

Consultation on a Social Housing Net Zero Standard in Scotland

Interim Equality Impact Assessment

November 2023

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1. Screening

1.1.1 Section 149 of the Equality Act 2010 requires the Scottish Government to:¹

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.1.2 The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.²

1.1.3 The duty under section 149 is known as the Public Sector Equality Duty (PSED). Therefore, we have assessed the impact of our policy against the three needs of the duty:

- ensuring that the policy does not discriminate unlawfully;
- considering how the policy might better advance equality of opportunity; and
- considering whether the policy will foster good relations between different groups.

2. Policy Aim

2.1.1 The aim of the policy is to review the post-2020 milestones of the Energy Efficiency Standard for Social Housing (EESH2) to ensure they are aligned with statutory net zero targets and ensure a just transition.³

- Net zero target: section A1 of the Climate Change (Scotland) Act 2009 requires that the net Scottish emissions account is at least 100% lower than the 1990 baseline by 2045.⁴
- Just transition: this means, as a minimum, that the costs of working towards meeting climate targets does not fall disproportionately on tenants, through higher rents or fuel costs, but also that we do not accept leaving some people in housing that is hard to heat.

¹ [Equality Act 2010 - Section 149](#)

² [Equality Act 2010 - Section 4](#)

³ [Energy Efficiency Standard for Social Housing Review Group: terms of reference](#)

⁴ [Climate Change \(Scotland\) Act 2009 - Section 1A](#)

3. Summary of Proposal

3.1.1 The proposal seeks to introduce a new Social Housing Net Zero Standard in Scotland. This will replace the post-2020 Energy Efficiency Standard for Social Housing (ESSH2). Current proposals, that have been co-developed with social housing stakeholders involved in the review of ESSH2, are as follows:

- A fabric efficiency rating (which focuses on the amount of energy for heat consumed by a property) measured in kWh/m²/year.
- A requirement to replace polluting heating systems⁵ with a clean heating system alternative by a backstop date of 2045.
- Ancillary elements of the proposed standard include measures to ensure air quality, variation of the standard in specific cases, and restrictions on re-letting property that cannot be brought up to standard.

3.2 Interaction with Other Policies

3.2.1 The policy interacts with minimum standards for energy efficiency in new build social housing.

3.2.2 The policy interacts with policies for energy efficiency and clean heating in owner occupied and private rented homes.

3.2.3 The policy interacts with policies for ensuring homes meet a minimum standard of habitability.

3.3 Who will it affect?

3.3.1 Everyone benefits if carbon emissions are reduced. However, stakeholders may be concerned if the cost of meeting net zero targets appears to fall disproportionately on any group.

3.3.2 The standard will specifically apply to social rented properties, rented under Scottish secure tenancies by local authorities and registered social landlords. We estimate that this means 590,000 households and 1,170,000 people.⁶

3.3.3 Some social tenants live in flats. 49% of local authority and 62% of housing association properties were flats in 2019. For the standard to apply effectively to flats it needs to be consistent with standards required for flats in other tenures (owner-occupied and private rented).

3.3.4 The new standard will also extend to Gypsy/Traveller accommodation. This is a change from ESSH2. There are currently 29 public Gypsy/Traveller sites in

⁵ 'Polluting heating systems' refer to heating systems which burn fossil fuels like gas boilers, oil boilers and liquid petroleum gas (LPG) boilers and bioenergy heating systems (e.g. those which use wood chips or other types of biomass or bioliquid (such as hydrotreated vegetable oil) also produce emissions when used to heat our homes – although there will be circumstances where these remain permissible).

⁶ [Scottish Household Survey: 2019 Annual Report](#)

Scotland provided by 19 local authorities and one Registered Social Landlord (RSL) providing approximately 400 pitches.⁷

3.4 Socio-economic context

3.4.1 Households in the social housing sector were significantly more likely than households in any other type of tenure to be found in high deprivation areas. Almost half of all households in the social rented sector were in the 20% most deprived areas in Scotland.⁸

- 42% of local authority properties and 54% of housing association homes were located in the 20% most deprived areas.
- Social rented households are more likely to have an adult looking after the home or family or be unemployed and seeking work.
- Six in 10 adults were not in employment (60% for both local authority and housing association properties). The proportion of adults in social rented properties who were permanently sick or disabled was higher than those in all other tenure types (15% of social rented properties compared to between 1 and 3% in other tenures), and a further 8% were unemployed and seeking work.
- 28% of social rented households stated that they manage well financially, a figure lower than all other tenures.

3.5 Scale of change

3.5.1 A shift to clean heating systems in social housing will require:

- Improvement to the fabric efficiency rating of social houses to ensure as much heat used in the home is retained by the building, reducing the cost of heating and providing an essential foundation for heating systems that do not cause carbon emissions; and
- A shift from forms of heating which use carbon fuels to fuels that do not cause carbon emissions. These are referred to as polluting heating systems throughout the consultation. We can only eliminate all emissions from heat by replacing polluting heating systems, which run on gas, oil (and other fossil fuel heating systems)⁹.

3.5.2 Currently 80% of social housing uses natural gas as its primary heating fuel.¹⁰

⁷ [Interim Gypsy/Traveller site design guide](#)

⁸ [Scottish household survey 2019: key findings](#)

⁹ “Bioenergy” heating systems, e.g. those which use wood chips or other types of biomass or bioliquid (such as hydrotreated vegetable oil) also produce emissions when used to heat our homes – although there will be circumstances where these remain permissible.

¹⁰ [Scottish House Condition Survey: Key Finding 2019, table 5](#)

3.6 Fuel poverty

3.6.1 Heating is a significant cost for fuel poor households and rising costs of fuel particularly impact anyone who has a low income.¹¹

- Fuel poverty has a strong association with income and households in the lower income bands have the highest rates of fuel poverty: 96% for the bottom income band and 60% for the 2nd bottom band. Fuel poverty rates across income bands are similar to 2018 fuel poverty rates.
- There are similar rates of fuel poverty for people living in houses rented from registered social landlords (39%), local authorities (36%) and in private rented homes (36%). In comparison, 12% of those with a mortgage are assessed to be fuel poor.
- Older households (27%) and have a higher fuel poverty rate than families (17%).

3.6.2 Switching from gas to renewable electricity as the primary heating fuel risks increasing fuel poverty, due to the relative costs of fuel, unless supported by measures that reduce the heat use of a building. The new Social Housing Net Zero Standard is designed to encourage measures to reduce heat use, as a first stage towards getting to net zero. We call this a “fabric first” approach.

3.7 What might prevent the desired outcomes being achieved?

3.7.1 The main barrier to improvement of housing is cost. We will encourage landlords to make use of grant funding, where available, from the Scottish Government or elsewhere. However, the main part of the cost of work to improve social homes will rely on the resources of social landlords, including borrowing, which ultimately comes from rental income. Landlords have a responsibility to ensure investment is cost effective and the new target will recognise their discretion in these decisions.

3.7.2 The scale of improvement to social housing is significant and delivering it will require a sufficient supply of clean heating systems, and installers qualified to fit them. Weakness in the supply chain could prevent the outcome from being achieved.

3.7.3 Clean heating technology will require changes in the way people use their homes. This requires ongoing support for tenants who receive new technology in order to ensure that its benefits are realised.

3.7.4 The policy is expected to include an element that allows for variations or exceptions in specified cases, where there are barriers that landlords cannot control or exceptional pressures on housing supply. There is a risk, if these provisions are too broad, that some groups will be left behind.

¹¹ [Scottish house condition survey: 2019 key findings](#)

4. Extent/Level of EQIA required

4.1.1 The Scottish Government considers that an equalities impact assessment (EQIA) is required for this policy.

4.2 Stage 1: Framing

4.2.1 From what we know about socio-economic conditions and evidence of impacts of those in poorer households in equality outcome groups, it is likely that:

- (a) People in these households will benefit from homes that are easier to heat, but
- (b) The same people are at risk if the costs of meeting higher standards fall disproportionately on housing in the social rented sector.

4.3 Stage 2: Data Gathering

4.3.1 At Stage 2, the Scottish Government considered evidence about the potential impacts on people in regard to the following characteristics:

- Age
- Disability
- Sex
- Gender reassignment
- Sexual orientation
- Race
- Religion or belief
- Pregnancy and Maternity

4.3.2 A summary of the evidence relevant to the impact of this policy on the protected characteristic groups is set out below. This has been prepared from information currently known to the Scottish Government. The consultation will invite views of stakeholders on the evidence base. Our initial view is that the following areas should be explored further:

- (1) Further analysis, if possible, on the relation between age, tenure and energy efficiency or fuel poverty;
- (2) Further engagement with representatives of the Gypsy/Traveller community (this should build on the work of subgroup 4 of the EESSH2 Review);¹²
- (3) Invite views on any concerns among disabled people about the technology that may be needed to get to net zero;
- (4) Note any additional data on gender reassignment emerging from the wider work of Housing to 2040.

The Scottish Government also gathered qualitative and quantitative data from:

- National Statistics: Scottish Household Survey, 2019

¹² [Energy Efficiency Standard for Social Housing Review - Gypsy / Traveller Sites subgroup minutes: December 2022](#)

- National Statistics: Scottish House Condition Survey, 2019¹³
- National Statistics: Poverty and Income Inequality in Scotland 2016-19
- National Statistics: Scottish Surveys Core Questions 2019
- National Statistics: 2011 Census
- Survey: The Scottish LGBT Equality Report 2015
- Qualitative Study: Melone, H., 2019
- Evidence Reviews: Liddell & Morris, 2010; Marmot Review Team 2011

4.4 Stage 3: Assessing the Impact

4.4.1 An initial impact of the assessment of the new standard for the protected characteristic groups, and any opportunity to promote better relations between groups, is set out below.

4.4.2 Further views will be sought as part of the public consultation, and a review of this EQIA will be carried out following the analysis of responses.

4.4.3 Summarised key findings of this EQIA are included below. A table is included in appendix A summarising the findings for each characteristic in more detail.

Have positive or negative impacts been identified for any of the equality groups?	This EQIA identified a range of potentially positive and negative impacts of the new Social Housing Net Zero Standard proposals and actions that will be undertaken to mitigate the negative impacts.
Is the policy directly or indirectly discriminatory under the Equality Act 2010?	There is no evidence that the policy is directly or indirectly discriminatory under the Equality Act 2010.
If the policy is indirectly discriminatory, how is it justified under the relevant legislation	N/A
If not justified, what mitigating action will be undertaken?	N/A

4.4.4 These impacts are considered against the Scottish Government’s Public Sector Equality Duty below, which requires authorities to have due regard to the following:

¹³ 2021 SHCS statistics were published in May 2023 at [Scottish House Condition Survey: 2021 Key Findings](#), however these results should not be compared with those for previous or future years owing to methodological limitations arising from data collection constraints at the time. The SHCS returned to the usual approach in April 2022. The fieldwork has been completed and we expect to publish the results as National Statistics in January 2024.

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - These proposals will have no impact.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - There is a potential for impacts in regard to this aspect of the Public Sector Equality Duty, these impacts are discussed at length in the following section.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
 - These proposals have no impact.

4.4.5 Key findings have been that some people may experience negative impacts as a result of one or more protected characteristics. This has the potential to have negative results on the advancement of equality of opportunity between those who share certain protected characteristics and those who do not (as set out in the Scottish Government’s Public Sector Equality Duty). In particular these possible negative impacts centre around challenges with:

Age

- Cost (running costs of clean heating systems due to lower income levels); and,
- Engagement (accessibility of advice and services, sensitive to disruption in their home, being informed, included and supported).

Disability

- Cost (running costs of clean heating systems due to lower income levels); and,
- Engagement (accessibility of advice and services, sensitive to disruption in their home, being informed, included and supported).

Sex

- Cost (running costs of clean heating systems due to lower income levels).

Paternity and Maternity

- Cost (running costs of clean heating systems due to lower income levels).

Gender reassignment

- Cost (running costs of clean heating systems due to lower income levels).

Sexual orientation

- Cost (running costs of clean heating systems due to lower income levels).

Race

- Cost (running costs of clean heating systems due to lower income levels); and,
- Engagement (accessibility of advice and services, being informed, included and supported).

Religion or belief

- Cost (running costs of clean heating systems due to lower income levels); and,
- Engagement (accessibility of advice and services, being informed, included and supported).
- Impact on Cultural cooking practices.

Marriage and Civil Partnership

- None.

4.5 Stage 4: Recommendations and Conclusion

Access to advice and support

4.5.1 The Scottish Government currently provides free and impartial advice and support through Home Energy Scotland (HES). HES provides in-depth advice to householders on clean heating technologies and on how to reduce their energy bills.

Potential for increased costs

4.5.2 The Scottish Government are engaging with local authorities and registered social landlords on the affordability of the new Social Housing Net Zero Standard, and the support needed for the sector. We are committed to the principle that meeting our climate change targets should be a just transition, so that the burden does not fall unfairly on those least able to pay, and to make sure that no one is left behind.

4.5.3 Landlords are encouraged to make use of available funding sources, which includes the Social Housing Net Zero Heat Fund and other Scottish Government schemes.

4.5.4 At least £1.8bn over this Parliament is committed to be made available to help retrofit heat and energy efficiency measures. This includes the Social Housing Net Zero Heat Fund – investing in a sector already leading the way in the heat transition.

4.5.5 The Social Housing Net Zero Heat Fund launched in August 2020 and is making at least £200 million available to social landlords until 2026 for the retrofit of their existing housing stock.

4.5.6 The fund supports both the deployment of clean heating and "fabric first" enhancements, helping landlords deliver warmer and more energy efficient homes.

4.5.7 Projects are eligible for up to 60% of the costs of clean heating systems and 50% of energy efficiency measures.

4.5.8 Rural and island communities face different challenges when delivering decarbonisation projects in social housing, so the fund has introduced uplifts to the

average grant cap. For projects in rural areas, the average grant cap per property will be increased by 11% and in remote areas by 22%. Rural and Remote areas can be identified using the 6-Fold Scottish Government classification.

4.5.9 Our Scottish Fuel Poverty Advisory Panel oversee implementation of our Fuel Poverty Strategy, providing an important means of external scrutiny on our progress towards meeting the statutory targets and collectively holding the Scottish Government to account on its delivery. As the Fuel Poverty 2019 Act requires the Scottish Government to formally consult with the panel on the strategy, we expect their further advice to Scottish Ministers by Summer.

Improving thermal comfort

4.5.10 High standards of energy efficiency are essential to reduce the overall demand for energy. Alongside energy saving behaviours these measures can help to ensure running costs remain affordable.

Cultural and religious use of open flames for cooking

4.5.11 Many buildings use the same fuel for heating and cooking, particularly natural gas. When buildings switch away from using fossil fuel boilers, decisions on cooking appliances may also need to be made. As we consult through on these proposals, we will work with stakeholder groups to ensure that the outlook of those impacted by this change are fed in.

Public Sector Equality Duty (PSED)

4.5.12 The Public Sector Equality Duty (PSED) – requires relevant organisations to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

4.5.13 To ensure that we take an inclusive approach, we will identify and support people across the range of protected characteristics, ensuring that support is available as required. We will give due regard to the three requirements of the Public Sector Equality Duty (PSED) for all protected characteristics.

Monitoring and Review

4.5.14 The EQIA has been valuable in raising the overall awareness and understanding of the key issues affecting people with protected characteristics.

4.5.15 The impacts of the proposals being consulted upon on the protected characteristics have been considered as a result of the assessment.

4.5.16 During the consultation process, the Scottish Government will continue to work with a wide range of stakeholders, including organisations that work with or represent people with one or more of the protected characteristics to gain further insight into the impacts of these proposed policies. This insight will be fed into development of the new Social Housing Net Zero Standard.

4.6 Stage 5: Authorisation of EQIA

Declaration I am satisfied with the equality impact assessment that has been undertaken for the Consultation on a new Social Housing Net Zero Standard and give my authorisation for the results of this assessment to be published on the Scottish Government's website.

Name:

Position:

Appendix A: Data and evidence gathering, involvement and consultation

This section includes the results of the evidence gathering (including the framing exercise), including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
Age	<p>A lower proportion of older households (36%) live in dwellings with the highest energy efficiency bands (EPC C or better, SAP 2012) than Families (55%) or other households (46%).</p> <p>Older households are less likely than Families and Other household types to report that their heating system doesn't always keep them warm in winter; 12%, compared to 16% of Families and 21% of other households.</p> <p>In qualitative lived experience research, fuel poor participants aged 65 and over that were on a low pension were often struggling to make ends meet and limiting heating. Whether health issues were present and how socially connected people were, were more obvious factors in shaping older people's ability to deal with fuel poverty. Older households (aged 65 and over) who kept the heating on all day tended to do so at a temperature that they considered relatively low, such as 18°C, perceiving this to be the most energy and cost-efficient way of using fuel.</p> <p>Households, who for various reasons do not take up their offer of funded childcare and so their children spend more time in the home, where any member of a household is aged under 5 and where the home is also occupied regularly during the daytime it is considered to require longer heating hours.</p>	<p>Scottish House Condition Survey 2019 (Last updated: December 2020)</p> <p>Research into the lived experience of fuel poverty in Scotland (www.gov.scot)</p> <p>The life chances of young people in Scotland: evidence review</p> <p>Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill and Fuel Poverty Strategy: health impact assessment -</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
	<p>For adolescents, living in a cold and/or damp home is associated with an increased risk of mental health problems and antisocial behaviour. Living in a cold home may cause stigma in teenagers. They may not feel comfortable inviting friends around to their home and this may affect friendships, peer groups and relationships. In the long term this can have an effect on a teenager's confidence and potentially lower their socioeconomic opportunities. Like children, teenagers are also at a higher risk of developing respiratory diseases such as asthma and poor health days can also affect their attendance at school and training and affect their educational attainment.</p> <p>For infants and young children, living in a cold and/or damp home is associated with an increased risk of hospital admissions, respiratory illnesses and allergies, and poor weight gain. Days off school will increase for these children and participation in some sports may become affected. These factors, along with having no-where warm to undertake their studies can also have a detrimental impact on educational attainment. The stigma associated with living in a cold home may also cause them to become isolated from friends and this can be detrimental during their developmental years.</p> <p>Pressure of keeping a warm home for children can impact parents physical and mental health. Conflict between keeping a warm home and the cost of heating can lead to stress and practises like adults skipping meals. Parents of children in under-heated homes described struggling to keep everyone warm and emphasised how stressful this was.</p>	<p>gov.scot www.gov.scot</p> <p>Taken from fuel poverty health impact assessment - Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill and Fuel Poverty Strategy: health impact assessment - gov.scot www.gov.scot</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
	<p>Adults living in cold homes are more likely to suffer from minor illnesses such as colds and flus and have an increased risk of mortality from cardiovascular and respiratory diseases. Minor illness can impact on their daily tasks from taking children to school or going to work. The adult population are the most productive in society and reduced productivity from this cohort can trickle down into the economy as a whole due to lost days from work. Adults with pre-existing conditions such as cardiovascular or circulatory disease, COPD or forms of arthritis are more likely to suffer during the cold weather and this may reduce their ability to maintain their daily lives and negatively damage their physical and mental wellbeing.</p>	
Disability	<p>Social renters are more likely to have a limiting, long-term physical or mental health condition (45%) than those in the private rented sector (22%), those who own their homes outright (28%) and those who own their homes through a mortgage (14%).</p> <p>Where any member of a household is aged 75 or over, or a household member has a long-term illness or disability lasting more than 12 months or is in receipt of benefits received for a care need or disability they are considered to require higher heating temperatures. If the home is also occupied regularly during the day, then they are also considered to require longer heating hours.</p>	<p>Scottish Surveys Core Questions 2019 (Last updated: January 2021)</p> <p>Poverty and Income Inequality in Scotland 2016-19</p>
Gender Reassignment	<p>There is a lack of data on gender reassignment in relation to housing tenure and energy use. There is a commitment in Housing to 2040 that housing policy development will consider and aim to understand and tackle any specific disadvantages people with this protected characteristic may experience.</p>	<p>Housing to 2040: equalities position statement</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
Pregnancy and Maternity	<p>Evidence suggests that households with children aged 0-4 are at high risk of poverty. The risk, however, is much higher when the youngest child is aged less than one year old. Evidence of the impact of heating on infants, noted above in relation to age, and the relative poverty of lone mothers, noted below in relation to sex.</p> <p>Cold Homes and infant health Living in a cold home has been found to negatively impact infants' physical health, in terms of lower weight gain, increased hospital admissions, and the increased prevalence and severity of respiratory problems like asthma.</p>	<p>Every child, every chance: The Tackling Child Poverty Delivery Plan 2018-22</p> <p>Evidence Reviews: Liddell & Morris, 2010; Marmot Review Team, 2011</p>

<p>Race</p>	<p>This characteristic includes Gypsies/Travellers who make use of dedicated housing facilities on sites provided by local authorities. Issues were raised with respect to the Gypsy/Traveller community, both in relation to how different accommodation types will be considered within the regulatory framework and the use of portable gas cylinders for heating. Accommodation on public and private Gypsy/Traveller sites will typically be either a pitch for a caravan and an amenity block that provides the kitchen and bathroom facilities or a pitch with a residential mobile home. Gypsy/Travellers living on public sector sites are likely to be on low or fixed incomes.</p> <p>Feedback gathered while developing a Site Design Guide for Gypsy/Traveller sites suggests that many existing amenity blocks are cold, difficult to heat and prone to condensation. A lack of investment has resulted in substandard accommodation and few measures to reduce fuel poverty. There is a higher need for heat due to poor insulation and the overall condition of amenity blocks. Gypsy/Travellers have told us that they find it difficult to heat 2 spaces – the caravan and the amenity block. As there is usually no living space in the amenity block this results in them being in and out of it throughout the day making it difficult to heat. Many amenity blocks do not have gas central heating plumbed so residents rely on fuel to power generators for heat and electricity. Residential mobile homes have lower levels of insulation and energy efficiency than standard housing. Some minority ethnic households report barriers to access of social housing, which would be affected by policy if it affects the supply of social housing. In 2019 82% of those who lived in socially rented households were White Scottish, compared to 80% of owner-</p>	<p>Interim Gypsy/Traveller site design guide (December 2021) Housing needs of minority ethnic groups: evidence review (2021) Scottish Household Survey 2019 (Last updated: September 2020)</p> <p>Consultation: HiBS Consultation Analysis</p>
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Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
	<p>occupied households, 55% of households in the private rented sector, and 65% of households in other tenures. These percentages are similar to previous years.</p> <p>In 2019, 3% of adults in socially rented households were African, Caribbean or Black compared to 1% of adults in private rented households, 1% of adults in other tenures and 0% of adults in owner occupied households.</p> <p>43% of people from Mixed, Black, Black British and Other ethnic groups, and 41% of Asian or Asian British ethnic groups were in relative poverty after housing costs. In comparison 18% of White British people were in relative poverty after housing costs.</p> <p>Accessibility of advice and financial support</p> <p>Specific groups may be unfairly impacted due to difficulties for people whose first language is not English, who may need help to understand how to operate new heating systems to best effect.</p> <p>Some ethnic minorities are likely to lack access to standard financial products. E.g., Pakistani and Bangladeshi women are three times less likely than White adults to have a bank account. Some religious and ethnic groups may be excluded from credit by a lack of availability of loans on terms that conform to their beliefs.</p>	
Religion of Belief	People who live in the social rented sector (3%) are more likely to identify as being Muslim compared to those who own their homes outright (1%) and	Scottish Surveys Core Questions 2019 (Last updated: January 2021)

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
	those who own their homes with a mortgage (2%).	
Sex	<p>Evidence suggests that certain groups of women are more likely to experience poor housing. This includes women from ethnic minorities, disabled and refugee women, women who have been in the criminal justice system, LGBTI (particularly transgender) women, older and younger women, women involved in prostitution, lone parents and women with other caring responsibilities. The relative poverty rate after housing costs is higher for single women pensioners (20%) than for single male pensioners (17%). The relative poverty rate after housing costs was highest for lone mother (39%) compared to other single working-age adults.</p> <p>Households where the HIH (head of household) was a man were more likely to report managing well financially than households with a woman HIH (60% compared to 49%). Research shows that women have less access to resources and are overrepresented in low paid employment and among social security claimants, there are gendered inequalities in connecting care with income.</p> <p>According to the annual survey of hours and earnings (2022), In 2022, the gender pay gap for all employees in Scotland was 12.2%.</p> <p>The gender pay gap for full-time employees in Scotland increased from 3.0% in 2021 to 3.7% in 2022 due to men’s hourly earnings increasing at a faster rate than women’s hourly earnings. However, this is still below the gap of 7.2% in 2019 (pre pandemic) and so continuing the longer-term downward trend.</p>	<p>Engender: A Woman’s Place: Gender, Housing and Homelessness In Scotland (2020)</p> <p>Melone, H. (2019) <i>Gender-based Perspectives of Fuel Poverty in Scotland</i>. Eaga Charitable Trust. Available at: Gender-based Perspectives of Fuel Poverty in Scotland Fuel Poverty Research Library (fuelpovertylibrary.info) (Accessed on 3 March 2023)</p> <p>Annual Survey of Hours and Earnings (2022)</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
<p>Sexual Orientation</p>	<p>In total, 3% of adults in social rented households identified as lesbian, gay, bisexual or other (LGBO) in 2017. However, it is likely that some of the differences in sexual orientation across tenures may be linked to age.</p> <p>Low Income</p> <p>In 2018, people who identified as LGBO were twice as likely to be unemployed compared to those who identified as heterosexual. This may be related to age as a higher proportion of those identifying as LGBO were in the age groups 16-24 and 25-34, which are the age groups where unemployment is highest.</p> <p>Concerns have been expressed about inequalities in employment for people who identify as LGBO due to prejudice and harassment from employers and colleagues.</p> <p>Health Inequalities</p> <p>People who identified as LGBO were slightly more likely to report a long term, limiting health condition (26%) than heterosexual adults (23%). This is particularly marked given the younger age profile of the LGBO group.</p>	<p>Social tenants in Scotland 2017</p> <p><i>Survey: The Scottish LGBT Equality Report 2015</i></p> <p><i>Evidence Review: Sexual Orientation in Scotland 2017 (drawing on Scottish Surveys Core Questions 2015)</i></p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source (full reference details in appendix)
Marriage and Civil Partnership	<p>Marriage and civil partnership are also a protected characteristic. However, in respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, education etc. do not apply to that protected characteristic. Equality impact assessment within the Scottish Government does not require assessment against the protected characteristic of Marriage and Civil Partnership unless the policy or practice relates to work, for example HR policies and practices.</p>	

Appendix B: Assessing the quality of the impacts and identifying opportunities to promote equality

At this stage of the interim equality impact assessment, the qualitative scoring of the potential impacts (negative, positive and neutral) has been considered for each of the protected characteristics and the other specified characteristics already listed in this interim EQIA. This qualitative scoring has been undertaken using the data and evidence available and gathered to date. This is a preliminary and indicative assessment of the potential impacts at this interim stage of the EQIA and will be subject to further review and revision after the consultation has taken place and during the system design.

Do you think that the policy impacts on people because of their age?

Age	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to age.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on older people and young children.</p> <p>Potential for increased costs</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies, with the risk of these costs being passed onto the tenants through increased rents and energy bills. The evidence found that certain age groups may have requirements for higher heating temperatures and longer heating hours.</p>

				<p>Accessibility of advice and services</p> <p>Older people may be sensitive to disruption in the home and have accessibility requirements in terms of communication and finance support. For instance, evidence shows lower internet use among older people and higher usage in young people.</p> <p>Improved thermal comfort</p> <p>Decarbonising our buildings and improving energy efficiency may provide health benefits, particularly for older people and children, by improving thermal comfort.</p>
Promoting good relations among and between different age groups			X	<p>The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations between different age groups.</p>

Do you think that the policy impacts people with disabilities?

People with disabilities	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to disability.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on disabled people.</p> <p>Potential for increased costs</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies, with the risk of these costs being passed onto the tenants through increased rents and energy bills. The evidence found the disabled groups may have requirements for higher heating temperatures and longer heating hours.</p> <p>Improved thermal comfort</p> <p>Decarbonising our buildings may provide health benefits, particularly for older people and children, by improving thermal comfort.</p> <p>Disabled people are more likely to live in socially rented properties and more likely to be unemployed, be</p>

				in low paid work, and be in relative poverty.
Promoting good relations among and between disabled and non-disabled people			X	The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations between disabled and non-disabled people.

Do you think that the policy impacts on men and women in different ways?

Sex/Gender	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to gender.
Advancing equality of opportunity	X	X		<p>There could potentially be negative impacts on women and households headed by women.</p> <p>Potential for increased costs</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies. The evidence suggests that female headed households are less likely to be managing well financially than male headed households.</p> <p>Women, and particularly households headed by women, may therefore be unfairly impacted by higher running costs of clean heating systems.</p>
Promoting good relations between men and women			X	The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations between men and women.

Do you think that the policy impacts on women because of pregnancy and maternity?

Pregnancy and Maternity	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to pregnancy and maternity.
Advancing equality of opportunity	X	X		<p>Potential for increased costs coupled with lower levels of income</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies. The evidence suggests that lone mothers are less likely to be managing well financially.</p> <p>Women, and particularly households headed by women, may therefore be unfairly impacted by higher running costs of clean heating systems.</p> <p>Improved thermal comfort</p> <p>Improving the thermal efficiency of social housing may provide health benefits, for pregnant women and those in the maternity period, by improving thermal comfort.</p>
Promoting good relations			X	The proposals for a new Social Housing Net Zero Standard are unlikely to

				impact on the promotion of good relations between pregnant women and other people.
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Do you think that the policy impacts on transgender people?

Gender reassignment	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to transgender people.
Advancing equality of opportunity		X		<p>Potential for increased costs coupled with lower levels of income</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies, with the risk of these costs being passed onto the tenants through increased rents and energy bills. Data on the relative performance of transgender people in the labour market is limited, however, some evidence suggests that transgender people may experience economic disadvantage in terms of securing and maintaining employment. This could put them at risk of being sensitive to price costs increases.</p>
Promoting good relations			X	The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations between transgender people and other people

Do you think that the policy impacts on people because of their sexual orientation?

Sexual orientation	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to sexual orientation.
Advancing equality of opportunity			X	The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the advancement of equality of opportunity related to sexual orientation.
Promoting good relations			X	The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations between people based on their sexual orientation.

Do you think that the policy impacts on people on the grounds of their race?

Race	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to race.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts for people from certain racial backgrounds</p> <p>Low income and sensitivity to cost increases.</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies, with the risk of these costs being passed onto the tenants through increased rents and energy bills. 43% of people from Mixed, Black, Black British and Other ethnic groups, and 41% of Asian or Asian British ethnic groups were in relative poverty after housing costs. In comparison 18% of White British people were in relative poverty after housing costs. People from minority ethnic groups were less likely to report they were managing well financially and less likely to have household savings.</p>

				<p>Improved thermal comfort</p> <p>The consultation for the Heat in Buildings Strategy raised the concern that gypsy traveller communities have greater need for heat due to poor energy efficiency and often have higher energy costs. Some also require to heat more than one dwelling space. Improving the thermal efficiency of gypsy / traveller sites may provide health benefits by improving thermal comfort.</p> <p>Accessibility of advice and financial support and services</p> <p>The HiB Strategy consultation raised the concern that specific groups may be unfairly impacted due to difficulties for people whose first language is not English, who may need help to understand how to operate new heating systems to best effect. Concerns were raised about the need to ensure that refugees are also able to access adequate advice and support.</p>
Promoting good relations			X	<p>The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good race relations.</p>

Do you think that the policy impacts on people because of their religion or belief?

Religion or belief	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	The proposals for a new Social Housing Net Zero Standard have been developed in such a way that it will not create unlawful discrimination related to religion or belief.
Advancing equality of opportunity	X	X		<p>There could potentially be positive and negative impacts on people from different religious backgrounds.</p> <p>Potential for increased costs coupled with lower levels of income</p> <p>Clean heating systems may cost more to install and operate than incumbent technologies, with the risk of these costs being passed onto the tenants through increased rents and energy bills. Evidence suggests that people who identify as Muslim have a high rate of relative poverty after housing cost and are more likely to live in deprived areas (and lower SIMD is associated with higher levels of fuel poverty and low income).</p> <p>Cultural cooking practices</p> <p>Some people may use open flames – specifically for cooking – for religious</p>

				<p>and cultural reasons. Moving to a clean heating system may mean that this method of food preparation is not possible.</p> <p>As we consult through on these proposals, we will work with stakeholder groups to ensure that the outlook of those impacted by this change are fed in.</p>
Promoting good relations			X	<p>The proposals for a new Social Housing Net Zero Standard are unlikely to impact on the promotion of good relations among people of religion and belief and others.</p>



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