

Winchester City Council

Equality Impact Assessment (EqIA)



Section 1 - Data Checklist

When undertaking an EqIA for your policy or project, it is important that you take into consideration everything which is associated with the policy or project that is being assessed.

The checklist below is to help you sense check your policy or project before you move to Section 2.

		Yes/No	Please provide details
1	Have there been any complaints data related to the policy or project you are looking to implement?	No	No complaints have been received to date regarding the solar panel charging policy.
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about the way the policy or function has or will be implemented?	Yes	Officers across Housing Services have been involved in the development of the policy.
3	Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?	Yes	Two focus groups with 18 tenants raised questions and ideas. A summary of this feedback will be appended to the Cabinet report.
4	Do you have any concerns regarding the implementation of this policy or project? <i>(i.e. Have you completed a self-assessment and action plan for the implementation of your policy or project?)</i>	Yes	Digital exclusion is a known issue among some tenants, particularly older residents.
5	Does any accessible data regarding the area which your work will address identify any areas of	Yes	Census 2021 data and tenant survey results highlight inequalities in digital access, disability, and income.

		Yes/No	Please provide details
	concern or potential problems which may impact on your policy or project?		
6	Do you have any past experience delivering similar policies or projects which may inform the implementation of your scheme from an equality impact point of view?	Yes	Previous energy efficiency and tenant engagement projects have informed this policy, including lessons on accessibility and communication.
7	Are there any other issues that you think will be relevant?	Yes	The policy proposes a charge set at 50% of the estimated energy savings, meaning tenants will still financially benefit overall. However, consideration is being given to how the charge might affect tenants on lower incomes or those with financial vulnerabilities, particularly in cases of budgeting challenges or changes in circumstances. Appropriate mitigation measures are being explored to support these tenants.

Section 2 - Your EqlA form

Directorate: Operations	Your Service Area: Housing	Team: Housing Retrofit Team	Officer responsible for this assessment: Charlotte Bailey	Date of assessment: 03/06/2025
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	Question	Please provide details
1	What is the name of the policy or project that is being assessed?	<u>HRA Solar Panel installation energy cost reduction sharing policy</u>
2	Is this a new or existing policy?	New
3	Briefly describe the aim and purpose of this work.	To introduce a fair and sustainable charging policy for tenants in council homes who benefit from solar panel and battery installations. The policy proposes that tenants contribute 50% of the estimated energy savings to support maintenance and a contribution to replacement, after 12 months of use with no charge.
4	What are the associated objectives of this work?	<ul style="list-style-type: none"> • Improve energy efficiency in council housing stock. • Reduce tenants' energy bills and carbon emissions. • Ensure long-term maintenance of solar systems. • Reinvest tenant contributions to expand the scheme.
5	Who is intended to benefit from this work and in what way?	Council tenants in properties suitable for solar panel installation will benefit from reduced energy bills, improved home energy ratings, and environmental gains. The council will benefit from a sustainable funding model.
6	What are the outcomes sought from this work?	<ul style="list-style-type: none"> • Reduced fuel poverty. • Lower carbon emissions. • Sustainable maintenance funding. • Increased tenant satisfaction and trust.
7	What factors/forces could contribute or detract from the outcomes?	Contributing Factors:

		<ul style="list-style-type: none"> • Tenant Engagement and Co-Design: The policy has been shaped through meaningful engagement with tenants, including two focus groups involving 18 participants. This co-design approach increases trust, ensures the policy reflects tenant values, and improves the likelihood of successful implementation. • Environmental and Financial Benefits: The installation of solar panels and batteries offers clear environmental benefits (reduced carbon emissions) and financial savings for tenants. These tangible benefits can drive positive sentiment and uptake. • Clear Communication and Transparency: Tenants expressed a strong desire for clarity around ownership, warranties, and the calculation of savings. Providing transparent, accessible information will help build confidence and reduce confusion or resistance. • Supportive Infrastructure: Existing council initiatives such as Digital Drop-ins, device access schemes, and partnerships with Citizens Advice provide a strong foundation for supporting digitally excluded or financially vulnerable tenants. • Structured Tenant Feedback Mechanisms: From July 2025, Winchester City Council will launch two tenant-led groups: <ul style="list-style-type: none"> • Policy Co-Creation Group (in-person collaboration with officers on new and existing policies) • Armchair Reviewers (remote, digital review of draft policies using an evaluation framework)
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		<p>These groups will ensure that the Solar Panel Charging Policy — and all future housing policies — are regularly reviewed and adapted based on tenant feedback, improving fairness, responsiveness, and long-term effectiveness.</p> <ul style="list-style-type: none"> • External Funding and Grants: Availability of government or regional funding for retrofit and energy efficiency projects can reduce the financial burden on tenants and the council, making the policy more sustainable. <p>Detracting Factors:</p> <ul style="list-style-type: none"> • Digital Exclusion: Some tenants, particularly older residents or those with disabilities, may struggle to access or understand digital communications about the policy. This could lead to disengagement or misunderstanding of the benefits and obligations. • Affordability Concerns: Although the charge is set as up to 50% of estimated savings, tenants on low incomes or with unpredictable financial circumstances may still find this unaffordable. Focus group participants raised concerns about fairness, especially for those using prepayment meters or facing hardship. • Perceived Complexity or Mistrust: Tenants raised questions about the long-term maintenance of the panels, what happens if systems fail, and whether the council could act as an energy provider. Without clear answers and guarantees, some tenants may be sceptical or resistant. • Suitability of Properties: Not all council homes are suitable for solar panel
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		installation due to roof orientation, shading, or structural issues. This could lead to perceptions of inequality if some tenants benefit while others do not.
8	Who are the key individuals and organisations responsible for the implementation of this work?	<ul style="list-style-type: none"> • Housing Services • Tenant Partnership Team • Retrofit Team • Cabinet Members
9	Who implements the policy or project and who or what is responsible for it?	The Housing Service implements the policy, with oversight from the Corporate Head of Housing and Strategic Director.

		Please select your answer in bold . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of race differently in a negative way?	Y	<u>N</u>	
10b	What existing evidence (either presumed or otherwise) do you have for this?	Census 2021 shows 6.4% of Winchester's population are from ethnically minoritised backgrounds. No direct barriers identified, but inclusive communication and translation support will be offered.		
11a	Could the policy or project have the potential to affect individuals or communities on the basis of sex differently in a negative way?	Y	<u>N</u>	
11b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence of disproportionate impact. The policy applies equally to all tenants.		
12a	Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?			

	<p><i>you may wish to consider:</i></p> <ul style="list-style-type: none"> • <i>Physical access</i> • <i>Format of information</i> • <i>Time of interview or consultation event</i> • <i>Personal assistance</i> • <i>Interpreter</i> • <i>Induction loop system</i> • <i>Independent living equipment</i> • <i>Content of interview)</i> 	<u>Y</u>	N	
12b	What existing evidence (either presumed or otherwise) do you have for this?	Census 2021 shows 16.2% of residents have a long-term health condition or disability. Digital exclusion and affordability were raised in focus groups. Mitigations include in-person support, accessible formats, and hardship options.		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of sexual orientation differently in a negative way?	Y	<u>N</u>	
13b	What existing evidence (either presumed or otherwise) do you have for this?	No barriers identified. Policy is inclusive and neutral.		
14a	Could the policy or project have the potential to affect individuals on the basis of age differently in a negative way?	<u>Y</u>	N	
14b	What existing evidence (either presumed or otherwise) do you have for this?	Older tenants are more likely to be digitally excluded. The council runs Digital Drop-ins and offers device support. Younger tenants may benefit more from digital-first communication.		
15a	Could the policy or project have the potential to affect individuals or communities on the basis of religious belief differently in a negative way?	Y	<u>N</u>	
15b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence of impact. Policy is secular and inclusive.		

16a	Could this policy or project have the potential to affect individuals on the basis of gender reassignment differently in a negative way?	Y	<u>N</u>	
16b	What existing evidence (either presumed or otherwise) do you have for this?	No barriers identified. Policy uses inclusive language and is applied equally.		
17a	Could this policy or project have the potential to affect individuals on the basis of marriage and civil partnership differently in a negative way?	Y	<u>N</u>	
17b	What existing evidence (either presumed or otherwise) do you have for this?	No differential impact identified.		
18a	Could this policy or project have the potential to affect individuals on the basis of pregnancy and maternity differently in a negative way?	<u>Y</u>	N	
18b	What existing evidence (either presumed or otherwise) do you have for this?	Tenants with young children may face financial pressures. Focus group feedback suggested payment holidays for hardship. This will be explored as a mitigation.		
19	Could any negative impacts that you identified in questions 10a to 15b create the potential for the policy to discriminate against certain groups on the basis of protected characteristics?	Y	<u>N</u>	
20	Can this negative impact be justified on the grounds of promoting equality of opportunity for certain groups on the basis of protected characteristics? Please provide your answer opposite against the relevant protected characteristic.	<u>Y</u>	N	Race: Sex: Disability: Accessible formats, in-person support, and hardship options. Sexual orientation: Age: Digital support for older tenants; flexible communication for younger tenants. Gender reassignment: Pregnancy and maternity: Consideration of payment holidays and hardship support. Marriage and civil partnership:

			Religious belief:
21	How will you mitigate any potential discrimination that may be brought about by your policy or project that you have identified above?	<p>To ensure the solar panel charging policy is inclusive, equitable, and does not disadvantage tenants with protected characteristics, the following mitigation measures will be implemented:</p> <p>Affordability and Financial Inclusion</p> <ul style="list-style-type: none"> • Hardship Support: A discretionary hardship scheme will be explored to support tenants experiencing financial difficulty. This may include: • Payment holidays for tenants facing temporary hardship (e.g. due to maternity leave, illness, or job loss), with missed contributions spread over future months. • Access fund (as suggested by tenants) to cover maintenance costs for those unable to pay due to long-term financial challenges. • Prepayment Meter Considerations: Tenants using prepayment meters will be supported to ensure they can still benefit from solar savings. <p>Digital Inclusion</p> <ul style="list-style-type: none"> • Digital Drop-ins: Continued delivery of in-person digital support sessions, particularly in sheltered housing schemes, to help tenants access information and manage their energy usage online. • Device Access Scheme: Tenants without access to a digital device can apply for a free device through the council's existing scheme (subject to availability). • Partnerships for Connectivity: Ongoing collaboration with Citizens Advice and other partners to help tenants access affordable data plans. 	

		<p>Accessible Communication</p> <ul style="list-style-type: none"> • Plain English Materials: All policy documents and communications will be written in plain, jargon-free language. • Alternative Formats: Information will be made available in large print, audio, and translated versions upon request. • In-Person Briefings: For tenants who prefer face-to-face engagement, briefings and Q&A sessions will be offered in community settings. <p>Inclusive Policy Design</p> <ul style="list-style-type: none"> • Tenant Co-Design: The policy has been shaped through tenant focus groups and will continue to be reviewed with tenant input to ensure it remains fair and responsive. • Monitoring and Feedback Loops: The council will monitor uptake and satisfaction across different demographic groups and protected characteristics. Adjustments will be made based on feedback and emerging needs. • Clear Ownership and Guarantees: Tenants will be provided with clear information about ownership of the solar panels, warranties, and what to do if the system fails. <p>Support for Specific Groups</p> <ul style="list-style-type: none"> • Older Tenants: Additional support will be provided to older tenants who may be less familiar with digital tools or energy systems.
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		<ul style="list-style-type: none"> • Tenants with Disabilities: Reasonable adjustments will be made to ensure equal access to information and support, including home visits if needed. • Tenants with Young Children: Consideration will be given to flexible payment options and communication formats that suit families with young children. • All tenants on the programme will receive a review of payments after 2-3 years of installation to ensure the scheme is still fair and all tenants are benefitting from the scheme as intended. 		
22	Do any negative impacts that you have identified above impact on your service plan?	Y	<u>N</u>	

Signed by completing officer	Charlotte Bailey – Tenant Partnership Manager
Signed by Service Lead or Corporate Head of Service	