

<b>MANAGEMENT COMMITTEE</b>	
<b>Date of meeting</b>	<b>30<sup>th</sup> August 2007</b>
<b>Agenda item</b>	<b>9</b>
<b>Purpose</b>	<b>DECISION</b>
<b>Author</b>	<b>Robert Dobbs</b>

<b>REVIEW OF EQUALITIES &amp; DIVERSITY</b>
---------------------------------------------

<b>PURPOSE OF REPORT</b>
<p>To update the Management Committee on Equality and Diversity at Co-op Homes including performance in complying with the regulatory code and our Equality and Diversity Strategy.</p>

<b>RECOMMENDATIONS</b>
<p>The Management Committee is requested to:</p> <ul style="list-style-type: none"> <li>i. Review Co-op Homes' performance on Equality and Diversity.</li> <li>ii. Confirm the priorities for 2007-08 as set out in 4.1</li> <li>iii. Agree the revised strategy in appendix 1</li> </ul>

<b>IMPLICATIONS</b>		<b>Report reference</b>
<b>Environmental</b>	None	-
<b>Equalities</b>	Yes	Whole Report
<b>Financial</b>	None	-
<b>Personnel</b>	None	-
<b>Policy</b>	None	-
<b>Stakeholder consultation required</b>	None	

## 1.0 BACKGROUND

1.1 Co-op Homes adopted a revised Equality and Diversity Policy and new Strategy in September 2006. As part of the Equalities and Diversity review carried out last year the Management Committee agreed to receive an annual report on Equality and Diversity that also includes performance in complying with the Regulatory Code and the Equality and Diversity Strategy.

1.2 In summary the main approach of our Strategy is to:

- Ensure our policy is reflected in day-to-day practices of staff throughout Co-op Homes.
- Achieve the standard set out in the Housing Corporation Code.
- Bring our Equality and Diversity practices into line with RHP where appropriate
- Support where possible Equality and Diversity work in the community in which we work

The strategy is attached as **Appendix 1**

1.3 The purpose of this review is to enable the Committee to decide whether or not the strategy is enabling Co-op Homes to:

- Meet the Housing Corporation regulatory requirements.
- Further the aims set out in the Equality and Diversity Strategy.
- Improve our performance in relation to equalities and diversity.

1.4 In addition this review will help the Committee decide how the strategy should evolve to respond better to the changing needs and expectations of our customers, other stakeholders and the legislative environment.

1.5 The main legislative changes relating to equalities and diversity since the last report are new provisions under the Disability Discrimination Act (DDA) introduced in December 2006, and requirements on age discrimination. Co-op Homes' has adopted RHP's human resource policies in this regard to ensure that they comply with the new legislation relating to age discrimination. A review of our approach to services for people with disabilities will be carried out in quarter three and as part of this we will review our compliance with the DDA. We are also working with RHP on developing a Group Disability Equality Scheme which we will make recommendations to the Committee about in our next report due in 2008/09.

1.6 The Audit Commission as part of their inspection of Co-op Homes in January this year made two recommendations relating to equalities that have now been achieved. These are:

- Ensuring that contractors comply with the equal opportunity requirements of Co-op Homes and that this compliance is periodically monitored
- Monitoring performance against all diversity targets and reporting this regularly to customers and to the Management Committee.

1.7 The structure of this report follows the main headings relating to equalities as set out in 1.2 above. Finally, the report summarises the key priorities for 2007-08.

**2. REVIEW OF PROGRESS AGAINST THE EQUALITY & DIVERSITY STRATEGY**

**2.1 Ensure our policy is reflected in day-to-day practices of staff throughout Co-op Homes.**

2.1.1 The Tenant Needs survey in December 2006 identified that a very high percentage of Co-op Homes tenants are BME (42%). This reflects the high percentage of BME in the west London Borough's where Co-op Homes has most of its properties. However, this data is being reviewed as part of the work to update stock condition information and equalities targets will be reviewed after this.

2.1.2 The table below sets out the performance against areas where we agreed we would monitor performance as well as those that are regulatory requirements.

Measure	Target	2006 /07 performance	Level of compliance
Percentage of lettings to BME households	35%	36%	COMPLIANT
Percentage of CHS staff, from a BME group	25%	29%	COMPLIANT
Percentage of repairs ordered from BME tenants	42%	36%	NEARLY COMPLIANT
Carry out initial investigation of racial harassment	Within one day of being reported	100%	COMPLIANT
Major contractors etc are aware of and comply with EOP	100%	100% (10 Companies)	COMPLIANT
Percentage of Resident Association members from BME	32%	30%	NEARLY COMPLIANT
Percentage of Management Committee Members from BME	25%	20%	NEARLY COMPLIANT
The same proportion of BME customers satisfied compared to non-BME	70%	84% BME* 79% NON-BME	COMPLIANT

\*Based on phone survey December 2006

2.1.3 Co-op Homes' performance is good for the majority of the regulatory targets for BME with monitoring systems in place for areas where we are currently not at the required level. The Management Committee is currently reviewing its composition and as part of this exercise will consider the level of BME membership.

2.1.4 The level of repairs reported by BME residents is below the target figure. However, more work is being done to update the IT management system so that all tenants are coded so that we can monitor all repairs as a number are still showing as having no ethnic code. This exercise will be done once we have the updated information carried out when the stock condition surveys are carried out.

2.1.5 Performance is now monitored against all diversity targets as recommended by the Audit Commission inspection. This performance will be summarised and reported to tenants through the next edition of Word on the Street, the website and to Tenant Management Groups for their information and comments.

## 2.2 Meeting the needs of BME people

2.2.1 The 2006 Tenant Needs and Satisfaction Survey (TNSS) showed that BME households were more satisfied with the main housing services than non-BME households 74% against 79%. The material differences appear at either end of the spectrum with significantly less BME households very satisfied and significantly more very dissatisfied. Overall the results do not present a significant cause for concern. The main reason for dissatisfaction among BME is overcrowding but Co-op Homes is unlikely to be able to address this by increasing its permanent stock. Again a slightly higher percentage of BME households believe the service is improving compared to non-BME households, 46% against 39%.

2.2.2 Lettings: We monitor lettings to ensure equivalent quality of stock let to BME households as for non-BME households as well as the relative proportion of properties let comparing demand/representation within community/representation within stock from each group.

### 2.2.3 Anti-social behaviour:

Need stats on what we have from the May report.

One of our main tasks this year was to bring the service fully into compliance with the ODPM Code of Practice. The included producing an information pack for victims of harassment and racial incidents, training frontline staff on taking witness statements, improving the systems for reporting and recording incidents and publicising our commitment to tackling anti social behaviour / racial harassment in Word on The Street.

### 2.2.4 Complaints:

The majority of complainants class themselves as white British and this is in line with the proportion of tenants who we know are from this group.

<b>Ethnic Origin</b>	<b>Complainant – Quarter 4 06/07</b>	<b>Complainant – Quarter 1 07/08</b>
African	0	0
Asian	0	0
Asian British Indian	0	0
Caribbean	0	0
Combination	0	0
Irish	0	0
White Irish	1	1
Other Black British	0	0
Other Mixed Background	0	0
Other White Background	0	0
S E Asian	0	0
White British	2	9

Co-op Homes

White Caribbean	0	0
Other	0	0
Not known	6	3
<b>Ethnic Group</b>	<b>Complainant – Quarter 4 06/07</b>	<b>Complainant – Quarter 1 07/08</b>
White British	22%	69%
BME (All)	11%	8%
Not known	67%	23%

2.2.5 Resident Involvement: A disappointment for the year was the lack of success in forming a BME resident group despite efforts to attract prospective members. However, we are considering alternative options (such as representation through the Customer Reference Panel) but it is noteworthy that participation from BME groups increased in the year.

2.2.6 Accessible services: The interpretation and translation service is well embedded and is promoted through a range of methods.

Work is currently being carried out on our Reading office to ensure that it is accessible and this is due to be completed by September.

One of the main tasks for this year was obtaining a complete data set on the ethnicity of our customers and any needs they might have. This is stored on the housing management system data base. This information will be reviewed so that we are better able to identify use and take-up of services. This means we can respond to unmet needs without bothering customers with completing an ethnic monitoring form every time they contact us. So far this year we have collected data from 47% of our permanent customers with tenancy verification visits and information was collated from the majority of our permanent and temporary customers in a tenant's needs survey at the beginning of 2006. However, we recognise there are gaps in the information we have and we are going to undertake a further survey in parallel with the stock condition survey of permanent homes that is due to commence in August.

### 2.3 Contractors and agents working on our behalf

2.3.1 We have contacted all of the main contractors we use to assess their compliance with either their own or Co-op Homes' policy on equalities and diversity.

2.3.2 All of the main contractors used by Co-op Homes have been contacted to assess their compliance with either our or their equal opportunities requirements.

2.3.3 Of the 39 large contractors we use 10 have responded and are compliant and a further 29 have stated that they are in the process of responding. Of the smaller contractors 71 have returned completed forms confirming their compliance. Where a contractor continually fails to respond to our request for information or does not comply with their own or our equal opportunities policy we will not use them until such time they do comply.

## 2.4 **Service delivery**

2.4.1 Co-op Homes is striving to deliver good services to all of its customers and there is clear evidence that this is now happening. Performance in most of the key indicators for the first quarter is either at or close to target. Satisfaction from customers through on-going surveys is strong and there is a growing culture throughout the organisation to deliver quality services.

2.4.2 At Co-op Homes we know that most of our services to people are already of a decent standard. The challenge presented by equality and diversity is to use our understanding of people's needs to be constantly adapting and improving these services so that they better fit individual needs. Over the last year there are many examples where we have striven to be above average:

- Carried out over 100 home visits in the year that are primarily targeted at vulnerable people.
- Carried out adaptations to tenants' homes so that they can live independently without the need to be re-housed.
- Worked with local authorities to sustain tenancies where they are failing due to issues of vulnerability
- Introduced a programme of new tenant visits to ensure any unmet needs are addressed.
- Contacted BME groups working within the Hounslow area to promote the support and advice that can be provided to Co-op Homes BME tenants.
- Provide a translation information leaflet with mailings where this is appropriate.

## 2.5 **Achieve the standard set out in the Housing Corporation code**

2.5.1 Co-op Homes complies with the regulatory code for BME households and overall there is a framework for continuous improvement in this area.

2.5.2 One action point remains outstanding from last year. This is the introduction of self assessment health checks to demonstrate primary Co-ops are involving all tenants in their activities and the management of their organisations.

## 2.6 **Bring our Equality and Diversity practices into line with RHP where appropriate**

2.6.1 Co-op Homes is represented on RHPs Equality and Diversity Working Group.

2.6.2 Equalities auditors from RHP are currently working with Co-op Homes to verify the equalities audit self-assessment. This will give a baseline indication of where the organisation is now and allow measurement of progress.

2.6.3 The Housing Team are leading on the audit as it is felt that it is not appropriate due to their small size and functions for other services to carry out individual audits. The equality audit is a tool for the manager and the team to benchmark their team's progress on key aspects of equality and diversity. This helps them to decide the level they should achieve, areas for improvement and to measure improvements made. The equality audit is

2.6.4 A recent audit by RHP 'equalities auditors' has shown that we have reached level one (out of five) with evidence of strong performance in a number of the other levels. They also recognised that there is a framework for continuous improvement regarding equalities and diversities. To understand the result it is important to bear in mind that equality audits measure not so much about what teams are doing to further equality and diversity but that they know and understand why they are doing it. The main elements are:

1. Awareness of the equality & diversity issues for the service
2. Clearly thought our equality & diversity objectives
3. A plan of action linked to the Corporate policy
4. Review of performance
5. Publicising the team's commitment to equality & diversity

Whilst it is important to note that the intent of staff is good, the result remains worrying because it is not good enough for a high degree of corporate level progress if this does not result in the team demonstrating a high degree of awareness of the issues and how they relate to the services they deliver.

## 2.7 **Support, where possible, equality and diversity work in the community in which we work**

- 2.7.1 Due to our relatively small size coupled with our dispersed stock supporting work in the community is an ambitious objective, but one which we are committed to nonetheless.
- 2.7.2 We continue to work with local authorities and the Police to tackle harassment and create safer neighbourhoods. We have encouraged tenants to get involved through articles in our quarterly tenant magazine.
- 2.7.3 We will be reviewing our approach to resident involvement in the autumn and look at how we can encourage a greater level of participation from all residents.
- 2.7.4 We have commenced a programme of consultation regarding the introduction of Estate Agreements at the summer round of Tenant Management Group meetings. This will be developed further at future meetings and a programme agreed to implement them on estates where there is a sufficient level of resident interest later this year.

## 3. **TIAA INTERNAL AUDIT OF EQUALITIES & DIVERSITY**

- 3.1 An internal audit of equalities and diversity at Co-op Homes was carried out in early August by TIAA the internal auditors. The report has yet to be published but the interim findings did not identify any areas of concern. A number of minor recommendations have been made and these will be responded to once the draft report is issued.
- 3.2 The draft recommendations are:

- 1 Even though RHP Group's HR section organises the mechanisms for communicating the equality and diversity strategy the Co-ops SMT should be aware of the methods used. The training programme being developed by the Chief Executive may address this issue.
  - 2 Some members of SMT are not aware of the location of the language / communications skills of staff.
  - 3 It would be prudent to get members to confirm their commitment to equalities and diversities when they make their annual declarations.
  - 4 Consider nominating a Board member or a SMT member as a champion for equality and diversity.
- 3.3 Members should note the third recommendation relating to the commitment of Committee members to equalities and diversity. The fourth recommendation will be carried out through nominating the Operations Manager as champion on equality and diversity issues.

#### **4. STRATEGIC PRIORITIES FOR 2007/08**

- 4.1 Taking into account the work carried out last year, the priorities for this year and until the strategy is reviewed in 2008 are:
  - 4.1.1 Each of the Service Improvement Plans for the three business streams has at least one Equality and Diversity objective as part of their service objectives for 2007/8
  - 4.1.2 Working with RHP's Equality Working Group to produce an improvement plan following the equality audit.
  - 4.1.3 The Housing Service is to achieve level 1 by the end of the financial year.
  - 4.1.4 Sharing and discussing results of surveys and questionnaires at Team meetings where there is information on BME data to raise awareness and identify solutions where performance is poor.
  - 4.1.5 Hold Equality and Diversity training session for all staff and for Committee members.
  - 4.1.6 Review our approach to services for people with disabilities through carrying out a best value review in quarter 3.
  - 4.1.7 Adopting a Group Disability Equality Scheme as jointly developed with RHP.
  - 4.1.8 Continuing to meet the Housing Corporation's regulatory requirements in this area
  - 4.1.9 Review how we are or should be meeting tenants needs after the updated tenants needs exercise being carried out at the same time as the stock condition data programme for permanent properties

#### **5. RECOMMENDATIONS**

- 5.1 The Management Committee is requested to:
  - 5.1.1 Review Co-op Homes' performance on equality and diversity.
  - 5.1.2 Confirm the revised monitoring standards and targets set out in 2.2.4 above.
  - 5.1.3 Confirm the priorities for 2007-08 as set out in 4.1
  - 5.1.4 Agree the revised strategy in appendix 1

**Appendix 1**

**CURRENT VERSION**

**Co-op Homes Equality & Diversity Strategy 2006-08**

The purpose of an Equality & Diversity strategy is to ensure we are constantly trying to live up to our policy aims and continuously seeking to improve.

To achieve and maintain an environment in which adherence to the principles of Equality & Diversity flourish requires an active rather than a passive approach.

At the same time Coop Homes has to take a sensible and pragmatic approach. This means only adopting measures that are commensurate with our size and scale of operation, and that represent clear benefits to the business.

Our key business is competing for agency work and managing the affairs of primary coops. To do this successfully our costs and ability to provide value for money are key success factors. While equality and diversity is important to us and our primary coop customers, it is not the most influential factor determining our ability to win and retain work contracts. It is not our aim, therefore, to be a top quartile performer in Equality & Diversity. Instead we intend to treat our customers fairly, demonstrate an understanding of their needs and where there is a good case for doing so, and provide a responsive service appropriate to their needs.

We came out of HC supervision in January following the merger with RHP and staying out is a core objective. In terms of Equality & Diversity this is best secured by ensuring we meet the Housing Corporation regulatory requirements.

RHP Group has an established Equality & Diversity strategy and consistently meets their legal, regulatory and policy obligations. As a bigger organisation they are able to invest more resources in Equality & Diversity and set themselves higher goals and targets. This has a number of advantages for Coop homes, such as cost savings and learning from best practice. These benefits are best realised by trying, as best we can to bring our policy into line with the RHP Group. Coop Homes will in future be represented on RHP Group's Equality and Diversity Committee

The Race Relations Amendment Act requires public bodies to promote positive relations between people. By regulation Coop Homes is expected to participate in meeting this requirement.

Taking all the above into account **our strategy over the next two years** should be:

- To ensure our policy is reflected in day to day practices of staff throughout Coop Homes
- To achieve the standard set down in the HC code
- To bring our equality and diversity practices into line with RHP where appropriate
- Support where possible Equality & Diversity work in the community in which we work.

Coop Homes has never had an equality and diversity strategy. However **this represents a strategy for the next two years.**

**PROPOSED REVISED VERSION**

**Co-op Homes Equality & Diversity Strategy 2006-08**

The purpose of an Equality & Diversity strategy is to ensure we are constantly trying to live up to our policy aims and continuously seeking to improve services to ensure they are accessible and meet the diverse needs and aspirations of individual customers.

To achieve and maintain an environment in which the principles of equality & diversity flourish through adoption of an active rather than a passive approach.

At the same time Co-op Homes has to take a sensible and pragmatic approach. This means adopting measures that are commensurate with our size and scale of operation, and that represent clear benefits to the business.

Our key business is competing for agency work and managing the affairs of primary co-ops. To do this successfully our costs and ability to provide value for money are key success factors. Equality and diversity is important to us and our primary co-op customers. Our intent is to treat our customers fairly, demonstrate an understanding of their needs and aspirations and, where there is an identified need and it is reasonable for us to do so, provide a responsive service.

We came out of HC supervision in January following the merger with RHP and staying out is a core objective. In terms of equality & diversity this is best secured by ensuring we meet the Housing Corporation regulatory requirements.

RHP Group has an established Equality & Diversity Strategy and consistently meets their legal, regulatory and policy obligations. As a bigger organisation they are able to invest more resources and set themselves higher goals and targets. This has a number of advantages for Co-op homes, such as cost savings and learning from best practice. These benefits are best realised by where appropriate to our scale and span of operations, bringing our policy into line with the RHP Group or adopting Group-wide strategies, policies and practices. Co-op Homes will continue to be represented on the RHP Equality and Diversity Working Group.

The Race Relations Amendment Act requires public bodies to promote positive relations between people. By regulation Co-op Homes is expected to participate in meeting this requirement.

Taking all the above into account **our strategy over the next two years** will be:

- To ensure our policy is reflected in day to day practices of staff throughout Co-op Homes
- To achieve the standard set down in the HC code
- To bring our Equality and Diversity practices into line with RHP where reasonable to do so
- Support where possible equality & diversity work in the community in which we work.