



EQUALITY IMPACT ASSESSMENT INITIAL SCREENING

Name of policy / strategy / project (the “initiative”):

Asbestos Management Plan

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

- To ensure Chevin Housing Group complies / discharges its duties under the Control of Asbestos at Work Regulations 2002 (CAWR)
- To manage the risk of exposure to asbestos or asbestos containing materials in communal areas of schemes, to employees in their workplace, to tenants, to Direct Labour Organisation (DLO) workforce and to commissioned contractors.
- To assist Chevin in meeting liabilities under the Workplace (Health, Safety and Welfare Regulations) 1992 and the Management of Health and Safety at Work Regulations 1999.

Completed by: Denis Creaghan

Manager / Team Leader:

Date: 30th June 2009

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e. have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group?
Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

We anticipate that the Asbestos Management Plan will have a positive impact on all tenants, staff, and contractors by ensuring that Chevin meets statutory obligations under the Control of Asbestos at Work Regulations 2002 (CAWR) and our liabilities under the Workplace (Health, Safety and Welfare Regulations) 1992 and Management of Health and Safety at Work Regulations 1999. The Plan will reduce the risk of exposure to asbestos for staff, tenants, sub-contractors and visitors to Chevin buildings, and in turn reduce the risk of ill-health.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'?
Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

We do not anticipate any adverse impact on one or more minority / under-represented or community group as a result of the new Plan.
Further information included in Q 3 addresses targeted staff training, plus actions that will help notify tenants about the asbestos plan where those customers do not speak English as their first language, where customers are hearing or voice impaired, or have a learning disability.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps?
Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Central to the Asbestos Management Plan is the compilation and maintenance of a comprehensive 'Asbestos Register' in line with recently published good practice that will detail the location of asbestos containing materials (ACMs) within Chevin properties. The information will be completed by undertaking Type 2 surveys to a representative sample of non-domestic premises and residential housing stock developed pre-1985. Those homes not covered by the survey will be subject to an in-house desk top study and Chevin will continue to carry out surveys to further enhance the data held on the Register.

A British Lung Foundation survey conducted in February 2008 and subsequent government research has demonstrated that many people in the building trade do not fully understand the dangers of asbestos, particularly younger people who believe that asbestos exposure only affects the older generation. Chevin Housing Group recognises that asbestos training is a high priority and the policy reflects this. Technical Officers and survey staff will be trained in identifying asbestos and processes in order that they can pick up asbestos issues at void or stock condition inspections to include on the Register. All Technical Officers and survey staff will have access to the same level of training. Technical Officers will also ensure that contractors are asbestos 'aware' before and after they are accepted onto the approved contractors list. Training provided to DLO staff who are determined as being high risk due to the nature of their work, will be appropriate to the higher level of risk.

The Register will ensure that Chevin is complying with regulations in respect of its duty of care to employees and assist our contractors in their duty of care to their staff by providing information about ACMs in our stock. This information will be provided to all staff including DLO staff, wardens and caretakers, as well as contractors, consultants, regardless of age, disability, gender/Transgender, ethnicity, religion or sexuality.

Although there is no legal obligation for Chevin to inform tenants about ACM in our stock, we recognise that it is good practice to keep our tenants informed and a copy of the Asbestos Register record sheet will be provided at sign-up to all new residents, regardless of age, disability, gender/Transgender, ethnicity, religion or sexuality. **This information should be provided in accordance with any alternative communication requirements that our tenants have made us aware of, such as large print, audio, Braille, or via a translator or interpreter. It should also take account of issues relating to illiteracy, or where a tenant may have a learning disabilities, wherever we are aware.** Information relating to sensory and communication impairments, plus personal communication requirements is to be

collected at application stage, so this information will be available for new tenants.

The Chevin Views newsletter has been / will be used to provide information / reassurance to tenants about Chevin's asbestos strategy. **Once again, this information should be provided in accordance with any alternative communication requirements that our tenants have made us aware of, as highlighted above.** Tenants are encouraged to contact Chevin if they have any concerns relating to asbestos in their home. In addition, wherever it is practical to do so, a label will be placed in communal areas or public buildings where asbestos is present but in good condition. The label will include a warning and state that the material should not be disturbed in any way. **Where these labels appear, it will be necessary to check communication requirements of the tenants and residents in the building to ensure that the message is conveyed in accordance with their personal communication needs, for example, this may mean having labels printed in alternative languages if necessary.**

Provided the issues highlighted above are put into place, there is no evidence to suggest that any staff, tenants, contractors or consultants will be negatively affected, regardless of age, gender, sexuality, ethnicity, religion or disability.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity.

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Not applicable. Chevin staff will ensure that the asbestos information is made available to contractors and consultants where necessary, ensure tenants are aware of asbestos removal, update records post completion and generally monitor and manage the Asbestos Action Plan.

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time?

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Residents have had an opportunity to comment on the proposals in June 2009 via the four regional Residents' panels. We do not intend to undertake a full impact assessment based on the evidence to date, but will continue to monitor and review the impact of the new strategy on tenants, staff, contractors and consultants once the procedures have been implemented. We will also action the recommendations highlighted in Q 3 above.

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Guidelines: Things to consider

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. **NB** If the initiative contravenes equality legislation, it **must** be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.