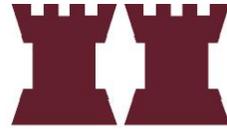


Two Castles
Housing Association



Equality & Diversity strategy (2011-2013)

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Section 1 Introduction

Our vision

Two Castles will acknowledge, value and respect the diversity of all its customers, staff and partners.

Relevant Two Castles core values

- Equality & Diversity: We will ensure that our standards of service are applied consistently to all
- People focused: We value the contribution of each individual and are committed to encouraging and supporting our people
- Empowerment: We are committed to the participation, involvement and development of residents, Board members, employees and other stakeholders

Equality & Diversity policy statement and strategy objectives

Two Castles is committed to:

- Communicating our commitment to Equality & Diversity, and our progress towards it
- Increasing and using our understanding of our customers
- Improving the accessibility of all our services and empowering our residents
- Ensuring our stakeholders (staff, residents, contractors etc) are representative of the communities we serve
- Monitoring customer satisfaction by diversity groups to ensure that we deliver fair and equal services
- Researching and developing good practice and innovation in Equality & Diversity
- Developing training for our stakeholders in Equality & Diversity to ensure they deliver to our high standards
- Ensuring that our contractors comply with our approach to Equality & Diversity
- Monitoring our services, staffing and employment in relation to diversity issues and acting to reduce any evident unfairness.

We recognise that Housing Association households contain higher than average proportions of people who can experience discrimination and other social disadvantage. Examples include:

- People from Black and Minority Ethnic (BME) communities
- People with disabilities and mobility problems
- Older people

- People with learning difficulties and/or mental health issues
- Those experiencing domestic violence
- Those with religious differences.

In addition to fulfilling our statutory responsibility to promote equality of opportunity in all our activities, we are committed to developing an organisational culture which values people from all sections of the community and the contribution each individual can make to our work.

This strategy is the embodiment of our approach to Equality & Diversity and it will be reviewed and monitored by the Board to demonstrate our commitment at the highest level in the organisation.

The strategy has a two-fold purpose:

- It is a clear and public statement of our commitment to working towards achieving excellence in this area of our work
- It is a guide for employees, customers, residents, partners, consultants and contractors. It points out what they can expect from us and what we expect from them. It clarifies duties and rights.

Two Castles' Housing Association recognises that discrimination creates barriers to equality. The Equality Act 2010, which was enacted (became law) in October 2010, states that all public bodies and those carrying out public functions have a statutory duty to ensure that equality is promoted and discrimination challenged in everything that the Association does.

Whilst we recognise that we are not currently classified as a public body in all that we do, this strategy demonstrates how we will meet the requirements of the Equality Act.

We want to ensure that our policies, procedures and working practices, in both employment and service delivery, reflect our commitment to achieving equality of opportunity. They will support our commitment to remove all direct and indirect discrimination, and eradicate any harassment or victimisation which may occur. We will not tolerate anti-social behaviour, including harassment, hate crime or domestic violence towards our customers or staff.

We are proud of our commitment and record on equalities. We have made progress in the work that we do, and we want to continue to build on our equality schemes currently in place on disability, race and gender and embed equality so that it is at the heart of all that we do.

Links to other strategies and policies

Our Equality & Diversity strategy is not intended to be viewed in isolation as it directly links to many strategies and policies that we already have in place. Listed below are some key examples of such strategies and policies:

- Corporate Plan
- Asset Management strategy
- Value for Money strategy
- Resident Involvement & Empowerment strategy
- Anti-social behaviour policy
- Vulnerable persons policy
- Harassment policy.

Section 2 Context

National context

Listed below are some national figures and statistics relating to different diversity profiles:

- BME people are more likely to live in social housing and more likely to suffer from bad housing conditions such as overcrowding
- Although there are more than 11 million disabled people in the UK, disabled people are still more than twice as likely to be out of work than non-disabled people
- 60% of over 85 year olds live alone
- Older people are twice as likely to be in fuel poverty
- Approximately half of all the accidental dwelling fire deaths in England and Wales occur among the over 60s
- Over 65s will increase by 2 million by 2015
- Over 85s will increase by 85% by 2031
- By 2026, 10% of the population will be over 75 years of age
- Despite progress since 1997 to reduce the gender pay gap, women still earn, on average, 23% less per hour than men
- 70% of people employed in local government are women but only 17% of chief executives are women
- A quarter of all violent crime is domestic violence against women by their partner or ex-partner
- The vast majority of single, homeless people are men.

Two Castles' context

During 2009-10 we carried out customer profiling of all our residents, Members, staff, and Residents' Panel to better understand and compare their diversity.

Residents

Two Castles has approximately 3,500 properties spread across the North of England, in more than 20 different local authority areas. In March 2011 we held customer profile data on 2,022 of those properties (approximately 60%), and this has given us information on 3,240 residents who are living in these properties.

Members

In January 2011 we carried out an Equality & Diversity survey of our 17 Members and received 15 responses (88%).

Staff

In June 2010 we carried an Equality & Diversity survey of all 115 staff and received 81 responses (70%).

Residents Panel

In November 2010 we carried out an Equality & Diversity survey of the 50 residents on the Residents' Panel and received 33 responses (66%).

Key Findings

Diversity strand	Main categories	Residents %	Members %	Staff %	Residents Panel %
Gender	Male	41	67	19	37
	Female	59	33	81	63
Age	Under 25 yrs old	27	0	2	0
	26-45 yrs old	21	0	48	3
	46-65 yrs old	22	33	50	52
	Over 65 yrs old	30	67	0	45
Disability	Some form of....	39	33	1	39
Ethnicity	White British	97	100	93	100
Religion/belief	Christian	74	87	70	82
Sexual orientation	Heterosexual	98	93	100	91

Section 3 Framework

Here we will set out our current approach, key objectives and priorities for Equality & Diversity across all aspects of the organisation.

In developing our framework we have used the Tenant Services' Authority's (TSA) 6 National Standards:

- Tenant Involvement and Empowerment
- Home
- Tenancy
- Neighbourhood and Community
- Value for Money
- Governance & Financial Viability.

Our local standards are set against our local context and population profiles, demonstrating that we are taking diversity into account when setting them. We will demonstrate that our customers have been involved in setting the local standards.

Within the TSA's framework, one of the principles relates directly to Equality & Diversity:

"We expect providers to understand and respond to the particular needs of their residents and to demonstrate how they have taken into account the needs of residents across the 6 diversity strands."

Within the Equality Act, The following nine characteristics are protected:

- Age
- Disability
- Sex
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation.

Standard 1. Resident Involvement & Empowerment

a) Customer Service & Choice

Our services, and information about our services, are designed and delivered to be inclusive of our customers' needs - as are the physical environments in which we deliver our services, be it our estates, regional offices or the public buildings we use to consult with our customers.

We already:

- Survey our customers in order to gather information about their diversity and needs
- Translate any information our customers might need if English is not their first language
- Provide home visits if some of our older, disabled or vulnerable customers require it
- Provide chaperoned visits where requested
- Re-launched our website so it includes and promotes a range of accessibility options including a language translator, audio browser and large print options
- Signed up for Language Line (a telephone based, foreign language interpretation service) on a pay as you go basis
- Reviewed and updated a range of our information leaflets and added language strap lines offering information in other languages
- Offer options for large print, audio, and translations on request.
- Have mobile induction loops for use in our Boardrooms, external meetings and other rooms.

b) Involvement & Empowerment

We are committed to making sure that residents' views are valued and acted upon. We want to make sure that all our residents have the opportunity to be involved. We have developed a range of ways for residents to become involved in shaping services to make sure that they meet the need of residents now and in the future.

We already:

- Consulted with staff, residents and the Board on this Equality & Diversity strategy
- Have a Resident Involvement & Empowerment strategy and action plan which our Residents' Panel was consulted upon and agreed
- Have a Residents' Panel who meet four times a year and is made up of over 50 residents from all the types of housing we have
- Have a resident who has been elected by the Residents' Panel to sit on our Board

- Have 3 residents who have been elected by the Residents' Panel onto each of our Regional Customer Services Committees
- Have a detailed resident involvement section on our website showing the range of involvement opportunities
- Have a resident magazine, Fanfare, which promotes opportunities for involvement. It is sent out to all residents every quarter and can be viewed on our website
- Sent out a Resident Involvement brochure to all residents in March 2010 which outlined a menu of different ways to get involved. This is now included in all new resident packs
- Offer to reimburse the costs to facilitate residents to attend meetings when residents have child or adult care responsibilities
- Hold meetings where resident representatives work closely with officers, such as focus groups, the Residents' Panel and Regional Committees
- Have scheme based meetings such as Residents' Associations, Leaseholder consultation events and housing officer surgeries
- Undertake a Two Castles' out-reach road show when we visit our schemes in a motor home to engage with residents who may not usually be involved or may have barriers to involvement
- Support a group of residents who undertake Mystery shopping and Tenant inspections
- Have an editorial panel for our resident magazine composed of residents and staff
- Choose venues that have disabled access for meetings, etc.

c) Complaints & Customer Satisfaction

Two Castles is committed to dealing with complaints from our customers in a clear, simple and accessible way. We have a number of ways that customers can complain, together with clear standards and procedures for how we deal with complaints and what our customers can do if they are not satisfied with our response.

We monitor customer satisfaction in a number of ways by carrying out surveys, listening to our residents and recording complaints and compliments.

We already:

- Produce a quarterly report for our Board and Regional Customer Service Committees showing our performance in dealing with complaints
- Produce an annual report outlining our complaints performance and the profiles of those people who have complained
- Carry out a three-yearly resident satisfaction survey, analysed by diversity group and carrying out actions to address any differences in satisfaction between diversity groups

- Carry out regular customer satisfaction surveys on key service areas.

Future plans under the Resident Involvement & Empowerment standard (a, b and c above) include:

- Increase the proportion of residents we hold diversity profile information for from 60% to 80%
- Monitor our service delivery by diversity strands and action any differences found between groups
- Improve the accessibility of our offices with regard to the Equality Act
- Monitor complaints and analyse them to see if we are discriminating against any particular groups, and take appropriate action if we are
- Publish and promote this strategy on our website, in the local press and through our resident magazine, Fanfare
- Increase and promote diversity through our website and magazine
- Inform stakeholders and partners of our new strategy through established mechanisms
- Continue to develop the range of formats we use to communicate information about our services, including letters (large print), audio, leaflets, photographs, typetalk, texting, emails and our website
- Ensure all staff understand how to use Language Line, access translation and interpretation services
- Equip staff with tools to improve service delivery where diversity issues arise such as a staff diversity guide and portable hearing loops
- Compare the profile of residents who are involved with Two Castles consultations with our customer profile information and identify and carry out actions to improve the representativeness of the Residents' Panel
- Train the Residents' Panel in Equality & Diversity issues.

Standard 2. Home

This standard covers the two areas of:

- Quality of accommodation
- Repairs and maintenance.

We aim to ensure our homes are warm, weatherproof and have modern facilities. Our repairs and maintenance service will respond to the needs of residents and offers choices to them. All our homes must also meet the statutory requirements for health and safety, the current Decent Homes standard and in the future the new Two Castles standard which is currently being developed.

We recognise the benefits of working in partnership and are involved in many partnerships, both formal and informal. We will ensure that our objectives in relation to Equality & Diversity are not compromised and we wish to ensure that contractors and consultants are committed to diversity in service provision.

We already:

- Work closely with our partners and contractors to ensure that our high standards relating to our customers' diverse needs are embraced by them
- Make sure for those people with disabilities that we make best use of our adapted properties
- Carried out a survey of over 500 of our residents requesting adaptations to plan more effectively for future works
- Have an asset management working group of staff and residents who are involved in the assessment and decision-making process of procurement and delivery of contracted services
- Make sure that all new suppliers and contractors can demonstrate their commitment to Equality & Diversity at the pre-contract stage
- Provide assistance where it is needed for our smaller contractors to reach a level of compliance on Equality & Diversity issues

Future plans under the Home standard include:

- Use our customer profile data to develop a budget to reflect the adaptation needs of our customers
- Develop a procurement policy that ensures that diversity issues are considered and produce a contractor guidance manual on dealing with diverse communities
- Provide support to local service providers to enable them to compete for any services we tender for
- Have a non-discriminatory procurement process

- Monitor satisfaction with the aids and adaptations service
- Develop a register of adapted properties so we can match customer needs with property characteristics
- Carry out equality impact assessments for all new developments

Standard 3. Tenancy

This standard covers the three areas of:

- Allocations
- Rents
- Tenure.

To meet this standard we will ensure that our homes are let in a fair, transparent and efficient way, taking into account the housing needs and aspirations of residents and potential residents. The diverse needs of our residents and customers must be reflected in the choices we make available to them, and the support systems we put in place to help households to access our services.

We already:

- Have an allocations policy which sets out clear criteria for who we can and cannot house and the reasons why
- Record the diversity profiles of who we house and use this information to improve our service delivery to those who need it
- Have an allocations process which identifies and offers support to potentially vulnerable residents, including those with support needs, those who do not speak English as a first language and who have difficulties with written English
- Set our rents in accordance with the government's targets on rents taking into account our customers' diverse needs
- Publish clear and accessible policies on tenancy management
- Provide support services to vulnerable residents to enable them to stay in their homes and prevent unnecessary evictions
- Have introduced a "Choice Based lettings" system in the North West region to enable our customers to have more choice over our housing.

Future plans under the Tenancy standard include:

- Review the allocations policy with our residents to ensure issues of discrimination are addressed
- Record and use diversity information for all applicants in order to better understand our potential customers' needs
- Use our customer profile data to improve the support we provide to residents who are having trouble paying their rent
- Consider the profiles of our residents across all forms of tenure to ensure we are allocating our properties in a fair and non-discriminatory manner.

Standard 4. Neighbourhood and Community

This standard covers the three areas of:

- Neighbourhood Management
- Anti-social behaviour
- Local area co-operation.

We work with our residents and customers to improve the neighbourhoods in which we have homes and/or services. We also work in partnership with the broader local authorities and police forces in identifying solutions to any anti-social behaviour or local estate management issues.

We already:

- Have policies for anti-social behaviour, harassment and domestic violence which are regularly reviewed in consultation with our customers
- Work in partnership with a range of local agencies addressing anti-social behaviour, such as the police, community safety teams, fire service etc. We promote and support Credit Unions in both regions and have taken other steps, e.g a financial information DVD , to raise the profile of financial assistance among our residents
- Record all anti-social behaviour incidents that are reported to us and analyse them to identify and deal with discrimination and harassment
- Signpost residents suffering such incidents to appropriate support agencies locally and will report such incidents to the appropriate partners
- Attend meetings with stakeholders in local areas to input into partnership schemes where appropriate
- Are a member of Equality & Diversity networking groups in each region which inform us of good practice and enable us to share information.

Future plans under the Neighbourhood and Community standard include:

- Review our anti-social behaviour, harassment and vulnerable persons policies in line with current good practice
- Continue a multi-agency approach to address issues of hate crime and harassment
- Ensure all staff understand how to report incidents of racial harassment and hate crime
- Engage with relevant community and voluntary organizations that address diversity groups, e.g. Age UK, Disability Rights, Lesbian Gay Bisexual Transgender (LGBT), etc
- Promote positive action taken regarding incidents which are, for example, racist, homophobic or religiously motivated on our website and in Fanfare
- As part of our regional networking groups, establish a programme for benchmarking Equality & Diversity issues with other housing providers.

Standard 5. Value for money

Value for money is a cross-cutting standard in itself because it applies to all aspects of our business, from managing and prioritising resources internally to procuring services externally from partner organisations. It places an increasing emphasis on residents and customers being involved in how services are delivered and their costs, and the resultant service charges that are often passed down to the residents themselves.

We already:

- Have a Value for Money strategy which covers all areas of our business
- Have employed a performance management officer, who has significantly improved our use of our main IT system (IBS), which allows better management of our customer profile data
- Are members of HouseMark, a national benchmarking initiative, which helps identify good practice and savings across all areas, including Equality & Diversity.

Future plans under the Value for Money standard include:

- Improve the use of our customer profile data to plan more effective and efficient maintenance and repairs programmes
- Undertake a comprehensive Stock Condition survey to identify savings and priorities on major works to properties. This will improve our knowledge of how accessible all our homes are, and those that have been, and could be, adapted
- Introduce a more effective repairs appointments' service to identify and support all of our residents according to their individual needs.

Standard 6. Governance and financial viability

We want to make sure that we have effective governance arrangements and that our structures, systems and processes will deliver the best outcomes for our customers. In doing so we need to be transparent and accountable and comply with relevant legislation and regulatory requirements for all stakeholders. In achieving this, our resources must be effectively managed and our business viable.

To ensure that our Board, Committees, staff and Residents' Panel are representative of the customers we serve we will strive to attain similar representation across all these groups. Where we identify under-representation by certain groups, we will promote positive action schemes to counter this.

The Board

The Board has overall responsibility for our strategy, and the monitoring and scrutiny of Equality & Diversity. They are responsible for ensuring diversity targets are set and met and they monitor progress against our Equality & Diversity Action Plan.

Our staff

The Senior Management Team is responsible for ensuring systems are in place to deliver all of our Equality & Diversity targets. They also have operational responsibility for ensuring the implementation of the action plan through the management of service managers, who are responsible for front line delivery of services.

All our staff have a duty to represent the company in an appropriate manner. We expect our staff to follow our policies and procedures, and when necessary refer to the Equality & Diversity Strategy or seek advice and assistance. We will provide appropriate training and support to ensure that our staff are able to deliver and promote equitable services and embrace diversity.

Residents

Our residents' input into the strategy and action plan is consultative. The Service Improvement Group for Equality & Diversity consists of residents and staff who are consulted on matters relating to diversity issues. The Residents' Panel also has a regular input into all areas of our business through its quarterly meetings, and this will include Equality & Diversity issues as need be.

Training

The provision of appropriate training and learning will be key to the effective implementation of the strategy and in embedding equality throughout the Association. The Association is committed to ensuring that appropriate information

and training is available to all, to adequately take into account the responsibilities, both organisational and individual, of all employees and members.

We already:

- Have a Board Champion for Equality & Diversity who leads in this area
- Have delivered Equality & Diversity training to the Board and Regional Customer Services Committees
- Have surveyed the diversity profile of the Board and Regional Customer Services Committees
- Have three of our six Core Values that relate to Equality & Diversity. All staff are expected to uphold these Core Values in everything that they do
- All staff undertake Equality & Diversity awareness training as part of their induction.

Future plans under the Governance and Financial viability standard include:

- Strive to achieve a Board and Committees with diverse backgrounds, skills and experience which broadly reflect the diversity of the communities that we operate in
- To ensure that all policies and decision making within the Association support Equality & Diversity objectives, and that changes agreed by the Board and Committees are fully impact assessed in terms of Equality & Diversity
- For all Board and Committee members to have received training on Equality & Diversity issues and refresher training at least once every two years
- Deliver Equality & Diversity training to the Residents' Panel
- Develop an Equality & Diversity handbook for all employees and members.

Section 4 Staffing and employment

Two Castles' Housing Association recognise that employees are the Company's most valuable resource and that the effectiveness and quality of its services depends on the performance and skills of its employees.

We already:

- Carry out a regular staff satisfaction survey
- Operate a system of flexi-time working to support staff's individual needs
- Make childcare vouchers available to staff
- Undertake equal pay reviews
- Have job evaluation systems in place
- Monitor recruitment and selection of staff across diversity profiles
- Monitor the diversity profiles of grievances received from employees
- Monitor the diversity profiles of staff disciplinary actions that are taken
- Monitor the diversity profiles of staff leaving the organisation
- Have a Harassment and Bullying policy in place across the organisation
- Monitor the diversity profiles of staff access to training and promotion opportunities.

Future plans under staffing and employment include:

- Analyse staff satisfaction by diversity profiles and take action to reduce any unfair differences
- Ensure that our staff profile broadly reflects, at all levels, the diversity of the communities within which we operate
- Promote a customer focussed approach throughout Two Castles, where all employees are able to recognise and respond to the diverse needs of our customers
- Reward staff for excellent achievements in the area of Equality & Diversity and promote Equality & Diversity awareness and action through staff one to ones
- Create a working environment where all employees feel empowered and supported in challenging inappropriate discriminatory behaviour
- Develop support mechanisms for under-represented employee groups and those with special needs to promote their inclusion
- Ensure that our recruitment reflects equality of opportunity across all diversity strands.

Section 5 Monitoring and review

Monitoring and reviewing this strategy

This strategy and action plan will be reviewed every two years by residents, staff, the Board and our management team to ensure its relevance and effectiveness. A quarterly report showing progress in the key areas will be submitted to the Regional Customer Services Committees. In addition we will produce an annual Equality & Diversity Report showing how this plan is progressing and detailing the outcomes achieved, which will aid with the review of this strategy. This will be presented to the Board as well as the Regional Customer Services Committees.

Action plan

To ensure the delivery, monitoring and review of this strategy, and to underpin its higher level strategic priorities, there is an associated action plan which details the actions, timescales and responsible officers concerned. Actions will be monitored and reported to Board and Regional Customer Services Committees quarterly as mentioned above. In addition the action plan will be updated annually and reported through the above structures.

Equality impact assessments

Equality Impact Assessments will become an embedded feature of policy development and strategic/operational reviews of services. They ensure that decisions made about our services and/or developments have included consideration of all the diversity issues of those they may affect. This includes evaluation of barriers that may exist or which could have a positive/negative impact on any individual or group. If any adverse impacts are found to exist, an action plan will be produced to reduce them.

Equality impact assessments should be made publicly available once they have been carried out. To ensure that they are embedded in all our future procedures and reviews, we will do the following:

- Develop a three year programme for carrying out of equality impact assessments of all existing policies and procedures and publish the programme on our website
- Identify a list of stakeholders for each of the diversity strands, who can be consulted to assist with EIAs and related issues
- Deliver a programme of training for all Board and relevant staff in understanding and, where appropriate, completing equality impact assessments
- Ensure all new services, developments, policies and procedures have Equality impact assessments carried out as standard.