of this Statement of Intent until March 2026, unless new versions are published, which will supersede this version.

The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes that meet the private domestic premises requirement of the Guidance (i.e. owner occupiers, private rented homes and social rented homes where it is let at or above market rates), helping to meet the Government's fuel poverty and net zero commitments, by installing energy efficiency measures.

The flexible approach for Local Authorities (LAs) to identifying fuel poor and vulnerable households who may benefit from heating and energy saving measures is referred to as "ECO4 Flex".

RCTCBC welcomes the introduction of the ECO4 Flex eligibility routes as one approach to helping the Council achieve its plans to improve the energy efficiency of homes of those in fuel poverty or vulnerable to the cold.

The Council operates an Approved Providers List (APL) to assist residents to select suitable, accredited installers while also allowing direct referrals from Installers to the Council. Declarations will not be provided to Installers or Agents that are not on the approved list and not accredited to undertake ECO4 works. Householders will select their own installers using the APL list for information and all contractual relationships will be between the householder and their choice of installer direct.

The Council is publishing this Statement of Intent (Sol) on the 1st September 2023 to confirm that each of the households declared will adhere to at least one of the available routes outlined below:

Route 1: Income

Households living in owner occupied homes with EPC rating (SAP band) D to G or private rented sector homes with EPC (SAP band) E to G

AND

with a gross annual income less than £31,000. Includes all sources of income from all household members including both non means and means tested benefits. This cap applies irrespective of the property size, composition, or region.

Route 2: Proxies

Households living in owner occupied homes or private rented homes with EPC rating (SAP band) E to G that meet a combination of two of the following proxies:

Proxy 1) Homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019. ¹
Proxy 2) Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).
Proxy 3) Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income'.
Proxy 4) A householder receiving free school meals due to low-income.
Proxy 5) currently unavailable
Proxy 6) A household referred to the LA for support by their energy supplier or Citizen's Advice because they have been identified as struggling to pay their electricity and gas bills.

¹ [Welsh Index of Multiple Deprivation \(full Index update with ranks\): 2019 | GOV.WALES](#)

** Note proxies 1 and 3 cannot be used together. Proxy 5 currently unavailable.*

Route 3: NHS Referral

Households living in owner occupied homes with EPC rating (SAP band) D to G and private rented sector with EPC rating (SAP band) E to G

AND

where a household member is suffering from a severe and/or long-term health condition that is adversely affected by living in a cold home.

These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related. This is because the Council recognises the negative impact for households with long-term health conditions living in less energy efficient homes and the effect on health and well-being.

All health conditions must be evidenced by a GP, Doctor or Health Practitioner from Local Health Board/NHS.

Route 4: Bespoke Targeting

Currently unavailable

Declaration and evidence check confirmation

All potentially eligible households should apply directly to one of the Installers on the Council's Approved Providers List or directly to the Heat & Save Team at heatandsave@rctcbc.gov.uk or telephone 01443 281136 or online www.rctcbc.gov.uk/heatandsave

RCTCBC accepts no responsibility or contractual obligations with Installers/Suppliers and the applicant enters into their own contractual agreement with the Installer of their choice.

All installers working under this agreement will need to provide a completed application form provided by RCTCBC and all evidence required to confirm eligibility of an application (property and occupants eligibility) before making a direct referral to the Council.

Declarations will only be provided to Installers that are registered on the Council's Approved Providers List and those that have the relevant Accreditations for providing measures under the ECO scheme. Installers can apply to be registered onto the list via Sell 2Wales using ITT: itt_97734 - RCTCBC Delivery of Domestic Energy Efficiency Measures Approved Provider List.

Declarations will be valid for 12 months from date of signature.

The Officer responsible for checking and verifying declarations and associated evidence submitted on behalf of the LA:

Name: Housing Energy Officer within the Heat & Save Team, Housing Strategy Team

Telephone: 01443 281136

Email: heatandsave@rctcbc.gov.uk

The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.

The decision on whether a household receives a measure under flexible eligibility or other ECO funding streams will be made by the energy supplier or their agent/ contractor and not the Council. The Council's role is to set eligibility criteria, assess applications and issue Declarations for eligible households. The issue of a Declaration by Rhondda Cynon Taf CBC will NOT guarantee installation of a measure, the final decision rests with the supplier.

Customer Contributions

RCTCBC has no influence over levels of funding available within the ECO Flex Scheme. Whilst it is expected that some measures through ECO Flex will attract levels of funding that will make the cost of the works completely free to the customer, others may only be partially grant funded. Any shortfall of costs will be notified to the customer following a survey via their selected Installer and the choice to proceed or decline will solely rest with the customer.

Administration/Referral Fees

Fee amount tbc

It is important to note that fees are to be paid by the Installer/Agent/Energy Company and

under no circumstances should they be passed on to the householder/customer.

General Data Protection Regulations & Privacy Notice

In order to issue Declarations and administer the scheme to enable households to access ECO 4 Flex funding the Council will be processing and sharing personal data. All data will be managed and stored in accordance with GDPR requirements and relevant legislation. A copy of the Council's Privacy Notice stating how data is managed can be found [Heat & Save Referral Hub Service Privacy Notices | Rhondda Cynon Taf County Borough Council \(rctcbc.gov.uk\)](https://www.rctcbc.gov.uk/heatandsave/privacy-notice)

CEO or dedicated responsible person mandatory signature

The Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council will oversee the process of identifying eligible households under ECO4 Flex.

Name: Paul Mee

Signature:

Job Title: CEO Rhondda Cynon Taf CBC (dedicated responsible person)

Date of signature: XX/XX/XXXX

For any general enquiries relating to this Statement of Intent please contact heatandsave@rctcbc.gov.uk

EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The [‘A More Equal Wales – Mapping Duties’](#) guide highlights the alignment of our duties in respect of the above-mentioned legislation.

SECTION 1 – PROPOSAL DETAILS

Lead Officer: Keryl Lanfear

Service Director: Derek James

Service Area: Prosperity & Development

Date: xxxx

1.a) What are you assessing for impact?

Strategy/Plan	Service Re-Model/Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Acronyms

(LA) Local Authority

(ECO) Energy Company Obligation

(DESNZ) Department of Energy Security and Net Zero, previously called (BEIS) Department of Business and Energy Industrial Strategy

(NICE) National Institute of Clinical Excellence

1.b) What is the name of the proposal?

Energy Company Obligation (ECO) 4 Flex Scheme.

1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

The ECO legislative order 2022 covers the ECO 4 programme which runs for the period April 2022 until March 2026 [Energy Company Obligation \(ECO4\) Guidance: Delivery | Ofgem](#)

Under the ECO 4 programme, Local Authorities (LAs) can voluntarily participate in the 'Flexible Eligibility' (ECO 4 Flex) part of the scheme which then enables eligible residents in the LA area to access this funding. The ECO 4 period runs until March 2026 and the value of the funding is expected to be around £4 billion across the UK with 50% of this being available for ECO Flex schemes. [ECO4 Guidance: Local Authority Administration | Ofgem](#)

The Council wishes to partake in the delivery of the scheme to help meet both fuel poverty and decarbonisation agendas to enable eligible residents in the county borough to access the external funding available and help them to improve the thermal efficiency of their homes. The delivery of the scheme fits within the objectives of the Council's Corporate Plan [The Council's Corporate Plan | Rhondda Cynon Taf County Borough Council \(rctcbc.gov.uk\)](#), Think Climate Plan 2022-2025 [Our Climate Plans | Rhondda Cynon Taf County Borough Council \(rctcbc.gov.uk\)](#), and Affordable Warmth: A Fuel Poverty Strategy 2019-2023 [Affordable warmth | Rhondda Cynon Taf County Borough Council \(rctcbc.gov.uk\)](#)

To participate in the Scheme LAs must publish a Statement of Intent which sets out the scheme criteria based on Guidance issued by Ofgem. The LA is then responsible for the scheme administration determining eligible applications from residents and providing Declarations to installers for eligible homes to allow the installers to access the funding available.

Providing an ECO 4 Flex Scheme is an action that supports the delivery of the Council's Affordable Warmth Fuel Poverty Strategy (2019-2023) and Think Climate Plan 2022 by seeking to promote improvements in energy efficiency to homes in the borough by enabling external funding to be accessed by eligible RCT residents.

As part of the national introduction of the scheme the Department of Energy Security and Net Zero (DESNZ) previously known as department for Business, Energy and Industrial strategy (BEIS) published an Impact Assessment 1st April 2022 on the scheme which includes equalities impacts. However, because the demographic data for equalities has only considered English based data, it has been used as a background reference but other relevant RCT local data (where available) has been sourced for the purposes of this impact assessment. The national impact assessment report can be found [ECO4 final stage Impact Assessment \(publishing.service.gov.uk\)](#)

The main characteristics that make households more at risk of fuel poverty are low incomes, health conditions, age (pensioners and those with children) and homes that are less energy efficient and the objectives of the scheme are to target and assist these households. Therefore the nationally prescribed eligibility criteria of the scheme has been designed to assist these households that are considered to be vulnerable to the effects of fuel poverty as shown below;

Route/Pathway	Household Eligibility	EPC rating/Tenure
1: Income	Households with a gross annual income less than £31K. The household is defined as all occupants including non-dependants.	Owner occupied homes with EPC rating (SAP band) D to G or private rented sector homes with EPC (SAP band E-G
2: Proxies Must meet a combination of two of the following proxies but proxy 1 and 3 together can not be used together	<p>Proxy 1: Homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019</p> <p>Proxy 2: Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates)</p> <p>Proxy 3: Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income</p> <p>Proxy 4: A householder receiving free school meals due to low-income</p> <p>Proxy 5: <u>Currently unavailable</u></p> <p>Proxy 6: <u>A household referred to the LA for support by their energy supplier or Citizen's Advice because they have been identified as struggling to pay their electricity and gas bills.</u></p>	Owner occupied homes or private rented homes with EPC rating (SAP band) E-G

3: NHS Referral	Households living in and where a household member is suffering from a severe and/or long-term health condition that is adversely affected by living in a cold home.	Owner occupied homes with EPC rating (SAP band) D-G and private rented sector with EPC rating (SAP band) E-G
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1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

Other relevant legislation and policy includes:

Welsh Government

- Well Being of Future Generations (Wales) Act 2015 [A guide to the well-being of future generations act: easy read | GOV.WALES](#)
- Energy Efficiency Strategy 2016-2026 [Energy efficiency strategy | GOV.WALES](#)
- Low Carbon Delivery Plan, Prosperity for All: A Low Carbon Wales 2019 [low-carbon-delivery-plan_1.pdf \(gov.wales\)](#)
- Fuel Poverty Strategy 2021 -2035 [Tackling fuel poverty 2021 to 2035 \[HTML\] GOV.WALES](#)
- Better Homes, Better Wales, Better World 2019 [Independent review on decarbonising Welsh homes: report \(gov.wales\)](#)
- Net Zero Strategic Plan 2022 [Welsh Government's Net Zero Strategic Plan](#)

UK Government

- The Electricity and Gas (Energy Company Obligation Order) 2022 [Energy Company Obligation \(ECO\) | Ofgem](#)
- Heat & Buildings Strategy 2021 [Heat and buildings strategy - GOV.UK \(www.gov.uk\)](#)
- Warm Homes and Energy Conservation Act 2000 [Warm Homes and Energy Conservation Act 2000 \(legislation.gov.uk\)](#)

- Climate Change Act 2008 [Climate Change Act 2008 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uk/acts/2008/27)
- Net Zero Strategy 2021 [Net Zero Strategy: Build Back Greener - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/net-zero-strategy)

1.e) Please outline who this proposal affects:

- Service users
- Employees
- Wider community

SECTION 2 – SCREENING TEST – IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Age (<i>Specific age groups i.e. young people or older people</i>)	Positive	<p>Census data highlights that the majority of residents in RCT are either aged under 16 or aged over 65. The largest tenure is owner occupied at 68%. ECO 4 recipients are expected to be older than the overall population due to the likelihood of them being single person households on low incomes and living in owner occupied homes. Therefore the eligibility of the scheme will have a positive effect on older private sector households that may be living in fuel poverty.</p> <p>One of the eligibility criteria is focused towards areas of income deprivation as classified in WIMD data and those receiving free School meals for children, so this will also have a positive effect on households with children and children living in poverty.</p>	<p>National definition around characteristics of fuel poverty highlights that households with either a resident over 65 or with children are one of the characteristics that influence the risk of fuel poverty. Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Census 2021 www.ons.gov.uk</p> <p>Early findings from the national impact assessment highlighted that age was over represented and the number of households reached by ECO (previous schemes) contained at least one person aged 65 or over is higher than the national estimate of all households. ECO 4 has a more explicit focus on households that are at risk of fuel poverty ECO4 final stage Impact Assessment (publishing.service.gov.uk)</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Disability <i>(people with visible and non-visible disabilities or long-term health conditions)</i>	Positive	<p>Census data highlights that 24% of people in RCT are disabled under the Equality Act. However, the true number of those living with other health conditions such as cold related illnesses are likely to be higher as not all these conditions would meet this definition. Welsh Index of Multiple Deprivation 2019 data identifies RCT as having higher than average areas of multiple deprivation, including health deprivation.</p> <p>If a disability or health condition affects the household being unemployed makes them three times more likely to be in fuel poverty than the national average. Those in employment but in receipt of low incomes or in general poverty are also more adversely affected.</p> <p>The Scheme offers a specific route</p>	<p>The scheme's guidance specifies this as a referral pathway. This is likely due to households with these health conditions being those that are most adversely affected by living in a cold home. Fuel poverty schemes are therefore aimed to assist those most in need.</p> <p>Census 2021 www.ons.gov.uk</p> <p>Fuel poverty factsheet 2019 data (publishing.service.gov.uk)</p> <p>ECO4 final stage Impact Assessment (publishing.service.gov.uk)</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		referral pathway for health conditions especially those that are impacted by living in cold related homes according to the NICE (National Institute of Clinical Excellence) Guidance and as such the scheme will have a positive impact on households with health conditions and disabilities. Those living with disabilities are also likely to be disproportionately affected by low incomes and the scheme will have a positive impact on those households.	
Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities)</i>	Positive	<p>Data from census 2021 relating to trans and non binary individuals in RCT is extremely limited with a high proportion not answered.</p> <p>Whilst we have no information on this characteristic within this proposal specifically, we understand that a person may transition at any point in their life. The Scheme does not distinguish against a particular gender identify. However, should certain identities be more affected by</p>	<p>Whilst no evidence is available at present to prove an impact on this characteristic, we will review this proposal if more data becomes available.</p> <p>Census 2021 www.ons.gov.uk</p> <p>ECO4 final stage Impact Assessment (publishing.service.gov.uk)</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		deprivation (incomes, health and/or location of home) the scheme will have a positive impact upon them.	
Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i>	Positive	<p>Although single person households may be more disproportionately affected by low incomes, couples married or in a civil partnership can also be on low incomes, particularly those older households. In RCT there are 34% of households living as married or civil partnership with a further 12% cohabiting. 19% of responses are unknown. The Scheme has the potential to have a positive impact on couples on low incomes or couples living with health conditions/disabilities of all ages.</p>	<p>Census 2021 www.ons.gov.uk</p> <p>ECO4 final stage Impact Assessment (publishing.service.gov.uk)</p>
Pregnancy and Maternity <i>(women who are pregnant/on maternity leave)</i>	Positive	<p>Pregnant women or someone on maternity leave could also include those in a single person household, couples, those with ill health or on a low income. Therefore, the scheme eligibility will have a positive effect on households on low incomes, or facing</p>	<p>Whilst these figures would be continually changing any households with pregnancy and maternity may be likely to be in receipt of low incomes due to changing circumstances and therefore</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		a reduction in income or those with health conditions.	the scheme would have a positive impact on them. ECO4 final stage Impact Assessment (publishing.service.gov.uk)
Race <i>(ethnic and racial groups i.e. minority ethnic groups, Gypsy, Roma and Travellers)</i>	Positive	As scheme is primarily targeted at low income, or ill health then this will have a positive impact on ethnic origin or race because all households regardless of race of ethnic origin may benefit from the scheme. <u>Census data highlights that the percentages of Asian and Gypsy Traveller ethnic groups are higher in the private rented sector compared to both owner occupied and housing association homes. This is a similar trend for mixed or multiple ethnic groups. As the scheme includes private rented homes this will have a positive impact on those living in private rented homes. However, the Council is aware that there can be poor landlord and tenant relationships and as landlord consent is required for eligible homes the</u>	Census 2021 www.ons.gov.uk ECO4 final stage Impact Assessment (publishing.service.gov.uk)

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p><u>Heat & Save team will liaise with landlords to support tenants to access the scheme. In addition to this to meet other strategic objective of improving housing conditions in the private rented sector we will also be undertaking active marketing and promotion directly to landlords either through our local Landlord's Forum and Rent Smart Wales and general advertising to maximise take up rates.</u></p>	
<p>Religion or Belief <i>(people with different religions and philosophical beliefs including people with no beliefs)</i></p>	<p>Positive</p>	<p>Census 2021 data highlights the breakdown of religions in RCT with 56% reporting no religion and 5% not answered. 39% of people reported having religions or beliefs and although we have no specific accurate information on this characteristic in terms of low income or health, we would estimate that improvements in other characteristics could affect this characteristic due to intersectionality.</p>	<p>Census 2021 www.ons.gov.uk</p> <p>Whilst no evidence is available at present to prove an impact on this characteristic, we will review this proposal if more data becomes available.</p> <p><u>ECO4 final stage Impact Assessment</u> <u>publishing.service.gov.uk</u></p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Sex <i>(women and men, girls and boys)</i>	Positive	Census 2021 data in RCT highlights slightly higher number of males living in the borough across all age categories apart from the over 65s where numbers of females are over double the amount of males in that age category. As fuel poverty characteristics suggests that single person households over 65 are likely to be more at risk of fuel poverty, this scheme will have a positive impact. For all age categories below 65 the numbers of males are slightly higher and scheme would have a positive effect on both men and women who are lone parents or couples in receipt of low incomes or living with health conditions.	Census 2021 www.ons.gov.uk ECO4 final stage Impact Assessment (publishing.service.gov.uk)
Sexual Orientation <i>(bisexual, gay, lesbian, straight)</i>	Positive	Census 2021 data highlights that the majority of RCT residents (90%) reported being straight or heterosexual. Whilst we have no	Census 2021 www.ons.gov.uk As research is being undertaken by 3 rd parties such as Age Concern on certain

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		information on proportions of poverty or health conditions in straight and LGBTQ+ people, we would estimate that improvements in other characteristics could have a positive impact due to intersectionality.	age profiles within LGBTQ+ groups we will review this proposal if further more detailed evidence or information becomes available. ECO4 final stage Impact Assessment (publishing.service.gov.uk)

In addition, due to Council commitments made to the following groups of people we would like you to consider impacts upon them:

	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Armed Forces Community <i>(anyone who is serving, has served, family members and the bereaved)</i>	Positive	Census 2021 data does not highlight poverty within veteran groups and reports the majority of veterans as being in good health. However this is only slightly	Veterans Factsheet 2020 (publishing.service.gov.uk)

		<p>higher than those not in good health, showing that many veterans do suffer from poor health. It also highlights that most veterans are male and over 65. This is also consistent with data from Office for Veterans' Affairs Factsheet 2020 which also highlights that 60% of veterans in the UK are over 65 years old. As households over 65 can be one of the groups that are considered to be more at risk of fuel poverty this scheme will have a positive impact on veterans, particular those that are also single person households or on low incomes or with poor health.</p> <p>Therefore, we would estimate that improvements in other characteristics could affect this characteristic due to intersectionality.</p>	<p>ECO4 final stage Impact Assessment (publishing.service.gov.uk)</p> <p>Census 2021 www.ons.gov.uk</p>
Carers	Positive	Census 2021 data highlights that there is a higher percentage of people	Census 2021 www.ons.gov.uk

<p><i>(anyone of any age who provides unpaid care)</i></p>		<p>providing unpaid care in the most deprived areas compared with least deprived areas. The highest percentage of unpaid carers were females in the 55-59 age category and males in the 55-64 age category.</p> <p>Therefore it seems that unpaid carers may be disproportionately affected by poverty compared to the general population and those with low incomes or health conditions will be positively affected.</p>	
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If the initial screening test has identified negative impacts then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant please provide an adequate explanation below:

No negative impacts have been identified in this proposal. Even where no evidence of the impact is available for certain characteristics/groups they are still expected to have a positive impact because it is widely agreed that people with intersecting categories of vulnerability are being disproportionately affected by fuel poverty. This ECO 4 Flex scheme aims to target those households that are affected by fuel poverty and therefore can provide a positive impact to all groups and characteristics that may be affected by poverty and ill-health. As further data/evidence becomes available the impact on these groups in this impact assessment will be reviewed and amended as required.

Are you happy you have sufficient evidence to justify your decision?

Yes

No

Name: Keryl Lanfear

Position: Housing Strategy Officer

Date: 10th August 2023

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

PLEASE NOTE – there is a separate impact assessment for Welsh Language. This must also be completed for proposals. Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a ‘strategic nature’ is available on page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

<ul style="list-style-type: none">• Single parents and vulnerable families• Pensioners• Looked after children• Homeless people• Students• Single adult households	<ul style="list-style-type: none">• People living in the most deprived areas in Wales• People with low literacy and numeracy• People who have experienced the asylum system• People misusing substances• People of all ages leaving a care setting• People involved in the criminal justice system
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<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Low Income/<u>Income Poverty</u> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	Positive	<p>A route pathway for the scheme is focused on low incomes (£31,000 gross annual household income), not necessarily those in receipt of means tested benefits.</p> <p>Helps households suffering from deprivation live in warmer and more energy efficient homes and can assist with a reduction in energy bills helping households to have more disposable income.</p>	<p><u>Poverty and deprivation (National Survey for Wales): April 2021 to March 2022 GOV.WALES</u></p> <p><u>Relative income poverty: April 2021 to March 2022 GOV.WALES</u></p> <p><u>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</u></p> <p><u>Energy Company Obligation (ECO) Ofgem</u></p> <p>JRF research on characteristics of households most at risk of fuel poverty <u>Fuel and poverty review June2014.pdf (cse.org.uk)</u></p>
<p>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</i></p>	Positive	<p>A route pathway for the scheme is focused on low incomes (£31,000 gross annual household income), not necessarily those in receipt of means tested benefits.</p>	<p><u>Poverty and deprivation (National Survey for Wales): April 2021 to March 2022 GOV.WALES</u></p> <p><u>Relative income poverty: April 2021 to March 2022 GOV.WALES</u></p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<i>spends and no provisions for the future)</i>		Helps households suffering from deprivation live in warmer and more energy efficient homes and can assist with a reduction in energy bills helping households to have more disposable income.	<p>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Energy Company Obligation (ECO) Ofgem</p> <p>JRF research on characteristics of households most at risk of fuel poverty Fuel and poverty review June2014.pdf (cse.org.uk)</p>
<u>Material Deprivation</u> <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	Helps households suffering from deprivation live in warmer homes by providing fully funded or subsidised energy efficiency improvements in homes to include heating and insulation	<p>Poverty and deprivation (National Survey for Wales): April 2021 to March 2022 GOV.WALES</p> <p>Relative income poverty: April 2021 to March 2022 GOV.WALES</p> <p>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Energy Company Obligation (ECO) Ofgem</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
			<p>JRF research on characteristics of households most at risk of fuel poverty <u>Fuel and poverty review June2014.pdf</u> cse.org.uk</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p><u>Area Deprivation</u> <i>(where you live (rural areas), where you work (accessibility of public transport))</i></p>	Positive	<p>A element of the scheme includes a proxy route pathway for the scheme is focused on the most deprived LSOA areas ranked 1-3 (WIMD). Must be combined with another selected proxy for that referral pathway.</p> <p>As RCT has higher than average areas of multiple deprivation and the scheme will assist those households through the referral route as mentioned above but also because these households are more likely to meet the low income eligibility criteria.</p>	<p>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Energy Company Obligation (ECO) Ofgem</p> <p>JRF research on characteristics of households most at risk of fuel poverty Fuel and poverty review June2014.pdf (cse.org.uk)</p>
<p><u>Socio-economic background</u> <i>(social class i.e. parents education, employment and income)</i></p>	Positive	<p>A route pathway for the scheme is focused on low incomes (£31,000 gross annual household income), not necessarily those in receipt of means tested benefits.</p>	<p>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Energy Company Obligation (ECO) Ofgem</p> <p>JRF research on characteristics of households most at risk of fuel poverty</p>

			Fuel and poverty review June2014.pdf (cse.org.uk)
<p>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></p>	Positive	<p>Allows households that are generally more prone to being in relative income poverty to access external funding under the UK wide ECO 4 Flex programme. The households that are most disadvantaged by poverty can include those more likely to be unemployed and/or living with disabilities. Information from the Relative Income Poverty Report 2012 for Wales highlights that households from certain ethnic groups are more likely to be relative income poverty than white ethnic group. 28% of working age adults with families where someone has a disability were in relative income poverty, compared to 16% of those without a disabled resident.</p> <p>The scheme provides energy efficiency measures to households that are most at risk of fuel poverty including tenures where the energy performance of homes is lower and where</p>	<p>Poverty and deprivation (National Survey for Wales): April 2021 to March 2022 GOV.WALES</p> <p>Relative income poverty: April 2021 to March 2022 GOV.WALES</p> <p>Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p> <p>Energy Company Obligation (ECO) Ofgem</p> <p>JRF research on characteristics of households most at risk of fuel poverty Fuel and poverty review June2014.pdf (cse.org.uk)</p>

		residents are in poverty and, or have health conditions or disabilities and therefore having a positive effect on tackling fuel poverty for groups of people that are most at risk of being affected	

SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. **Attach a separate action plan where impacts are substantial.**

There have been no disproportionate negative impacts identified for any particular group, so no further action is required to reduce or mitigate.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

No negative impacts identified so no further mitigating actions required.

- 4.c) Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/.

Although an impact assessment was undertaken as part of the national scheme implementation the demographic data was primarily focused on England. Therefore, although we have used the national impact assessment for reference we have undertaken our own impact assessment for equality based on locally based data for RCT, such as Census 2021 and other relevant published data as listed in the impact assessment to attempt to provide more evidence based assessment relevant to local demographics.

- 4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.

No consultation was required because the scheme is driven nationally by UK Government, with prescribed eligibility. As part of the development of the scheme any necessary formal consultation on the background policy to the scheme was undertaken by Ofgem and Department of Energy and Net Zero, along with an impact assessment.

4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?

Yes

No

SECTION 5 – MONITORING, EVALUATING AND REVIEWING

5a) Please outline below how the implementation of the proposal will be monitored:

The scheme will be monitored and reported quarterly for scheme outcomes in terms of number of applications made, number of successful installs and numbers and types of measures installed. At the end of each financial year a more detailed annual report will be undertaken which will also analyse trends of households accessing assistance, including those that apply but are unsuccessful in receiving assistance. This will help us review delivery of the scheme to identify any barriers and any potential mitigating actions that may be required to maximise the successful delivery of the scheme.

5b) When is the evaluation of the proposal due to be reviewed?

An annual evaluation of the scheme will be undertaken at the end of each financial year for internal monitoring and review. A formal report with outcome figures will be reported to Ofgem annually, as per scheme requirements. At the end of the scheme a final report will be produced (ECO 4 Flex obligation expected to end March 2026) to include an overall analysis of the scheme.

5c) Who is responsible for the monitoring and review of the proposal?

Keryl Lanfear, Housing Strategy Officer

5d) How will the results of the monitoring be used to develop future proposals?

Scheme reports and day to day delivery of the scheme via the Housing Energy Officers will highlight any potential need for changes within future energy efficiency schemes along with any barriers for delivery generally. Throughout the scheme delivery period should any adverse effects be identified by the Energy Officers or through feedback from customers for people in protected groups, this will trigger a review of this impact assessment.

SECTION 6 – REVIEW

For all policy proposals, whether it is a Significant Key Decision or not, you are required to forward this assessment to Diversity and Inclusion team – equality@rctcbc.gov.uk and the Consultation and Engagement team – consultation@rctcbc.gov.uk in the first instance for some initial guidance and feedback.

As part of the Welsh Language, Equalities and Socio Economic Duty Impact Assessment Process all proposals that fall within the definition of Significant Key Decision should present at the Officer Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your report is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Strategic Decision please forward your completed impact assessment, policy proposal/report and consultation report to CouncilBusiness@rctcbc.gov.uk for an Officer Review Panel to be organised to discuss your proposal. See our guidance document for more information on what a Significant Key Decision is.

It is important to keep a record of this process so that we can demonstrate how we have considered and built in equality/Socio economic considerations wherever possible. Please ensure you update the relevant sections below in collaboration with the relevant departments

Diversity and Inclusion team Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
Consultation Comments	Date Considered	Brief description of any amendments made following consultation
Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations

SECTION 7 – SUMMARY OF IMPACTS FOR THE PROPOSAL

Provide below a summary of the impact assessment, to include some of the main positive and negative impacts along with an overview of actions taken since the impact assessment to better contribute to more positive impacts. This summary must be included in the Equality Considerations section of the Delegated Decision report. It is not suitable to only write 'please see full report at Appendix x' in the body of the report. The impact assessment must be published alongside the report.

An Equality Impact Assessment has been completed and the main findings are as follows:-

In summary, the Equality Impact Assessment identifies positive and neutral impacts, and no negative impacts upon the protected characteristics.

SECTION 8 – AUTHORISATIONS

Lead Officer:

Name: Keryl Lanfear

Position: Housing Strategy Officer

Date: 7.9.23

I recommend that the proposal:

- Is implemented with no amendments
- Is implemented taking into account the mitigating actions outlined
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage

Head of Service/Director Approval:

Name: Claire Hutcheon

Position: Head of Housing Strategy & Investment

Date:

Please submit this impact assessment with any SLT/Cabinet Reports.

WELSH LANGUAGE IMPACT ASSESSMENT TOOL

This Welsh Language Impact Assessment (WLIS) tool enables RCT Council to consider the principles and requirements of the [Welsh Language Standards \(No.1\) Regulations 2015](#) to ensure compliance with the [Welsh Language \(Wales\) Measure 2011](#).

Stage 1 – Information Gathering

NOTE: As you complete this tool you will be asked for **evidence to support your views**. Please see [Welsh Language Impact Assessment Guidance](#) for more information on data sources.

Proposal Name:	Energy Company Obligation (ECO) 4 Flexible Eligibility 'ECO Flex'
Department	Prosperity & Development (Housing Strategy and Investment)
Service Director	Derek James
Officer Completing the WLIA	Keryl Lanfear
Email	Keryl.lanfear@rctcbc.gov.uk
Phone	07875072467
Brief Description	The ECO order applies across the UK and places an obligation on energy suppliers to reduce carbon emissions in domestic homes. It runs until March 2026 and it estimated as being valued at £4 billion over the total period. The ECO 4 Flex Scheme is 50% of the overall obligation delivery and LAs can administer and deliver schemes voluntary to level external funding into their areas, without such involvement that part of the funding will not be available for residents in their local authority. Although the LA is not contractually responsible for the installation of energy measures or managing the funding arrangements of the scheme it is responsible for the administration of the scheme. As part of this responsibility we will ensure compliance for communication standards including Welsh Language requirements. To participate and deliver the scheme the LA must publish a Statement of Intent (Sol) on their website, outlining the eligibility criteria and delivery of the scheme along with application processes and then determine applications from residents against the set eligibility criteria, which will be produced bilingually on our website. The Scheme is based on guidance set by Department of Energy and Net Zero (DESNZ) and aims to assist households with characteristics that make

	<p>them more at risk of being in fuel poverty. This includes those living in less energy efficient homes who are in receipt of low incomes/means tested benefits, households with pensioners, children and/or residents with health conditions that are more adversely affected by living in cold homes. Interim reports and a final scheme report will be submitted to Ofgem.</p> <p>The Heat & Save Officer based within the Housing Strategy team will be enabling delivery of this scheme to support actions towards the delivery of the Council's Affordable Warmth Fuel Poverty Strategy 2029-2023 and the new Strategy in addition to the Local Housing Strategy that are both currently under development.</p>
<p>Date</p>	<p>10/08/2023</p>
<p>Please outline who this proposal affects? (Service Users, Employees, Wider Community)</p>	<p>Residents in RCT, Employees, Wider Community</p>

What are the aims of the policy, and how do these relate to the Welsh Language?

The ECO 4 Flex Scheme is a UK wide scheme which is delivered by local authorities on a discretionary basis as part of their interventions to combat fuel poverty and climate change, working towards NetZero and fuel poverty targets. Delivery of the scheme enables RCT residents to access funding available from obligated energy companies, installers or their agents under the ECO flex part of the ECO obligation imposed upon them by UK Government. The application process is available bilingually and there will be no delays due to applications being made in Welsh.

The Council is responsible for the administration of the scheme including the operational delivery of the 'application process' which includes the eligibility assessment and promotion to residents through marketing and engagement will be done bilingually. The delivery of the scheme will have a positive impact on the Welsh Language because the marketing of the scheme will be undertaken bilingually, despite this not being a requirement of the scheme across the UK. Services will also be pro-actively offered bilingually to residents through the existing Heat & Save service which operates as a 'one stop referral hub' for domestic energy related advice and services in accordance with the Council's Welsh Language duties.

As the scheme is primarily delivered in the private market, with energy suppliers, installers and agents also undertaking their own marketing and customer engagement, in many cases companies may be based outside of Wales. However, as part of the scheme administration they require 'Declarations' to be provided from the Council for eligible households. To improve joint working and standards for residents the Council has decided to create an Approved Providers List (APL) and will only be providing declarations to companies that are approved onto the list. As part of the APL all companies will have agreed to a service level agreement (SLA) to ensure that they adhere to the Council's Welsh Language requirements, despite the Council having any formal contractual relationships with the installers directly. Heat & Save Officers will work with installers to help raise their awareness and understanding, encouraging Welsh Language training for their staff, as well as assisting them with translation assistance via the Council in-house translation service (where possible) or an external provider for their own marketing and promotional materials. Companies found not adhering to the Council's Welsh Language requirements will be suspended or removed from the APL and not able to participate in the scheme delivery in RCT until compliance is achieved.

Delivery of the scheme will be done collaboratively through the APL as the Council will have no contractual relationship with installers, but we have developed positive working relationships through previous energy schemes delivered and will continue to work with them to also encourage promotion of the Welsh Language through other activities they undertake outside of this scheme. As many companies also work outside RCT area, this may also have a positive effect on their activities across other areas of Wales.

<p>Who will benefit / Could the policy affect Welsh language groups? If so, list them here.</p>	<p>Residents who are at risk of being in fuel poverty, or those with a cold related illness, living in less energy efficient homes across all tenures in RCT. With the cost-of-living crisis and the energy crisis National Energy Action estimate that the numbers of households in fuel poverty have doubled since October 2022. The Scheme could therefore benefit any resident who is likely to be or become at risk of fuel poverty due to living in energy in-efficient homes and either in receipt of low income or need above average heating due to a health condition, along with those that may be considered more affluent but could at any time find themselves affected by fuel poverty due to changes in their personal circumstances. The fourfold increases in energy bills are resulting in an increasing number of households finding it difficult to heat their homes affordably.</p> <p>Any impact on Welsh Language groups should only be positive as the joint working with delivery partners through the APL will ensure the Welsh language is embedded in working practices.</p>
<p>Current linguistic profile of the geographical area(s) concerned</p>	<p>The 2021 Census figures regarding the Welsh language show a decrease in the percentage of Welsh speakers across Wales to 17.8%. There was, however, a small increase in RCT – the percentage of the population of the county borough who can speak Welsh increased from 12.3% to 12.4%. Numerically, RCT saw a 2.8% increase in the number of Welsh speakers in the county borough, from 27,779 speakers to 28,556 speakers. RCT was also one of only four LAs in Wales to see an increase in the percentage of Welsh speakers – the others were Cardiff, the Vale of Glamorgan and Merthyr Tydfil. All of these are neighbouring county boroughs, which could demonstrate that our region is seeing some positive trends in terms of increases in Welsh speakers, and that there may be a resulting increase in demand for services through the medium of Welsh. As further, more detailed, data from the Census becomes available for RCT (e.g. LSOA data), we will need to consider what impact it may have on the services we provide.</p>
<p>Other relevant data or research</p>	<p>UK Government’s Energy Company Obligation (ECO) Order Energy Company Obligation (ECO) Ofgem</p> <p>RCTCBC’s Affordable Warmth: A Fuel Poverty Strategy 2019-2023 Affordable warmth Rhondda Cynon Taf County Borough Council (rctcbc.gov.uk)</p> <p>Welsh Government’s Tackling Fuel Poverty Plan 2021-2035 Tackling fuel poverty 2021 to 2035 [HTML] GOV.WALES</p>

Stage 2 – Impact Assessment

In this section you need to consider the impact, the evidence and any action you are taking for improvement. This is to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language (Wales) Measure 2011.

Please note there is a separate impact assessment for Equality and Socio-Economic duty that must also be completed for policy proposals.

Remember that effects that are positive for some groups could be detrimental to others - even among Welsh language groups. Consider the effects on different groups. For example, a proposal may be beneficial to Welsh learners, but not to Welsh speakers.

Previous Welsh Language Impact Assessments can be found by [clicking here](#).

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
<p>Opportunities for persons to use the Welsh language</p> <p>e.g. staff, residents and visitors</p> <p>The rights of Welsh speakers and learners to use Welsh when dealing with the council and for staff to use Welsh at Work</p>	Positive	1.) During the Pandemic we have embraced technology in order to provide services differently and this has been an opportunity to promote the Welsh language as people accessing the Council's website have access to services in the Welsh language. This will provide Welsh speakers and	1.) Over the last 2 years no applications have been received in Welsh for any Heat & Save grant assistance despite it being available on our Website bilingually. However, number of users using online tools to access services through the medium of Welsh will	1.) All general communications, marketing and promotion of the scheme will be provided bilingually. Individual language choice of resident will be respected, once communication is with individual direct.

		<p>learners an opportunity to use the Welsh language.</p> <p>2.) Through working collaboratively with our partners (some of whom, such as the Local Health Board, are also subject to the Welsh language standards and therefore obligated to provide services in Welsh) will enable us to promote the Welsh language and have access to a larger pool of staff in order to utilise their Welsh language skills.</p> <p>3.) When meetings are being undertaken all individuals will be given the opportunity to hold the meeting in Welsh and as per standards 24/24A if this is requested the meeting will be facilitated in Welsh with the use of translators (if needed).</p> <p>4.) The Housing Strategy Team will liaise with WLS to help ensure compliance with Welsh Language Standards and will promote awareness/understanding amongst all partners.</p>	<p>continue to be monitored and ensure that all options available in English are available in Welsh.</p> <p>2.) Both staff and people in the community are able to engage digitally and actively have their needs met through these methods.</p> <p>3.) Although no Heat & Save grant applications have been received in Welsh in the last 3 years in Welsh we will continue to increase in the number of grant applications received for Eco 4 Flex and general Heat & Save services</p>	<p>2.) Develop digital inclusion skills and opportunities – linking into Digital Communities Wales. We will work with local libraries, community groups, schools and colleges to help reach those that are digitally excluded and also to promote the scheme availability through the medium of Welsh.</p> <p>3.) Actively promote and monitor delivery of the scheme utilising resident feedback and spot checks to ensure that installers are using bilingual materials and making their services available in Welsh. Where external partners have their own Welsh Language standards there will be an expectation to abide by the strongest set of standards. We will also encourage installers to have Welsh speakers (where possible) in their own organisations and</p>
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		<p>5.) Partners registered on the APL who may be based both within or outside of RCT area will be provided with the opportunity to work with us through the medium of Welsh.</p>		<p>promote Welsh Language training to their workforce.</p> <p>4.) Actively promote Welsh language options to applicants/residents by ensuring that correspondence pro-actively invites people to communicate with us in Welsh by using standard wording bilingually.</p>
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Stage 2 – Impact Assessment

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
<p style="text-align: center;">Numbers and / or percentages of Welsh speakers</p> <p>e.g Welsh Medium Education / Study Opportunities. Links with the Welsh Government's Cymraeg 2050 Strategy / RCTCBC Five Year Welsh Language Strategy</p>	<p style="text-align: center;">Positive</p>	<p>1.) The Welsh Government's ambition is to see the number of people able to enjoy speaking and using the Welsh language to reach a million by the year 2050, RCTCBC hopes to encourage this ambition by providing the conditions to facilitate an increase in the use of the Welsh language in line with the RCTCBC 2022-2027 Welsh Language Promotional Strategy and its accompanying action plan. 51821-41 Welsh Language Promotion Strategy Cover 2022-27.qxp Layout 1 (rctcbc.gov.uk)</p> <p>2.) This Scheme will support these goals by ensuring, wherever possible, that Welsh speakers/learners</p>	<p>1.) In line with the Council's Welsh Language Promotional Strategy and our Welsh Language Standards, the Scheme Guidance and Statement of Intent will be provided in both Welsh and English and any materials including bilingual text will be provided Welsh first.</p> <p>2.) Monitor numbers of staff and service users accessing Welsh language courses. RCTCBC will encourage staff and partners to enable staff to have access to Welsh Language courses and we will monitor this to ensure its effectiveness.</p>	<p>1.) Ensure our key partners provide and promote scheme information and access to services through the medium of Welsh.</p> <p>2.) Review the number of new ECO 4 flex applications received in Welsh.</p> <p>3.) Work with our APL delivery partners to support and develop scheme marketing materials and access to their services are provided in English and Welsh (where possible) and providing support and guidance on how to access translation</p>

		<p>have access to Heat & Save energy services that provides them the opportunities to continue to use/learn the Welsh language.</p> <p>3.) Developing the skills of staff and service users will help to increase the numbers of Welsh speakers by ensuring training is actively offered in Welsh and by ensuring Welsh language courses are promoted to Council staff and delivery partners of the scheme by reminding everyone of the internal and external courses available and reminding staff that they can attend during working hours.</p>		<p>services (including offering the Council's free translation service).</p> <p>4.) Promote Welsh language courses to staff and service users.</p> <p>5.) Work with the Welsh Language team to develop briefing notes to inform staff of the Welsh Language services that they need to offer customer/clients.</p>
<p>Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life in work and in the community</p> <p>Actively encourage and promote the use of our services in Welsh to see an increase in demand over time</p>	Positive	<p>1.) All promotional material for the scheme is provided bilingually with Welsh appearing first.</p> <p>2.) Improved access to the Council's website will provide an opportunity to promote the Welsh language</p>	<p>1.) Monitor increase in the take up of partners providing marketing materials and resident engagement.</p>	<p>1.) Ensure that all material is bilingual with both Welsh and English published in line with the Welsh Language Standards.</p>

Stage 2 – Impact Assessment

Will the proposed action affect any or all of the following?

	Does the proposal have any positive, negative or neutral impacts?	Describe why it will have a positive/negative or neutral impact on the Welsh language.	What evidence do you have to support this view?	What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
<p>Compliance with the <u>Council's Statutory Welsh Language Standards</u> e.g increasing or reducing the Council's ability to deliver services through the Medium of Welsh.</p> <p>Consider the rights of Welsh speakers to use Welsh when dealing with the Council and for staff to use Welsh at Work</p>	<p>Positive</p>	<ol style="list-style-type: none"> 1.) The delivery of this Scheme will increase the Council's ability to deliver services and promote other services delivered in the private market through the medium of Welsh. 2.) Consideration to the rights of Welsh speakers to use Welsh language when dealing with the Council and for staff members who wish to use Welsh at work. 3.) The Council will procure partners to the APL in line with the requirements of the Welsh Language Standards, specifically Standards 76-80 which will enables suppliers 	<ol style="list-style-type: none"> 1.) Increase in number of applications received through the medium of Welsh will be evidenced via the Council's online applications which is accessible bilingually. 2.) Increase in the number of grant applications communicating via the telephone or email in Welsh. 3.) Increase in the number of installers using bilingual marketing materials and engaging with residents in Welsh. The Scheme Guidance including the Statement of Intent will be published online bilingually. 	<p>Actively promote and monitor delivery of the scheme utilising resident feedback and spot checks to ensure that installers are using bilingual materials and making their services available in Welsh.</p> <p>Actively promote Welsh language options to applicants/residents when they engage with the service.</p>

		<p>to submit an application in Welsh if that is their wish.</p> <p>4.) All relevant standards will be provided to partners joining the APL list to ensure they are able to comply with our statutory responsibilities. Standard 94 requires the Council to publish a policy on awarding grants – all grants the Council awards must be considered how the proposed use will impact the Welsh language, but as there is a specific grant criteria for this scheme the wider implications are not applicable.</p> <p>5.) All residents are provided with the option of applying for grant assistance and/or engaging with the service in Welsh relevant to standards 70-75. Back-office services, such as complaints handling, correspondence, publicity, websites and phone services – where these enabled or provided directly by the Council will be available in Welsh.</p>	<p>4.) Any complaints will be dealt with under the Council's Corporate procedure, in line with the Welsh Language Standards</p>	
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Treating the Welsh language, no less favourably than the English language	Positive	See above	See above	Provide any bilingual materials with the Welsh Language first, before English.
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Stage 3 - Strengthening the proposal

Having listed actions in section 2 which may mitigate any negative impacts or better contribute to positive impacts – please record below which ones you will imbed into the policy proposal and who will be responsible for them.

Also consider is the proposal necessary? Would it be possible to meet demand without any new developments? Could other existing provision be used? Where should the development be?

What are you going to do?	When are you going to do it?	Who is responsible?
Review how we have embraced technology and provided services differently during the COVID-19 pandemic and further enhance these by ensuring we deliver information in the Welsh language.	Ongoing	RCTCBC Housing Strategy Team
Actively promote and monitor delivery of the scheme utilising resident feedback and spot checks to ensure that installers are using bilingual materials and making their services available in Welsh.	Ongoing	RCTCBC Housing Strategy Team
Actively promote Welsh language options to applicants/residents when they engage with the service via all pathways/sources.	Ongoing	RCTCBC Housing Strategy Team
RCTCBC will ensure its key partners provide and promote information through the medium of Welsh.	Ongoing	RCTCBC Housing Strategy Team
Provide any bilingual materials with the Welsh Language first, before English, published in line with Welsh Language requirements	Ongoing	RCTCBC Housing Strategy Team

Review the number of new ECO 4 flex applications received in Welsh.	Ongoing	RCTCBC Housing Strategy Team
Work with our APL delivery partners to develop scheme marketing materials available in English and Welsh and where offered bilingually Welsh text is provided first. Monitor this throughout the scheme delivery period.	Ongoing	RCTCBC Housing Strategy Team
Actively promote both Council services and services offered by key partners that are available in Welsh.	Ongoing	RCTCBC Housing Strategy Team
Promote Welsh language courses to staff, applicants/residents and delivery partner staff.	Ongoing	RCTCBC Corporate
Ensure the guidance sheet of requirements of the standards for commissioned partners is available for installers	Ongoing	RCTCBC Housing Strategy Team
If ways of reducing the impact have been identified but are not possible to implement, please explain why. Give sufficient detail of data or research that has led to your reasoning.		
What was identified?	Why is it not possible?	
Offering all services in accordance with Welsh Language standards	<p>Not all of the Council's APL delivery partners will have their own Welsh Language Standards. As part of the APL process we can ensure that the registered installers ensure that promotional materials are provided bilingually we can only promote and encourage that they provide Welsh speaking services as we have no direct contractual relationship with them for this scheme.</p> <p>Any installer found not in compliance with our SLA for promotional materials will be removed from the APL register for delivery of this scheme.</p>	

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Stage 4 – Review

For all policy proposals, whether it is a Significant Key Decision or not, you are required to forward this assessment to Welsh Language services – welshlanguageofficer@rctcbc.gov.uk and the Consultation and Engagement team – consultation@rctcbc.gov.uk in the first instance for some initial guidance and feedback.

As part of the Welsh Language, Equalities and Socio Economic Duty Impact Assessment Process all proposals that fall within the definition of Significant Key Decision should present at the Officer Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your report is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Strategic Decision please forward your completed (Stage 1>6) impact assessment, policy proposal/report and consultation report to CouncilBusiness@rctcbc.gov.uk for an Officer Review Panel to be organised to discuss your proposal. [See our guidance document](#) for more information on what a Significant Key Decision is.

It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable Welsh language considerations wherever possible. Please ensure you update the relevant sections below in collaboration with the relevant departments.

Welsh Language Services Comments	Date Considered	Brief description of any amendments made following Welsh Language Services feedback
<p>Welsh Language Services welcome this comprehensive Welsh Language Impact Assessment and the proposals put forward. There are, however, some areas in which further improvement would help strengthen the WLIA.</p> <p>First of all, we would like to see some more detail in terms of actual numbers/percentages being used to illustrate some of the increases alluded to. This would strengthen the proposals put forward as the evidence would include further detail.</p> <p>Something we feel that is really important here as well is that any external partners or third parties are aware of their responsibilities in terms of the Welsh Language Standards and that they ensure that a pro-active offer for language</p>		<p>Further detail and evidence added where data was available.</p> <p>The Housing Strategy team will lead by working with the Welsh Language Team drawing on their expertise, knowledge and experience to pass on relevant information (such as summary sheet of standards available from Welsh Language Team) to installers to help them understand their requirements and seek</p>

choice is in place when possible. Furthermore, if the Housing Strategy Team will be leading on this, it is important that they are familiar with the Standards so that they can support external partners when needed.		further advice from Welsh Language team as required to support installers.
Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
Consultation Comments	Date Considered	Brief description of any amendments made following consultation

Stage 5 – Monitoring, Evaluating and Reviewing

How and who will you monitor the impact and effectiveness of the proposal?

The ECO 4 Flex Scheme will be delivered for the duration of the relevant ECO Order by UK Government (which is currently until March 2026). During this time the Housing Strategy Team will be monitoring and reporting on performance outcomes data around delivery of the scheme on a quarterly and annual basis. We will continually review use of Welsh Language through grant applications and engagement with service throughout the whole the delivery period and consider effectiveness of services and seek improvements as required. A formal end of scheme report will also need to be provided to Ofgem as part of Scheme delivery requirements, although Welsh Language information will not be required for this, we will be able to analyse and report on accessibility and access to our services available in Welsh.

We will hold regular progress meetings with staff involved in the delivery of the scheme as well as scheme delivery partners to review scheme delivery and outcomes including Welsh Language requirements throughout delivery of the scheme. We will also collate and monitor take up of Welsh Language services to help us review if they are fit for purpose and seek feedback from residents and installers using these services.

Stage 6 – Summary of Impacts for the Proposal

Provide below a summary of the impact assessment, to include some of the main positive and negative impacts along with an overview of actions taken since the impact assessment to better contribute to more positive impacts. This summary must be included in the Welsh Language Considerations section of the SLT/Cabinet report template. It is not suitable to only write 'please see full report at Appendix x' in the body of the report. The impact assessment must be published alongside the report.

A Welsh Language Impact Assessment has been completed and the main findings are as follows –

The delivery of the ECO 4 Flex scheme will have a positive effect on the Welsh Language, Welsh speakers and Welsh learners that are not a necessary requirement of the legislation or the scheme but will be adopted, promoted and implemented by RCTCBC.

Working together with partners will help raise awareness to all delivery partners of these requirements of the Welsh Language Measure 2011 and the Welsh Language Standards, along with ensuring that the scheme delivery complies with these and actively promotes the opportunity to communicate/engage with us in Welsh. It is envisaged that this work will also have a positive impact on the other core business activities that installers undertake while working both within RCT and Wales as a whole by raising their understanding of what is required and where to access support, including training resources for their own staff who may be keen Welsh learners.

The Scheme will assist some of the most disadvantaged households in the county borough and allow them to engage with us through the medium of Welsh both in terms of advice and support services provided and through the grant application process by ensuring all information is produced bilingually along with promoting training and developing Welsh language skill of staff. Marketing and engagement will be delivered through a range of methods all of which will be available in Welsh.

Stage 7 – Sign Off

Name of Officer completing the WLIA	Keryl Lanfear	Service Director Name:	Derek James
Position	Housing Strategy Officer	I recommend that the proposal: (Highlight decision)	Is implemented with no amendments

			Is implemented taking into account the mitigating actions outlined
			Is rejected due to disproportionate negative impacts on the Welsh language
Signature		Service Director Signature	
Date		Date	