

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Asbestos Management Policy and Plan
<b>Date of assessment</b>	June 2024
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Maintenance Manager
<b>Officer conducting assessment</b>	Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Asbestos Management Policy and Plan sets out Dartford Borough Council's ('The Council') Policy, Management Plan and Procedure for managing asbestos. The document details the Council's approach with regard to the day to day management of asbestos within its housing stock, as well as sites or operations which fall under the responsibility of the Housing Service of the Council.</p> <p>The Council is committed to ensuring the exposure to asbestos is prevented as far as reasonably practicable. A pro-active approach to asbestos has been adopted as the Council aims to protect the health, safety and welfare of its employees and others who may be affected by the Council's undertakings, such as contractors, tenants or visitors.</p> <p>The Policy and Plan has been reviewed to ensure it remains up to date and this Customer Access Review has been carried out in conjunction with the review. The main updates and additions to the policy include the following:</p> <ul style="list-style-type: none"> <li>• A separate 'Legislation and Regulatory Framework' section has been included to present the legislation, regulation and guidance the Council is required to adhere to when delivering this policy, plan and procedure.</li> <li>• Added more information to the definitions of 'management survey' and 'refurbishment/demolition survey' to clarify the aim of each survey.</li> <li>• Complaints section added.</li> <li>• Data protection section added.</li> <li>• Equality and diversity section added.</li> <li>• Monitoring and review section added.</li> <li>• Minor re-wording, formatting and re-numbering of paragraphs in parts of the document.</li> </ul>

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<b>Step 1: Scoping the assessment</b>	
<b>2. Who will be affected by the activity or proposal?</b>	The Policy will affect Council employees, contractors, tenants, as well as owners of property and visitors of any Council owned properties.
<b>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</b>	<p>a) The Asbestos Management Policy and Plan contributes to the Regulator of Social Housing tenant satisfaction measure BS03 – Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out. This was 100% for 2023-24.</p> <p>b) The Asbestos Management Policy and Plan contributes to the Housing ambitions in the draft Corporate Plan 2024-2027 to:</p> <ul style="list-style-type: none"> <li>• Ensure that our homes are well maintained and empower tenants to shape and influence their own communities.</li> <li>• Provide a high quality and responsive housing service that’s built on respect for aspiring and existing tenants. We want to be practical, honest and straightforward in all the information and advice we give.</li> <li>• Strive for full compliance with the Regulator of Social Housing’s consumer standards in delivering good quality homes and services to the tenants that live in our homes.</li> </ul>
<b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b>	<p>The Asbestos Management Policy and Plan and its delivery is intended to be compatible with the following relevant legislation and regulation:</p> <ul style="list-style-type: none"> <li>• The Health and Safety at Work etc. Act 1974</li> <li>• The Management of Health and Safety at Work Regulations 1999</li> <li>• The Control of Asbestos Regulations 2012</li> <li>• Workplace, Health and Safety Welfare Regulations 1992</li> <li>• Occupiers’ Liability Act 1957</li> </ul> <p>The Policy and Plan and its delivery is also intended to be compatible with the following guidance:</p> <ul style="list-style-type: none"> <li>• HSE L143 Managing and working with asbestos</li> <li>• HSG264 Asbestos: The Survey Guide</li> <li>• HSG248 Asbestos: The Analysts’ Guide</li> <li>• HSG247 Asbestos: The Licensed Contractors’ Guide</li> <li>• HSG227: A comprehensive guide to managing asbestos in premises</li> </ul>
<b>Step 2: Information collection</b>	
<b>5. What do you know about the groups of people who will be affected? (i.e. demographic</b>	<p><b>Dartford population profile</b></p> <ul style="list-style-type: none"> <li>• <b>Gender</b> – There are slightly more female residents than male residents in Dartford where 51% are female and 49% are male, which is the same as the overall England ratio of females and males.</li> </ul>

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<p>information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<ul style="list-style-type: none"> <li>• <b>Age</b> – The median age in Dartford is 37 years, which is slightly lower than the overall England mean age of 40 years. 21.1% of Dartford’s population is aged 14 years or under. This is followed by residents aged 35 to 44 years (15.7%), 25 to 34 years (15.2%), 45 to 54 years (13.3%), 55 to 64 years (10.8%), 15 to 24 years (10.2%), 65 to 74 years (7.4%), and aged 75 years and over (6.4%)</li> <li>• <b>Ethnicity</b> – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.50%), Asian, Asian British or Asian Welsh (9.90%), Mixed or Multiple ethnic groups (3.10%), and Other ethnic groups (2.00%)</li> <li>• <b>Disability</b> – 15.9% of Dartford’s population are disabled. Of this, 6.6% of people’s activities are limited a lot and 9.3% of people’s activities are limited a little.</li> <li>• <b>Religion</b> – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Hindu, 0.6 Buddhist, 0.1% Jewish, 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census.</li> <li>• <b>Sexual orientation</b> – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.5% described themselves as gay or lesbian. 0.91% described themselves as bisexual. 0.14% described themselves as pansexual; 0.03% described themselves as asexual; 0.00% described themselves as queer. 0.01% described themselves as ‘other sexual orientation’. 6.54% did not answer this question in the Census.</li> </ul> <p>(Source: Census 2021, Office for National Statistics)</p> <p><b>Tenant profile</b></p> <p>The Council currently owns and manages a total of 4,216 properties. Information in relation to the protected characteristics of Council tenants is captured by the service, as follows:</p> <ul style="list-style-type: none"> <li>• Gender – 66.03% tenants are female and 33.85% tenants are male.</li> <li>• Age – 1.59% of tenants are aged 18 to 24 years; 20.41% are aged 25 to 39 years; 38.22% are aged 40 to 59 years; and 39.78% are aged 60 years plus.</li> <li>• Ethnicity – 67.72% of tenants are from a White ethnic group and 1.47% are from a Black or Black British ethnic group. 1.45% of tenants are from an Asian or Asian British ethnic group, 2.00% are from a mixed ethnic group and 0.24% are from a Chinese or other ethnic group. The ethnic group of 27.12% of tenants is unknown or stated prefer not to say.</li> <li>• Disability – 20.84% of tenants have a disability/vulnerability and 79.16% do not have a disability/vulnerability.</li> </ul>

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<b>Step 2: Information collection</b>	
	<p><b>Leaseholder profile</b> – There are currently 481 leasehold properties. The conveyancing process is managed by external bodies and legal transfers which do not collect personal data concerning the protected characteristics of new home owners. The Housing Service does not receive or hold any personal data regarding leaseholders other than name and address.</p>
<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>Internal consultation on the draft updated Asbestos Management and Plan has been carried out with Council officers.</p> <p>The Council has been informed of tenants views on building safety through the annual Tenant Satisfaction Measures Survey (TSM) carried out in 2023, as follows:</p> <ul style="list-style-type: none"> <li>• TP05 – Satisfaction that the home is safe - 78.0%</li> </ul>
<p><b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p>The Council is committed to ensuring the voice of its tenants is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord’s housing-related policies and strategies. Consultation with Council tenants will be undertaken, as follows:</p> <ol style="list-style-type: none"> <li>1. All Council tenants will be invited to comment on the draft Asbestos Management Policy and Plan.</li> <li>2. The Dartford Tenants’ and Leaseholders’ Forum (DTLF) will be invited to comment on the draft Asbestos Management Policy and Plan. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery.</li> <li>3. The Housing Advisory Board (HAB) will be invited to comment on the draft Asbestos Management Policy and Plan. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members.</li> </ol>

<b>Step 3: Assessing the equality impact</b>	
<p><b>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</b></p> <p>a) tackling unlawful discrimination</p>	

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## Step 3: Assessing the equality impact

- b) promoting equality of opportunity
- c) promoting good relations

NOTES:

- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

## Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<p><b>Communication needs</b>                      In accordance with the Council's Equality &amp; Diversity Document Framework, the Asbestos Management Policy and Plan and information around asbestos can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Sex			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<p><b>Alternative format and interpreting services</b>                      In accordance with the Council's Equality &amp; Diversity Document Framework, the Asbestos Management Policy and Plan and information around asbestos can be provided in alternative formats including documents translated into</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	other languages. Telephone and face-to-face language interpreting services can also be provided upon request.			
<b>Religion/Belief</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>	Not applicable as the Policy does not apply in the context of employment.	Not applicable as the Policy does not apply in the context of employment.	<input type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	There are no known circumstances where the policy will have relevance to or a disproportionate equality impact on the protected characteristic groups of age, sex, gender reassignment, religion/belief, sexual orientation and pregnancy/maternity. The priority for asbestos related works will be based on the discovery and condition of the asbestos containing material. The Policy and Plan provides the same level of protection for all building users, regardless of any protected characteristics.
<b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b>	The Council will work with its contractors in delivering asbestos related work, including for any emergency related works or where asbestos is likely to be disturbed. The Council will also work with the Duty Holder of any premises, for instance, where the landlord retains the Duty Holder responsibility and the Council is a minor occupier, to ensure that adequate mechanisms are in place and the site is meeting the relevant requirements.
<b>11. Any other comments</b>	No.

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## Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from all Council tenants and leaseholders	Invite comment and input on the draft policy from all Council tenants and leaseholders	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	August 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer
Views from the Dartford Tenants' and Leaseholders' Forum on the draft policy	Invite comment and input on the draft policy from the Dartford Tenants' and Leaseholder's Forum	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	August 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer
Views from the Housing Advisory Board	Invite comment and input on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer

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**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

## Step 5: Decision making and future monitoring

<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Head of Legal Services and Director of Housing & Public Protection
<b>14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>15. How will you continue to monitor the activity or proposal on protected characteristic groups?</b>	The Asbestos Management Policy and Plan will be reviewed regularly to monitor its effectiveness and ensure there is not a negative impact on any of the protected characteristic groups.
<b>16. When will you review this Customer Access Review?</b>	The Asbestos Management Policy and Plan will be reviewed regularly to address legislative, regulatory, best practice or operational issues. New Customer Access Review assessments will be undertaken in conjunction with the review of the policy.

## Step 6: Final steps

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| <b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>   |
| <b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b> |

Reviewed by Legal Services:



1/8/24

Reviewed by Director of Housing & Public Protection:

Peter Dosad. 18.7.2024

