



EQUALITY AND DIVERSITY STRATEGY

(OCTOBER 2009)

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FOREWORD

The purpose of this strategy is to define the way in which Cosmopolitan Housing Group will deliver on its commitments to members of the diverse communities who are employed, who receive services and who are otherwise impacted upon by our activities.

Organisations such as the Cosmopolitan Housing Group operate within the most disadvantaged sections of the community, delivering services to people that experience discrimination. We have a moral and service-led obligation to respond to and meet the social diversity that exists within our society and a duty to promote a culture of community cohesion and celebrate difference. In addition, we have a legal and regulatory responsibility to promote equality of opportunity in all our activities.

The equal opportunities policies already in force across the Group recognise that in their day to day lives certain groups and individuals may experience inequality because of their gender, race, age, marital status, sexuality, disability, religion or belief. These policies confirm the commitment of the Group to work proactively to ensure delivery of equal opportunity for all and prevent unlawful and unfair direct and indirect discrimination. This strategy takes these commitments further, moving away from equal opportunities acknowledgement that different people require different treatment, and recognising that difference is itself something to be valued.

The strategy is subject to annual review and it is expected that the aims to counter disadvantage in all the above areas will continue to develop with experience and through consultation with all appropriate stakeholder interests.

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EQUALITY AND DIVERSITY STRATEGY ORGANISATIONAL VISION, MISSION AND OBJECTIVES

Vision

The Group's vision for the future is one where through the combined efforts of its existing and new member companies, the cumulative successes of its members will place Cosmopolitan Housing Group Limited as a recognised provider of diverse, innovative, customer focussed, high quality housing related products and services.

Mission Statement

In delivering this vision the Group has a mission to:

‘provide leadership, promote excellence and maintain an infrastructure for continued growth and financial stability’

Objectives

The following set of corporate objectives have been developed, which set out how the Parent will meet its overall vision.

The objectives are as follows:

1. Provide strong leadership to achieve corporate synergy
2. Develop efficient services and financial strength
3. Raise the profile and positive brand of the Group
4. Champion Equality and Diversity

In the development of these objectives, Equality and Diversity has been a key consideration. It is one of the organisation's key corporate objectives, and it is something that is cascaded down to the Group's subsidiary organisations.

EQUALITY AND DIVERSITY STRATEGY CORE VALUES

The Cosmopolitan Housing Group will ensure that all companies within the Group operate under and live up to the core values:

- Listen to, and communicate with, customers, employees and external stakeholders in a timely, accurate, understandable and respectful manner.
- Understand the value of effective and efficient business processes to bring about positive results.
- Foster an environment that promotes personal and corporate innovation, sharing and maximisation of resources together with a desire for team work.
- Be open to change and flexible in attitude.
- Acknowledge that respect, integrity, trust and fairness are fundamental to personal, customer and inter agency relationships.
- Value a culture where everyone is involved, accountable, respected and appreciated.
- Aim to perform at the highest level of competence and take pride in accomplishment.

EQUALITY AND DIVERSITY STRATEGY

UNDERSTANDING EQUALITY AND DIVERSITY

Defining “Equality”:

Equality requires the Group to respond to the needs of individuals and groups according to their needs, which may at times involve engaging in positive action.

The principles behind an approach in support of “equality” is one where an individual’s or group’s diverse background does not prevent them from receiving services, obtaining employment or simply being treated equally and in accordance with the same high level of standards as any other person.

This is not something that can be instantly generated, but requires a cultural shift which is supported by policies and procedures being implemented that support the commitment to equality, in addition to the plethora of regulatory and legislative obligations that have been enacted to bring about equality of opportunity.

Defining “Diversity”:

Diversity is concerned with recognising and valuing difference amongst the individuals and groups. This applies to the full range of services in which the Group engages.

Through employing a diverse workforce that is representative of the communities in which the Group operates, it will be able to engage with and understand the needs of the communities in which it works. It will strive to deliver services that promote social justice and do not discriminate against any individuals or groups.

It is imperative that the Group is able to maximise the skills that exist within both a diverse workforce and the wider community to deliver high service standards and promote community cohesion. The benefits of this can also lead to improved staff motivation, continuous improvements, and higher levels of customer satisfaction.

EQUALITY AND DIVERSITY STRATEGY LEGAL AND REGULATORY CRITERIA

Cosmopolitan has a duty to comply with the following:

- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974
- Sex Discrimination Act 1975 and 1986
- The Race Relations Act 1976, and associated Codes of Practice issued by the Commission for Racial Equality (CRE) (now the Equality and Human Rights Commission (EHRC))
- The Housing Act 1988 (in particular Section 56)
- Disability Discrimination Acts 1995 and 2005
- Asylum & Immigration Act 1996
- The Employment Rights Act 1996
- The Housing Act 1996
- Police Act 1997
- The Protection from Harassment Act 1997
- The Human Rights Act 1998
- The Employment Relations Act 1999
- Gender Reassignment Regulations 1999
- Race Relations (Amendment) Act 2000
- EC Council Directive 2000/43/EC (equal treatment between people irrespective of their racial or ethnic origin) and UK legislation to implement this, including the Race Relations Act 1976 (Amendment) Regulations 2003
- The Employment Act 2002
- The Flexible Working (Procedural Requirements) Regulations 2002 and the Flexible Working (Eligibility, Complaints and Remedies) Regulations 2002
- The Part-time Workers (Prevention of less favourable Treatment) Regulations 2000 and the subsequent Amendment Regulations, 2002
- The Fixed Term Employees (Prevention of less favourable Treatment) Regulations 2002
- The Maternity and Parental Leave etc. Regulations 1999 and the Maternity and Parental Leave (Amendment) Regulations 2001 and 2002
- The Paternity and Adoption Leave Regulations 2002
- The Paternity and Adoption Leave (Adoption from Overseas) Regulations 2003
- Race Relations (Amendment) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Race Relations (Amendment) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- The Social Security Contributions and Benefits Act 1992; The Statutory Maternity Pay (General) Regulations 1986; The Social Security, Statutory Maternity Pay and Statutory Sick Pay (Miscellaneous Amendments) Regulations 2002; The Statutory Paternity Pay and Statutory Adoption Pay (General) Regulations 2002; The Employment Rights Act 1996 (Application of Section 80B to Adoptions from

Overseas) Regulations 2003 and The Social Security Contributions and Benefits Act 1992 (Application of Parts 12ZA and 12ZB to Adoptions from Overseas) Regulations 2003

- Housing Act 2004 Gypsies and Travellers
- Civil Partnership Act 2005
- Employment Equality (Age) Regulations 2006
- Equality Act 2006
- Work and Families Act 2006
- Equality Act (Sexual Orientation) Regulations 2007

Cosmopolitan needs to adhere to the following:

- Housing Corporation Regulatory Code
- Housing Corporation Good Practice Note 8
- Housing Corporation - Gender Equality Scheme and Action Plan 2007
- Housing Corporation - Disability Equality Scheme and Action Plan 2006-09
- Housing Corporation – How We Regulate 4: Our Overall Approach
- Audit Commission’s Diversity Key Line of Enquiry (KLOE 31)
- Commission for Racial Equality – Statutory Code of Practice on Racial Equality in Employment 2005
- Disability Rights Commission – The Duty to Promote Disability Equality – Statutory Code of Practice, 2006
- Commission for Racial Equality code of practice on housing and associated guidance - Equality and Human Rights Commission (EHRC)
- Housing Associations’ Guide to Disability Equality Schemes and Action Plans 2007, Habinteg
- Race and Housing Challenge Report 2001

EQUALITY AND DIVERSITY STRATEGY CORPORATE COMMITMENT AND RESPONSIBILITY

The Board will:

- Set strategy
- Monitor performance and agree corrective action where necessary and appropriate
- Ensure compliance with the strategy
- Challenge existing practice
- Regularly review the Strategy

Chief Executive and Management Team will:

- Implement the Strategy
- Develop clear action plans
- Ensure all reports on policy matters to the Board identify equality and diversity implications
- Ensure training and development on equality and diversity matters is received by Board members, staff, tenants, and contractors to sustain competencies and maintain up to date knowledge

Managers will:

- Actively promote equality and diversity
- Challenge discrimination within their areas of responsibility

Staff will:

- Ensure they work in accordance with this policy
- Give full commitment to the principles contained herein

Tenants are expected to:

- Adhere to matters of law in relation to equality and diversity and the terms of their tenancy agreement
- Fulfil a 'good neighbour' role respecting the needs and circumstances of all people in their community

Equality and Diversity issues face the whole organisation and requires that each of the above applies the commitments contained within the Strategy to their day to day operations.

Any anomaly or the need to adopt a variation in practice should be drawn to the attention of the Management Team to ensure proper consultations are undertaken before making change.

EQUALITY AND DIVERSITY STRATEGY POLICY STATEMENTS

Our strategy recognises that:

- All people are different and have differing needs and these will be taken into account when planning services and developing employment policies.
- We aim to treat each individual with respect and consistent with the standards defined in the Group's stated core values.
- Action plans need to be implemented to address discrimination experienced by particular individuals or groups
- Action needs to be taken to promote and achieve diversity in employment, service delivery, working with communities and formulation of business plans
- Actions to achieve our stated aims will be supported by appropriate budget provision and resources.
- All aims are applicable Group wide, applying to all functions and relevant action plans.
- We aim to ensure that equality and diversity issues are treated as part of the 'mainstream' services and practices of the Group which will help develop existing organisational culture and performance.

EQUALITY AND DIVERSITY STRATEGY STRATEGY AIMS

The aims of this Strategy are as follows:

- To promote and achieve equality of opportunity in the provision of housing, services, employment and training.
- To ensure that the Cosmopolitan Housing Group is accessible to all and that it is able to meet the diverse needs of its customers, employees, and stakeholders regardless of race (including Gypsies and Travellers), gender, marital status, sexual orientation, disability, gender or age and to promote community cohesion.
- To combat inequality and discrimination against people, communities and organisations with which we work and to clearly demonstrate that such behaviours will not be tolerated by the Group.
- To ensure we work closely with the diverse range of people within our neighbourhoods, empowering residents to shape and influence services provided
- Ensure that the Group complies with its legal and regulatory obligations and best practice.

EQUALITY AND DIVERSITY STRATEGY DIVERSE GROUPS

Cosmopolitan Housing Group is committed to achieving equality for “all” with regards to equality and diversity issues. We will work to combat discrimination and ensure that difference is not an obstacle to securing services, employment, training or career progression.

Whilst the Group acknowledges that there are many forms and categories of difference that may be applied, its core focus shall be upon the 6 core strands of equality and diversity. When Action Plans related to the Group’s Equality and Diversity commitments are being developed, they will need to take account of each of the six core strands. However, it also recognises that this is by no means exhaustive.

Age

Since 1st October 2006, the Employment Equality (Age) Regulations have made it unlawful to discriminate against workers, employees, job seekers and trainees on the basis of their age.

The Group is aware of these requirements, and have amended their policies and procedures that could have potentially contravened these principles. As a consequence, the Group will not discriminate against anyone seeking employment or employed by the Group on the grounds of age.

In addition, the Group will also work to promote age equality in the provision of services to residents.

Disability

The Disability Discrimination Act makes it unlawful for a service provider to discriminate against a disabled person by refusing to provide any service which it provides to members of the public. Service providers are also required to take all reasonable steps to change any practices which makes it unreasonably difficult for a disabled people to make use of its goods and services.

The Group will seek to promote disability equality in the provision of all services and employment activities. The Group’s overall approach in this area is outlined within its Disability Equality Policy, published in December 2007, and the actions that it will deliver in accordance with its policy objectives are set out in the Group’s Disability Equality Action Plan.

The Group will ensure that it makes all reasonable alterations to meet the needs of disabled persons and that it ensures that its employment practices do not unfairly discriminate anyone with a disability.

Religion

Religious intolerance is still a problem in many communities and many people from differing faiths and religions face discrimination and intolerance on a daily basis.

The Group recognises these issues and strives to remove barriers to housing and to tackle discriminatory practices and anti-social behaviour as a result of such intolerances. The Group will not tolerate discrimination against anyone due to their religious beliefs or lack of religious beliefs within the communities in which the Group operates.

The Employment Equality (Religion and Belief) Regulations 2003 makes it unlawful to discriminate on the grounds of religion and belief. The regulations apply to vocational training and employment. The Group will also show no tolerance to discrimination amongst its workforce on the grounds of religion.

Gender

Obligations are placed upon the Group as both an employer and provider of services under legislation such as the Sex Discrimination Act, Equal Pay Act, Gender Recognition Act, Equality Act and associated codes of practice.

The Group's overall approach to combating gender inequalities is set out in its Gender Equality Policy and the way in which it will achieve this within its Gender Equality Action Plan.

In summary, the Group will strive for gender equality in service provision and employment for men, women and transgender people.

Race (including Gypsies and Travellers)

As a result of the MacPherson Report in 2000, there was an amendment to the Race Relations Act 1976, placing a positive duty on housing providers such as Cosmopolitan Housing Group to take responsibility for how their actions assist individuals, neighbourhoods and areas, and interest communities to feel part of cohesive and prosperous communities.

The legislation requires an open perspective to be adopted beyond the boundaries of the organisation, requiring consideration of the impacts of the organisation, and its partners, on individuals, areas and groups. In essence, the approach requires organizations such as the Group to:

- eliminate unlawful racial discrimination
- promote equality of opportunity between persons of different racial groups
- promote good relations between persons of different racial groups, and

- introduce and undertake Equality Impact Assessments

The Group is committed to achieving racial equality in both the workplace and the communities that it serves.

Sexuality

The Group will work to create an environment where Lesbian women, Gay men, and Bi-sexuals are able to be open about their sexual preferences should they wish to do so whilst living and working without fear of discrimination and reprisal.

This approach requires the Group to challenge its existing policies and procedures to ensure that assumptions are not being made based upon people being heterosexual.

In relation to employment, the Employment Equality (Sexual Orientation) Regulations 2003 make it unlawful to discriminate on the grounds of sexual orientation. However, our approach will also cover such issues as service delivery, including the recognition of civil partnerships and the rights of such persons as a married couple such as in relation to tenancy succession.

Other Diverse Groups

Whilst the six core strands will form the basis for much of the Group's formal structures and analysis, it is also aware that these are by no means exhaustive and the Group's overall approach in relation to Equality and Diversity will be mindful of this situation.

Other examples may include the following:

Marital status: The Group would equally not discriminate against any persons due to their marital status.

People with HIV / Aids / Cancer / Terminal illnesses: The Group would equally not discriminate against persons due to their health or illnesses.

Social Background: The Group recognizes that in some instances people may come from disadvantaged backgrounds which has limited the opportunities available to them. The Group considers that it has a role in raising aspirations amongst excluded groups in the promotion of community cohesion and improvement.

People with additional support needs: Whilst people with support needs do not necessarily fall into one of the above categories, and vice versa, the Group will aim to ensure that its services are accessible to all and will seek to provide additional advice and support to those who need it.

The Group also recognises that people may fit into more than one of the aforementioned categories.

EQUALITY AND DIVERSITY STRATEGY

SCOPE OF THE STRATEGY

This Strategy is intended to address equality and diversity issues in their widest context. There are many individuals, groups or communities who may face discrimination, who may be unable to access services, or who may receive services that do not meet their needs and requirements.

This may include people within the following groups:

- People from black and minority ethnic (BME) communities
- Lesbians, gay men, bisexual people and people who identify as transgender
- Households headed by women, especially lone parents
- People with disabilities
- Older people
- Young People
- People with HIV/Aids
- People with learning difficulties
- People with mental health issues
- People suffering from alcohol or substance abuse
- Ex-offenders
- People in contact with the criminal justice service
- People experiencing domestic violence or sexual abuse

The Strategy applies to anyone who has contact with the Group. It includes staff members, tenants, Board members, customers, contractors, stakeholders and partners. It seeks to ensure that their equality and diversity related needs are met and that at all times they are treated with the utmost dignity and respect.

The primary focus of some of the more detailed aspects of this strategy is on the delivery of social housing related services. However, the value and ethos promoted within this Strategy is applicable to all parts of the Group.

EQUALITY AND DIVERSITY STRATEGY STRATEGY COMMITMENTS

In order to meet its corporate commitments to Equality and Diversity, this strategy sets out its aims and actions in relation to the following areas of work:

- Corporate Commitment
- Governance and Board Membership
- Employment
- Services
- Allocations
- Resident Involvement
- Resident Satisfaction
- Anti-Social Behaviour
- Procurement of goods and services

1) Corporate Commitment

To successfully implement the Group's corporate commitments it is imperative that all staff and Board members understand the principles of equality and diversity, the Group's approach to this agenda, and the contribution that they are able to make towards these objectives. It is also important that the Group operates processes that enable it to assess where successes have been achieved and where further improvements are required.

To achieve this, the Group will:

- Widely publicise the Group's commitments to the strategy to a range of internal and external audiences, including publishing the document on the Group's intranet and websites.
- Ensure equality and diversity is a key facet of all business planning activities.
- Ensure that equality and diversity is a key factor assessed in all policy developments, with all papers presented to the Board required to assess the impact of proposals in terms of equality and diversity.
- Providing on-going equality and diversity training to Board members, staff, involved residents, and contractors.
- Requiring all formal resident involvement groups to formally adopt the Group's commitments to equality and diversity.
- Set clear performance targets and provide regular reports and updates on progress in delivering this strategy to the Board.

2) Governance and Board Membership

The Boards of Management are responsible for the overall governance of the organizations within the Group. It is important the Boards demonstrate clear leadership in equality and diversity issues. Board Members are selected by the Group's Membership and Staffing Committee according to the competencies, skills, knowledge and experience that they are able to offer to the Group. When vacancies arise, consideration is given to maintaining a balanced Board, and the recruitment and selection process follows an open and transparent process which involves assessing the suitability of applicants against the requirements set out at the outset of the recruitment process.

The recruitment process does involve equal opportunities monitoring by disability, ethnicity, and gender. Appointments are based on the suitability of candidates to fill an identified skills gap. However, it is recognized that the effectiveness of the Board will be enhanced where it is able to reflect the mix of the communities that it serves. This is particularly the case in relation to the Association's Board of Management that is directly responsible for service delivery to tenants. The composition of the Board will therefore be checked against available information about the diversity mix of the communities in which services are delivered.

Where the Boards are not reflective of the communities served, the Group will encourage people from under-represented groups to apply for vacancies as they arise. This will particularly be the case in relation to ethnicity, gender, age, sexuality, religion and disability.

To achieve its objectives, the Group will:

- Regularly review the constituency of the Board by disability, ethnicity, gender, age, religion and sexuality and set targets.
- Operate a Board Member Recruitment processes that are equitable and transparent, making selections based upon the skills and qualities required to maintain a balanced Board that is fit for purpose
- Provide regular training and development opportunities for Board members, particularly in relation to equality and diversity issues
- Encourage persons from under-represented groups to apply to become Board Members, provided that they also meet the requirements of the role.
- Advertise opportunities to become Board members widely, in a range of locations that are likely to attract interest from a diverse range of people

3) **Employment**

The Group aspires to have a diverse workforce delivering quality services, operating in an environment governed by the Group's core values and which is free from harassment.

The Group also aims to maintain a working environment where all employees are free to share their needs and concerns and are not disadvantaged in the workplace by doing so.

The Group has a desire for its workforce to be representative of the communities that it serves, particularly in terms of ethnicity, gender, disability, faith, sexual orientation and age. This should be the case at all levels of the organization. However, it should also be a workforce that has the skills and qualities required in order for the Group to deliver its strategic objectives, including those related to equality and diversity. All appointments will therefore necessarily be made on the basis of a candidate's ability to carry out the role required.

To achieve its objectives, the Group will:

- Aim to have a workforce that is reflective of the communities served by the Group
- Explore a range of approaches to advertising and recruiting staff from diverse backgrounds. This will include advertising all vacancies in the following locations:
 - Group website
 - Internally
 - COFEM website
 - Partner Agencies
 - Newspapers/Journals
 - Specialist trade magazines
- Include positive statements about the Group's commitments to equal opportunities in all job advertisements.
- Make reasonable adjustments for all prospective staff members attending interview and within the workplace following appointment with a disability and for other diverse needs where this is feasible.
- Guarantee an interview where minimum essential criteria is met.
- Regularly review the Group's recruitment and selection processes to ensure that they are fair and transparent and accord with legislation and best practice.
- Provide a fair, systematic and reliable basis for selecting the most suitable candidate for any given vacancy. All potential employees will be required to complete a selection procedure which assesses candidates against a range of specified criteria.

- Maintain relevant records in areas of recruitment, training and employment using these to identify possible areas of inequality and to confirm that staff employed reflect the composition of the communities served.
- Endeavour to be an employer of first choice by offering competitive salaries combined with training and development opportunities to ensure retention of employees.
- Minimise the opportunities for unlawful discrimination to occur in terms and conditions of employment through keeping abreast in developments, taking legal advice where appropriate, and consulting with staff.
- Provide training for all staff on equality and diversity, including awareness raising as part of the staff induction process.
- Participate in positive action training schemes and COFEM initiative.
- Ensure all staff engaged in recruitment and selection are trained and supported to undertake the role required.
- Seek ways to develop cultural awareness within our organisation.
- Involve staff at all levels of the organisation in the development and review of the Group's approach to promoting equality and diversity.
- Develop policies and procedures for staff which take into account and respectful of the needs and requirements of diverse groups.
- Develop and maintain rigorous harassment, bullying and dignity at work processes.
- Continue to employ wherever possible people who become disabled and assist in any re-training.
- Undertaking exit interviews to learn from experiences
- Working to ensure that older workers are enabled to leave the organisation with dignity and flexibility in timing and working arrangements
- Follow the guidance contained within the Commission for Racial Equality – Statutory Code of Practice on Racial Equality in Employment 2005

We also aim to maintain a working environment where all employees are free to share their needs and concerns and are not disadvantaged in the workplace by doing so.

To achieve its objectives, the Group will:

- Consult with staff to identify caring responsibilities and develop arrangements to meet their needs.

- Make the best use of flexi-time and family-friendly policies to meet these needs (within the constraints of the service)
- Promote the Group's policies in respect of its commitments to its staff.
- Develop the organisational culture where all employees operate in an understanding and supportive environment.
- Create opportunities for staff from disadvantaged groups to share experiences.
- Create an environment which is free from all types of harassment, bullying, intimidation, and sexist behaviour.
- Encourage women to take up employment and training opportunities.

4) Services and Accessibility

The Group will endeavour to ensure that all individuals and groups are able to access the Group's services, irrespective of any disability, vulnerability, or disadvantage. This requires an understanding and requirements of the communities served so that these can be responded to in terms of the knowledge and skills of staff, the services provided, and the buildings from which services are delivered.

To achieve its objectives, the Group will:

- Ensure that all offices comply with the requirements of the Disability Discrimination Act through property audits and inspections.
- Offer services and facilities that will increase the opportunities for the Group's services to be accessible, including Language Line, Translation services, and Induction Loops.
- Make our organisational information widely available and where practical in relevant community languages, braille, large print, on tape, provide and advertise signing and other translation facilities, to ensure that all sections of the community, particularly disadvantaged individuals or groups, can gain access to services.
- Staff will adopt a flexible approach to service delivery, providing explanations of documentation and assisting with reading where literacy problems exist.
- Maintain links with a range of specialist support providers who are able to meet the needs of a broad range of vulnerable people where required.

- Provision of a 24 hour repairs service which provides access and information to contractors on the specific vulnerabilities of tenants where known.
- Ensure that there are staff employed who have received training on how to deal with disabled and vulnerable persons.
- Provide home visits to tenants, particularly where there are known disabilities or vulnerabilities.
- Maintain links with community groups that work with or represent the diverse groups that fall within the ambit of this strategy.
- Contact on a regular basis representative groups to offer support with regards to issues facing the community and to confirm proper access to information and advice.
- Ensure that the diverse needs of existing tenants are fully understood through the capturing of information via the Tenant Census and other profiling activities.
- Operate an efficient and effective Aids and Adaptations service, accessing match funding wherever possible to maximise the scale of works that can be delivered.
- Ensure that the Design Brief for new developments take into account the needs of vulnerable, disabled and other diverse groups' needs.
- Monitor levels of satisfaction with services.
- Adopt a partnership approach with other housing providers, local authorities and community groups to enhance the opportunities for meeting the specific needs of disabled, vulnerable or disadvantaged groups. This will also involve:
 - responding promptly to partners in relation to local research and assessments in relation to the needs of diverse groups and the furtherance of local strategic partnership aims
 - actively participating in local initiatives

5) Allocations

In relation to the Group's social housing activities, its purpose is to ensure that as a social landlord it is able to provide homes for individuals who are in the greatest need. In order to achieve this, the allocation procedures in place must be fair and transparent, and regularly reviewed to accord with the latest legislation, regulation, and best practice. It is through this approach that it can work towards the development of balance and sustainable communities that contain a diverse mix of individuals and groups.

To achieve its objectives, the Group will:

- Identify the diverse mix of the communities it operates within and seek to understand their needs and requirements.
- Undertake regular reviews of its allocation policy and procedures.
- Set lettings targets that measure performance on the allocation of properties to diverse groups.
- Ensure that information about access to social housing properties within the Group is accessible and available in a range of formats.
- Use a variety of methods to market accommodation.
- Make use of referral agencies.
- Establish links with and market the services provided by the Group to community groups that are actively engaged in delivering services to diverse populations.
- Work collaboratively with partner organizations, particularly local authorities, to ensure the most effective use of properties in terms of equality and diversity.
- Participate in partnership groups that facilitate the allocation of adapted properties to those who need them (e.g. ACCESS)
- Utilise customer profiling information to inform the needs of existing tenants in relation to such activities as tenant transfers.

6) Resident Involvement

Resident involvement is essential in order to ensure that the Group's services reflect the needs and aspirations of its users. This means engaging with residents in decision-making wherever feasible. It means that opportunities will be created to allow for residents to be involved in issues and in ways that they are interested in through the adoption of a 'menu of options' approach.

To achieve its objectives, the Group will:

- Maintain monitoring systems that enable the Group to profile the diversity of customers engaged in formal involvement activities.
- Only recognise tenants and resident associations if they have formally adopted equality and diversity principles, whilst providing support and advice if they have not.

- Consult all residents on the services they receive and by making necessary arrangements to help residents participate in the decision making process.
- Consult with any residents facing discrimination about their needs.
- Seek ways to actively promote involvement of residents in both formal and informal structures to a diverse range of customers, particularly where we are aware of under-representation (e.g. disabled persons; younger people; particular BME groups).
- Provide training to actively involved residents on equality and diversity.
- Be sensitive to the needs of different groups and individuals when planning and organising events.
- Work with tenant groups to ensure that they operate in an open and inclusive way.
- Explore ways in which disadvantaged and hard to reach groups can participate.

7) **Complaints**

The Group will operate formal complaints resolution policy and procedures so that its customers are able to inform the Group when there is a breakdown in the services delivered, or standards are not being met.

To achieve its objectives in this area the Group will:

- Ensure that the complaints procedure is easily accessible and easy to use by all customers.
- Monitor complaints received by gender, race, disability, sexual orientation, age, and religion to identify if any particular groups are being disadvantaged or discriminated against either directly or indirectly by the activities of the Group, taking corrective action where any trends are identified.
- Ensure that no person that has made a complaint will be treated any differently by virtue of them having made the complaint so as to constitute victimization of that person.
- Ensure all complaints of racial harassment are investigated and resolved quickly and effectively in line with the Race Relations (Amendment) Act 2000.

8) Resident Satisfaction

The Group aims to ensure that all groups are equally satisfied with the standards of service delivered by the Group.

To achieve its objectives, the Group will:

- Complete a Tenant Census to profile the Group's social housing tenants and tailor services to reflect needs identified.
- Undertake regular satisfaction surveys, including a STATUS survey at least every three years in addition to service specific satisfaction monitoring that is undertaken on an on-going basis. The results will be analysed to identify dissatisfaction amongst any diverse groups and action plans developed to address these when they arise.
- Undertake consultation to identify any reasons for any disparities in satisfaction levels where these arise.

9) Anti-Social Behaviour

It is important that the Group is able to promote the development of sustainable homes and communities. This is a key corporate objective of the Association within the Group. All residents, regardless of their diversity, should be able to enjoy their homes without fear of harassment, abuse or intimidation. Where any such incidents do occur, it is also important that staff have received appropriate training and there are relevant policies and procedures in place to enable the Group to respond efficiently and effectively to any such situation that may arise. This will maximise the potential for residents to live without fear of harassment or attack.

There are policies in place across the Group to enable it to respond effectively to anti-social behaviour and related incidents, and these are supported by more detailed procedures that set out to staff how to respond to particular incidents. This includes such issues as anti-social behaviour, harassment, racial harassment, domestic violence and hate crimes.

To achieve its objectives, the Group will:

- Regularly review policies and procedures that are in operation across the Group to ensure that they comply with legislation, regulation and best practice.
- Widely publish the Group's approach to dealing with incidents of anti-social behaviour.
- Actively encourage residents to report incidents of anti-social behaviour when they arise.

- Take efficient and effective action against the perpetrators of anti-social behaviour, ensuring the needs of the victim are upheld at all times.
- Provide a range of additional services and resources that provide support and assistance to the victims of anti-social behaviour.
- Adopt a multi-agency approach to addressing issues of anti-social behaviour
- Ensure that victims of anti-social behaviour are able to access support and guidance as and/or when required.
- Operate a range of performance monitoring systems to analyse information for trends and patterns to inform service delivery.
- Provide staff with regular and relevant training to ensure they take the most appropriate and effective action at all times.

10) Procurement of Goods and Services

The Group is eager to ensure that its contractors, consultants and other suppliers endeavour to uphold the Group's commitments to equality and diversity at all times, in relation to both their employment practices and service delivery.

To achieve its objectives, the Group will:

- Promote the principles of equality and diversity as part of the selection process for contractors, consultants, suppliers and partners.
- Make it a condition of any engagement that the third parties operate in accordance with the Group's equality and diversity commitments as set out in this strategy.
- Offer equality and diversity training to contractors on a regular basis, particularly smaller ones that require assistance and support.
- Assist smaller organisations to develop an approach to equality and diversity. This may include permitting them to adopt the Group's approach.
- Establish clear standards and targets to be met by the contractors, consultants and suppliers.
- Operate systems that allow for monitoring the performance of contractors, consultants and suppliers in relation to equality and diversity and their progress against agreed targets.

- Use people and provide services in people's homes which are sensitive to the diverse cultural needs that exist within the communities they serve.

11) Development and Regeneration

A core function of the Group's activities is the development of new housing properties and a contribution to the broader regeneration of areas and communities. In fulfilment of these objectives, it is essential that the Group is able to work to meet the diverse needs of the communities that it serves.

To achieve its objectives, the Group will:

- Develop properties to meet the specialist needs of minority groups where opportunities for doing so arise (e.g. BME specific housing).
- Develop properties that are accessible for a range of client groups, particularly those with disabilities and special needs, contributing to local authority strategic objectives.
- Work with and alongside specialist providers to meet the needs of minority groups (e.g. Steve Biko HA)
- Monitor the sale of shared ownership properties by the six core diversity strands to identify any trends and ensure that such properties are openly accessible for all.
- Work with disadvantaged sections of society as part of the Group's commitments to Community Development, raising aspirations and opportunities for groups to engage in the work of the organisation.

EQUALITY AND DIVERSITY STRATEGY METHODOLOGICAL APPROACH

In the implementation of this Strategy, the Group will adopt an “outcome focussed” approach, identifying particular actions that can be taken to improve the contributions that the Group is able to make to the Equality and Diversity agenda in the communities in which it operates.

A cyclical approach will therefore be adopted, in accordance with the Housing Corporation’s Good Practice Note 8. This will follow a four step process as follows:

- Needs analysis
- Planning
- Implementation
- Monitoring

Needs Analysis

The Group will undertake and regularly re-visit and review information about the diverse needs that exist within the communities that it serves, giving particular attention to the six core diversity strands.

This approach will enable the Group to identify the housing needs and aspirations of the communities that the Group serves, both in terms of existing residents and the needs of people who aspire to live in the Group’s properties.

A Diversity Working Group will be established to drive this process forward, and to subsequently monitor the implementation of any agreed actions.

Planning

It will be the responsibility of a Diversity Working Group to draw up an Action Plan setting out the priorities and targets for the Group, in accordance with its key commitments, giving particular attention to the six core diversity strands.

These targets will be based upon the Group’s own needs analysis, underpinned by the principle that all residents and potential residents are entitled to the same high quality standard of services, regardless of their diversity or individual needs.

Implementation

Overall, the implementation of this Strategy will seek to ensure that its commitments are met in relation to all service areas for all diversity classifications.

In summary, this will mean that all residents and potential residents:

- Have a right to receive the same high standards of service
- Are able to access the full range of information about the Group in appropriate formats
- Will receive prompt and effective responses to any incidents where harassment is reported
- Receive the same high levels of service whether they are provided directly or through contractors, who will be required to sign up to the same strategic commitments as those advocated by the Group

All approaches will also be informed by accurate and up to date information about the stock condition and asset data.

Monitoring

All Action Plans will need to be approved in the first instance by the Group's Board of Management.

Progress against Action Plans will be reported to the Board at least annually.

At an operational level, it will be the role of the Diversity Working Group to monitor the implementation of the Group's Equality and Diversity Action Plans. This group will meet at least quarterly.

Progress against objectives will ultimately need to be measured against levels of tenant feedback and satisfaction.

Particular attention in the monitoring process will need to be afforded to critical areas of activity, including: allocations, complaints, aids and adaptations provided, evictions, incidents of harassment and domestic violence.

Diversity Working Group

The Diversity Working Group (DWG) will take the lead within the Group to ensure:

- That the aims of the Equality and Diversity Strategy are promoted throughout the Group

- That the tasks within the Action Plans are regularly reviewed to ensure that they are completed within agreed timescales
- That the DWG reports to Board, within an agreed timescale, providing an update on the current status of the Action Plans
- That the Equality and Diversity Strategy and associated Action Plans are treated as a high priority within the Group, and will contain at least one Director within its membership

EQUALITY AND DIVERSITY STRATEGY TRAINING

To ensure staff have the knowledge, confidence and competencies to deliver and comply with the requirements of this strategy and are proactive in challenging stereotyping and any form of discrimination, a thorough approach to training will be taken.

Staff and Board members will receive training when:

- They are new
- Periodically, when there is a change in policy or procedure to adopt best practice
- Any other time as identified by the Management Team

Tenants will receive advice, training and/or be invited to awareness raising events when:

- They are involved in reviewing the policy
- There is a change in policy or procedure
- As and when identified by the Resident Involvement Team or any other staff who have contact with tenants

EQUALITY AND DIVERSITY STRATEGY OUTSIDE AGENCIES

The success of this strategy requires the Group to be proactive in seeking the advice, support and joint-working opportunities with representative groups. The Group will make contact with and seek to work with the following agencies (as well as seeking new and emerging groups):

| | |
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| <p>Community Advice and Information Services</p> <p>Liverpool Jewish Youth and Community Centre Harold House Dunbabin Road Liverpool L15 6XL Telephone: 0151 475 5671</p> <p>The Pagoda Chinese Community Centre Henry Street Liverpool L1 5BU Telephone: 0151 708 8833</p> <p>Churches Action for Racial Equality 34-36 Princes Road Liverpool L8 1TH Telephone: 0151 709 2896</p> <p>Liverpool Black Sisters 34-36 Princes Road Liverpool L8 1TH Telephone: 0151 709 8162</p> <p>Merseyside Bangladesh Association 101-107 High Park Street Liverpool L8 3HF Telephone: 0151 723 0294</p> <p>Liverpool Yemeni Society Liverpool Yemeni Association 167A Lodge Lane Liverpool L8</p> | <p>Merseyside Caribbean Council 1 Amberley Street Liverpool L8 1YJ Telephone: 0151 708 9700</p> <p>Care-Frica Unit 23 13 Myrtle Parade Myrtle Street Liverpool L7 7EL Telephone: 0151 707 8985</p> <p>Liverpool Somali Irish Community Care Merseyside 60 Duke Street Liverpool L1 5AA Telephone: 0151 709 7222</p> <p>Liverpool 8 Law Centre 34-36 Princes Road Liverpool L8 1TH Telephone: 0151 709 7222</p> <p>Pakistan Centre Mulgrave Street Liverpool L8 2TF Telephone: 0151 709 9669</p> <p>Liverpool Somali Association 145 Granby Street Liverpool L8 2UR Telephone: 0151726 0594</p> <p>Community Association Crawford House Upper Warwick Street Liverpool L8 5HE Telephone: 0151 709 3853</p> |
|--|---|

OUTSIDE AGENCIES (Cont'd)

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|---|--|
| <p>Asylum Seekers Support Services</p> <p>Refuge Action 34 Princes Road Liverpool L8 1GH Telephone: 0151 702 6300</p> <p>Support for Asylum Seekers 38 The Mount Heswall VH2 4JI Telephone: 0151323 4425</p> <p>Immigration Advisory Service Toxteth Town Hall 15 High Park Street Liverpool L8 8DX</p> <p>Liverpool Central CAB 1st Floor State House Dale Street Liverpool L2 4TR Telephone: 0151 285 8989</p> | <p>Probation Service</p> <p>National Probation Service Merseyside Suite 405 Cotton Exchange Building Old Hall Street Liverpool L3 9LQ Telephone: 0151 476 7166 Fax: 0151 476 7170</p> |
| <p>Equality & Human Rights Commission Helpline Freepost RRLG-GHUX-CTR Arndale House Arndale Centre Manchester, M4 3EQ 0845 604 6610 - England main number 0845 604 6620 - England textphone 0845 604 6630 - England fax</p> <p>(NOTE: The On 1st October 2007 the three equality commissions merged into the new Equality and Human Rights Commission: Commission for Racial Equality (CRE); Disability Rights Commission (DRC); and the Equal Opportunities Commission (EOC))</p> | <p>National Citizens Advice Bureaux www.adviceguide.org.uk</p> <p>Age Concern England Astral House 1268 London Road London SW16 4ER</p> <p>Age Positive Department for Works and Pensions Room 38d Moorfoot Sheffield S1 4PQ</p> |

EQUALITY AND DIVERSITY STRATEGY RESIDENT INVOLVEMENT AND STAKEHOLDER CONSULTATION

The Group is committed to and works towards giving every Association resident the opportunity to participate and be involved in decision making processes. The Association will therefore support the development and growth of resident groups and:

- Ensure wherever possible that meeting locations are accessible to all residents
- Offer material in other formats, large print, Braille, tape and in residents' first language
- Arrange interpretation services allowing for literacy and illiteracy levels
- Consult on an annual basis regarding the content of this Strategy
- Develop 'easy read' material for people with learning disabilities

In addition, periodic consultations will also take place with a wide range of stakeholder interest groups and other agencies to ensure the strategy keeps pace with best practice.

EQUALITY AND DIVERSITY STRATEGY PERFORMANCE MONITORING, TARGETS AND REVIEW

Performance Monitoring

Overall, the Group will monitor Equality and Diversity performance to ensure that it does not discriminate against any particular groups. This will be reported to the Group's Board of Management annually.

In fulfilling this requirement, particular attention will be given to each of the six diversity strands for all service area commitments outlined in this Strategy document.

Targets were traditionally prescribed within the Housing Corporation's Good Practice Note 4. These covered the following areas:

- Lettings
- Tenant satisfaction
- Dealing with harassment
- Staffing
- Governing body membership
- Tenant and resident association membership
- Employment of contractors, consultants and suppliers

Whilst monitoring against these core areas shall remain, they will be monitored within a broader suite of Equality and Diversity performance indicators. These will initially be developed by the Diversity Working Group based upon needs analysis of the communities served. They will reflect the six core diversity strands across all service areas.

Performance will be communicated to staff, residents and stakeholders through appropriate communication channels such as the Group's websites and newsletters

EQUALITY AND DIVERSITY STRATEGY POLICY SUMMARY

The policy statement is designed to be robust, comprehensive and relevant to the needs of employees and residents. It summarises the Group's approach to equality and diversity matters and in itself will be subject to annual review involving staff and residents.

The equality and diversity policy of the Group 'cuts across' all activities of the organisation and should therefore be reflected in all aspects of employment and service delivery.

DOCUMENT CONTROL

| | |
|---------------------|--------------------------------|
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