



APPENDIX 1

Equality, Diversity, Cohesion and Integration Screening

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions. Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion and integration.
- whether or not equality, diversity, cohesion and integration is being/has already been considered, and
- whether or not it is necessary to carry out an impact assessment.

Directorate: Resource and Housing	Service area: Sustainable Energy and Air Quality
Lead person: Tom Knowland	Contact number: 0113 378 5876

1. Title: Council Tax and Business Rates Feasibility and Design Study

Is this a:

Strategy / Policy Service / Function Other

If other, please specify

The procurement of a Council Tax and Business Rates Feasibility and Design Study, the aim of which is to test the viability of piloting council tax and/or business rate incentives as a means of encouraging homeowners and businesses to improve the energy efficiency of their properties through retrofit measures.

2. Please provide a brief description of what you are screening

The procurement of a Council Tax and Business Rates Feasibility and Design Study, the aim of which is to test the viability of piloting council tax and/or business rate incentives as a means of encouraging homeowners and businesses to improve the energy efficiency of their properties through retrofit measures. The following issues will be covered by the study:-

- Evidence on political / public appetite for an incentive scheme;
- Outline of how incentive scheme would work and how to structure a pilot;
- Identify any requirements (data, technical, administrative) for a pilot;
- Identify constraints, risks and solutions.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies/policies, services/functions affect service users, employees or the wider community – city wide or more local. These will also have a greater/lesser relevance to equality, diversity, cohesion and integration.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, carers, disability, gender reassignment, race, religion or belief, sex, sexual orientation and any other relevant characteristics (for example socio-economic status, social class, income, unemployment, residential location or family background and education or skills levels).

Questions	Yes	No
Is there an existing or likely differential impact for the different equality characteristics?		X
Have there been or likely to be any public concerns about the policy or proposal?		X
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?	X	
Could the proposal affect our workforce or employment practices?		X
Does the proposal involve or will it have an impact on <ul style="list-style-type: none">• Eliminating unlawful discrimination, victimisation and harassment• Advancing equality of opportunity• Fostering good relations		X

If you have answered **no** to the questions above please complete **sections 6 and 7**

If you have answered **yes** to any of the above and;

- Believe you have already considered the impact on equality, diversity, cohesion and integration within your proposal please go to **section 4**.
- Are not already considering the impact on equality, diversity, cohesion and integration within your proposal please go to **section 5**.

4. Considering the impact on equality, diversity, cohesion and integration

If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.

Please provide specific details for all three areas below (use the prompts for guidance).

- **How have you considered equality, diversity, cohesion and integration?**
(think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected)

A key element of the commissioned study would be to identify constraints, risks and solutions to the introduction of a Council Tax or Business Rate incentive scheme. Potential barriers that may be encountered include:-

General

- A major barrier will be the need to ensure any schemes developed and tested are revenue neutral or positive. In times of uncertainty about funding for local government, this issue needs to be explored sensitively. The approach will be to review the range of powers that the LA has (for example the Discretionary Fund) and to model a range of different scenarios where businesses or households undertake measures that would normally lead to an increase in their Business Rates or Council Tax and how any increases might be effectively reduced.
- Any scheme should be revenue neutral, with central Government ensuring that the financial incentives are drawn in such a way so that the Council is no worse off in terms of Council Tax and Business Rates receipts or delivery costs.
- Political oppositions regarding affordability for local householders and linking thermal efficiency to ability to repay.
- Public and business confidence: Learning from the patchy experience of implementation of Green Deal/PAS2030 installers/receipts/payments,
- How to calculate the level of incentive –costs vs benefit/payback period
- Council Tax and Business Rates are produced/managed using a standard piece of software so introducing a different way to calculate these would need a bespoke module to be designed and implemented. In house ITT systems to administer any changes will difficult to update without any additional cost, need to review links with existing databases.
- The delivery method for a geographic pilot. It is anticipated that a pilot would avoid pepper-potted delivery in order to keep delivery costs down and encourage innovation.

Council Tax Specific

- Barnsley, Hull and Leeds between them cover a good representation of different housing stock. A potential barrier that the study would need to address would be the fact that some housing is much more expensive to upgrade (e.g. back to backs) and there may be a limit to the level of efficiency that can be achieved. 60% + of band F and G houses have solid walls and will therefore be much more expensive to insulate. It would be important to address how to avoid penalising households whose property is at the maximum efficiency that it can achieve.
- Energy Performance Certificates (EPCs) are not always very accurate/not all properties have current ones, so an allowance would need to be made for undertaking EPCs.
- How an incentive scheme would work within the private rented sector (e.g. how does an incentive scheme apply to a landlord when the tenant pays the Council Tax) . Identify who benefits from the improvements the resident or property owner, if resident then savings from thermal improvement plus Council Tax could be significant, need to understand how this is apportioned between landlords and residents. .
- Increasingly properties are being let inclusive of Council Tax (to avoid empty property premiums) – issue of transparency

- Equity – poorest people have the lowest ability to improve their buildings (i.e. can't afford energy efficiency or live in rented properties) so we would need to create a fund for low income people and find a way to tackle rented sector;
- Understanding that moving to EPC will be journey for most people in a number of improvements at appropriate points in throughout their life-identifying the trigger points and acting appropriately (e.g. the birth of child and other points at which property upgrade might be considered).
- When to apply incentive (e.g. at point of purchase (between exchange and completion) or during void period).
- Use of Building Regulations and Planning Permission as a trigger point to achieve EPC: How to use the local plan and adapt it via supplementary planning guidance so that building regulations become the trigger point.

Business Rate Specific

- Business Rate variation will need to address the issue that many businesses occupy properties that they do not own. It will therefore be necessary to consider the tenant/landlord dynamic and investigating the incentives needed in order to stimulate energy efficiency investment in this sector.
- Another barrier will be the administration and eligibility of any such scheme, so that onerousness does not deter businesses from applying or the LA from implementing. Simple application and determination methods will be explored as part of the study

• Key findings

(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)

These issues will be addressed in the commissioned study and as part of the consideration as to whether to proceed with a pilot.

• Actions

(think about how you will promote positive impact and remove/ reduce negative impact)

These issues will be addressed in the commissioned study and as part of the consideration as to whether to proceed with a pilot.

5. If you are **not already considering the impact on equality, diversity, cohesion and integration you **will need to carry out an impact assessment**.**

Date to scope and plan your impact assessment:	N/A
Date to complete your impact assessment	N/A
Lead person for your impact assessment (Include name and job title)	N/A

6. Governance, ownership and approval

Please state here who has approved the actions and outcomes of the screening

Name	Job title	Date
Tom Knowland	Head of Sustainable Energy and Climate Change	19 September 2019

7. Publishing

This screening document will act as evidence that due regard to equality and diversity has been given. If you are not carrying out an independent impact assessment the screening document will need to be published.

*If this screening relates to a **Key Delegated Decision, Executive Board, full Council** or a **Significant Operational Decision** a copy should be emailed to Corporate Governance and will be published along with the relevant report.*

*A copy of **all other** screening's should be sent to equalityteam@leeds.gov.uk. For record keeping purposes it will be kept on file (but not published).*

Date screening completed	19 September 2019
If relates to a Key Decision- date sent to Corporate Governance	N/A
Any other decision – date sent to Equality Team (equalityteam@leeds.gov.uk)	DATE