

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

## **1. Introduction**

- 1.1 This Strategy sets out the Housing Directorate's approach to equality and diversity in line with the Council's corporate Equality and Diversity Policy and its statutory duties as a public authority. This includes actions designed to:
- eliminate discrimination, harassment and victimisation in the provision of housing services;
  - ensure that everyone who needs housing advice and services is fully able to access them; and,
  - promote understanding and tolerance of different cultures and good relations within the communities served by the Housing Directorate.
- 1.2 The Strategy sets out how the Directorate will meet these obligations in the delivery of its services to everyone who lives, or aspires to live, within the District.
- 1.3 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 Housing Directorate's Equality and Diversity Strategy is consistent with the Council's role as a fair employer. The Council's Equality in Employment Policy is available on the Council's website, Intranet and as a hard copy from Human Resources in Corporate Support Services.
- 2.2 The Council recognises the importance of its role as a social landlord in dealing effectively with all forms of discrimination. In recognition of this the Directorate also has Service Strategies on 'Harassment' and 'Anti-Social Behaviour' which are linked to this Strategy.
- 2.3 The Housing Directorate is also well placed to promote equality in its role as a Local Strategic Housing Authority working in partnership with registered housing providers, such as Housing Associations, to develop and manage affordable housing in the District.
- 2.4 The Housing Directorate also provides services to private sector residents in the District. Some of these services are statutory, such as the licensing of Houses in Multiple Occupation (HMOs) and the investigation of complaints about unsatisfactory housing.
- 2.5 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.
- 2.6 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 Racial Equality Council, Victim Support, and other relevant agencies.

2.7 This Service Strategy has been developed in accordance with the provisions of equality and housing legislation and, where relevant, the associated codes of practice.

2.8 The Equality and Diversity Strategy has also been developed in consultation with the Tenants and Leaseholders Federation which includes in its role the promotion of equality, the elimination of discrimination and fostering good community relations.

### **3. Coverage**

3.1 The Council has a number of responsibilities and requirements under the Equality Act 2010. These 'General Equality Duties' are to:

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity between those who share a 'protected characteristic' and those who do not; and
- Foster good relations between people who share a 'protected characteristic' and those who do not.

The 'protected characteristics' are age, disability, faith or belief, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race and sexual orientation.

3.2 The purpose of the general equality duty is to integrate consideration of equality and good relations into our day-to-day business. It entails giving appropriate weight and priority to the need to:

- Remove or minimise disadvantages;
- Take steps to meet the needs of people with protected characteristics; and,
- Encourage people with protected characteristics to participate in public life.

3.3 In addition to its general equality duty the Council also has a 'Specific Equality Duty' to:

- Publish information to show that we are complying with our duties and to show how much progress we have made;
- Carry out equality analysis on our services using information about those services and the views and experiences of customers who use them;
- Prepare and publish Equality Objectives to show that we meet the general duty.

3.4 The Council has produced an 'Equality Scheme' which builds upon and replaces its Race Equality Scheme 2007, Disability Scheme 2007 and Gender Equality Scheme 2007. The Equality Scheme is a strategy and set of objectives and associated actions to demonstrate that the Council meets its specific duty, both as an employer and a service provider. The objectives and actions in the Scheme are incorporated into Business Plans at service level. In the Housing Directorate these are The Housing Revenue Account Business Plan, The Housing Repairs and Maintenance Business Plan, the Private Sector Housing Business Plan and the C.A.R.E. Business Plan.

3.5 The Directorate also maintains an active involvement in the Council's Corporate Equalities Working Party which is chaired by the deputy Chief Executive and meets every two months. This provides the following functions:

- To progress the Corporate Equalities Action Plan;
- To provide support and guidance to the staff group;
- Working Group members to act as the equalities link to their service;
- To identify, support and provide guidance to service equalities advocates;
- To progress the Customer Impact Assessment (CIA) programme;
- To monitor the quality of CIA's;
- To progress the equality mapping of the District;
- To promote the equality message; and,
- To promote compliance with the Council's General Equality Duty

3.6 This Strategy explains how the Housing Directorate will meet its obligations in the delivery of all of its services.

#### **4. Relationship with Other Documents, Strategies, Policies and Procedures**

4.1 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 Strategy
- Private Sector Housing Enforcement Policy
- Housing Service Strategy on Harassment
- Housing Service Strategy on Anti-Social Behaviour
- Equality and Diversity Action Plans
- Housing Charter
- Housing Allocations Scheme
- Housing Appeals Procedures
- Standard Tenancy Agreements

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

- Equality Policy 2011
- Equality Scheme 2011
- Equality Objectives Action Plan
- Dignity at Work Policy 2011
- Training Directory (including mandatory diversity training)
- Equality Monitoring Policy and Guidance 2012
- Equality Information Publishing Guidance
- Compliments and Complaints procedure
- CIA Toolkit

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

- Housing Related Support Commissioning Strategy 2013-14 (Essex County Council)
- Multi-Agency Public Protection Arrangements (MAPPA)
- Hate Crime reporting procedures (Safer Communities)
- Guidelines for the Protection of Vulnerable Adults from Abuse

- Floating support for vulnerable households
- Scheme for women experiencing domestic violence (SaferPlaces)
- Mediation services (provided by Relate)
- Rent Deposit Guarantee Scheme (delivered in conjunction with Epping Forest Housing Aid Scheme (EFHAS))
- PLACE (Private Leasing Agreements Converting Empties) Scheme (provided jointly between EFDC, Genesis and five other local authorities)
- HALD (Housing Association Leasing Direct) (in association with Genesis)
- Landlord Accreditation Scheme for students of the E15 Acting School (joint initiative with Essex University)
- Gardening and Handyperson Services (delivered jointly with Voluntary Action Epping Forest)
- Housing Repairs Service (managed by Mears using EFDC employees)

## 5. Aims and Objectives

The Housing Directorate is committed to:

- Ensure 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.

### 5.1 The objectives of this Strategy are to:

- Develop a cohesive approach to equality and diversity within the Housing Directorate. This includes organisations working in partnership or contracted to supply services;
- Raise public awareness about the Housing Directorate's approach to equality and diversity, promote greater understanding and tolerance among residents and tenants, celebrate diversity and 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 are adequately trained to ensure that its aims are met; and,
- Ensure that the effectiveness of the Strategy is monitored and reviewed.

### 5.2 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, the Tenants Scrutiny Panel and C.A.R.E.'s Service User Forum;

- Review accessibility of information, services and premises, and make reasonable adjustments where required;
- Conduct equality analysis 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 staff;
- 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 in the delivery of housing services; and,
- Regularly review the effectiveness of this Strategy (at least every three years).

5.3 The target audience for this Strategy is:

- EFDC Members;
- All Housing Directorate staff;
- Tenants and leaseholders of Council property and other people living in the same communities, including home-owners, private tenants, residents of Council-run accommodation (such as sheltered housing, hostels for homeless people, etc.); and,
- All organisations working with the Council in delivering housing services or in providing support to people who may suffer from inequality and unfair discrimination.

## **6. Statutory Requirements**

6.1 In 2010, the various strands of legislation relating to equalities were brought together under the Equality Act 2010 which unified and superseded all previous legislation affecting equality and discrimination, and established a focused approach to equality law.

6.2 In addition, the following current legislation has particular implications for services delivered by public authorities, including the Housing Directorate, in relation to equality and diversity.

### **6.3 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); and,

- 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).

#### 6.4 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.

#### 6.5 Equality Act 2010

Under the 2010 Equality Act public bodies have a duty to tackle discrimination, promote equality of opportunity and encourage good community relations. The Act introduces the notion of 'protected characteristics' which replace the equalities 'strands' identified in previous legislation. These protected characteristics are:

- Age,
- Disability,
- Faith or belief,
- Gender,
- Gender reassignment,
- Marriage and civil partnership,
- Pregnancy and maternity,
- Race; and ,
- Sexual orientation.

The Housing Directorate's approach to meeting the requirements of the Act are set out in this Strategy's Action Plan.

- 6.6 The Council also has a duty under the Equality Act to produce and publish equality information to demonstrate that we are complying with our equalities duties. The information must be published annually from January 2012 and show the progress we have made towards delivering equality for our customers and employees. Key representatives have received training and are collating information from their service areas. This will be published on the Council's website from January 2013.

#### 6.7 Contractors Obligations

Contractors must not discriminate unlawfully, but they do not have the same legal obligations as public authorities have under the Equalities Act. However, where services are contracted out to an external supplier or partner organisation the Council still remains responsible for meeting the general equality duty.

- 6.8 Public authorities 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.

- 6.9 The Housing Directorate requires 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. The Directorate

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.

- 6.10 Supervision of any contract includes the outcome of equality monitoring. Steps will be taken to encourage improvement or enforce compliance if performance falls short.
- 6.11 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.

## **7. Client Consultation, Information and Involvement**

7.1 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.

7.2 The Housing Directorate consults in the following ways:

- Feedback is sought from users and non-users e.g. customer satisfaction surveys and the website, to assist in developing services;
- The Directorate consults with a number of groups that represent service users such as recognised residents' associations, the Leaseholders Association, the Sheltered Housing Forum and the C.A.R.E. Service User Forum. The Tenants and Leaseholders Federation is consulted on matters affecting all Council Tenants and Leaseholders. A Tenant Scrutiny Panel is being set up to provide an independent check and, if necessary, to challenge service delivery and performance.
- All Council partners are consulted on Housing Strategies, policies and procedures affecting them, through the most appropriate means (e.g. organisations such as Shelter and the Citizens Advice Bureau are consulted on changes to the Housing Allocations Scheme).
- Surveys are carried out on all housing services in place to measure customers' satisfaction with the services they have received.
- Surveys are undertaken from time to time on individual service areas. A census is being carried out on all tenants during 2013, for example. All surveys undertaken collect monitoring data which will be used appropriately to improve the service.

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

- Epping Forest Tenants' and Leaseholders' Federation;

- Operational Managers and key staff responsible for each aspect of Housing Directorate's Services;
- The Caring and Repairing in Epping Forest (C.A.R.E.) Advisory Panel; and,
- The Council's Housing Scrutiny Panel and the Housing Portfolio Holder.

7.4 In order to meet its general equality duty to enhance community cohesion and to ensure that representative bodies reflect the diversity of their communities, as far as possible, the Housing Directorate proactively encourages residents from different sectors of the community to become involved and participate in bodies such as the Tenants and Leaseholders Federation, C.A.R.E. Service Users Forum, Residents Associations and Social Club Committees.

7.5 Articles will be included from time to time in the tenants' magazine 'Housing News', the Council website, and also in the Council's newsletter 'the Forester', which goes to all households in the District. Publications can be made available in large print and other formats. These can be used 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 users of housing services.
- Raise awareness of equality and diversity initiatives affecting tenants and residents in the District.
- 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.
- All Customer Impact Assessments are published on the Council's website.

7.6 Where appropriate, ongoing support, including equality/diversity training, will be made available to assist those people understand the issues covered by this Service Strategy and the Service Strategy on Harassment. If necessary, translation services will be used to improve communication with members who do not speak or read English well. The Housing Directorate (or partner organisations) will provide support to individuals who have practical difficulties in participating in voluntary Housing groups.

## **8 General Principles**

8.1 Equality is about making sure that every person has equal and fair access to services irrespective of personal attributes. Discrimination occurs when a person is treated less favourably than they would otherwise because of a protected characteristic, whether or not they have that characteristic. 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 are entitled to.

8.2 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.

8.3 An example of the way in which particular protected characteristics are taken into account in the delivery of specific Housing services is with regard to delivering services to disabled people. The Equality Act 2010 requires 'reasonable adjustments' to be made 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 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.

#### 8.4 Socio-Economic Disadvantage

In addition to the protected characteristics, the Equality Act places a requirement on local authorities and other specified public bodies, when making strategic decisions, such as deciding priorities and setting objectives, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. The potential for inequalities on the basis of socio-economic factors is considered by the Directorate in the provision of all housing services. Examples of this are the proactive work being undertaken with Council Tenants in the light of Welfare Reforms and the setting of the eligibility criteria for offering Housing Assistance to homeowners and private-sector tenants.

8.5 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.
- 8.6 Complaints monitoring – all formal complaints of discrimination or otherwise and the outcomes of investigations will be monitored and reported quarterly at Continuous Improvement Meetings between managers and their Assistant Director. Everyone who submits a complaint is asked to complete an equality monitoring form which helps identify people who feel they are experiencing discrimination as well as the types of discrimination being complained of.
- 8.7 Equality Analysis
- Equality analysis is systematically and thoroughly assessing the effects that a proposed policy, procedure or practice is likely to have on people with different protected characteristics. The Council carries out equality analysis through its Customer Impact Assessment (CIA) process and has developed a corporate 'toolkit' to standardise the process of equality analysis throughout the Council. All CIAs are published on the Council's intranet and website.
- 8.8 CIAs are routinely carried out on all existing Council services but also have to be carried out on any new services or policies. Information on any equality impacts have to be included in reports to Members.
- 8.9 Equality Analysis identifies:
- Consultation and monitoring arrangements that are in place and where there are gaps;
  - The accessibility of services;
  - Whether there is a need to raise awareness and understanding of equality and diversity issues;
  - Any staff training needs;
  - Which external organisations (public, private or voluntary) that work in partnership to deliver services and the extent to which they contribute to the general duty; and,
  - The overall impact in terms of promoting equality, eliminating unlawful discrimination and promoting good relations between different sectors of the community.
- 8.10 Over a three-year period starting in 2009 the Directorate has carried out CIAs on the following service areas:
- Homelessness
  - Right to Buy and Leasehold Services
  - Private Sector Housing Assistance
  - Private Sector Housing Enforcement
  - Housing Strategy and Development
  - Housing Repairs Service and Asset Management (including Gas Servicing)
  - Sheltered/Supported Housing
  - Careline
  - Tenant Participation and Information
  - Housing and Estate Management
  - Housing Allocations Scheme
  - Choice Based Lettings Rent Arrears

Actions that will improve equality in service provision have been drawn into CIA Action Plans and progress against these is monitored at regular meetings between Housing Managers and the relevant Assistant Director.

- 8.11 Formal consultation with Housing Directorate staff, service users and any others affected by changes to the service or new policies and procedures is an essential element of equality analysis. It 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 of this is to ensure that everyone who is likely to be affected by changes or new policies and procedures has an opportunity to express their views, concerns or suggestions before decisions are made.
- 8.12 When new Housing Directorate policies, procedures or practices are introduced, appropriate equality monitoring systems will be implemented at the same time to ensure that no groups are adversely impacted.

## **9. Action Plan**

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

<b>Action</b>	<b>Lead Officer/s</b>	<b>Timescale/Comments</b>	<b>Resource Implications</b>
Annual ethnicity monitoring report to include separate ethnicity monitoring of allocations made at sheltered housing accommodation	Housing Options Manager	Now included Ongoing	Within existing resources
Publish the Directorate's Equalities information	Managers of relevant service areas	First report to be published by 1 February 2013	Within existing resources
Set up Tenant Scrutiny Panel	AD Housing (Private Sector & Resources) Tenant Participation Officer	First formal meeting to take place by 1 March 2013	Within existing resources
Carry out a Tenant Census	All Managers Principal Housing Officer (Strategy and Information)	June 2013	Within existing resources
Undertake customer exit surveys as required	All Managers	Ongoing	Within existing resources
Request copies of equal opportunities policies from all external contractors	All Managers	Ongoing	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)	Ongoing	Within existing resources

## **10. Resourcing the Strategy**

10.1 As equality and diversity is embedded into the Housing Directorate's functions, no funding has been separately identified within the Directorate's

budget for this. With regard to staffing resources, however, all staff are responsible for ensuring that they observe the principles of equality outlined in this document in their day-to-day work. Managers are responsible for ensuring that all employees receive appropriate equality/diversity guidance and training as part of the induction process and further training on a regular basis thereafter to 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 their decisions and policies and know how to carry out equalities analysis.
- 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.

10.2 The Housing Directorate's Information and Strategy Team has a specific role in publicising the Directorate's information on equality and diversity including uploading completed CIAs onto the Council's intranet.

## **11. Key Targets and Performance Monitoring**

11.1 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).

11.2 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. There are a number of sources for this 'profiling' information such as the national census. Some data is already available from the 2011 national census but where this is not available, useful information can be found in more recent data sources. In 2010, for example, the Council's Local Strategic Partnership drew together a 'data profile' of the District to support the production of the new Sustainable Communities Strategy.

11.3 Where useful profiling data is not available, individual service areas carry out their own surveys. In 2007 the Directorate conducted a 'census' of all its tenants and leaseholders in relation to their ethnicity, gender, disability and age. This data was added to the computer database which already includes data collected at the time of their application. A further census is to be carried out in 2013 which will include all the relevant protected characteristics.

11.4 These data sources help to provide benchmarks against which access and service usage, sanctions taken against tenants and leaseholders, and repairs and planned maintenance can be compared.

11.5 The Housing Directorate is required by law to record 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 result of this monitoring is reported to the Tenants and Leaseholders Federation and the Housing Scrutiny Panel on an annual basis. Equality monitoring of the provision of services through C.A.R.E., Careline dispersed alarm users and Social Club users is undertaken.

- 11.6 The Council has adopted a Housing Charter, and Service Standards which set out the promises made to its customers, and gives full details of the services that they can expect to receive. Performance against the standards is reported annually to the Tenants and Leaseholders Federation and the Housing Scrutiny Panel.

## **12. Reviewing the Strategy**

- 12.1 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 February 2016.