

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

1. Title of Proposal

Communal Heating Improvement Programme

2. What will change as a result of this proposal?

Ofgem introduced new heat regulations in 2026. These will provide more protections for resident and will require the Council ensure that systems are run effectively and that data is reported to Ofgem (the Regulator).

The Housing Service operated 11 communal heating/ heat networks. Improvements across a number of service areas are required to meet regulations. An improvement action plan has been developed to ensure that the regulations are met and that outcomes are improved for tenants and owners (residents) connected to these heating systems. Actions include better customer protections, commissioning of condition surveys and delivery of remedial actions to systems (investment).

Once all the systems are improved and data has been collected, a cost recovery tariff model will be developed and applied to all systems. This will be subject to further engagement and reporting to Elected Members, including a further specific/ focused IIA.

3. Briefly describe public involvement in this proposal to date and planned

Tenant and resident feedback has informed the improvement action plan in order to improve service delivery and outcomes for tenants.

Residents at a number of blocks have been consulted on a range of improvement actions to their blocks/ communities, which includes heating systems.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

Yes

5. Date of IIA

28 January 2026

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

| Name | Job Title | Date of IIA training |
|---|------------------------------------|----------------------|
| Douglas Alexander (Lead officer, facilitator and report writer) | Senior Housing Development Officer | |
| Alistair Latona | Senior Housing Development Officer | |
| Donna O'Donnell | Senior Housing Development Officer | 7/9/22 |
| Marta Hadziewicz-Camara | Housing Development Officer | |

7. Evidence available at the time of the IIA

| Evidence | Available – detail source | Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal |
|-------------------------------|---|---|
| Data on populations in need | Tenant population (Scottish Housing Regulator) Number of homes connected | 20,634 City of Edinburgh Council social rent properties 1,262 homes are connected to heat networks operated by the Housing Service |
| Data on service uptake/access | Number of Council tenants and private households connected to communal Heating system | Breakdown of tenures is Total 1,262 Private 163 Council Homes 1,099 |

| Evidence | Available – detail source | Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal |
|--|---|--|
| Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation. | <p>The Edinburgh Poverty Commission Scottish Index of Multiple Deprivation (SIMD)</p> <p>Scottish House Condition Survey (SHCS)</p> <p>Fuel Poverty Index</p> | <p>An estimated 17% of people (more than 80,000) of Edinburgh’s citizens live in poverty, including almost one in five of all children. An increasing number of citizens rely on foodbanks. Several groups and household types show higher than average risk of poverty, including social housing tenants.</p> <p>The SIMD evidences that several areas with predominantly social rented homes in Edinburgh are listed in the top 10% of the most deprived areas in Scotland.</p> <p>The SHCS data shows that social housing sector has have the highest energy efficient homes but still have the highest level of fuel poverty as result of low income.</p> <p>The following types of family are identified by Scottish Government as being more likely to be living in poverty: lone parent families; minority ethnic families; families with a disabled adult or child; families with a younger mother; families with a child under one; families with three or more children (Ref: https://www.gov.scot/publications/tackling-child-poverty-priority-families-overview/pages/introduction/)</p> <p>Children’s rights ECHR Article 27 (adequate standard of living) states that every child has the right to a standard of living that is good enough to meet their physical and social needs and support their development. Governments must help families who cannot afford to provide this.</p> |
| Data on equality outcomes | The Edinburgh Poverty Commission | Several groups and household types in Edinburgh show higher than average risk of poverty, including tenants of social and private rented housing. |

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|--|---|--|
| | <p>SIMD</p> <p>Elected Member Briefing Note: Gender Responsive Budgeting (swbg.org.uk)</p> | <p>Women are more likely to experience poverty than men and still tend to have more responsibility for unpaid work including childcare, care for older or disabled people, and domestic work. For many women, this means a greater reliance on public services and can limit the time they have for paid work and other activities.</p> <p>Inequalities based on gender intersect with other forms of inequality based on class, race, disability and other factors so that some groups of women, particularly poor women, women from minority ethnic communities and disabled women face multiple disadvantage.</p> <ul style="list-style-type: none"> Households headed by single women with dependent children, and single men without dependent children are most likely to experience poverty. <p>Women are more likely to experience sexual and sex- based violence.</p> <p>Work is underway to develop the data collection of tenant demographics, including economic and household composition situation.</p> |
| Research/literature evidence | <p>Ofgem regulatory guidance</p> <p>Heat Trust voluntary guidance</p> | Full understanding of the new regulations and building on the best practice learned from Heat Trust. |
| Public/patient/client experience information | Deputations at Committee of | Customer experience and data driven evidence indicates that improvement are needed on how the systems are run, |

| Evidence | Available – detail source | Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal |
|---|--|--|
| | <p>customer experience</p> <p>Engagement sessions with tenants as part of detail Design Review at Cables Wynd and heating charge consultation with residents at Greendykes/ Wauchope in 2024)</p> <p>Individual complaints from Tenants and owners on delivery of communal heating and billing</p> | <p>operated and maintained and then recharged to tenants and owners. The improvement plan seeks to address these, which will affect all residents.</p> |
| Evidence of inclusive engagement of people who use the service and involvement findings | <p>Annual Tenant Survey on</p> <p>Consultation with Tenants and owners at Greendykes/ Wauchope House Summer 2024</p> <p>Ongoing with Engagement with tenants and owners at Maidencraig and Westfield Court</p> | <p>67.2% tenants said they were satisfied with the overall service the Council provided</p> <p>The consultation sought tenants feedback on their priorities for future metering and billing services and what support they might require. The key priority for tenants was that their heating was affordable, their tariffs were clearly explained and that they could track how much energy they were using through accurate meter readings. Some tenants were positive about flexible payment options, such as paying online, but wanted to ensure traditional methods, such as in shops, existed.</p> |

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|---|--|---|
| | | |
| Evidence of unmet need | Managing demands on the service | Areas of improvement identified with numerous service areas (e.g. meters and billing) and an improvement plan has been developed to meet these needs (e.g. better ways to complaint, improving reliability of the supply. |
| Good practice guidelines | Ofgem Heat Trust | Ofgem best practise guidance Heat Trust Voluntary best practise guidance |
| Carbon emissions generated/reduced data | Energy Advise Service Data Data collection from systems | <p>Between February 2024 and January 2025, the Energy Advice Service supported 1,621 tenants, and helped to deliver c.£305,000 financial savings to tenants and c.413,000 kg of carbon savings.</p> <p>Partial data from current operation of the systems on energy consumption. A key identified improvement action as consumption is currently estimated, and new meter points will improve accuracy of data collected.</p> <p>Scotland's 10 warmest years on record have all occurred since 1997. The average temperatures for the last decade (2014- 2023) were 1.02°C warmer than the 1961- 1990 average, and the warmest year on record was 2022.</p> <p>There has been an increase in rainfall over Scotland in the past few decades with an increasing proportion of rainfall coming from heavy rainfall events. The annual average rainfall in the last decade (2014-2023) was 10% wetter than the 1961-1990 average, with winters 29% wetter.</p> <p>Mean sea level around the UK has risen by approximately 1.4 mm/year from the</p> |

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|----------|---------------------------|--|
| | | <p>start of the 20th century and the rate of sea level rise has increased over the last 30 years.</p> <p>Climate change impacts are frequently felt most by the poorest and most marginalised groups in society, who may also suffer from reduced health and wellbeing.</p> <p>A 'just transition' means moving to a more sustainable economy in a way that's fair to everyone.</p> <p>The just transition addresses various dimensions of inequality, vulnerability and opportunity. It frames the transition with a human rights lens with the aim of eliminating existing inequalities, enabling social inclusion and promoting different forms of equity. From the climate justice perspective, relevant issues include: the disproportionate impacts of climate change on underrepresented and vulnerable communities; the injustices incurred by richer countries being the significant contributors to historical greenhouse gas emissions and poorer countries being the most vulnerable to the impacts of climate change; intergenerational injustices; loss and damage from climate change impacts; and unequal access to clean and affordable energy, green finance and to a sustainable and healthy diet.</p> <p>The just transition is a crucial enabler to implementing the net zero transition: involving all affected parties and responding to injustices serves to ensure political acceptability for climate action, mitigate the risk of 'just transition litigation', and ultimately avoid delays in achieving net zero globally. To achieve its varied aims, a just transition is considered</p> |

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|------------------------------|---|---|
| | | to require fundamental restructuring of the socioeconomic systems that have created these inequalities and the climate crisis. |
| Environmental data | Scottish House Condition Survey (SHCS) | Improvement actions will support increased efficiency of the system, including a reduction in emissions. |
| Risk from cumulative impacts | Scottish Index of Multiple Deprivation (SIMD) | Improvements will ensure that tenants and owners have access to reliable heating systems and have control over how they pay for their heating. |
| Other (please specify) | na | Na |
| Additional evidence required | | |

8. In summary, what impacts were identified and which groups will they affect?

| Equality, Health and Wellbeing and Human Rights | Affected populations |
|--|---|
| <p>Positive</p> <p>Systems will be managed efficiently and ensure that residents have access to reliable and secure heating. This could improve health and educational outcomes.</p> <p>Improvements would give residents more control over their heating, and a choice on how much they wish to spend on heating/ energy.</p> <p>Complying with heating regulations will ensure that tenants and owners are aware of their rights.</p> | <p>All users connected to the heating systems.</p> <p>Communications will be planned with tenants</p> |

| Equality, Health and Wellbeing and Human Rights | Affected populations |
|--|---|
| | and residents, including to secure new Heat Supply Agreements as per the action plan. |
| <p>Negative</p> <p>Mild disruption to residents through delivering the improvement programme as internal access may be required to homes, e.g. install new smart meters.</p> <p>The Council may have to implement potential legal requirement for owners to agree to improvement actions, and new terms of service.</p> | <p>All</p> <p>Private owners</p> |

| Environment and Sustainability including climate change emissions and impacts | Affected populations |
|---|-----------------------------|
| <p>Positive</p> <p>Improvements will result in increased efficiency of the system, likely reducing energy emission from the system.</p> <p>Increased control over energy may result in tenants using less energy, reducing emissions.</p> <p>Better compliance with new regulations and Government targets.</p> <p>New smart prepayment systems may result in reduced requirement to travel to top up payment cards and therefore, reduce emissions.</p> | All |
| <p>Negative</p> <p>Initial carbon impact to deliver improvements (e.g. replacing meters and disposal of all meters or boilers).</p> | |

| Economic | Affected populations |
|--|-----------------------------|
| <p>Positive</p> <p>Residents will have a better understanding of their energy costs, and choice about how much energy they wish to use.</p> | All residents |

| Economic | Affected populations |
|---|-----------------------------|
| Improvements may result in reduced energy consumption reducing overall cost to run the heating systems. | All residents |
| Better operations and maintenance systems may result in increased efficiency for the system, less wear and tear and reduce refurbishment costs. | All residents |
| Move towards a new cost recovery tariff may result in savings and value for money for the Housing Revenue Account (HRA) and thus all tenants. | City of Edinburgh Council |
| Complying with heating regulations will ensure that the Council will avoid any potential penalties from the Regulator. | City of Edinburgh Council |
| Negative | |
| Improvements may result in additional costs for heat users. This may have an Increased impact on those on low incomes. | All residents |
| Initial costs to the Council to meet regulations and deliver improvement works (e.g. remedial actions). | Private owners |
| Initial costs to owners to pay their share of improvement actions required to meet regulations (e.g. remedial actions). | |
| Additional resources will be required by the Council to deliver improvements. | |

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

Some elements of the improvement plan will require expert providers to deliver services, e.g. metering and billing installations, Condition Surveys and remedial actions. Existing frameworks will be used to secure external providers. New procurement exercise may be required to tender the improvement actions, which will follow the Council's sustainable procurement policies.

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

A communication plan will be drafted to ensure that tenants and owners affected will be updated. Some communications are already underway (e.g. Maidencraig/ Westfield/ Cables Wynd) and services will learn lessons from existing successes and areas for continued improvement.

- 1. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

No.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

| Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts) | Who will take them forward (name and job title) | Deadline for progressing | Review date |
|---|--|---------------------------------|--------------------|
| Ensure that all residents have clear communication so they understand the changes and potential impacts | Douglas Alexander (Senior Housing Development Officer) | January 2027 | September 2026 |
| Engage with Cllrs, stakeholders and tenants to discuss detail of a new cost recovery tariff model | Douglas Alexander (Senior Housing | March 2027 | September 2026 |

| Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts) | Who will take them forward (name and job title) | Deadline for progressing | Review date |
|--|---|--------------------------|-------------|
| | Development Officer) | | |

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

Tenants will be supported through any disruptions. Private owners will be supported in line with current investment in mixed tenure sites processes.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

Tenants are regularly engaged with on the changes. A new communal inbox has been created to make it easier for tenants to contact on any issues with their heating. a Priority Register will also be developed as part of the action plan, providing additional protections for those affected.

16. Sign off by Head of Service

Name Derek McGowan

Date 9/2/2026

17. Publication

Completed and signed IIAs should be sent to:
integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments
Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at
www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/