

Equality & Diversity (E&D) Strategy 2018-21



Introduction

The Equality Act 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.

Castles & Coasts Housing Association (**CCHA**) operates across a wide geographical area. We are committed to ensuring we understand who our customers are, what their needs are and that our services are delivered in a flexible and diverse way, taking into consideration the needs of all customers. We are equally committed to ensuring equality of staff and key stakeholders.

The strategy and associated Delivery Plan, sets out how we will encourage, value and deliver diversity as an employer and service provider in line with government legislative and the Regulatory Standards. It is also aligned to our Corporate Strategy 2018-23.

Our Corporate Values of Accountability, Respect, Honesty, Quality and Fairness are particularly relevant to this strategy.

Relevant Corporate Objectives:

- Customer: To deliver high quality services to residents and prospective residents
- Organisational Development/Staffing: To be an attractive employer for both existing and prospective employees – to recruit, develop and retain staff who will add value to our business.

Relevant Cross-cutting objective: E&D.

We will ensure our policies, procedures and working practices, for 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. We will not tolerate anti-social behaviour, including harassment, hate crime or domestic violence towards our customers or staff.

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.

Strategic Aims

- To make a commitment to E&D, supported by a clear Delivery Plan
- To provide high quality services that are accessible to all and continuously improving to meet the changing needs of our customers
- To encourage and facilitate involvement from our customers in shaping the delivery of high quality and accessible services
- To gather and securely hold E&D-related data on our customers, employees and Board Members, and use this to identify areas for future service improvement

- To recruit, develop and retain a diverse, talented and motivated workforce that reflects the communities we work with
- To embed a culture of equality within CCHA.

Delivery

Delivery of the strategy will be devolved into 4 objectives:

1. Understanding our customers and their needs
2. Delivery of diverse and appropriate services to customers
3. Embedding an equality culture across CCHA and our delivery partners
4. Ensuring diversity in our workforce.

Objective 1: Understanding our Customers

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

- Recent migrants
- Those who have experienced trauma, such as domestic violence or political intimidation
- People with disabilities, e.g. sight, hearing, speech and mobility
- Older people
- People with learning difficulties and/or mental health issues
- People from Black and Minority Ethnic communities
- Those with minority religions and beliefs.

In order to ensure the services we deliver are inclusive and meet the needs of our diverse customers, an initial large-scale customer data exercise is required in order to widen and enhance the data sets we hold, as these are currently incomplete, outdated and therefore unreliable. This data will then be used alongside geo-demographic data from our communities to provide a profile of our customers and the communities in which they live.

By undertaking this data exercise, we will have more accurate data available to us to understand our customers, the communities in which we operate and how we can further shape and improve our services to meet their needs. This information will be kept up to date for new customers and will be validated and updated, as necessary, upon contact with customers. It is anticipated that an exercise will be required every 5 years to ensure the data we hold is relevant and up to date. This exercise will be carried out in line with General Data Protection Regulation requirements.

Objective 2: Delivery of Diverse and Appropriate Services to Customers

The Regulatory Framework states that Registered Providers must demonstrate that they understand the different needs of customers.

Our customer data exercise, and the subsequent data held by the Association, will help us to understand who our customers are and ensure our services are appropriate to meet the needs of all customers. In order to ensure our services are appropriate, we will gain continuous feedback from our customers and use this to ensure a flexible and appropriate service offer is in place for all customers.

CCHA has a flexible and accessible service offer in place which offers choice for our customers; our services can currently be accessed in a range of ways to suit customer needs:

- Telephone
- Face to face
- Self Service Portal
- Email
- Text
- Website

We will continue to build on this service offer to ensure our services are accessible and easy to use for all customers. Our Customer Feedback Policy and Customer Experience Strategy set out how we will use feedback from customers to continually improve our services to meet the changing needs of our diverse customer range. We will encourage and use feedback from all the services we deliver to ensure they are appropriate to the needs of our customers. When gaining this feedback, we will ensure diversity information is captured and will look for trends to ensure our services are inclusive and are not discriminatory.

Our Resident Involvement Framework will encourage a diverse range of customers to become involved in shaping our services, the framework is delivered in a range of ways to suit customer needs, customers can be involved by telephone, email, face to face or text to allow more customers to be involved.

CCHA already has a number of mechanisms in place to ensure equality in the delivery of our services.

We Currently:

- Equip staff with tools to improve service delivery where diversity issues arise, such as our staff handbook
- Survey our customers to gather information about their diversity and needs
- Provide home visits for those customers who require
- Provide chaperoned visits is required
- Include a range of accessibility options on our website and other written communications, including high contrast and large print options
- Use Language Line (a telephone based, foreign language interpretation service)

- Include language strap lines offering information in other languages on general written information, e.g. leaflets and magazines
- Offer options for large print, audio, and translations on request
- Have hearing loops in our boardrooms, and mobile ones for other rooms and external rooms
- Make sure we make best use of our adapted properties for customers with disabilities
- Have a clear assessment process in place for customers' with adaptation needs
- Have a non-discriminatory procurement process
- Make sure that all new suppliers and contractors can demonstrate their commitment to E&D at the pre-contract stage
- Provide assistance where it is needed for our smaller contractors to reach a level of compliance on E&D issues
- Involve customers in the assessment and selection of contractors
- Monitor satisfaction with the aids and adaptations service
- Develop our register of adapted properties so we can match customer needs with property characteristics
- Share our staff E&D guide with our contractors
- Have a customer magazine, which promotes opportunities for involvement. It is available in multi-channel formats to meet customer preferences
- Have an editorial panel for our customer magazine, composed of customers and staff
- Ensure our homes are let fairly, transparently and efficiently, taking into account the diverse housing needs and aspirations of customers and potential customers, giving them choices and support systems to help them access our services
- Have an allocations process which identifies and offers support to potentially vulnerable customers, including those with support needs, those who do not speak English as a first language and who have difficulties with written English
- Publish clear and accessible policies on tenancy management
- Provide support services to vulnerable customers to enable them to stay in their homes and prevent unnecessary evictions
- Use "Choice Based Lettings" systems in the North West and parts of the North East to give customers more choice over their housing
- Make our services more accessible for customers with young families or working (time poor), e.g. direct debits and website portal, so customers can check rent accounts online and do transactions out of hours, card payments by phone, online banking, and website enabled for mobile devices
- Have a policy for Anti Social Behavior (**ASB**), harassment and domestic violence which is regularly reviewed with our customers and compared with best practice
- Work in partnership with local agencies addressing ASB, e.g. the police, community safety teams, and fire service
- Record all ASB incidents reported to us and analyse them to identify and deal with discrimination and harassment
- Signpost customers suffering such incidents to appropriate support agencies locally, and report such incidents to appropriate partners
- Attend meetings with local stakeholders to input into partnership schemes
- Are a member of E&D networking groups which inform us of good practice and enable us to share information
- Ensure all staff understand how to report incidents of racial harassment and hate crime

- Set our rents in accordance with the government's direction and any rent standard guidance, taking into account our customers' diverse needs
- Are members of HouseMark, a national benchmarking initiative, which helps identify good practice and savings across all areas, including E&D
- Undertake a comprehensive Stock Condition Survey to identify savings and priorities on major works to properties. This is improving our knowledge of how accessible all our homes are, and those that have been, and could be, adapted
- Have a repairs appointments service which identifies and supports our customers according to their individual needs.

Objective 3: Embedding an equality culture across CCHA and our partners

In order to meet our objectives, it is important that the Board, staff and contracting partners of CCHA have an embedded culture of equality. To deliver this, we will ensure members of the Board and staff receive E&D training and an employee handbook is available to assist staff. We will also ensure our contractors understand and meet our equality requirements and are also provided with a copy of our handbook to follow. We will also have a Board Champion for E&D who leads in this area.

We will ensure staff understand the profile of our customers and what is expected of them in the delivery of our services to ensure equality is embedded in our culture. Specific diversity topic training will also be held with appropriate staff to ensure they understand and can provide support to our diverse customers, for example Dementia Friends Training within our Sheltered & Supported and Housing Teams. We will also keep staff informed of, and give them opportunities to participate in, local diversity related events.

In order to effectively communicate our equality commitment, we will publish the strategy and Delivery Plan to our staff and communicate our equality aims to customers to raise awareness of our objectives.

Objective 4: Ensuring Diversity in our Workforce

Our employees are the Association's most valuable resource; the effectiveness and quality of our services depend on the performance and skills of our employees.

- In order to attract and retain a diverse workforce we will carry out regular staff satisfaction surveys, analysed by diversity strands, and take action to reduce any unfair differences. It is our aspiration to ensure that our staff profile broadly reflects, at all levels, the diversity of the communities we serve.

We already:

- Operate a system of flexi-time working to support staff's individual needs,
- Make childcare vouchers available to staff,
- Undertake equal pay reviews,
- Have a job evaluation system in place,
- Monitor recruitment and selection of staff across diversity profiles,
- Monitor the diversity profiles of staff leaving the organisation,

- Have a Harassment and Bullying policy in place across the organisation,
- Promote a customer focussed approach throughout CCHA, where all employees are able to recognise and respond to the diverse needs of our customers and each other,
- Create a working environment where all employees feel empowered and supported in challenging inappropriate discriminatory behaviour.

Monitoring & Review

The Board has overall responsibility for the strategy, the monitoring and scrutiny of E&D to assist with this process, the Board have appointed an E&D Board champion. They are responsible for ensuring diversity targets are set and met and monitoring progress against our E&D Delivery Plan.

The Customer Experience Manager is responsible for ensuring delivery of the associated Delivery Plan which can be found within Appendix 2; it sets out key deliverables and associated timeframes. The Delivery Plan will be updated on an annual basis; this strategy will be reviewed every three years by the Board to ensure its relevance and effectiveness. We will produce an annual E&D Report for the Board, showing how the Delivery Plan is progressing and detailing the outcomes achieved, which aids the review of this strategy.

Delivery plan

To ensure the delivery, monitoring and review of this strategy, there is an associated Delivery Plan which can be found within Appendix 2. This details the actions, timescales and responsible officers concerned; as above, the actions are monitored and reported to the Board annually.

Equality Analysis

Equality Analysis will become an embedded feature of policy development and strategic/operational reviews of services. It ensures 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. We have delivered a programme of training for all Board Members and relevant staff in understanding and, where appropriate, completing equality impact assessments. To ensure that they are embedded in all our future procedures and reviews, the Board will ensure that all new services, and appropriate policies and procedures have Equality Analyses carried out.

References

Our E&D Strategy directly links to the following Strategies, Policies and Legislation:

[Corporate Strategy 2018-23](#)

[Customer Experience Strategy 2018-23](#)

[Customer Feedback Policy](#)

[Asset Management Strategy](#)

[Value for Money Strategy](#)

[Anti-Social Behaviour Policy](#)

[Warnings and Vulnerabilities Policy](#)

[Harassment and Bullying Policy](#)

[E&D Handbook](#)

Equalities Act 2010

Regulatory Standards