

Epping Forest District Council
HOUSING DIRECTORATE'S STRATEGY ON
EQUALITY AND DIVERSITY

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1. Introduction

1.1 This Strategy sets out the Housing Directorate's approach to promoting equality and diversity in line with the Council's corporate Equality and Diversity Policy and its statutory duties as a public authority to promote equality. This includes actions designed to:

- eliminate unlawful discrimination and promote equality of opportunity
- recognise and value the needs and contributions of individuals and identifiable groups within the wider community served by the Housing Directorate
- ensure that everyone who needs housing advice and services is fully able to access them
- promote understanding and tolerance of different cultures and good relations within the communities served by the Housing Directorate

1.2 The Housing Directorate's Equality and Diversity Strategy is consistent with the Council's role as a fair employer. Further details about the Council's Equal Opportunities Policy relating to employment may be obtained from the Human Resources Section.

1.3 Dealing effectively with all forms of discrimination, is an important role for the Council as a social landlord. This Strategy is linked to the Housing Directorate's Service Strategies on Harassment and Anti-Social Behaviour.

- 1.4 The Housing Directorate is also well placed to promote equality in its role as a Local Strategic Housing Authority working in partnership with the Registered Social Landlords (RSLs) to develop and manage affordable housing in the District.
- 1.5 Furthermore, the Council has a role in supporting vulnerable adults in the community, older people and those who are homeless, who may be more at risk of discrimination and unfair treatment and less able to challenge it.
- 1.6 As with related issues, such as responding to racist, homophobic and other anti-social behaviours, the Council works in partnership through the Crime and Disorder Reduction Partnership with Essex Police, Essex County Council, Essex Race Equality Council, Victim Support, and other relevant agencies.
- 1.7 The Strategy has been developed in accordance with the provisions of equality and housing legislation and, where relevant, the associated codes of practice.
- 1.8 The Equality and Diversity Strategy has been developed in consultation with the Tenants and Leaseholders Association which is working to enhance equality and diversity.
- 1.9 The Equality and Diversity Strategy was approved by the Council's Housing Portfolio Holder on xxxxx following consultation with the Housing Scrutiny Panel.

2. Background

- 2.1 The Council has a legal responsibility not to discriminate on grounds of race, gender and disability in its provision of goods, facilities, services and premises.
- 2.2 In addition, the Race Relations (Amendment) Act 2000 requires all public authorities to take a more pro-active approach, which entails promoting equality of opportunity, eliminating unlawful racial discrimination and promoting good relations between persons of different racial groups. These three elements are combined to form a 'general duty'. There are also specific duties, which includes a requirement to prepare and publish a Race Equality Scheme setting out:
 - A prioritised list of relevant functions and policies
 - Monitoring arrangements to check for any adverse impact on promoting race equality
 - Impact assessment and consultation arrangements to assess the likely impact of proposed functions and policies
 - Publication of the results of monitoring, assessments, and consultation and any changes made to functions and policies arising
 - Arrangements for ensuring public access to information and Council services
 - Staff training.
- 2.3 Similar statutory duties applied in relation to disability (from December 2006) and gender (from April 2007).

- 2.4 The Council developed and agreed its Race Equality Scheme, including an action plan, in 2002. Since then, the Council has conducted a review of all relevant services and assessed how well it is achieving its equality performance targets. This resulted in service specific action plans plus a Corporate Equality Action Plan in 2006. Whilst the current statutory requirement relates to race equality, other aspects were considered throughout this process, e.g. potential inequality relating to gender, religion, disability, age, etc.
- 2.5 As part of this review process, the Housing Directorate undertook equality impact assessments and developed equality action plans for the following service areas:
- Housing Options
 - Housing Assets & Repairs
 - Housing Management
 - Older Peoples Services
 - Housing Strategy
 - Housing Information
- 2.6 The purpose of these assessments was to identify:
- Consultation and monitoring arrangements that were already in place for existing services and identify any gaps
 - Arrangements required for conducting impact assessments and formal consultation processes for proposed policies
 - The accessibility of its services
 - The need to raise awareness and understanding of equality and diversity issues amongst tenants
 - Staff training needs
 - Which external organisations (public, private or voluntary) were working in partnership with the Housing Directorate to deliver services and the extent to which they were contributing to the general duty.
 - Overall impact in terms of promoting equality, eliminating unlawful discrimination and promoting good relations between different sectors of the community.
- 2.7 The purpose of the action plans was to address any shortfalls in these areas and all the action items were scheduled to be delivered by April 2007 or earlier. Progress made is summarised under the Strategy's Action Plan. Actions which need to be tackled on a corporate basis were carried into the Corporate Equality Action Plan.

3. Legal Framework

- 3.1 During 2009, the various strands of legislation relating to equalities are being brought together under one Act called the Equalities Bill which expected to come into force in 2010. Details of the proposed legislation is set out at section 4 of this Strategy. The following current legislation has particular implications for services delivered by public authorities, including the Housing Directorate, in relation to equality and diversity.

3.2 Human Rights Act 1998

It is unlawful for a public authority to act in a way that is incompatible with a Convention right. The Act includes the following rights to:

- Private and family life, home and correspondence (Article 8)
- Freedom of thought, conscience and religion and to manifest their religion or belief, in worship, teaching, practice and observance (Article 9)
- Men and women of marriageable age have the right to marry and to found a family (Article 12)
- The enjoyment of the rights and freedoms set forth to be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status (Article 14).

3.3 Sex Discrimination Act 1975 and Race Relations Act 1976 - Provision of Goods, Facilities, Services and Premises

It is unlawful for anyone (including specifically local authorities) concerned with the provision of goods, facilities or services to the public to discriminate on grounds of race or sex:

- By refusing or deliberately omitting to provide them
- As regard to their quality
- The manner or terms on which they are provided
- Irrespective of whether the goods, facilities or services are provided for payment or free of charge
- In relation the letting or disposal of premises.
- Exceptions include:
- Single sex establishments providing special care or supervision (e.g. women's refuges).
- Facilities for single sex users in order to preserve privacy and decency.

3.4 Race Relations (Amendment) Act 2000

Public authorities are required to meet a general duty to:

- Eliminate unlawful racial discrimination
- Promote equality of opportunity
- Promote good relations between persons of different racial groups.

The Race Relations Code of Practice in Rented Housing gives specific guidance in relation to race equality in relation to providing Housing Services.

Equality Act 2006

From April 2007, public authorities will be required to meet a general duty to:

- Eliminate unlawful gender discrimination (this also covers transsexuals)
- Promote equality of opportunity between women and men

This Act will also extend the legislation relating to the provision of goods, facilities, services and premises to cover religion, belief and sexual orientation.

3.5 Civil Partnership Act 2004

This Act provides rights and responsibilities that are broadly similar to married couples for same sex partners who have legally registered a civil partnership.

3.6 Disability Discrimination Act 1995 – Provision of Goods, Facilities, Services and Premises

It is unlawful to discriminate against disabled people by:

- Refusing to provide a service without justification.
- Providing a service to a lesser standard without justification.
- Providing a service on worse terms without justification.
- Failing to make reasonable adjustments to the way services are provided for disabled people.
- Failing to make reasonable adjustments to the physical features of service premises, to overcome physical barriers to access.

3.7 Disability Discrimination Act 2005

From December 2006, public authorities will be required to meet a general duty to:

- Eliminate discrimination and harassment of disabled persons that is related to their disabilities
- Promote equality of opportunity between disabled persons and other persons
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons
- Promote positive attitudes towards disabled persons
- Encourage participation by disabled persons in public life.

4. New Equalities Bill 2009

- 4.1 Under the new Equalities Bill which is expected to become law in 2010, there will be a new duty for public bodies to tackle discrimination, promote equality of opportunity and encourage good community relations. The Bill extends the number of minority groups and includes the following:
- Race
 - Disability
 - Gender
 - Faith or belief
 - Age
 - Sexual orientation
 - Transgender
- 4.2 The new Equality Framework for Local Government introduced in 2009, (which replaces the Equality Standard for Local Government), broadens the definition of equality to “equal life chances for all”
- 4.3 The Council, in response and in preparation, is reviewing its Equality Impact Assessment Toolkit to ensure assessments are more relevant, better informed and focussed on outcomes rather than processes. It will ensure that services are accessible and reflect the needs of the community with equality mainstreamed into all of its activities. The Housing Directorate will be reviewing all of its Equality Impact Assessments to ensure they meet with the new Toolkit. A pilot exercise on the management of rent arrears has already been undertaken.
- 4.4 The response of the Housing Directorate on the new legislation and the work that needs to be undertaken in reviewing Equality Impact Assessments is set out under this Strategy’s Action Plan.

5. Relationship with Other Documents, Strategies, Policies and Procedures

- 5.1 The following Housing Directorate’s Service Strategies, policies and procedures are relevant to this Equality and Diversity Strategy:
- Housing Strategy
 - Homelessness Strategy
 - Private Sector Housing Renewal Strategy
 - Housing Service Strategy on Harassment
 - Anti-Social Behaviour Strategy
 - Equality and Diversity Action Plans
 - Housing Charter
 - Housing Allocations Scheme
 - Housing Appeals Procedures
 - Standard Tenancy Agreements

5.2 The following corporate strategies, policies and procedures also have links with this Strategy:

- Corporate Equality and Diversity Policy
- Corporate Equality Action Plan
- The Council's Race Equality Scheme
- The Council's Harassment and Bullying Policy including harassment procedures for its employees
- Staff equality, diversity and dignity training programme
- Equality monitoring statistics and Census data
- Corporate Compliments and Complaints procedure

5.3 The following strategies, policies and procedures, delivered in partnership with other agencies, are also relevant to this strategy:

- Local Supporting People Strategy
- Multi-Agency Public Protection Arrangements (MAPPA)
- Hate Crime reporting procedures
- Guidelines for the Protection of Vulnerable Adults from Abuse
- Floating Support Scheme for vulnerable single adults
- Stay Safe Scheme for women experiencing domestic violence
- Mediation services (provided by Relate and Mediation Norwich)

5.4 The Council has adopted a Housing Charter which has recently been updated in accordance with the requirements of the new Equalities Bill, and has Service Standards which set out the promises made to its customers, and gives full details of the services that they can expect to receive. The performance against the standards are reported annually to the Tenants and Leaseholder's Federation and the Housing Scrutiny Panel.

6. Aims and Objectives

The Housing Directorate is committed to:

- Ensuring that its public services are fully accessible and responsive to the diverse needs of all groups and communities served.
- Working proactively, and in partnership with others, to promote equality of opportunity, eliminate unfair discrimination and build cohesive communities.

6.1 The objectives of this Strategy are to:

- Develop a cohesive approach to equality and diversity within the Housing Directorate and organisations working in partnership or contracted to supply services.
- Ensure the Council, and other bodies delivering housing services, meet their statutory requirements.
- Raise public awareness about the Housing Directorate's approach to equality and diversity; to promote greater understanding and tolerance among residents and tenants; to celebrate diversity and to enhance good community relations.

- Ensure any allegations of unfair discrimination are properly and promptly investigated by people who understand the issues.
- Ensure that councillors, staff and associated persons understand this Strategy and have received the necessary training.
- Ensure the effectiveness of the Strategy is monitored and reviewed.

6.2 To achieve this, the Housing Directorate will:

- Establish monitoring systems and processes to gather equality data on service users and consultees which can be analysed to assess any adverse impact by decisions, policies, procedures and practices to ensure they are non-discriminatory.
- Seek feedback from staff, partner organisations and service users on policies, procedures and practices that affect them.
- Encourage diverse involvement and participation in consultation exercises and in membership of bodies such as the Tenants' and Leaseholders' Federation and Social Club Committees.
- Review accessibility of information, services and premises, and make reasonable adjustments where required.
- Conduct equality impact assessments and formally consult on proposed policies prior to making decisions about their implementation.
- Publicise the outcome of monitoring, consultation and impact assessments.
- Provide equality/diversity training for its employees.
- Raise awareness among service users, non-users and partner organisations about what this Strategy means and how it is being implemented.
- Investigate and take action to address allegations of unfair discrimination.
- Regularly review the effectiveness of this Strategy (at least every three years).

6.3 The target audience for this Strategy is:

Epping Forest District Councillors

Housing Directorate managers and employees.

Tenants and leaseholders of Council property and other people living in the same communities, including residents of Council-run accommodation such as sheltered housing, hostels for homeless people, etc.

All organisations working with the Council in delivering housing services or in providing support to people who may suffer from inequality and unfair discrimination.

7. Consultation on this Strategy

7.1 People likely to be affected by the Equality and Diversity Strategy and those who will be involved in implementing the Housing Directorate's Equality Action Plan have been consulted on this Strategy prior to its implementation. This includes the following:

- Epping Forest Tenants' and Leaseholders' Federation.
- The Anti-Social Behaviour Network Group which forms part of the Crime & Disorder Reduction Partnership.
- The three Citizens' Advice Bureaux in the District.
- Operational Managers and key staff responsible for each aspect of Housing Directorate's Services.
- The Caring and Repairing in Epping Forest Advisory Panel
- The Council's Housing Scrutiny Panel and the Housing Portfolio Holder.

8. Terminology and Examples of Discrimination

- 8.1 Equality is about making sure that every person has equal and fair access to services irrespective of personal attributes, such as their race, gender, disability, age, religion, sexuality, etc. Discrimination may be open and deliberate or covert and unintentional - for example a particular policy, decision, process, criterion, requirement or practice may unintentionally prevent some people from doing or accessing something which they legitimately should be able to do.
- 8.2 Direct discrimination is where a person is treated less favourably because of their ethnic origin, colour, nationality, sex, marital status, disability, religion, age, sexual orientation, etc. In most of these cases, such discrimination would be unlawful. (Harassment on such grounds is a form of direct discrimination.) However, some forms of direct discrimination are necessary and can be justified such as the provision of a refuge restricted to women who are at risk of domestic violence or services specifically designed to help older or disabled residents.
- 8.3 Discrimination can also occur for reasons that are not covered by the law. For example, people may be treated less favourably because of their appearance (height, weight, attractiveness, how they dress, etc.), how they communicate (their accent, verbal skills, etc.), their lifestyle (relationships, habits, occupation, educational achievement, etc.) and any other personal attribute. People are more likely to suffer from discrimination if they are perceived to be different from the majority group or they have less power and are less able to challenge discrimination.
- 8.4 Indirect discrimination is where an apparently neutral provision, criterion or practice is applied equally to everyone, but it puts people from one race/sex/religion etc. at greater disadvantage than others. If the discriminatory effect cannot be objectively justified (or it is a disproportionate means of achieving a legitimate end), then as with direct discrimination, it may be unlawful. For example, if Housing Services only ever provided information in English, people who cannot speak or read English could suffer indirect discrimination by not being able to find out what services are available. (To avoid such discrimination, translation or interpreter facilities are available on request).
- 8.5 Positive action is allowed in certain circumstances – section 35 of the Race Relations Act allows housing organisations to make special provision for particular racial groups in service provision.

- 8.6 Diversity is concerned with recognising and valuing difference in its broadest sense. It is about creating a culture and practices that recognise, respect, value and harness differences for the benefit of the community, the organisation and the individual. Diversity encompasses factors covered by legislation, such as age, gender, race, sexuality, disability, and religion, as well as other factors such as appearance, lifestyle, education and socio-economic status.
- 8.7 Equality and diversity are not inter-changeable but are inter-dependent. Equality of opportunity does not happen where difference is not recognised and valued.
- 8.8 Race is defined by the Race Relations Act 1976 as including colour, nationality (including citizenship), ethnic or national origin. People who are more likely to suffer from racial discrimination are those from minority ethnic groups such as:
- Black people who are African, Caribbean, Asian or people of mixed heritage.
 - White people such as Eastern Europeans, Jews, Sikhs, Gypsies and Irish Travellers.
- 8.9 The 2001 Census showed that, in the Epping Forest District, 8.7% of the population are from a minority ethnic group (including dual heritage), with the largest single group being Indian. The census does not break down the number of white minority ethnic groups residing in the District, but this includes, among others, Italian communities, Gypsies and Irish Travellers.
- 8.10 Racism – The MacPherson Report, which followed the inquiry into the death of Stephen Lawrence, provided the following definitions:
- “Racism in general terms consists of conduct or words or practices which advantage or disadvantage people because of their colour, culture or ethnic origin. In its more subtle form it is as damaging as in its overt form.”*
- 8.11 Institutional racism is described as:
- “The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping.”*
- 8.12 Religion - this includes any religious or similar philosophical belief (which is likely to include a form of collective worship, a clear belief system and a profound belief affecting the way of life or view of the world). Religion can define who you are, how you view the world around you and how you interact within it. The largest minority religious groups in the District are Muslim and Jewish (2001 Census). There are various religious customs and requirements in relation to everyday living. For example, many religions include a requirement to wash in free-flowing water before and after certain functions, which means that having access to a shower is more of a necessity for some people than others.

- 8.13 Disability – a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. A few examples include: learning disabilities, some long-term medical conditions (e.g. diabetes, epilepsy), progressive illnesses (e.g. cancer, multiple sclerosis, HIV, Parkinson’s disease), physical impairments (e.g. musculoskeletal disorders, Chrono’s disease, heart conditions), mental impairments (e.g. schizophrenia, manic depression, phobias which have a substantial effect on a person’s life), facial disfigurement, sensory impairments (e.g. blindness, impaired hearing). It can be seen that many disabilities are not generally visible and people may need specially adapted facilities, support or services for reasons that are not always obvious to others.
- 8.14 Reasonable adjustments are required by the Disability Discrimination Act to the way services are provided for disabled people and/or to the physical features of premises to overcome physical barriers to access. Whether specific adjustments are regarded as ‘reasonable’ depends on a number of factors including the size and resources of the organisation, the extent to which the adjustment removes any disadvantage caused by a person’s disability and other factors, e.g. any legal or practical constraints relating to the premises. Examples could include: providing materials in different reading formats (on request), improving lighting, providing an induction loop or making changes to a premises such as installing ramps, a lift, accessible toilets, automatic doors, wider parking bays, etc.
- 8.15 Sexism - is discrimination, prejudice or oppression based on gender. It can be directed towards individuals such as comments and jokes that demean women, discrimination in the workplace or when delivering services or by violence e.g. sexual assault, domestic abuse. Sexism is usually experienced by women because men often have greater power, e.g. in society, the workplace, religion and in many homes. However, individual men may suffer sexism e.g. where they are employed in typical female occupations or in relation to roles seen as female, such as childcare.
- 8.16 Examples of institutional sexism include:
- Processes or attitudes that assume that the man is the main decision maker or higher earner when providing goods and services to couples.
 - Unintended barriers to women’s participation in activities e.g. by having meetings in the early evenings when women with family care responsibilities are busy providing the evening meal or putting children to bed.
 - Organisational decisions and practices based on an assumption of male superiority such as restricting women from access to resources or from tackling high risk challenges or high profile tasks.
 - Unequal pay where financial rewards for ‘male’ occupations are typically higher than for ‘female’ occupations requiring the same degree of knowledge and skill.
- 8.17 Homophobia - is the irrational fear of people who are, or perceived to be gay, lesbian or bisexual. Homophobia can lead to prejudice, discrimination and harassment, sometimes violence, based on an individual's sexual orientation.

8.18 Ageism - is discrimination or prejudice based on age and is often associated with the stereotyping of older people as being physically and mentally weak and incompetent, set in their ways and dependent. The status, roles and aspirations of older people are frequently diminished by society. People at the other end of the age spectrum may also suffer from ageist attitudes by not being taken seriously or considered suitable for positions of responsibility or leadership.

9. Complaints of Discrimination

9.1 If a person, receiving a service from the Housing Directorate feels that they have experienced unfair discrimination in the way they have been treated by the Council, or other bodies acting on behalf of the Council, they have the right to raise this and have the matter investigated. Options for dealing with alleged discrimination include:

- Seek advice – via an experienced body such as Epping Forest Housing Directorate, housing associations, the Citizens Advice Bureaux, Victim Support, South Essex Switchboard (for homophobic incidents) or Essex Racial Equality Council.
- Raise the matter informally – by contacting an Epping Forest District Councillor or a Housing officer to request that the matter be investigated. An explanation may indicate that there was an objective and fair rationale behind the decision, policy, practice, etc.
- Formal complaint – if a person is not satisfied with the response to their informal enquiry or they wish to submit a formal complaint in the first place, this will be progressed in accordance with the Council's Compliments and Complaints Procedure. This is explained in the Council's Compliments and Complaints booklet, available from the Council's offices.
- Investigation – all formal complaints of discrimination will be investigated and the complainant will be informed, in writing, of the outcome.

9.2 Complaints monitoring – all formal complaints of discrimination or otherwise and the outcomes of investigations will be monitored and reported half yearly to the Housing Management Team. In order to ensure that certain sections of the community are not suffering from unfair discrimination, all those who submit a complaint will be asked to complete an equality monitoring form. Therefore, monitoring will record the types of people who feel they are experiencing discrimination as well as the types of discrimination being complained of.

10. Consultation of Service Users

10.1 The Housing Directorate has a duty to involve and consult anyone likely to be affected by its policies in order to make sure people from particular sectors of the community (e.g. minority ethnic groups, people living according to different religions or cultural traditions, single parents, large families, gay couples, etc.) will not be adversely affected or, where this is unavoidable, that such impact is proportionate and lawful.

10.2 The Housing Directorate consults the following:

- Feedback is sought from users and non-users e.g. via the website, to assist in developing services housing information and tenant participation initiatives.
- All Council partners are consulted on Housing Strategies, policies and procedures affecting them, through the most appropriate means.
- Prospective tenants are consulted, during the Accompanied Viewing process, about their accommodation requirements as affected by e.g. their religion, disability, family circumstances, etc.
- Customer exit surveys are in place to measure customer satisfaction with the services they have received.
- All surveys undertaken collect data on minority groups which will be used appropriately to improve the service.

11. Involvement and Participation of Service Users

11.1 The Housing Directorate has a duty to enhance community cohesion and to ensure that representative bodies reflect the diversity of their communities, as far as possible. To achieve this, the Housing Directorate will proactively encourage residents and tenants from different sectors of the community to become involved and participate in bodies such as the Tenants' and Leaseholders' Federation, Caring and Repairing Service Users Forum, Residents Associations and Social Club Committees.

11.2 People who are currently under-represented in such activities include younger people, single parents and people who live in rural areas. Methods such as rural initiatives and targeted participation activities are being considered to encourage a more representative cross-section of the community to become actively involved in relevant- activities.

11.3 On-going support, including equality/diversity training, will be made available to assist those people understand the issues covered by this Equality and Diversity Strategy and the Harassment Strategy. If necessary, translation services will be used to enhance communication with members who do not speak or read English well. Support will be provided by the Housing Directorate (or partner organisations) for individuals willing to participate in voluntary Housing groups should they be faced with any problems associated with their role.

12. Monitoring

12.1 Monitoring involves collecting, analysing and evaluating information to measure performance, progress and change. It includes quantitative data (such as numbers of people from different ethnic groups who use a particular service) and qualitative data such as feedback from service users, non-users, employees, partners, etc. (e.g. via satisfaction surveys, consultation exercises and complaints procedures).

- 12.2 Where quantitative data is used, the results need to be compared to a base line in order to assess whether there has been any adverse impact. In order to create this, the Housing Directorate conducted a Census in 2006 of all its tenants and leaseholders in relation to their ethnicity, gender, disability and age. The response was approximately 30%. This data has been added to the person profiles held on the Anite Open Housing Management System (OHMS), which already includes data collected at the time of application. Together with the latest national census data for the Epping Forest District population, this will provide two clear benchmarks against which access and service usage, sanctions taken against tenants and leaseholders, and repairs and planned maintenance can be compared.
- 12.3 Under the Housing and Equalities Bill 2009, details of which are set out in Section 4 of this Strategy, additional arrangements will be put in place to monitor the new and amended categories.
- 12.4 The Housing Directorate currently records the ethnic origin of people on its Housing Register and of those who are allocated Council accommodation to determine if there is any apparent adverse impact in housing allocations. This includes a separate exercise for sheltered housing allocations. (The data for 2008/2009 showed a very close correlation between housing applications and allocations.) Equality monitoring of the provision of services through Caring and Repairing, Careline dispersed alarm users, Social Club users is undertaken.

13. Staff Training

- 13.1 The Housing Directorate will ensure that all employees receive appropriate equality/diversity guidance and training as part of the induction process and on a regular basis thereafter, to retain the focus on equality and diversity and ensure staff remain up-to-date. Such training will include:
- Legislation updates on statutory duties and individual rights and responsibilities.
 - Ensuring managers consider the possible equality impact of decisions and policies they make and know how to conduct equality impact assessments.
 - Ensuring staff responsible for conducting consultation exercises and equality monitoring know how to do this effectively and what to look for.
 - Guidance notes will be published on the Council's intranet for front-line staff on dealing with vulnerable residents.
 - Equality/diversity training for front-line staff within the Corporate Training Programme – to include disability awareness and disability etiquette.

14. Procurement and Partnerships

- 14.1 The statutory duties to promote equality still apply when relevant services are contracted out to an external supplier or partner organisation. Contractors must not discriminate unlawfully, but they do not have the same legal obligation as a public authority to promote equality of opportunity and good race relations. The Housing Directorate remains responsible for meeting the general duty and will ensure the statutory duties are met, regardless of whom is carrying them out.
- 14.2 The duty to promote equality applies indirectly to housing associations, because they are regulated by the Housing Corporation, which is directly covered.
- 14.3 Public authorities and housing associations must also comply with EU procurement rules which means they must make sure that, where relevant, anti-discrimination and equal opportunity requirements are explicitly specified in the procurement process, from the start, e.g. by ensuring that equality considerations are built into the tendering process.
- 14.4 The Housing Directorate require all potential contractors and partners to provide copies of their equal opportunities policies and to demonstrate their commitment, both in principle and practice, to equality. It includes equality clauses in all housing agreements, making clear what the Council requires of its contractors and partners and requires monitoring data to be provided by sub-contractors.
- 14.5 Supervision of any contract includes assessment against the agreement and outcome of equality monitoring. Steps will be taken to encourage improvement or enforce compliance if performance falls short.
- 14.6 The Housing Directorate will also ensure that the methods used for advertising and awarding future contracts is non-discriminatory and, where practicable, that businesses run by minorities are encouraged to participate in the tender process.

15. Equality Impact Assessments

- 15.1 Equality Impact Assessments are a means of systematically and thoroughly assessing the effects that a proposed policy, procedure or practice is likely to have on people, depending on their race, disability or gender. The main purpose of an equality impact assessment is to pre-empt the possibility that a new policy could affect some groups unfavourably. An impact assessment is preventative rather than remedial and is a form of risk assessment.

15.2 In accordance with the new Toolkit, the key stages of conducting an impact assessment include:

- Consider the aims, purpose, objectives and outcomes of each activity
- Consider who uses the activity
- Make a judgement on the users of the activity
- Consider available evidence (e.g. monitoring, survey, consultation data) and gather more if required;
- Assess likely impact, and ways of reducing this taking into account the evidence;
- Consider alternatives if the policy is likely to have an adverse impact;
- Consult formally;
- Decide whether to adopt the policy.

- Draw up an action plan

- Publish the Impact Assessment

15.3 Formal consultation of Housing Directorate staff, service users and any others affected by changes to the service or new policies and procedures is an essential element of the impact assessment process and will be carried out, taking into account the principles of relevance and proportionality. In some cases, views will be sought at an early stage to inform policy development and then again when the proposals are finalised. The aim will be to ensure all persons likely to be affected by changes or new policies and procedures have an opportunity to express their views, concerns or suggestions before decisions are made.

15.4 The specific duty of monitoring relates to relevant functions and policies once they have been put into practice, and being alert to any concerns about the way they are working. When new Housing Directorate policies, procedures or practices are introduced, appropriate equality monitoring systems will be implemented at the same time.

16. Publicity

16.1 The outcomes of impact assessments, consultation and monitoring will be communicated to all parties via the Council's website.

16.2 Articles will be included from time to time in the tenants' magazine *Housing News* (which can be made available in large print and other languages and formats) to:

- Counteract inaccurate or negative publicity in the media which is contrary to the aims of this strategy.

- Publicise the Council's commitment to equality and diversity and to explain what this means for tenants and housing applicants.
- Raise awareness of equality and diversity initiatives affecting tenants and residents.
- Encourage wider participation in consultation exercises and involvement activities and communicate the outcome of feedback surveys and consultation exercises.
- Explain why monitoring is being carried out and what it shows.
- Celebrate diversity and promote good relations within the community.
- Challenge assumptions and stereotypes about different life choices (e.g. Gypsies and Travellers, same sex couples), different religions (e.g. Muslim or Jewish customs and beliefs), people living with disabilities (e.g. mental health problems), etc.

17. Action Plan

17.1 The following actions have either been completed or will be undertaken in the future by the Housing Directorate:

Action	Lead Officer/s	Timescale/Comments	Resource Implications
Annual ethnicity monitoring report to include separate ethnicity monitoring of allocations made at sheltered housing accommodation	Housing Options Manager	Now included On-going	Within existing resources
Complete Impact Assessment Actions	All Managers	Completed To be updated 2009/20010	Within existing resources
Continue to meet the requirements of the Disability Discrimination Act 2005	All Managers	On going	Within existing resources
Corporately meet the requirements of the Equality Act 2006	Human Resources Section	Completed	Within existing resources
Undertake consultation at accompanied viewing on whether the accommodation meets requirements in terms of religion, disability etc	Housing Repairs Manager	Completed	Within existing resources
Undertake customer exit surveys from time to time	All Managers	On going	Within existing resources
Monitor the ethnicity of Social Club users	Housing Manager (Older Peoples Services)	On going	Within existing resources

Action	Lead Officer/s	Timescale	Resource Implications
Request copies of equal opportunities policies from all external contractors	All Managers	On going	Within existing resources
Publish the outcomes of the Council's Impact Assessments on the website	Human Resources Section	Completed	Within existing resources
Publicise in the tenants magazine Housing News articles demonstrating the Council's commitment to equality and diversity	All Managers Principal Housing Officer (Strategy and Information)	On going	Within existing resources
Ensure new arrangements are in place to monitor the new categories under the Housing Equalities Bill	All Managers Principal Housing Officer (Strategy and Information)	On going	Within existing resources

18. Reviewing the Strategy

- 18.1 This Housing Directorate Strategy on Equality and Diversity will be reviewed by the Housing Scrutiny Panel in consultation with the Tenants and Leaseholders Federation, the Anti-Social Behaviour Group, and the Citizens Advice Bureaux no later than November 2012.