

<b>Equality Impact Assessment</b>	<b>Please enter responses below in the right hand columns</b>
TEMPLATE UPDATED SEPT 2015 <b>Date</b>	
<p><b>Sign-off path for EIA</b> (please add/delete as applicable) If you are conducting an EIA on a Cabinet decision, it should come to Corporate EIA panel for sign off.</p> <p><b>There is no corporately set sign off path for EIAs. It is up to you to decide the level of risk (legal, community, political, equalities) and to think about the appropriate level of scrutiny and challenge.</b> If you are not sure email <a href="mailto:equalities@lambeth.gov.uk">equalities@lambeth.gov.uk</a> Places where an EIA can be signed off are listed.</p>	<ul style="list-style-type: none"> <li>• Head of Equalities (email <a href="mailto:equalities@lambeth.gov.uk">equalities@lambeth.gov.uk</a>)</li> <li>• Director (this must be a director not responsible for the service/policy subject to EIA)</li> <li>• Strategic Director or Chief Exec</li> <li>• Directorate Management Team (Children, Health and Adults, Corporate Resources, Neighbourhoods and Growth)</li> <li>• Procurement Board</li> <li>• Corporate EIA Panel</li> <li>• Cabinet</li> </ul>
<b>Title of Project, business area, policy/strategy</b>	<b>Stautory Asbestos Related Works</b>
<b>Author</b>	<b>Mohtasham Ali</b>
<b>Job title, directorate</b>	<b>Asbestos Safety Advisor, Health &amp; Safety Team, Property Services</b>
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<b>Strategic Director Sponsor</b>	<b>Sue Foster</b>

# London Borough of Lambeth Equality Impact Assessment

Please enter responses below in the right hand columns.

## 1.0 Introduction

### 1.1 Business activity aims and intentions

*In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the political vision, and outcomes?*

All asbestos related works are governed by The Health & Safety At Work Act 1974 where it is the responsibility of the landlord to ensure that all risks due to health & safety to staff, visitors, residents and contractors are minimised to as low as reasonably practical. The Control of Asbestos at Works Regulation 2012 (CAR 2012) is used in order to comply with H&S at Work Act 1974. The proposal is to ensure that the risk due to asbestos exposure is reduced to as low as reasonable possible by ensuring all asbestos related works are carried out safely and within set guidelines. This will be achieved by ensuring there is clarity and uniformity in regards to managing the risks due to asbestos. This document is aimed at all services which deliver asbestos management in any shape or form (Responsive Repairs, Capital Delivery, Technical Services and some areas of Corporate Lambeth)The intended out come is to ensure that the risk to asbestos exposure is minimal and to reduce the number of HSE related incidents and queries that lambeth Council have incurred over the last 5 years.

The opportunity to promote equalities for all equality groups is high however the adverse impact across all groups is low. All tenants and leaseholders, regardless of their equality group, will be positively impacted by the introduction of this new asbestos contract.

## 2.0 Analysing your equalities evidence

### 2.1 Evidence

*Any proposed business activity, new policy or strategy, service change, or procurement must be informed by carrying out an assessment of the likely impact that it may have. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the protected characteristics enshrined in law and the local characteristics which we consider to be important in Lambeth (language, health and socio-economic factors).*

*Even though the Lambeth Council health & safety team monitor customer satisfaction rating in regards to asbestos works within their dwellings as part of the KPI's, the Council has undertaken a comprehensive coproduction exercise which incorporated all aspects of property maintenance and not limited to asbestos related works. The following activities were undertaken:*

- *16 Workshops involving over 300 residents*
- *Surveys sent to all 36000 properties (one survey per household)*
- *An online survey which had 165 respondents*

*In total, we had over 6000 residents helping coproduce the Lambeth Housing Standard. This represents over 16% of our homes having made their views known. We also know that residents from over 92% of the geographical areas in the Borough responded.*

*During the workshops, residents were asked to engage in two ways. Firstly, they were asked to identify the top 5 aspects of the options being proposed personal to their home and to their needs. Secondly, residents were put into random groups and given a representative 'cake' along with representational 'slices' to build a LHS within the known financial envelope. This allowed residents to discuss both the needs of tenants and leaseholders as well as to understand the financial implications of some of their decisions. Surveys (both online and postal) allowed residents to share their personal views. At the end of the process, the Council then had priorities for tenants, leaseholders and group priorities and working with residents were able to assess these and, working within the known financial envelope, create a standard which is based on the priorities of all residents.*

*Unfortunately, during the printing process for the surveys, the equalities information page was left off and so we only have either anecdotal information and information from the online surveys.*

*Equality information from the online surveys:*

<b>Category</b>	<b>Results</b>	<b>Percentage</b>	<b>Known percentages in social housing (tenants)</b>
Gender	99 female 59 male 7 no response	Female – 60% Male – 36% No response – 4%	Female - 62% Male – 38%
Age band	18-24yrs – 12	7%	16-34yrs – 11%

	25-34yrs – 47 35-44yrs – 52 45-54yrs – 30 55-64yrs – 10 65–74yrs – 7 75-84yrs – 1 85yrs+ - 1 No response - 5	28% 32% 18% 6% 4% 1% 1% 3%	35-64yrs – 62%  65yrs+ - 27%
Disability (Y/N)	Y – 38 N – 114 No response - 13	23% 69% 8%	45% 55%
Ethnicity	White - 70 Mixed - 8 Asian – 9 Black – 56 Other - 10 No response - 14	42% 5% 5% 34% 6% 8%	White – 42% Mixed – 15% Asian - 3% Black - 40%

*Where residents did have a disability and responded through the survey comments box to this effect, they had the option of choosing to have access improvements as one of their priorities for inclusion in the LHS.*

*From the respondents, it is clear we had a good male / female response rate when compared to our overall gender split however, as would be expected with an online survey, we had a higher proportion of young people than over 65's respond than is reflected in the age split across the stock. The responses are also reflective of the overall number of disabled residents in our housing stock. It is*

also evident that ethnicity across the stock was well represented and proportionate in the online survey responses. It is interesting to note, we had a higher response from the Asian community than is proportionate in the Borough and a lower response from those of mixed racial backgrounds.

The Asbestos Safety Advisor believes the implementation of the new project will impact favourably on all residents for all the reasons set out in the introduction. The current small scale contract implemented from April 2016 has seen many benefits. The site audits carried out by the asbestos safety advisor has seen a decline in the asbestos materials missed on the surveys and the number of incidents and queries from the HSE has declined .

<b>Number of HSE related asbestos incidents or queries from July 2013 – April 2017 (before implementation of small scale asbestos contracts procured by the Health &amp; Safety Team)</b>	<b>Number of HSE related asbestos incidents or queries from April 2017 – Current (after implementation of small scale asbestos contracts procured by the Health &amp; Safety Team)</b>
7	0

In addition, asbestos site audits have shown that the total number of incidents where asbestos has been missed on a survey has declined substantially since the implementation of the small scale contract (the asbestos safety advisor carried out 4% site audits of the total number of communal surveys carried out in the previous month)

<b>Number of inspections from March 2015 to March 2016 where asbestos was identified as being omitted from report before implementation of contract</b>	<b>Number of inspections from March 2015 to March 2016 where asbestos was identified as being omitted from report after implementation of contract</b>
10	0

**IF YOUR PROPOSAL ALSO IMPACTS ON LAMBETH COUNCIL STAFF YOU NEED TO COMPLETE A STAFFING EIA.**

Protected characteristics and local equality characteristics	<p><b>Impact analysis</b></p> <p><b>For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:</b></p> <p><i>Please explain how you justify your claims around impacts.</i></p> <p><i>Please include any data and evidence that you have collected including from surveys, performance data or complaints to support your proposed changes.</i></p> <p><i>Please indicate sources of data and the date it relates to/was produced (e.g. 'Residents Survey, wave 10, April 12' or 'Lambeth Business Survey 2012' etc)</i></p>
Race	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Gender	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Gender re-assignment	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Disability	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Age	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Sexual orientation	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Religion and belief	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Pregnancy and maternity	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p> <p>Please insert explanation and data here. <b>(data given above in two tables)</b></p>
Marriage and civil partnership	<p><b>Positive / Negative / Positive and negative / None / Unknown (delete as required)</b></p>

	Please insert explanation and data here. <b>(data given above in two tables)</b>
<b>Socio-economic factors</b>	<b>Positive</b> / Negative / Positive and negative / None / Unknown (delete as required) Please insert explanation and data here. <b>(data given above in two tables)</b>
<b>Language</b>	<b>Positive</b> / Negative / Positive and negative / None / Unknown (delete as required) Please insert explanation and data here. <b>(data given above in two tables)</b>
<b>Health</b>	<b>Positive</b> / Negative / Positive and negative / None / Unknown (delete as required) Please insert explanation and data here. <b>(data given above in two tables)</b>
<b>2.2 Gaps in evidence base</b> <i>What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.</i>	<p>The gaps in the evidence is that there has been no breakdown of the impact of different sectors of society. However the asbestos safety advisor believes that from the data collected that all sectors will be benefitted positively equally in regards to health and risk from exposure to asbestos.</p> <p>The site audits which have been carried out by the asbestos safety advisor are limited to the common parts as the asbestos safety advisor is responsible for managing the asbestos to these areas only. The site audits did not generally cover internal domestic surveys.</p>
<b>3.0 Consultation, Involvement and Coproduction</b>	
<b>3.1 Coproduction, involvement and consultation</b> <i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i>	<p>The Key stakeholders are Lambeth residents, internal Council departments and external contractors who must work with the successful bidders.</p> <p>The Asbestos Safety Advisor believes that a borough wide asbestos contract (which Lambeth Council have not procured before) will protect all stakeholders in regards to risk from asbestos as it will take into consideration quality (40%) and price (60%) and provide uniformity and clarity and should lead to a better quality of asbestos related works (surevys and removals).</p>

	<p>The Asbestos Safety Advisor has previously procured a small scale asbestos contract. The KPI's and site audits that have been carried out by the Asbestos Safety Advisor has shown that the quality of surveys and asbestos related works has greatly increased compared to when Lambeth Council was working to the Brent Housing Framework .</p> <p>Hence this contract should considerably reducing the risk to all residents, visitors, Lambeth staff and external parties and the potential risk of HSE related incidents.</p> <p>External stakeholders were all informed in 2015 of the potential changes as they were incorporated within the Lambeth Asbestos Policy. At the Lambeth Council chaired Health &amp; Safety contractors meeting the majority of external stakeholders had no queries. All external stakeholders are all currently working with Lambeth Council approved asbestos companies and hence don't envisage that there will be a problem in regards to the transition.</p>
<p><b>3.2 Gaps in coproduction, consultation and involvement</b>  <i>What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.</i></p>	<p>This will be a borough wide contract and will affect all residents who are having repairs in their dwellings or as part of the Decent Homes programme. This is irrespective of local equality characteristics. The asbestos safety advisors role is to protect the council and all those affected by the works the council carries out. From previous data the safety advisor has set out, he believes that all residents who are having works carried out within their dwellings will all positively benefit from the new contract. In this respect consultation will not be required or deemed necessary</p>
<p><b>4.0 Conclusions, justification and action</b></p>	

<p><b>4.1 Conclusions and justification</b>  <i>What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?</i></p>	<p>Where repairs are required in a dwelling or common part or where there is a programme of Decent Homes all those dwellings will be positively impacted with the implementation of the new contract irrespective of local equality characteristics. This is because there will be a comprehensive assessment of quality and prove and whether the interested parties have the resources, skills and experience to carry out the works.</p> <p>There has previously been issues with the quality of asbestos related works being carried out and the HSE attended Lambeth Council partially due to the poor quality of previous asbestos data when Lambeth Council was implementing the Brent Housing Framework. The risks will be mitigated by carrying out KPI's and assessing if there are any critical non-compliances and the best way to resolve them quickly and efficiently. Carrying out site audits, customer satisfaction, attending site within agreed timescales, any health &amp; safety incidents and attending meetings as requested</p> <ul style="list-style-type: none"> <li>• <u>Race</u></li> </ul> <p>We know from our annual status survey, that our ethnicity profile amongst our tenants is as follows:  White – 42%  Mixed – 15%  Asian - 3%  Black - 40%</p> <p>Which shows the proportion of BME residents as 58%</p> <p>Across the Borough as a whole, the ethnicity profile is different and shown as:  White 63%  BME 36%</p> <p>It is clear from the above data that there are more BME residents in our Council housing stock than represented in the Borough as a whole. Therefore, any changes to the stock will disproportionately affect those residents from a BME background. It is important to note that the LHS will positively impact our housing stock and therefore a large number of residents from a BME background in the borough will be positively impacted due to the improvements made to their homes.</p>
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- Gender

The split in tenants in Lambeth's housing stock is 62% female and 38% male. This does not reflect the Borough as a whole where there is a 51%/49% split male to female. This shows that there are a disproportionate number of female tenants in our housing stock and therefore any changes to the stock will disproportionately affect women. It is important to note that the LHS will positively impact our housing stock and therefore a large number of women in the borough will be positively impacted due to the improvements made to their homes.

- Disability

Across Lambeth as a whole, approximately 15% of residents class themselves as having a disability. This figure is much higher in our council housing stock where 45% of our tenants class themselves as having a disability. Therefore, those with disabilities are disproportionately represented in our Council stock and will therefore be disproportionately affected.

There are issues in relation to how the standard will or will not meet the needs of our disabled residents. Disabled residents with a physical disability will continue to have access to aids and adaptations for their homes to improve their ability to live within their homes and unlike in the government's decent homes standard, Lambeth's Housing Standard explicitly includes this requirement. The standard also includes works to estates to improve accessibility. Lambeth owns properties specifically designed for those with learning difficulties and these would be brought up to the Lambeth Housing Standard as the standard will apply to all properties. It is also recognised that different types of improvements may be required for specific client groups with specific needs relating to their housing and the Council will expect its ALMO partners to take these into consideration when specifying works to improve properties.

The Council also has a number of blocks of sheltered accommodation, catering for our elderly population many of whom have mobility needs. Sheltered accommodation will also be brought up to the Lambeth Housing Standard and since the LHS contains 'aids and adaptations' as well as 'access improvements', this should benefit these residents. Improvements to lifts will also improve mobility for those residents for whom this is an issue.

When implementing the standard, our ALMO partners will have to work particularly closely with all residents with particular needs, whether they are mental, physical or other.

- Age

Lambeth has a young population with almost 75% of our residents under the age of 45. In our housing stock, 78% of residents are under the age of 65 which mirrors the profile of the Borough. As the LHS is based on the property and not the resident, resident age is not a factor in determining whether or not a property will benefit from improvements. However, it is important to note that improving sheltered stock and access to properties will benefit older residents with mobility issues as well as mothers with young children (pushchairs) and the younger children themselves. Refurbishing lifts will also improve accessibility for those with age-related mobility issues.

The review of the housing requirements for older residents currently being considered, as the Older Peoples Housing Strategy is being developed, will include consideration of the Council's sheltered housing provision to ensure it best meets the needs of older residents now and in the future and therefore will influence how the LHS is implemented. This Strategy aims to ensure that there is choice and flexibility in housing provision for older people in recognition of the wide range of needs and preferences of a diverse client group that encompasses the large minority of residents in the borough who are over 60 years old.

- Sexual orientation

Lambeth has relatively little data concerning sexual orientation, however, initial data collection shows approximately 4% of the Borough classify themselves as gay, lesbian or bisexual. There is no data at present on the sexual orientation of those living in our housing stock.

As the LHS is based on the property and not the resident, sexual orientation is not a factor in determining whether or not a property will benefit from improvements. However, it is important to note that the LHS will significantly improve the quality of our housing stock and therefore anyone living in one of our social properties should see a positive improvement to their lives, whatever their sexual orientation.

- Religion and belief

The LHS will not disproportionately affect anyone with particular religious beliefs. When the LHS is being implemented, the contractors will need to work with residents to ensure that works do not affect prayer routines or other religious / belief activities.

- Socio-economic factors

There are approximately 10000 leaseholders who own properties that will be affected by the LHS. As stated in the LHS, leaseholders will be required to pay for this proportion of costs related to external and communal works. This may be quite a high cost to leaseholders on some estates. The Council is aware that this may disadvantage some of our leaseholders financially and to mitigate this, both our ALMOs have implemented leaseholder repayment option plans which give leaseholders a range of ways and timescales for paying for Section 20 works.

According to our leases, leaseholders will have to be given at least 60 days notice of any works being undertaken for which a leaseholder charge is liable. It is worth noting that Leasehold Council felt that the LHS will significantly improve the thermal efficiency of properties and therefore reduce the utility bills for leaseholders in the long-run.

At present, just under 3000 leaseholders are in arrears with their payments which equates approximately 60% of leaseholders that have been billed for works. Of these, about 10% are currently being pursued through the courts and for the rest, LL and URH are continuing to work with leaseholders and identify appropriate repayment plans

<b>4.2 Equality Action plan</b>	
<i>Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.</i>	
<b>Equality Issue</b>	<b>Mitigating actions</b>
<b>Example:</b> That the equality analysis may not have accurately covered all the equality impacts; and the mitigations may not act to reduce disproportionate impact	<b>Example:</b> Review the EIA and assess whether the mitigating actions were sufficient. <b>12/09/12. Joe Bloggs. Head of ABC</b>
<b>Disability</b>	As part of the Capital Works Programme , capital Works will be carrying out works in many of the sheltered housing accomodations, Project officers for the schemes to assess mitigating actions as required and the Asbestos safety adviors will provide guidance and advice as required. This may include respite, meals on wheels where residnets may have to vacate their dwellings for duration of works
<b>All other equality issues</b>	It is belived that all local equality characteristics will all be positively impacted with the implementation of new contract. Any mitigating circumstances must be dealt with as required. Mitigating actions assessed monthly as part of KPI's and non-compliances addressed. Responsible officer will depend on the area of work, and repairs as part of the Responsive Repairs Contract and any Decent Home related works will eb addressed by Project Manager/Office rin that department.
<b>5.0 Publishing your results</b>	
The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.	
<b>EIA publishing date</b>	28 jan 2017
<b>EIA review date</b>	28 June 2018
<b>Assessment sign off (name/job title):</b>	Mohtasham Ali (Asbestos Safety Advisor)

All completed and signed-off EIAs must be submitted to [equalities@lambeth.gov.uk](mailto:equalities@lambeth.gov.uk) for publication on Lambeth's website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers' name, email and phone number).