## Lancaster West Refurbishment Programme

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### Introduction

### Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (PSED) is contained in the Equality Act 2010 which came into force on 5 April 2011. The main duty is set out in section 149 of the Act, specifying that public authorities must, in the exercise of their functions, *"have due regard"* to the need to eliminate conduct that is prohibited by the Act. Such conduct includes discrimination, harassment and victimisation related to the following protected characteristics:

- age\*
- disability
- gender reassignment
- marriage and civil partnership\*
- pregnancy and maternity
- race
- religion or beliefs
- sex
- sexual orientation

The PSED also requires public authorities to have due regard for the need to:

- eliminate unlawful discrimination
- advance equality of opportunity between people who share a protected characteristic and those who don't
- foster or encourage good relations between people who share a protected characteristic and those who don't

\* <u>Part 3</u> <sup>1</sup> of the Act concerns discrimination in relation to services and public functions, yet section  $28(1)^2$  provides that Part 3: does not apply to the protected characteristic of

(a) age, so far as relating to persons who have not attained the age of 18

(b) marriage and civil partnership

#### Due regard

A definition of due regard can be found in case law, the leading case of which is the R (Brown) v Secretary of State for Work [2008] EWHC  $3158^3$  which established 6 principles:

I. decision-makers must be made aware of their duty to have due regard to the identified needs

<sup>&</sup>lt;sup>1</sup> Legislation.gov.uk. (2010). *Equality Act 2010*. [online] Available at:

http://www.legislation.gov.uk/ukpga/2010/15/part/3 [Accessed 20 Feb. 2020].

<sup>&</sup>lt;sup>2</sup> Legislation.gov.uk. (2020). Equality Act 2010, Section 28. [online] Available at:

http://www.legislation.gov.uk/ukpga/2010/15/section/28 [Accessed 20 Feb. 2020].

<sup>&</sup>lt;sup>3</sup> Brown, R (on the application of) v Secretary of State for Work and Pensions [2008] EWHC 3158 (Admin)

<sup>(18</sup> December 2008), URL: http://www.bailii.org/ew/cases/EWHC/Admin/2008/3158.html

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2. the duty must be fulfilled both before and during consideration of a particular policy, and involves a "conscious approach and state of mind"

3. it is not a question of ticking boxes, the duty must be approached in substance, with rigour and with an open mind, and a failure to refer expressly to the duty whilst exercising a public function will not be determinative of whether due regard has been had

- 4. the duty is non-delegable
- 5. the duty is continuing

6. it is good practice for an authority to keep a record showing that it has considered the identified needs.

#### Equality Impact Assessments (EIA)

An Equality Impact Assessment (EIA) is an analysis of a proposed organisational policy, or a change to an existing one, which assesses whether the policy has a disparate impact on people with protected characteristics. They are carried out to assist compliance with the Public Sector Equality Duty outlined above.

The EIA represents an opportunity for public authorities to ensure that they make better decisions based on robust evidence. It ensures that there is a written and transparent record of the equality considerations being considered, and ensures decision making includes a consideration of the actions that can mitigate any negative impacts on particular protected groups.

Our vision	<ul> <li>Our vision is for the Lancaster West Estate to become a sustainable, model 21<sup>st</sup> century social housing estate.</li> </ul>
	- By co-designing with residents and using innovative approaches to refurbishment, Lancaster West will become an example which other estates and local authorities across the country can look towards and be inspired by.
	- We aim to create an improvement for all community groups in terms of quality of housing.
	- Lancaster West will also be a green estate, aiming to become net-zero by 2030. This means it will not cause any additional greenhouse gases to be released to the atmosphere.
What's in scope?	- The Lancaster West refurbishment programme covers the whole of the Lancaster West Estate.
·	- This EIA examines the impact of the Lancaster West Refurbishment Programme on residents of the Lancaster West Estate.
	<ul> <li>It includes the full scope of works, including an uplift of outside areas and communal spaces.</li> </ul>

## Scope of Equality Impact Assessment (EIA):

This EIA examines the impact of the Lancaster West Refurbishment Programme on residents of the Lancaster West Estate.

When referring to the Lancaster West Estate Refurbishment Programme, this includes the full scope of works, including uplift of outside areas and communal spaces.

### **Equality Impact Assessment**

Protected	Potential impact
characteristic:	

#### Age Over-65s

Demographic information:

- Out of the 1322 residents we have data on, the age of 242 residents is unknown.
- Of the 1080 residents whose ages are known, the average age in the Lancaster West Estate is 44.4, over 6 years higher than the average age across the rest of the borough of 38<sup>4</sup>.
- 20% of our residents are over the age of 65, compared to 12.1% borough average<sup>5</sup>, as outlined in the 2011 census.
- Cambourne Mews has the highest proportion of older residents, with 40% of its residents being over 65, followed by Camelford Walk and Lower Camelford Walk with 23% of residents over 65.
- Hurstway Walk has the highest number of over-65 residents with 33, followed by Barandon Walk with 31 and Testerton Walk with 22. Verity Close has 22 over-65s, followed by Upper Camelford Walk with 18.

<sup>4</sup> Localstats.co.uk. (2011). Kensington and Chelsea Census Demographics United Kingdom. [online] Available at: http://localstats.co.uk/census-demographics/england/london/kensington-and-chelsea

<sup>&</sup>lt;sup>5</sup> Baker, D. (2011). *Census 2011: Kensington and Chelsea*. [online] Rbkc.gov.uk. Available at: https://www.rbkc.gov.uk/pdf/Census%202011%20-%20December%20Release%20Summary.pdf

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Block	No. of 65+	No. of under- 18s	No. age unknow n	No. working age (18- 65)
Barandon Walk	31	14	44	97
Camborne Mews	17	~<10	~<10	17
Camelford Court	~<10	~<10	~<10	27
Camelford Walk	10	~<10	~<10	18
Clarendon Walk	~<10	16	24	55
Hurstway Walk	33	35	40	99
Lower Clarendon Walk	~<10	~<10	~<10	10
Morland House	~<10	~<10	~<10	21
Talbot Grove House	12	~<10	~<10	56
Talbot Walk	~<10	~<10	~<10	10
Testerton Walk	27	23	20	95
Treadgold House	~<10	11	~<10	43
Upper Camelford Walk	18	12	17	43
Upper Clarendon Walk	~<10	11	~<10	52
Upper Talbot Walk	~<10	~<10	10	~<10
Verity Close	22	~<10	35	46
Grand Total	219	163	242	698

#### Disproportionate impacts:

- Older residents are more likely to spend more time in their homes or have mobility issues which makes it harder to leave their homes. This means that they are more likely to be impacted by the noise and disruption caused by the refurbishment works. This noise and disruption could lead to stress and discomfort, or trigger residents with PTSD following the Grenfell tragedy.
- **People of working age** are more likely to be out of their homes during the period when noisy works are permitted, so those over the age of 65 are likely to be disproportionately affected.
- Those with **mobility issues** may be more likely to remain at home and less likely to attend engagement events, so there is a risk that their views on the refurbishment programme are not taken into account.

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- Older people with mobility issues are particularly vulnerable to slips and trips and any dust, rubble, tools, equipment, leads or uneven areas of paving or flooring may cause a fall.
- Older residents with visual impairments may not be able to see hazards that are obvious to others, including trip hazards, temporary slopes and warning signs.

#### Mitigations:

- LWNT should signpost to, or set up, older person friendly respite facilities and activities, so older residents affected by the noise have somewhere else that they would like to go to escape the disruption. This respite provision should include quiet spaces, so residents do not feel like they must socialise with others and have appropriate access to somewhere for rest.
- To ensure that older residents have an equal say in the refurbishment, Resident Engagement Leads should also carry out door-knocks and arrange one-to-one appointments to gather resident priorities as well as using block-wide workshops.
- To avoid older residents being put in danger by the works taking place in their homes or around the estate, clear signage of any hazardous areas should always be displayed. Furthermore, if there are any areas which may pose a risk to older residents in their homes while refurb work is taking place, contractors should carefully explain these to the resident and take the time to ensure the resident's safety.
- Contractors should also be required to minimise any dust or pollution from the works wherever possible.

#### Under-18s

#### Demographic information:

- 163 under-18s are known, though we belive this is actually nearer 500
- Of the 1080 residents whose ages are known, 15% of our residents are under the age of 18, compared to average of 18% across the rest of the borough. <sup>6</sup>
- Lower Clarendon Walk has the highest proportion of under-18s at 27%, followed by Talbot Walk and Camelford Walk with 21% and then Camelford Court with 19%.
- According to our data, Hurstway Walk has the highest number of under-18s, followed by Testerton Walk with 23 and Clarendon Walk with 16. Barandon Walk is 4<sup>th</sup> with 14 under-18 residents.

<sup>&</sup>lt;sup>6</sup> Baker, D. (2011). Census 2011: Kensington and Chelsea. [online] Rbkc.gov.uk. Available at: https://www.rbkc.gov.uk/pdf/Census%202011%20-%20December%20Release%20Summary.pdf

Disproportionate impacts::

- **Younger people**, particularly those aged under 12 may be curious about the refurbishment works in their homes or around the estate and wander into dangerous areas, putting themselves and others at risk.
- Schoolwork may be impacted as a result of the refurbishment work due to the noise and disturbance it will cause. This may have an impact on younger people who have public examinations and are studying during periods of noisy work.

#### Mitigations:

- Signage around hazardous areas should be very clear so **children are aware of the dangers of entering such areas.** An engagement event aimed at under-12s could also take place before works start to explain what is going to happen in the refurbishment, as well as inform them about the dangers involved in the works and highlight the importance of reading and adhering to the signage.
- To avoid the refurbishment works impacting on younger resident's schoolwork and public examinations, any respite facilities being provided should include a **quiet study space** which they can escape to and use should the works become too loud to study in their homes.

#### **Disability** Demographic information:

- According to the resident profile data we have, there are less than 50 residents with a form of disability. However, the number is likely to be much higher than limited amount of data indicates. Government data<sup>7</sup> suggests that 1 in 5 people report having a form of disability.
- Even looking at the data we have on residents applying for the Local Lettings Policy, there are 43 reporting a disability.
- Furthermore, given the context of the estate, it is likely that there will be a higher proportion than average with PTSD. A mental health condition is considered a disability if it has a long-term effect on day-to-day activities as defined under the Equality Act 2010.
- Older people are more likely to have a form of disability, as shown by government data<sup>8</sup> which indicates that approximately 44% of those over the state pension age report having a disability. Therefore, we can assume that in the blocks where there are a higher number/proportion of over-65s, there is also likely to be more people with disabilities.

<sup>&</sup>lt;sup>7</sup> Department for Work and Pensions (2018). *Family Resources Survey 2017/18*. [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/791271/familyresources-survey-2017-18.pdf

<sup>&</sup>lt;sup>8</sup> Ibid.

- While there are potential ways the refurbishment could negatively impact listed below, the refurbishment is also likely to improve outcomes for our disabled residents. The Local Lettings Plan means we can move disabled residents into homes that are better suited for the accessibility needs, and more general adaptations may be installed in some blocks such as lifts which will significantly help some disabled residents.

#### Disproportionate impacts:

- **People with mobility related disabilities** may be more likely to be in their homes during the day when noisy works takes place. This means they may experience higher levels of stress and discomfort from the noise taking place.
- They may be more likely to remain at home and **not attend engagement events**, so there is a risk that their views on the refurbishment programme are not considered.
- People with mobility issues and visual impairments **may also find it harder to navigate around the refurbishment works** taking place in their homes and blocks.
- People with **long-term mental health issues may be affected also by the noise** caused by the works, exacerbating their symptoms and leading to higher levels of stress.
- Those with **autism** may find the changes taking place around them and the loud noise stressful and induce anxiety.

#### Mitigation:

- LWNT should set up accessible respite facilities and activities, so disabled residents affected by the noise have somewhere else that they would like to go to escape the disruption. This respite provision should include quiet spaces, so residents do not feel like they must socialise with others and are able to find somewhere to rest and avoid noise.
- To ensure disabled residents have an equal say in the refurbishment as abled residents, LWNT should also carry out door-knocks and arrange one-to-one appointments to gather resident priorities as well as using block-wide workshops.
- Contractors should make every effort to ensure the floors of resident's homes are free of debris or any trip hazards which could put a disabled person at risk. If there are any areas which are more hazardous, contractors should explain these to the residents to ensure their safety.
- The changes brought about by the refurbishment will cause will need to be clearly explained to all our residents to reduce the risk of it causing anxiety to our residents, in particular residents with autism.

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Gender	Demographic information:
reassignment	Demographic information.
	<ul> <li>Under the Equality Act 2010, those who have the protected characteristic of gender reassignment includes people who are proposing to undergo, are undergoing, or have undergone, a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex.</li> <li>There is not any data available on people on the estate who identify as trans and have sought gender reassignment.</li> <li>Furthermore, no robust data on the wider UK trans population exists. The Government Equality Office tentatively estimates that there are approximately 200,000-500,000 trans people in the UK, and the ONS is working on a way to produce more data.</li> <li>41% of trans men and trans women responding to a Stonewall survey<sup>9</sup> said they had experienced a hate crime or incident because of their gender identity in the last 12 months, and 65% say they have been discriminated against or harassed because of being perceived as trans in same time period.</li> </ul>
	Risks:
	- There is a risk of residents with the <b>protected characteristic of</b> <b>gender reassignment being subject to a form of negative</b> <b>behaviour or comments</b> by contractors or staff who enter their homes as part of the refurbishment works.
	Mitigation:
	- LWNT should begin to collect more data on our residents to understand how many do not identify with the sex they were assigned at birth. Once we have more data, then we will be better able to mitigate any of the risks presented by the refurbishment to our trans residents.
Marriage and civil	Demographic information:
partnership	- There is no available data on the number of couples who are married or in a civil partnership on the Lancaster West Estate
	Disproportionate impact
	- There is <b>no evidenc</b> e to suggest that residents who are married or in a civil partnership are going to be negatively impacted by the refurbishment programme.
	Mitigation:

<sup>&</sup>lt;sup>9</sup> Stonewall (2017). LGBT in Britain - Trans Report. [online] Available at: https://www.stonewall.org.uk/system/files/lgbt\_in\_britain\_-\_trans\_report\_final.pdf

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- LWNT should begin to collect more data on our residents to understand how many are currently in a marriage or civil partnership. Once we have more data, we will be better able to mitigate any of the risks presented by the refurbishment to these residents.

#### **Pregnancy** and maternity Demographic information:

- There is no available data on the number of residents who are pregnant or mothers.

#### Risks

- There is evidence<sup>10</sup> to suggest that stress in pregnancy can have impacts on their child's development. There is a risk that the refurbishment could cause high levels of stress to our residents, with the effects felt more acutely by pregnant women.
- Pregnant women may be more likely to remain at home due to fatigue and not attend engagement events, so there is a risk that their views on the refurbishment programme are not considered.
- Mothers are more likely than fathers to take a higher burden of childcare, so may also become less involved in the design of the refurbishment or take part in engagement activities, especially if they take place after school.

#### Disproportionate impacst:

- To reduce the risk of our residents becoming stressed, respite facilities should be provided so those affected by the noise have somewhere else that they would like to go to escape the disruption. This respite provision should include quiet spaces, so residents do not feel like they have to socialise with others and are able to find somewhere to rest and avoid noise.
- To ensure residents who are also pregnant, or mothers have an equal say in the refurbishment as abled residents, Resident Engagement Leads should also carry out **door-knocks and arrange one-to-one appointments** to gather resident priorities as well as using block-wide workshops.

Race

Demographic information:

<sup>&</sup>lt;sup>10</sup> Brannigan, R., Tanskanen, A., Huttunen, M., Cannon, M., Leacy, F. and Clarke, M. (2019). The role of prenatal stress as a pathway to personality disorder: longitudinal birth cohort study – CORRIGENDUM. *The British Journal of Psychiatry*, pp.1-1.

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- Of the 1322 residents we have profile information about ethnicity, 401 are unknown, and a further 14 have chosen not to disclose their ethnicity.
- The ethnic breakdown of our residents it as follows:

Ethnicity	Total
UNKNOWN	401
WHITE BRITISH	123
BLACK AFRICAN	108
WHITE - OTHER	103
BLACK CARIBBEAN	97
OTHER - ARAB	94
Somali	67
MOROCCAN	39
OTHER - FILIPINO	39
MOROCCAN ARAB	38
OTHER - ARAB MOROCCAN	28
BLACK - OTHER	27
MIXED - OTHER	19
ASIAN - OTHER	18
WHITE SPANISH	17
PREFER NOT TO SAY	14
WHITE PORTUGUESE	14
WHITE IRISH	12
MIX WHITE - BLK CARRIB	10
OTHER LATIN AMERICAN	~<10
ASIAN BANGLADESHI	~<10
OTHER - IRANIAN	~<10
FILIPINO	~<10
ASIAN PAKISTANI	~<10
OTHER ETHNIC GROUP	~<10
ASIAN INDIAN	~<10
MIXED WHITE ASIAN	~<10
MIXED WHITE BLK AFRI	~<10
ASIAN CHINESE	~< 0
BLACK SOMALI	~<10
Grand Total	1322

- Out of the 921 residents whose ethnicities we are aware of, 798 (87%) are not White British. This shows the diversity Lancaster West Estate and the importance of reducing the risk of any discrimination, harassment and victimisation.
- In Kensington and Chelsea, 72% of residents report that their main language is English, while 2.2% report not being able to speak English well and 0.3% report not being able to speak English at all.<sup>11</sup>

<sup>&</sup>lt;sup>11</sup> ONS. (2011). 2011 Census - Office for National Statistics. [online] Available at: <u>https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/</u>2011censusquickstatisticsforenglandandwales/2013-01-30#proficiency-in-english

- In North Kensington, there are over 1,800 households where no occupant speaks English as their main language, and over 1,400 residents speak very little to no English.<sup>12</sup>

#### Risks:

- There may be language barriers that prevent some residents who don't speak English engaging with the refurbishment process. This could lead to issues such as:
  - Residents not feeling included in the design of the refurbishment
  - Residents not having full say on the refurbishment taking place in their homes, for example they may not be able to articulate what they want refurbished/changed or the specifications they require
  - Residents not being able to communicate with contractors who enter their homes – this communication barrier could lead to stress and anxiety for the residents
- Even if information about the refurbishment is translated into the language the resident is best able to engage with, there are certain cases where this may be inadequate. For example, Somali has only recently become a written language, so some Somali residents over a certain age may not understand Somali when written down.
- There is also a risk of racial intolerance/harassment by the contractors on the estate.
- There is also a risk that refurbishment specifications contain items that are culturally incompatible and represent a form of indirect discrimination.

#### Disproportionate impacts:

- To avoid the **risk of language barriers becoming an issue**, the LWNT should have staff on hand who are able to provide translations either over the phone or face-to-face when required. An audit may need to take place to fully understand the range of languages that are spoken on the estate, and ensure translators are available for residents who do not speak English.
- **Contractors will also need to be fully briefed** on the importance of treating all residents with respect and informed that any form of racial or cultural intolerance will not be accepted.
- To ensure that the specifications for the refurb within properties don't contain any items that represent a form of indirect discrimination, the spec will have to be fully codesigned with residents from a range of ethnicities to ensure it is inclusive of everyone's needs, for example including bidet hoses and deep sinks for large cooking utensils.

<sup>&</sup>lt;sup>12</sup> The ClementJames Centre. (2016). Our Community's Needs - The ClementJames Centre - Releasing Potential in the Community. [online] Available at: https://clementjames.org/our-community-needs/

Demographic information:
- On the Lancaster West Estate, a wide ran

- On the Lancaster West Estate, a wide range of religions and beliefs are represented.
  Of the data that we have, the breakdown of religion and belief
- among our residents is as follows:

Religion	Total
PREFER NOT TO SAY	289
CHRISTIAN	184
MUSLIM	125
NO RELIGION OR BELIEF	41
ANY OTHER RELIGION	~<10
BUDDHIST	~<10
HINDU	~<10
JEWISH	~<10
SIKH	~<10
PREFER NOT TO SAY	289
Grand Total	655

- Our data however is limited, as we are only aware of the religion/belief of 399 of our residents.

#### Disproportionate impacts:

- There is a **risk of contractors being unaware of beliefs** and practices among some members of the Muslim community and cause offence. For example, it may be culturally inappropriate for someone to enter a home and speak to a woman without another male family member present or engage in any physical contact with any member of a household.
- There is also a risk that the noise from the refurbishment could interfere with **prayer times and Ramadan**.

#### Mitigation:

- Contractors will need to be fully briefed on the cultural norms of different faiths to ensure they are aware of the appropriate way to conduct themselves and communicate with residents of certain faiths in their homes. This will help to avoid any situations that could make residents uncomfortable.
- Any respite facilities set up should include a quiet space for prayer or reflection, especially during periods such as Ramadan, so residents are able to pray away from the noise and disturbance caused by the refurbishment.

Sex

#### Demographic information:

- Of the 1322 residents we have data on, we do not have data on the sex of 72.
- Of the 1250 residents we do know the sex of, 676 (54%) are women and 574 (46%) are men. This is reflective of the wider picture of social housing across the UK, with there being more women than men in social housing or claiming housing benefit. <sup>13</sup>
- At a block level, we can see that there is significant variance in the proportion of women in each block. 65% of Upper Clarendon Walk residents are female, the highest proportion of any block, followed by Talbot Grove House at 64%.
- Conversely, Morland House has the highest proportion of men at 60%, followed by Camelford Walk with 55% and then Verity Close with 47%.

Block	No. Female	No. Male	No. Unknow n	Total	Known Total
Upper	remaie	Male		TULAI	IULAI
Clarendon					
Walk	51	28	~<10	80	79
Talbot		-	-		
Grove					
House	52	29	~<10	83	81
Camelford					
Court	27	19	~<10	47	46
Hurstway					
Walk	110	82	15	207	192
Upper					
Talbot					
Walk	14		0	25	25
Clarendon					
Walk	57	45	~<10	104	102
Lower					
Clarendon					
Walk	12	10	0	22	22
Camborne				(5	
Mews	23	16	~<10	43	39
Talbot	10			10	10
Walk	10	~<10	0	19	19
Testerton	79	74	12	175	153
Walk	/9	/4	12	165	153
Upper Camelford					
Walk	44	42	~<10	90	86
Barandon	77	ד-	10	70	00
Walk	90	87	~<10	186	177
Treadgold	,,,			100	177
House	33	32	~<10	68	65
Verity					
Close	44	50	12	106	94
Camelford					
Walk	18	22	~<10	43	40
Morland					
House	12	18	~<10	34	30

<sup>&</sup>lt;sup>13</sup> Women's Budget Group. (2017). [online] Available at: https://wbg.org.uk/wp-content/uploads/2017/11/housing-pre-budget-nov-2017-final.pdf

Grand					
Total	676	575	72	1322	1250

Disproportionate impacts:

- There is a risk as mentioned earlier around contractors being unaware that some women may feel uncomfortable if they speak to them without a male family member present.
- There is also a risk that some women may feel threatened or uncomfortable by the presence of male contractors they are unfamiliar with entering their homes without warning to carry out works.

#### Mitigation:

- As mentioned previously, contractors will have to be fully briefed on different cultural norms and practices to ensure they are aware of the appropriate way to communicate with residents, particularly female residents of certain faiths.
- To reduce the risk of women feeling threatened by contractors entering their homes who they are unfamiliar with or without warning, there should be clear lines of communications between residents and contractors at all time. Contractors should give advanced notice of the times when they are due to enter a resident's home and ensure the residents are familiar with the contractors who are going to be carrying out the works.

Sexual orientation	Demographic information:
onentation	<ul> <li>We have very limited data on the sexual orientation of our residents.</li> <li>Of the 1322 residents we have data on, 222 have disclosed information about their sexual orientation.</li> <li>Of the 222 residents, 215 identified as heterosexual, ~&lt;10 identified as gay men and ~&lt;10 identified as bisexual.</li> </ul>
	Disproportionate impacts:
	- There is a risk that LGBTQ+ residents may be subject to unwanted comments by contractors on the estate or in their homes.
	- Beyond this however, there is no evidence to suggest that the refurbishment will adversely impact our LGBTQ+ residents.
	Mitigations:
	The LWNT should begin to collect more data to gain a better

 The LWNT should begin to collect more data to gain a better understanding of the numbers of LGBTQ+ residents living on the

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Lancaster West Estate. This will help to identify any further risks that may be present as a result of the refurb and mitigate them.

- The LWNT should also be informed that there is a zero-tolerance policy on harassment and discrimination towards our residents, including our LGBTQ+ residents, and could ensure this message is delivered through training.

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### Action Plan

In order to mitigate the risks shown in this EIA, the following actions for the LWNT have been identified:

Characteristics	What:	When:
Age, disability, religion and belief	<ul> <li>Set up respite facilities and activities, so residents affected by the noise from the refurbishment have somewhere else that they would like to go to escape the disruption. These respite spaces should:</li> <li>include quiet spaces, so residents do not feel like they have to socialise with others and are able to find somewhere to rest or pray;</li> <li>be accessible for disabled residents and include facilities and activities that older residents feel comfortable accessing;</li> <li>include a quiet study space for younger residents.</li> </ul>	End of June 20/21
Multiple	To ensure all residents have an equal say in the design of the refurbishment, even if they are unable to attend block-wide prioritisation workshops, Resident Engagement Leads should also carry out door-knocks and arrange one-to-one appointments to gather resident priorities. This will ensure that the process is inclusive of the needs of all residents.	End of June 20/21
Age	To reduce the risk of elderly or younger residents being put in danger by the works taking place in their homes or around the estate, clear signage of any hazardous areas should always be displayed. Furthermore, if there are any areas which may pose a risk to elderly residents in their homes while refurb work is taking place, contractors should carefully explain these to the resident and take the time to ensure they are safe.	End of June 20/2 I
Age, Disability	To reduce the risk of harming the respiratory health of our vulnerable residents, the LWNT should brief contractors on the need to minimise any dust or pollution from the works wherever possible. If necessary, masks should be provided to vulnerable residents to ensure their respiratory health is not affected by the works.	End of June 20/21
Sex	To avoid residents feeling scared or threatened by workers they are unfamiliar with entering their homes without warning, LWNT should brief all contractors to ensure they introduce themselves to the resident whose home they are working in. If a new contractor that the resident is unfamiliar with	End of June 20/21

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**Equality Impact Assessment** Lancaster West Refurbishment Programme

	must enter the property, then another contractor the resident does know should also be with them to help avoid any confusion if the resident is scared. There should be clear lines of communications between residents and contractors at all time, with contractors giving advanced notice of the times when they are due to enter a resident's home.	
Disability	The LWNT must also brief contractors to take particular care in the homes of residents with mobility issues or visual impairment to ensure their floors are cleared of any debris which could form a trip hazard or cause a fall.	End of June 20/21
Disability	The LWNT should ensure residents are fully informed about that changes that are likely to take place as a result of the refurbishment. This may help to ease resident's anxieties about change, particularly for our residents with autism.	End of June 20/21
Gender reassignment, Sexual Orientation	The LWNT should being collecting outstanding tenant profile information to find out the number of trans, married, pregnant and LGBTQ+ residents on the Lancaster West Estate. This will enable the team to identify further inequalities and discrimination that may negatively affect them and mitigate them accordingly.	End of March 2021
All	All those working on the refurbishment are to be informed that there is a zero-tolerance policy towards any form of intolerance, harassment or discrimination towards any of our residents. Ensure that all staff are aware of and understand LGBT issues and that they do not make moral judgements concerning sexuality or its expression, especially when entering someone's home, and are comfortable collecting this data.	End of June 20/21
Race	Ensure that there are staff on hand who can provide translations either over the phone or face-to-face when required. An audit may need to take place to fully understand the range of languages that are spoken on the estate, and ensure translators are available for residents who don't speak English.	End of March 2021
Race	Ensure that literature and information about the programmes is available in the appropriate formats and languages and that they are accessible to a wide range of groups who may encounter language and	End of June 20/21

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	literacy barriers. Leaflets and information could be made available in pictorial form to enable all residents to see how the process will affect their home.	
Race, Religion and belief	Brief contractors on the cultural norms of different faiths to ensure they are aware of the appropriate way to conduct themselves and communicate with residents of certain faiths in their homes. This will help to avoid any situations which could make residents uncomfortable.	End of June 20/21
Race	Ensure that the specifications for the refurb within properties do not contain any items that represent a form of indirect discrimination. The spec is to be fully co-designed with residents from a range of ethnicities and cultural backgrounds to ensure it is inclusive of everyone's needs.	End of June 20/21
All	<ul> <li>Ensure that all residents:</li> <li>receive information about their works and how extensive it will be;</li> <li>are notified of clear dates for the start and end of the works;</li> <li>are aware of who to contact if things go wrong.</li> </ul>	End of June 20/21

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