

# Equality Impact Analysis Template

## Section 1: Introduction


Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
The Barkantine Heat Network PFI Transitional Agreement
Service area and Directorate responsible
Sustainability, Housing and Regeneration Directorate
Name of completing officer
Alice Jones, Energy and Sustainability Projects Officer
Approved by (Corporate Director / Divisional Director/ Head of Service)
Date of approval
03/05/2024

**Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.**

### Conclusion – To be completed at the end of the Equality Impact Analysis process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.*

*The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.*

Conclusion	Current decision rating (see Appendix A)
<p>It is the finding of this EQIA that the stability provided by the proposal, as well as the opportunity to improve the functioning and efficiency of the Network, will substantially benefit many residents, service users and the wider community across protected characteristics.</p> <p>Continuation of the Service under the current provider, for an extension period of 2 years, will minimise the risk of potential disruption to heat provision to residents, many of whom may be vulnerable. Extension of the current PFI contract will also further the Council’s aim to expand and decarbonise the Network, continuing to provide a low-cost heat solution which will tackle fuel poverty, support housing and infrastructure development on the Isle of Dogs and meet the Council’s carbon reduction targets, to the benefit of all residents.</p> <p>In the remainder of cases, where a protected group does not experience a direct positive effect, the impact will be neutral.</p>	<p><b>Green</b></p> 

**The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:**

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the council’s [website](#).

## Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

### **Purpose**

The purpose of this EQIA is to explore the potential impact of extension and modification to the existing PFI contract on residents, service users of the Network and the wider community with protected characteristics and to ensure that the Council complies with its duties under the Equality Act 2010. The proposal does not have an impact upon Council staff.

### **Background**

The Barkantine Heat and Power project was established in March 2000 through a 25-year Private Finance Initiative ('PFI') contract ('Contract') between the London Borough of Tower Hamlets (the 'Council') and the Barkantine Heat and Power Company Limited ('BHPC'). BHPC was set up to design, build, operate, maintain and finance the Barkantine District Network (the 'Network') in the Isle of Dogs, Tower Hamlets. The incumbent provider of these services is EDF Energy.

Located in an Edwardian substation building, the Network consists of an Energy Centre containing a 1.4MWe combined heat and power (CHP) engine and four 1.4MWth heat only boilers. The Network was initially built to supply heating and hot water to 700 homes in high- and low-rise blocks (predominantly homes owned and managed by the Council but subsequently transferred to One Housing Group in 2005), a leisure centre, swimming pool and a primary school to address the issues of fuel poverty, affordable energy and global warming, and support urban renewal.

The Contract will expire in October 2025 and assets of the Network are intended to be handed back to the Council. To enable the continued provision of heat to the existing customers, new arrangements will need to be put in place to manage the Network or alternative provisions made. The Council has considered several options, including extension to the current contract, which will temporarily maintain the status quo, or a short-term procurement to enable service to continue.

### **Proposal**

To continue to deliver heat to new and existing customers, the Barkantine PFI Steering Group has agreed a Preferred Way Forward (PWF), which involves modifying and extending the existing PFI agreement with EDF. This extension to the contract will be in place from October 2025 for a period of 2+ years. During this time, the Project Team will continue to shape the strategy to expand and decarbonise the Network, with the intention

to procure a long-term delivery partner, through a competitive tender process, beyond the contract extension. The PWF was identified by the Project Team and its Legal Consultant, Sharpe Pritchard LLP, to be the option least likely to hold legal, financial, social and political risks and to deliver maximum benefits to the Council and customers of the Network. It aims to:

- Ensure continuation of services to existing customers to prevent loss of service (heat, billing and maintenance).
- Facilitate a route to decarbonisation and expansion of the network.

The Barkantine PFI Steering Group agrees that an extension to the existing agreement is the best way to ensure the continuation of services and minimise potential disruption to residential and commercial customers. As the incumbent provider, EDF will continue to deliver services, there will not be any period of handover, transfer or mobilisation. EDF has familiarity with the asset and customers, and a strong relationship has been built between the Project Team and relevant professionals at EDF, which will continue post-expiry.

An extension will also assist the Council in meeting its long-term aims to decarbonise and expand the Network, supporting future development on the Isle of Dogs by providing a low-cost, low carbon heat solution to residents and helping the Council to meet its poverty reduction, net zero and housing delivery targets. The extension will provide the Project Team with the crucial time needed, and resource saved from avoiding a short-term change in Provider, to focus on a strategy for decarbonisation and expansion and the specification for the procurement of a long-term delivery partner. This includes the application for grants to make improvements to the Network, in line with recommendations arising from an Asset Condition Survey completed in January 2024.

Another option to deliver heat post-expiry was considered and remains in contingency. This option was to procure a partner to manage the scheme, on a short-term contract of 2 years. The Project Team identified several risks in proceeding with this option as the PWF. Soft market testing undertaken in the summer of 2023, had identified that there was not significant appetite among potential suppliers to bid for a short-term contract. This could result in a non-viable bidder, or no bidders for the post-expiry services. There is a risk that services to customers might be disrupted in this period, resulting in an unpredictable heat loss to residential and domestic users of the Network. Additionally, this option may impede the Council's ability to apply for grants to improve the Network, as such grants require the incumbent supplier, EDF, to facilitate this. It is unlikely this would be completed if EDF would no longer be involved in the Network post-2025.

## Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

### **Contextual evidence**

There are a range of contextual factors which impact on residents and are relevant to decision-making related to the Barkantine Heat Network. These include policy and regulatory changes, Council priorities and key issues in the borough.

### **Heat networks**

Heat networks are vital to the government's net zero strategy. In high density areas, such as Tower Hamlets, they are often the lowest cost, low carbon heating option, by offering a communal solution, capturing or generating heat locally, for provision to a range of homes and businesses. By supplying multiple buildings, they avoid the need for individual boilers or electrical heaters in each building. Heat networks are also unique in their capacity to use local sources of waste heat, for example from factories and data centres.

The landscape around district heating is changing, and the government is keen to expand and strengthen the sector. This is via schemes such as the Heat Network Efficiency Scheme (HNES), which provides grant funding to support performance improvements to existing or operational district heating projects. There are also regulatory changes due to come into force, such as the implementation of heat network zoning via the Energy Act 2023. This will designate zones in which heat networks are expected to offer the lowest cost solution for decarbonising heat and provide communities with the tools to accelerate the development of heat networks. Within these zones, larger, non-domestic heat demands will be mandated to connect to heat networks. This is expected to impact on development surrounding the Barkantine Heat Network.

### **Fuel poverty**

As of January 2024, according to the Low-Income Family Tracker dashboard, 12,157 low-income households in Tower Hamlets are in fuel poverty (39% of the total number of low-income households). 15,005 children live in these households. 3.1% of households in Tower Hamlets do not have central heating, which is slightly above the rate in England of 1.5%. The Council is committed to tackling this as Priority 1 of the Strategic Plan: Tackling the cost-of-living crisis. Fuel poverty has

been shown to have significant negative impacts on health and wellbeing, including increasing incidences of respiratory disease and rates of depression.

### **The housing crisis**

The London housing crisis is acute in Tower Hamlets, with more than 19,000 on the waiting list. This is compounded by significant population growth, with the number of residents in the borough increasing by 22.1% between the 2011 and 2021 censuses. Addressing this issue is a key objective for the Council, as laid out in Priority 2 of the Tower Hamlets Strategic Plan 2022-26: Providing homes for the future. This aims to deliver social homes, house the homeless and tackle overcrowding. The London Plan identified the Isle of Dogs and South Poplar as an Opportunity Area, with the potential for 29,000 new homes by 2041. This growth, and the increase in the demand of electricity and heating resulting from it, will present a significant challenge to the Council unless proactive steps are taken to improve the infrastructure in the area, while supporting its wider climate agenda.

### **The climate crisis**

Tower Hamlets Council aims to become a net zero carbon borough by 2045, which presents a significant challenge, as it currently produces the fourth highest level of total carbon emissions in London. The Tower Hamlets Strategic Plan highlights this ambition within Priority 7: A clean and green future, including the desire to move towards low-carbon sources of heat and power.

### **Protected characteristics**

Using data gathered from the 2021 census and borough profile, in addition to other sources, it is possible to build a picture of the specific challenges and vulnerabilities facing protected groups within Tower Hamlets.

#### **Age (all age groups)**

Tower Hamlets has a significantly younger population than the rest of England. This is primarily distributed between the 20 – 44 age categories, with a comparatively low number of older people than in England, and a roughly average number of children and people under 19. The pensioner poverty rate in Tower Hamlets (44%) is nearly double that of London (23%) and is currently the highest rate in England. The levels of child poverty in the borough (32.5%) are also nearly double that of London (19%) and is also the highest level nationally.

Housing costs are known to play a significant role in perpetuating child poverty in Tower Hamlets. Around 60% of children live in a house which relies on Housing Benefit. Poverty can stunt physical growth and development in children, shorten

life expectancy and widen achievement gaps. Children are also more vulnerable to negative impacts from fuel poverty and living in a cold or damp environment.

There is also a correlation between age and proficiency in English. Levels of language proficiency are low among older Bangladeshi residents, with around a quarter having low proficiency in the English language. This can make it harder to access suitable healthcare and other services. This may be compounded by high rates of digital exclusion among the elderly, which can present barriers to inclusive service access and participation.

### **Disability (physical, learning difficulties, mental health and medical conditions)**

The population of Tower Hamlets has proportionately fewer residents who identify as disabled under the Equality Act (12.9%) than across the whole of England. This might be due to its younger population, as 72.7% of residents who identify as having a disability in the borough are above 50 years old. There is a correlation between deprivation and disability with 13,731 low-income households (44% of the total number of low-income households) classed as disabled (claiming ESA, DLA or both). 9,890 of these households are claiming the highest level of disability or sickness benefits (claiming higher DLA, higher AA or enhanced PIP. 3,316 children live in these households.

People with a long-term illness or disability are more likely to experience fuel poverty and are vulnerable to negative impacts resulting from a disruption in their heat provision, particularly in winter. More than twice the percentage of people identified as homeless were disabled (44.1%) when compared with the rest of the population of England and Wales (17.5%) and double the percentage of people identified as homeless reported bad or very bad health when compared with the rest of the population of England and Wales (13.2% versus 5.2%).

### **Sex**

Tower Hamlets is unusual in that it has a slightly higher proportion of males (50.2%) in the borough than females (49.8%) compared to England as a whole (49% and 51% respectively). Within the borough's adult population, women are twice as likely as men to have poor proficiency in English, and most older Bangladeshi women (93%) have poor proficiency levels in English.

### **Gender reassignment (and people with different Gender Identities e.g. Gender fluid, Non-Binary etc)**

Around 1% of residents in Tower Hamlets have a different gender identity to their sex registered at birth. This is the same proportion as London, but twice the proportion of the whole of the UK (0.5%).



### **Marriage and civil partnership**

32% of residents in the borough are married or in a registered civil partnership, with 58.3% never having married or registered a civil partnership. A remaining 9.7% residents were separated, divorced or widowed.

### **Religion or philosophical belief**

Tower Hamlets has a significantly different profile in terms of religious belief to England as a whole. Fewer people in Tower Hamlets state they have no religion (26.6%) than in England (36.7%), and significantly fewer responded that they were Christian (22.3% versus 46.3% nationally). Conversely, a far higher proportion of residents identified as Muslim (39.9%) than in England as a whole (6.7%), making it the borough with the highest proportion of Muslim residents in England and Wales. There was correlation between religion and English language proficiency, with a significant number of residents who identified as Muslim or Christian stating that they could not speak English well.

According to the 2021 census, Muslim residents were the least likely to be in long-term employment (both males and females), with female Muslims being significantly less likely than males. Residents who identified their religion as Muslim, particularly those over 50 years old, were much more likely than other religious groups within their age bracket to have ill health.

### **Race and ethnicity**

Tower Hamlets is more ethnically diverse than England and London. Around 40% of the population in Tower Hamlets is White compared to around 53% in London and around 82% in England. Around 34% of the population in Tower Hamlets is Bangladeshi, with 44% identifying as Asian or Asian British. Tower Hamlets also has the third highest Chinese population in the country. 46.8% of residents were born outside of the UK, compared to 17.4% of England's total population and 6.2% of residents in Tower Hamlets cannot speak English well, or at all, compared to 1.9% in England as a whole.

The Black, Asian and Minority Ethnic (BAME) communities in Tower Hamlets face significant challenges related to inequality and deprivation. BAME households account for 78% of all households on the housing register, and a higher proportion of people identified as homeless in the 2021 census identified within the "Black, Black British, Black Welsh, Caribbean or African" (15.0%), "Mixed or Multiple ethnic groups" (5.1%), or "Other ethnic group" (6.1%) high-level categories, when compared with the rest of the population of England and Wales (4.0%, 2.9%, and 2.1%, respectively). 31% of Asian/Asian British and 19% of Black/African/Caribbean/Black British households experience overcrowding. Bangladeshi residents were also the most likely to report that they were in bad or very bad health.



### **Sexual orientation**

A relatively high number of residents identify their sexual orientation as Lesbian, Gay, Bisexual or Other (7.2%), compared to England and Wales as a whole (3.1%).

### **Pregnancy and maternity**

There were 4,381 live births in Tower Hamlets in 2021. By the global standard, giving birth in the UK is safe, but women living in the most deprived areas have the highest maternal mortality rate compared to those living in the least deprived areas. Compared to London, Tower Hamlets has a higher level of low-birth-weight babies, which are an indicator of poor maternal health as well as infant health.

### **People with care experience**

As of March 2023, there were 301 children in local authority care in Tower Hamlets, and the Through Care Service was supporting 457 care experienced young people between the ages of 14 and 25. Children in care are more likely to have Special Educational Needs (SEN). In Tower Hamlets, 34.9% have an Education, Health & Care Plan (EHCP) and 20.9% are with SEN Support (for 2022) This compares to 5.4% of all pupils in all Tower Hamlets schools with an EHCP and 11.6% with SEN Support. 41% of 19–21-year-old care leavers are not in education, employment or training compared to 12% of those who have not experienced care. An estimated 26% of the homeless population have care experience.

### **Socio-economic**

Tower Hamlets is a borough where there is significant inequality. 20.9% of residents are within the highest socio-economic classification, as per the 2021 census data, well above the national average of 12.2%. It is a highly qualified borough, with 50.3% of residents achieving Level 4 qualifications and above, versus 33.9% overall. These positive outcomes are not evenly distributed, however. The proportion of residents who have never worked and are long-term unemployed are 13% in Tower Hamlets but 8.5% in England as a whole, and 53.6% of households are facing at least one dimension of deprivation. 56% of children estimated to be living in low-income families, the highest level of child poverty in the UK. The borough also has the highest level of pensioner poverty in the UK.

Many individuals with protected characteristics can be more vulnerable to experiencing poverty. Several factors are thought to contribute to the high levels of poverty in the borough, including higher levels of household unemployment than average, the high cost of living (especially housing) and the increase in low-paid, insecure work.

Poverty can have a range of impacts, including on an individual's mental and physical health, restrict their education and opportunities, access to housing and increase their risk of experiencing crime. People experiencing poverty are also at a higher risk of digital exclusion, due to a lack of access to devices or digital services, or a lack of skills. This can make it more challenging to access services or participate in certain aspects of society.

### **Parents/carers**

There are 64,200 0–17-year-olds in Tower Hamlets in 2021, amounting to 21% of the population. This suggests that high numbers of people in the borough are parents.

6.4% of residents over 5 years old provide unpaid care in Tower Hamlets. In the UK in general, poverty is particularly high within families where there are adults being cared for, with more than one-third living in poverty. The inability to work is the key driver for much poverty amongst carers. In 2017/18, 36% of working-age carers were not in work, compared with 23% of non-carers.

People with caring responsibilities, whether for dependent children or persons with ill health or disabilities, may be more reliant on social services, and therefore vulnerable to service disruption. They may also find it challenging to balance caring responsibilities and employment, leading to an increased risk that they will experience poverty.

### **Sources**

The following sources were used to obtain the above information:

- [Annual Public Health Report 2022 | London Borough of Tower Hamlets](#)
- [Black, Asian and Minority Ethnic Inequalities Commission Report and Recommendations 2021 | London Borough of Tower Hamlets](#)
- [Borough profile | London Borough of Tower Hamlets](#)
- [Census 2021 | ONS](#)
- [Child Poverty Briefing | London Borough of Tower Hamlets](#)
- [Corporate Parenting Strategy | London Borough of Tower Hamlets](#)
- [Economic Fairness – Fuel Poverty | London Datastore](#)
- [Fuel poverty detailed tables under the Low Income Low Energy Efficiency Indicator | GOV.UK](#)
- [Heat networks | GOV.UK](#)
- [How life has changed in Tower Hamlets: Census 2021 | ONS](#)
- [Inspiring and supporting Tower Hamlets women into leadership | London Borough of Tower Hamlets](#)

- [Isle of Dogs and South Poplar Opportunity Area | London City Hall](#)
- [Language proficiency in Tower Hamlets | London Borough of Tower Hamlets](#)
- [Maternal Report | MBRRACE-UK](#)
- [Official Census and Labour Market Statistics | Nomis](#)
- [Poverty Review 2021 | London Borough of Tower Hamlets](#)
- [Tackling London's housing crisis | London City Hall](#)
- [The London Plan | London City Hall](#)
- [The Tower Hamlets Children and Families Partnership Strategy 2024-2029 | London Borough of Tower Hamlets](#)
- [Tower Hamlets Council Strategic Plan 2022-2026 | London Borough of Tower Hamlets](#)
- [Tower Hamlets State of the Borough 2023 | London Borough of Tower Hamlets](#)
- [Understanding the challenges faced by fuel poor households | GOV.UK](#)

## Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
<b>Protected</b>				
<b>Age</b> (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>People who are older, or very young, may be more vulnerable if their house experiences a loss of heat, especially in winter. In the event of service disruption, older residents, who may have lower proficiency in English, or face digital exclusion, could find it harder to access support or replacement heat. The stability in service provision provided by the proposal will benefit these residents by reducing the likelihood that they will experience an interruption in heat provision.</p> <p>Additionally, the extension will enable the fulfilment of long-term objectives to expand and decarbonise the Network. This will support Council aims related to tackling fuel</p>

				poverty and the housing crisis, which will benefit children and older residents, who may be more vulnerable to deprivation.
<b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>People who have physical or learning disabilities, or mental health and medical conditions, may be more vulnerable if their house experiences a loss of heat, especially in winter. The stability in service provision provided by the proposal will benefit these residents by reducing the likelihood that they will experience an interruption in heat provision.</p> <p>People living with disabilities are also more likely to experience poverty, and homeless people are also likely to also have at least one disability. Supporting the expansion and decarbonisation of the Network would benefit these residents by providing a low-cost heat source to reduce fuel bills and a greater number of available houses.</p>
<b>Sex</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Women in Tower Hamlets are twice as likely to have low English language proficiency than men. In the event of service disruption leading to a loss of heat, these women may be more vulnerable if</p>

				they cannot communicate easily for assistance. The stability in service provision provided by the proposal will benefit these residents by reducing the likelihood that they will experience an interruption in heat provision.
<b>Gender reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposal will not disproportionately impact on residents who have undergone gender reassignment. In the case that residents identify with one or more other protected characteristics, the impact would be positive.
<b>Marriage and civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposal will not disproportionately impact on residents due to their marriage or civil partnership status. In the case that residents identify with one or more other protected characteristics, the impact would be positive.
<b>Religion or philosophical belief</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Data indicating that residents who identify as Muslim experience greater ill-health. This might make them more vulnerable to a disruption in heat provision. Residents



				<p>without a good proficiency in English might also face barriers to seeking help in this event. The stability provided by the proposal would minimise the risk of service disruption to these residents.</p>
<b>Race</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Some residents may have lower proficiency in English, which could impede their access to support in the event of a disruption in heat provision. The data also show that Black, Asian and Ethnic Minority residents face greater health inequalities, which would make them more vulnerable in the event of a heat loss incident. The stability provided by the proposal would minimise this risk.</p> <p>Black, Asian and Ethnic Minority residents are also at a higher risk of experiencing poverty and issues with housing and overcrowding. Supporting the expansion and decarbonisation of the Network would benefit these residents by providing a low-cost heat source to reduce fuel bills and increase housing development, to ease the housing crisis in the borough.</p>
<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

				The proposal will not disproportionately impact on residents due to their sexual orientation. In the case that residents identify with one or more other protected characteristics, the impact would be positive.
<b>Pregnancy and maternity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Women who are pregnant or on maternity may be more vulnerable if their house experiences a loss of heat, especially in winter. The stability in service provision provided by the proposal will benefit these residents by reducing the likelihood that they will experience an interruption in heat provision.
<b>People with Care Experience</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	People with care experience are disproportionately more likely to experience homelessness and fuel poverty. The proposal will support the development of new housing on the Isle of Dogs, some of which will also be social housing. This will benefit people with care experience who may face difficulties accessing housing in the borough. The expansion and decarbonisation of the Network will also continue to provide a low-cost heat solution

				to residents who may be at risk of fuel poverty.
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some people may experience fuel poverty because of their socio-economic status or may be at higher risk of homelessness. The proposal will support the development of new housing on the Isle of Dogs, some of which will also be social housing. This will benefit people experiencing poverty, who may face difficulties accessing housing in the borough. The expansion and decarbonisation of the Network will also continue to provide a low-cost heat solution to residents who may be at risk of fuel poverty.
<b>Parents/Carers</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parents and carers in the borough may be at a greater disadvantage in the event of a disruption in service provision leading to a loss of heat, due to the higher risks faced by the people they care for. They may also face challenges in accessing support to deal with heat loss, because of their caring responsibilities. The stability in service provision provided by the proposal will benefit these residents by reducing the

				<p>likelihood that they will experience a loss of heat in their homes.</p> <p>There is also evidence that parents and carers are more vulnerable to facing fuel poverty and issues with housing. Supporting the expansion and decarbonisation of the Network would benefit these residents by providing a low-cost heat source to reduce fuel bills and a greater number of available houses.</p>
<p>People with different <b>Gender Identities</b> e.g. Gender fluid, Non-Binary etc</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The proposal will not disproportionately impact on residents due to their gender identity. In the case that residents identify with one or more other protected characteristics, the impact would be positive.</p>
<p><b>Any other groups</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No other groups have been identified who would experience a disproportionate impact resulting from the proposal.</p>

## Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
If the proposal is approved, no action is needed. In the event the proposal is not approved, and the Council opts for the short-term competitive tender pathway, another EQIA must be completed to assess the impact upon residents.	Complete a further EQIA, in the event that the PWF is not approved and the Council seeks to procure a short-term contract for heat provision.	N/A	Abdul Khan	

## Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?




Should the Council decide to proceed with the proposal to extend and modify the PFI contract with EDF for 2 years post 2025, no further action needs to be taken, as the impact upon all residents has been assessed as positive or neutral. If the PWF is not approved, the Council may have to progress a second contingency

option of a competitive procurement of a short-term partner to ensure the provision of heat to the Council's residential and commercial customers on the Isle of Dogs. This EQIA has identified that proceeding with this option may present a risk of disproportionate negative impacts upon residents across a range of protected characteristics, and therefore a further EQIA should be completed to fully understand this.



## Appendix A

### EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 
<p>As a result of performing this analysis, the policy or activity does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>Proceed</b></p>	<p><b>Green</b></p> 