



Date: November 2007

Date of Review: November 2008

COMPREHENSIVE EQUALITY POLICY (CEP)

Statement of Commitment

South Lakes Housing is determined to promote equality and diversity to improve community well being in South Lakeland District.

We recognise that people who provide and use our services come from diverse backgrounds, with different experiences and needs.

We want our services to be accessible and useful to everyone and will take positive action to ensure equality and fair treatment so that individual needs are met.

As an employer, we want our staff and job applicants to feel valued and to believe that they are given equal chances, no matter what their background or circumstances.

This policy aims to ensure that no-one receives less favourable treatment because of race, ethnic origin, nationality, faith, cultural background, gender, sexuality, disability, domestic circumstances, illness, age, employment status, membership of trade unions or political beliefs.

Glossary

AWAZ – Voice and Social Network of BME Community in Cumbria

BME – Black and Minority Ethnic

CEP – Comprehensive Equality Policy

EIA – Equality Impact Assessments

LAA – Local Area Agreement

LGBT – Lesbian, Gay, Bisexual and Transgender

LSP – Local Strategic Partnership

SLEDP – South Lakeland Equality and Diversity Partnership

Harassment

SLH believes that residents have the right to live in their home without fear of harassment and that staff have the right to work without fear of harassment either from within the company or customers.

SLH will not tolerate or condone any kind of racial, sexual or other forms of harassment, including bullying. It has a number of other policy commitments which are relevant here:

- Racial Harassment Policy
- Domestic Violence Policy

- Hate Crime Policy
- Antisocial Behaviour Policy
- Dignity at Work Policy

The revised Tenancy Agreement soon to be published also makes it part of the tenants contract that harassment will not be tolerated.

Where any harassment does arise SLH will:

- Investigate and take appropriate action on all reported cases
- Arrange support for victims of harassment through referrals to appropriate agencies
- Monitor racial and other forms of harassment on an ongoing basis
- Where necessary, make arrangements to re-house victims of harassment where this is their wish
- Make proactive arrangements to advise tenants and prospective tenants that harassment will not be tolerated and that action will be taken where this does occur
- Remove graffiti that would incite harassment or racial hatred

Content of the CEP

The CEP is a major review of the original SLH Equality and Diversity Policy 2004 which was developed with tenants. The revision takes account of the new duties to produce a Race Equality Scheme, a Disability Equality Scheme and a Gender Equality Scheme (see section below on legislation). These are included in a single document together with a three year action plan (Appendix 2). Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process explained below.

Where possible this CEP takes on board all of the six equality strands – race, faith, age, gender, sexuality and disability. We also recognise that in South Lakeland, rurality is another factor that can overlay any of the other strands. It adds further obstacles from isolation, poor transport, difficulties of access to services.

The CEP uses the experience we have gained through partnership work with other agencies in Cumbria and also from developing our knowledge of our own tenants. This has informed our understanding of what are the priorities for SLH and which of our activities are most related to diversity issues.

SLH has actively participated in and learned from a number of research projects and consultations carried out through the Cumbria Equality and Diversity Partnership. These include

- The Cumbria Attitudes Survey 2004

- Housing Corporation research study into Living with a Disability in South Lakeland 2004
- Listening to our BME communities – consultation exercise in Cumbria 2005
- Follow up consultation 15 December 2005
- BME consultation event 2006

SLH was one of the founder members of the South Lakeland Equality and Diversity Partnership (SLEDP) which aims to develop an understanding of local diversity issues and create projects focussed on local needs. This group acts as the task group for the Local Strategic Partnership.

In June 2007 this group held its first consultation forum in the area. Comments and insights gained from this consultation have informed the Equality Schemes included later in this CEP.

The Community Profile

South Lakeland's main characteristics can be summarised in the following:

- Rural isolation
- Affordable housing problems
- A homogenous population (99.2% white British)
- A small but growing ethnic minority population (0.8%) -the largest group is Chinese
- Predominant religion Christian with less than 1% other religions (mainly Buddhist)
- A small but growing East European migrant worker population –mostly Polish
- High levels of prejudice
- An ageing population – 20% are retired – forecast for nearly 40% of population to be over 60 by 2021
- Loss of younger people.
- More women than men
- Higher than the national average long term illness
- Predicted increase in claimants for Disability Living Allowance and Incapacity Benefit.
- 6% gay/lesbian/bi-sexual/transgender

See Appendix 1 for comparison of community/SLH tenant data regarding ethnicity.

SLH Tenant Profile

- Higher proportion of elderly than in the wider community– nearly half of tenants are over 65yrs
- Higher proportion of retired (40%)
- Higher proportion of women (62.6%)
- Stable tenancies – 43% have been tenants for over 21 years
- 46% rely on state benefits.
- Higher proportion of disabled than in the community– 27.5% of tenants have a disability in addition to frailty associated with ageing

- Very few tenants from ethnic minorities (0.12%)– very few on waiting lists (24).

Conclusions from profiling

The small numbers of people from ethnic minorities must not lead us to ignore their needs. SLH may have few such tenants but must ensure it is giving fair access to its services. It can also play a part in promoting social harmony and reducing hate crime.

The high proportion of elderly people and those with disabilities make these equality strands of great importance both in the District and for SLH, for they already make up a large part of our core customers. It is relevant to how SLH manages resources and assets to support these groups and give them easy access to services.

The needs of young people are another prominent issue, especially in relation to the shortage of affordable housing, and future asset management by SLH. Young people's needs are in danger of being overlooked if they are only seen as a problem in estate management.

Gender is significant for SLH as it has many single parent families (predominantly a female parent) and elderly women on their own. Nearly 2/3rds of its tenants are female.

Faith and sexuality issues are not well understood and we must work harder here to understand their relevance to our activities.

Delivering national values

Equality Standard for Local Government (ESLG)

SLH commits to using the Equality Standard as a measure of its progress in diversity matters.

The Equality Standard has been developed by the Commission for Racial Equality, the Disability Rights Commission, the Equal Opportunities Commission and the Employers Organisation for Local Government. It gives a framework through which local authorities, including ALMOs, can begin to identify and address processes which may lead to discrimination, directly or indirectly, and work towards a culture that values diversity and has a far reaching awareness of equality issues.

The framework focuses on colour, race, ethnic origin, sex and disability but can be expanded to encompass all aspects of diversity where discrimination could occur, for example age and sexual orientation.

The central aim of the Standard is to incorporate equality issues into all policy and practice throughout the organisation in order to ensure every individual is given equal opportunity to access services and employment.

The standard sets out 5 levels for the organisation to achieve and detailed guidance in support of this. The 5 levels are:

1. Commitment to a Comprehensive Equality Policy
2. Assessment and Consultation
3. Setting equality objectives and targets
4. Information systems and monitoring against targets
5. Achieving and reviewing outcomes

SLH was judged at inspection in 2004 to have reached ESLG Level 1. SLH Business Plan 2007-11 sets out the target of achieving Levels 2 and 3 within 5 years. Our priorities now are to look rigorously at all our activities to remove discrimination and promote opportunity; doing this in consultation with tenants and partners.

Legislation

The CEP also complies with the following legislation:

Equal Pay Act 1970	CRE Code of Practice for
Sex Discrimination Act 1975	Employment
Race Relations Act 1976	Employment Equality (Religion &
(Amendment Regulations 2003)	Belief) Regulations 2003
Race Relations (Amendment) Act 2000	Civil Partnership Act 2004
Disability Discrimination Act 1995	Mental Capacity Act 2005
Human Rights Act 1998	Employment Equality (Age)
Commission for Race Equality (CRE)	Regulations 2006
Code of Practice for Rented Housing	Racial & Religious Hatred Act 2006
	Equality Act 2006

Delivering Community Values

SLH's priorities are determined by those expressed in a number of community strategic planning documents:

Local Strategic Partnership (LSP)

South Lakeland Community Strategy "A Shared Vision for the Future 2004-24"

"A Vision for Community Involvement: The community in South Lakeland will play a positive role in informing and influencing the processes which determine how decisions are made and how resources are used. In particular ways will be found to enable young people, people with disabilities and minority groups to become more involved."

"A Vision for Crime and Disorder Reduction: South Lakeland will remain a safe and secure place to live, work and learn without fear of crime and disorder."

The LSP has a number of Task groups which deliver the Community Strategy. SLH is active on the

- Community Involvement Task Group
- Children and Young persons
- South Lakeland Crime and Disorder Reduction Group.

The South Lakeland Equality and Diversity Partnership acts as another LSP task group. It also reports to the Cumbria Equality and Diversity Partnership.

Local Area Agreement (LAA) targets

The LSP is the delivery agent for the Local Area Agreement negotiated between central Government and the Cumbria Strategic Partnership. SLH's activities in the main do not contribute directly to the tasks and targets currently in the LAA. However, we make an indirect contribution, especially in relation to creating safer, stronger communities. These targets are referred to, where relevant, in the following Equality Schemes.

South Lakeland District Council

SLDC Comprehensive Equality Policy 2006-9

SLDC Housing Equality and Diversity Strategy 2005-10

These give the following priorities with which SLH should align itself:

- Improving Accessibility
- Promoting Equality of Opportunity and eliminating discrimination
- Monitoring Review and Accountability.

Priorities for Action

In line with the community strategies, SLH's priorities are

- Removing obstacles – improving access to services
- Removing discrimination – preventing harassment
- Improving our understanding of needs, monitoring our activities

The CEP Action Plan (Appendix 2) summarises our proposed actions for the next 3 years.

Equality Impact Assessments

In order to achieve Level 2 of the Equality Standard, SLH will examine all its activities for their impact on equality groups and carrying out proper consultation

Equality Impact Assessments (EIA) are a method for challenging the way we work to make sure our activities do not discriminate and that, where possible, they promote equality. It is a way to make sure staff members and teams think carefully about the likely impact of their work on different individuals and take action to improve services, policies, strategies and projects. It involves anticipating the consequences of these on the target groups and making sure that, as far as possible, any negative consequences are eliminated and opportunities for promoting equality are maximised.

The actions required to address any issues that arise from this process will be included in the Equality Action Plan and the annual SLH Delivery Plan. Appendix 3 shows the main activities carried out by SLH and lists the relevant strategies/policies/procedures. It assesses the relevance of these in relation to the equality duties and identifies risks and priorities. Appendix 4 shows the timetable proposed for a 3 year programme of impact assessments.

Consultation

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use the local advisory groups such as AWAZ (ethnic minorities) Gay Cumbria and the Cumbria Disability Network.

Monitoring and Reporting

Each of the following Equality Schemes states how it will be monitored.

We will review the CEP annually, report against the Equality Schemes every year and review the Schemes at least every three years.

South Lakes Housing Race Equality Scheme

This Scheme sets out SLH's commitment to equality regarding race, the context and what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

Race Equality Commitment

SLH is firmly committed to preventing discrimination relating to race and to promoting equality. We recognise that racism has a profound impact on the lives of tenants and residents of the district, especially given the small numbers of people from ethnic minorities living in the area and the lack of support communities. Negative assumptions about people based on their colour, accent, religion, dress, culture and ethnic origin create barriers that may prevent them from receiving appropriate housing services and access to employment and training opportunities.

We will seek to:

- eliminate racial discrimination
- promote equality of opportunity
- promote good relations between persons of different racial groups

Context

Although small, the ethnic minority population in South Lakeland has doubled since 1991, when 0.4% were non-white to 0.8% in 2001. Of SLH tenants, only 0.12% are non-white.

The Cumbria Attitudes Survey revealed that there is a high level of prejudice in the area, especially against people from minority groups.

A Black and Minority Ethnic (BME) Consultation exercise undertaken by the Cumbria Equality and Diversity Partnership in 2005 revealed that over 90% of the respondents felt that there was room for improvement in all the services mentioned including housing services. The main suggestions to improve the services were better communication, better translation service, plain English with no jargon and services that reflect the ethnic make-up of the community.

A number of comments and insights were gained at the South Lakeland Equality and Diversity Partnership (SLEDP) conference in 2007. Terms such as ignorance, lack of perception, lack of awareness, attitudes and complacency were prominent amongst people who raised issues. There was also the move to challenge these issues, further increase awareness through greater partnership working, wider education, celebrating diversity and mainstreaming race issues throughout strategic planning, policy and services.

Migrant workers

In the last 5 years there has been a significant and noticeable growth in the number of migrant workers in South Lakeland, predominantly from East Europe, working in the hotel and catering trades. Research by Voluntary Action Cumbria (Mapping of Advice and Support for Migrant Workers 2007) shows that there are strategic issues to be noted:

- The longer term aspirations for bringing families and settling will affect future demand for housing. Once migrants have qualified for residence in the UK they have the same rights for housing with SLH as other UK residents.
- Access issues relating to language and times of access to offices and meetings (migrants typically work long hours)
- Race/hate incidents

At the SLEDP conference these comments were made. The main issue was that of isolation; of people from the wider community, isolation of the wider community from migrant workers. Language, vulnerability and access to services, jobs and decent homes were also highlighted as big issues. As potential solutions, the breaking down of barriers was regarded as high, whether this be through training, education, better communication or support groups.

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (Appendix 2). Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

We will:

Service Delivery

- Continue to monitor lettings made to black and minority ethnic (BME) applicants
- Develop links with community organisations and other agencies to publicise our services to BME groups
- Ensure that translation and interpretation services are available to facilitate communication
- Continue our zero-tolerance of harassment

Employment

- Make sure staff composition is representative of the community.
- Avoid discrimination in where and how we advertise posts
- Assess our human resources policies to ensure equal treatment
- Provide opportunities for training and work experience to promote inclusion

Monitoring

We will monitor staff by reference to racial groups:

- the numbers of staff in posts
- applicants for employment, training, promotion
- benefited or suffered detriment as a result of performance assessment procedures
- are involved in grievance procedures
- are subject of disciplinary and complaints procedures

SLH Targets and Performance Indicators

- Best Value Performance Indicators 74, 74i and 75i. Measure the satisfaction of BME tenants with service and opportunities for participation.
- BVPI 164 CRE compliance
- BVPI 2 ESLG levels achieved.
- The 3-yearly STATUS survey of SLH tenants will be monitored for racial differences in response.
- Annual CORE Data - New Lettings Summary Statistics

Local Area Agreement targets

- % of people who feel their local area is a place where people from different backgrounds get on
- Increase the number of individuals from BME communities benefiting from the support of the Cumbria Multi-cultural Service
- Decrease the number of people who feel they do not have a positive attitude to minority groups

Reporting

We will report against the scheme every year and review the scheme at least every three years.

South Lakes Housing Gender Equality Scheme

The Equality Act 2006 placed a duty on public bodies to have “due regard to the need to eliminate unlawful discrimination and to promote equality between men and women”. This Scheme sets out SLH’s commitment to equality regarding gender, the context what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

Gender Equality Commitment

SLH is firmly committed to preventing discrimination relating to gender and to promoting equality. Without prejudicing men's rights to equality, the first priority will be to achieve equality of opportunity for women. Women can experience discrimination and disadvantage in terms of employment and service delivery, and may experience sexist behaviour both in public and in the home.

SLH will ensure that women receive:

- Equal access to services and resources
- Equal opportunity in employment, including career development
- Equal participation in the decision-making process

The Context

In the District more than half of the population is female. Yet for SLH tenants, there is an even greater proportion of women. This is highly significant for our services in relation to gender equality. Possible explanations are the number of elderly women who outlive their partners and the fact that more single parents are female.

	Women	Men
South Lakeland	51.6%	48.4%
SLH Tenants	62.6%	37.4%

The particular issues we need to consider are:

- Women tend to outlive men. This is especially significant bearing in mind South Lakeland has a particularly high (and growing) proportion of elderly and SLH has half its tenants over 60.
- More single parents are women and divorce rates are increasing.
- Inequalities in employment pay and opportunity for promotion.
- Caring responsibilities falling mainly on women resulting in lack of flexibility in employment and access to services; less opportunities for engagement
- Community safety – real or perceived insecurities – low level harassment
- Domestic violence and potential knock-on effect to homelessness.

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (Appendix 2. Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

Service Delivery

We will:

- Seek to make housing estates safer for women
- Work with partners in South Lakeland Crime and Disorder Reduction Partnership Work to encourage reporting of incidents in partnership with the Cumbria Domestic Violence Forum.
- Encourage the provision of non-housing services to help reduce discrimination e.g. providing childcare facilities at training events.
- Assess the different impact of policies and practices on both sexes
- Consider the particular needs of elderly women on their own and single parents.

Employment

We will:

- Strive to ensure staff composition is representative of the community.
- Avoid discrimination in where and how we advertise posts
- Assess our human resources policies to ensure equal treatment
- Provide opportunities for training and work experience to promote inclusion
- Gather information on how our work affects women and men, composition of our workforce, compare with local labour market information,

Assessing and Consulting

We have looked at all SLH functions and policies to see how relevant they are to equality regarding gender. These will be taken forward in more detail in future equality impact assessments. (see Appendix 3 for relevance and priorities.)

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use local advisory groups: Gay Cumbria, Cumbria Disability network and AWAZ (for ethnicity/race issues).

Monitoring

SLH Targets

- BVPI 225 for domestic violence.
- BVPI 11a % females in top 5% of earners

- Annual CORE Data - New Lettings Summary Statistics

We will monitor staff by reference to gender:

- the numbers of staff in posts
- applicants for employment, training, promotion
- benefited or suffered detriment as a result of performance assessment procedures are involved in grievance procedures
- are subject of disciplinary and complaints procedures

Local Area Agreement targets/indicators

- “Increase the number of domestic violence incidents reported annually to the Police.”
- “Increase the number of domestic violence incidents where an arrest was made.”
- “Increase the number of convictions for domestic violence incidents”
- Reduce the % of repeat victims
- % of people who feel their local area is a place where people from different backgrounds get on

Reporting

We will report against the scheme every year and review the scheme at least every three years.

South Lakes Housing Disability Equality Scheme

This Scheme sets out SLH's commitment to equality regarding disability, the context and what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

Disability Equality Commitment

People with disabilities can be prevented from taking a full and active part in their communities and may be denied equal access to services and employment. SLH is fully committed to preventing discrimination relating to disability and to promoting equality.

The legal definition of disability is a person who has 'a physical or mental impairment that has a substantial and long-term adverse effect on a persons ability to carry out normal day to day activities'. It will be helpful to bear in mind that disability can also include sensory impairments. Staff should remember to avoid generalisations.

The Context

In South Lakeland, the equality strands of Disability and Age should be looked at together as there is considerable overlap. Many elderly people do not regard themselves as having a disability, viewing their difficulty as merely a symptom of ageing. These will not be "caught" in surveys or monitoring systems. Therefore, the number of people who should be considered as having physical or sensory impairment will be much higher than statistics show.

The District has an aging population – the number of people aged 40 and under is significantly below the national average. Almost one in five people are retired, as opposed to one in seven nationally. Forecasts predict that those aged 65-74 will increase by 39.4% up to the year 2021 and those aged 75 and over will increase by 31.4%

The number of people in South Lakeland claiming incapacity benefit and disability living allowance is forecast to increase substantially over the next fifteen years.

The SLDC Housing Needs Survey undertaken in 2002 identified that 9899 households or 20% of all households in the District contain at least one household member who suffers from serious ill health or permanent disability. The same Needs Survey undertaken in 2006 showed the largest group having a disability are those with a walking disability but who are not wheelchair users.

There is a high requirement for adaptations of homes. The main priorities are accessible or special shower/bath/toilets, handrails improved access/ramps /doorways and stair lifts. Providing aids and adaptations is an important service provided by SLH.

Comments on disability issues made at the SLEDP conference centred around awareness, information, support and resources. All were regarded as lacking. Many thought that people with a disability were marginalized, regarded as invisible and in many cases branded as less capable. However, many felt that this was a particularly important issue in South Lakeland, mainly due to the ageing population in the area and the observation that many older people do not regard themselves as suffering from a disability. This issue was regarded as very important. Many noted the

problems of living in a rural area, the problems of accessible transport was further compounded by what many recognized as a 'postcode' lottery. Solutions ranged from improving the transport system, introducing electronic equipment to libraries for people with sight impairments and the increase in funding and resources.

SLH Tenants

Many of SLH's functions are geared to supporting people with disabilities and to enable them to continue independent living within the community. The table below shows the high proportion of tenants with mobility problems compared to the community.

The SLH database on tenants covers 86% of tenants. 27.5% have a disability, out of which the following disabilities pertain:

	SLH Tenants	SL District
Type of disability	%	%
Unseen health/medical problems	31	*
Mobility issues	25	6.1
Hearing problems	16.5	*
Other	12	*
Eye sight problems	7	*
Specific learning difficulty	3	*
Autistic spectrum disorder/Aspergers	0.5	*

* no data available

The database also reveals that tenants can have multiple disabilities or live with a partner who also has disabilities and/or is elderly. As noted above, many elderly people do not regard themselves as having a disability, viewing their difficulty as merely a symptom of ageing.

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (see Appendix 2. Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

Service Delivery

SLH is determined to achieve a consistent and fair delivery of services to meet the varied requirements of all residents, service users and employees, whatever their disability. We will:

- Improve understanding. Discrimination can occur through unwitting prejudice and stereotyping. Thoughtlessness often stems from ignorance, a lack of awareness or sensitivity to people's experiences. We will work hard with staff, customers and partners to improve our understanding of different needs, viewpoints and backgrounds.
- Train staff to be sensitive to differing needs and know where to seek information or help in dealing with issues as they arise.

- Promote positive attitudes
- Implement the Equality Standard for Local Government.
- Consult with tenants and a range of disability groups within the community to ensure their thoughts and views are considered in relation to the policy making process and the delivery of services.
- Encourage participation
- Seek to eliminate disability related harassment
- Continue to provide resources for adaptations and publicise adaptations to council properties to reach all those entitled to assistance
- Ensure offices are accessible for people with disabilities

- Continue to communicate with people through appropriate means, e.g. translated material, oral translation service, audiotapes, videotapes, braille and computer disks. We already offer alternative sources of documentation for the public, Braille, large print, 'Talking Newsletter' other languages, and a member of staff who can sign.

- Provide assistance to people who are unable to read or have other difficulties which prevents them receiving information

- Set targets for staff recruitment of people with disabilities and provide adaptations to the workplace where necessary

Employment

SLH will

- not discriminate in the areas of recruitment, selection and promotion on grounds of disability.
- provide learning and development activities to all employees irrespective of disability.
- Provide opportunities for people with disabilities to gain training and work experience
- make staff aware of the means of raising concerns about possible discrimination on grounds of disability.
- take action where there is evidence of harassment or victimisation based on disability.
- undertake exit interviews for staff who are leaving, one of the purposes of which is to ascertain the reason for leaving, and to identify any potential areas of discrimination.

Assessing and Consulting

We have looked at all SLH functions and policies to see how relevant they are to equality regarding disability. These will be taken forward in more detail in future equality impact assessments. (see Appendix 3 for table of relevance and priorities.)

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use local advisory groups: Gay Cumbria, Cumbria Disability network and AWAZ (for ethnicity/race issues).

Monitoring

SLH targets

- BVPI 16a % employees declaring they meet DDA definition
- A new local indicator will measure satisfaction with services among people with disabilities.
- The 3-yearly STATUS survey of SLH tenants will be monitored for differences in response from people with disabilities.
- Annual CORE Data - New Lettings Summary Statistics

Local Area Agreement Targets

- Improve the health of people with a learning disability
- % of people who feel their local area is a place where people from different backgrounds get on

Reporting

We will report against the Scheme every year and review the Scheme at least every three years.

South Lakes Housing **Sexual Orientation Equality Scheme**

This Scheme sets out SLH's commitment to equality regarding sexual orientation, the context, what we are doing and what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

The Gender Duty also requires public authorities to eliminate discrimination and harassment of transsexual staff and of transsexual service users.

Sexual Orientation Equality Statement

SLH is firmly committed to preventing discrimination relating to sexual orientation and to promoting equality.

Discrimination can occur through unwitting prejudice and stereotyping. Thoughtlessness often stems from ignorance, a lack of awareness or sensitivity to people's experiences. We will work hard with staff, customers and partners to improve our understanding of different needs, viewpoints and backgrounds.

This Policy makes it clear that lesbians, gay men, bisexual and transgender people will receive South Lakes Housing services free of discrimination.

Context

The North West Equality and Diversity Strategy estimates that the Lesbian, Gay, Bisexual and Transgender (LGBT) community accounts for 6-7% of the population of the North West. This translates to around 7000 people in South Lakeland.

The Cumbria Attitudes Survey 2004 made it clear that there is a great deal of prejudice locally against this group. The LGBT community can be subject to harassment and bullying. Gay Cumbria has expressed particular concern about the effect on young people and their families. It is clear that sexuality has far wider implications than is appreciated. These are complex issues which can lead to isolation, family breakdown and mental health problems, made worse by the obstacles of the rural context (isolation/poor transport) and lack of affordable housing.

The South Lakeland Equality and Diversity Partnership Conference in June 2007 gave a number of insights. Pervading most comments was the observation that there was a lack of something, whether this be support for families, individuals, or a lack of resources and training or a lack of awareness on the part of the wider community, statutory bodies or through strategic planning. Many identified the role of education as a means to solve many issues. More open discussion on the issues was called for as well as prioritising the problems and risks to people's mental health and partnership working. Many called for the greater involvement of Gay Cumbria as the main driver in combating highlighted issues.

What we are doing

Access to housing rights has, in the past, been a particular issue for the LGBT community as same-sex partners have not had the same rights as immediate family or spouses. SLH now operate all its allocations, rights to succession and right-to buy policies by giving equal rights to same-sex partners.

SLH has recently revised its tenancy agreement to include clauses regarding harassment, specifying that this will not be tolerated against LGBT people.

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (see Appendix 2. Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

Service Delivery

SLH is determined to achieve a consistent and fair delivery of services to meet the varied requirements of all residents, service users and employees, whatever their sexuality. This will be undertaken through: -

- Improving our understanding. Discrimination can occur through unwitting prejudice and stereotyping. Thoughtlessness often stems from ignorance, a lack of awareness or sensitivity to people's experiences. We will work hard with customers and partners to improve our understanding of different needs, viewpoints and backgrounds.
- We will train staff to be sensitive to differing needs and know where to seek information or help in dealing with issues as they arise.
- We do not know the percentage of SLH tenants in this group. Although it is monitored, there is a low response rate to the question on sexuality. We will continue to improve our monitoring data.
- consultation with Gay Cumbria to ensure their thoughts and views are considered in relation to the policy making process and the delivery of services.

Employment

SLH will

- not discriminate in the areas of recruitment, selection and promotion on grounds of sexuality.
- provide learning and development activities to all employees irrespective of sexuality.
- make staff aware of the means of raising concerns about possible discrimination on grounds of sexuality.

- take action where there is evidence of harassment or victimisation based on sexuality.
- undertake exit interviews for staff who are leaving, one of the purposes of which is to ascertain the reason for leaving, and to identify any potential areas of discrimination.

Assessing and Consulting

We have looked at all SLH functions and policies to see how relevant they are to equality in sexuality. These will be taken forward in more detail in future equality impact assessments. (see Appendix 3 for relevance and priorities.)

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use the local advisory group: Gay Cumbria.

Monitoring

We do monitor new applicants and tenants for sexuality but the response rate is low. There are currently no relevant Best Value Indicators relating to sexuality.

Local Area Agreement Targets

- % of people who feel their local area is a place where people from different backgrounds get on

Reporting

We will report against the Scheme every year and review the Scheme at least every three years.

South Lakes Housing
Faith Equality Scheme

This Scheme sets out SLH's commitment to equality regarding faith and belief, the context and what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

Faith Equality Commitment

SLH is firmly committed to preventing discrimination relating to faith and belief and to promoting equality.

Discrimination can occur through unwitting prejudice and stereotyping. Thoughtlessness often stems from ignorance, a lack of awareness or sensitivity to people's experiences.

We will work hard with staff, customers and partners to improve our understanding of different needs, viewpoints and backgrounds.

SLH is determined to achieve a consistent and fair delivery of services to meet the varied requirements of all residents, service users and employees, whatever their faith or beliefs. This will be undertaken through: -

The Context

South Lakeland has a predominantly Christian population. 1% are of other faiths and 14% are of none.

Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other	None
80,962	366	43	67	67	6	248	13,579

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (see Appendix 2. Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

Service Delivery

- The implementation of the Equality Standard for Local Government.
- consultation with faith groups within the community to ensure their thoughts and views are considered in relation to the policy making process and the delivery of services. This will be done with the South Lakeland Equality and Diversity Partnership.
- training staff to be sensitive to differing needs and know where to seek information or help in dealing with issues as they arise.

Employment

SLH will

- not discriminate in the areas of recruitment, selection and promotion on grounds of faith or belief.
- provide learning and development activities to all employees irrespective of faith or belief.
- make staff aware of the means of raising concerns about possible discrimination on grounds of faith or belief.
- take action where there is evidence of harassment or victimisation based on faith or belief.
- undertake exit interviews for staff who are leaving, one of the purposes of which is to ascertain the reason for leaving, and to identify any potential areas of discrimination.

Assessing and Consulting

We have looked at all SLH functions and policies to see how relevant they are to equality in faith and belief. These will be taken forward in more detail in future equality impact assessments. (see Appendix 3 for relevance and priorities.)

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use local advisory groups: Gay Cumbria, Cumbria Disability network and AWAZ (for ethnicity/race issues).

Monitoring

SLH Targets

There are currently no relevant Best Value Indicators relating to Faith and Belief.

Reporting

We will report against the scheme every year and review the scheme at least every three years.

South Lakes Housing Age Equality Scheme

This Scheme sets out SLH's commitment to equality regarding age, the context and what further actions can be taken to ensure the removal of discrimination and promotion of equal opportunity.

Age Equality Commitment

SLH is firmly committed to preventing discrimination relating to age and to promoting equality.

Discrimination can occur through unwitting prejudice and stereotyping. Thoughtlessness often stems from ignorance, a lack of awareness or sensitivity to people's experiences.

We will work hard with staff, customers and partners to improve our understanding of different needs, viewpoints and backgrounds.

SLH is determined to achieving a consistent and fair delivery of services to meet the varied requirements of all residents, service users and employees, whatever their age.

This commitment pertains to all age groups although in some parts of the Scheme more prominence is given to issues relating to the elderly and to young people.

The Context

In South Lakeland, the equality strands of Disability and Age should be looked at together as there is considerable overlap. Many elderly people do not regard themselves as having a disability, viewing their difficulty as merely a symptom of ageing. These will not be "caught" in surveys or monitoring systems. Therefore, the number of people who should be considered as having physical or sensory impairment will be much higher than statistics show.

The District has an aging population – the number of people aged 40 and under is significantly below the national average. 31.2% are over 60.

Almost one in five people are retired, as opposed to one in seven nationally. Forecasts predict that those aged 65-74 will increase by 39.4% up to the year 2021 and those aged 75 and over will increase by 31.4%

The conference held by the South Lakeland Equality and Diversity Partnership showed that age issues are of particular importance to South Lakeland.

Older peoples' issues

The area has an ageing population coupled with out migration of younger people. The fundamental problems raised were rurality, accessible transport and access to health care. All these areas created isolation and a lack of independence in the older population of the area. Solutions included the sharing or pooling of resources, the greater politicisation of the elderly and finding a better way to deliver services.

Young People's Issues

Concern about the issues of communication, engagement and involvement was high. Many raised the issue of rurality and transport as a major issue for young people in South Lakeland. Isolation, access to affordable housing and 'media' driven perceptions of young people were also highlighted as issues facing young people. When asked to record potential solutions the overwhelming majority indicated better communications as key. This included empowering young people to take the initiative as well as the call for changes to well established approaches.

Tenants

SLH has a higher proportion of elderly tenants than in the local population. 46% of tenants are over 65 and 27% are over 75. Clearly the needs of older people are of great significance to SLH.

Many of SLH's functions are geared to supporting the elderly to enable them to continue independent living within the community or to live within sheltered housing schemes.

The needs of young people within the community relate predominantly to access to affordable housing which is currently outwith SLH's control.

Within our estates the needs of young people concern their welfare in the home, their opportunities for activities and estate management issues.

Future Actions

The CEP Action Plan within this policy summarises how we will deliver this Scheme (see Appendix 2. Note that this is currently an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

Service Delivery

- The implementation of the Equality Standard for Local Government.
- Improve systems to identify vulnerable tenants and adapt service delivery accordingly
- Improve perceptions of security through property and estate management
- Promote positive images of young people
- Improve opportunities for access to activities
- Provide appropriate support for families with young children
- Promote community cohesion and cross-gender understanding through projects and residents/tenants groups

- consultation with partners within the community to ensure their thoughts and views are considered in relation to the policy making process and the delivery of services.

- train staff to be sensitive to differing needs and know where to seek information or help in dealing with issues as they arise.

Employment

SLH will

- not discriminate in the areas of recruitment, selection and promotion on grounds of age.
- provide learning /development activities to all employees irrespective of age.
- make staff aware of how to raise concerns about possible discrimination on grounds of age.
- take action where there is evidence of harassment or victimisation based on age.
- undertake exit interviews for staff who are leaving, one of the purposes of which is to ascertain the reason for leaving, and to identify any potential areas of discrimination.

Assessing and Consulting

We have looked at all SLH functions and policies to see how relevant they are to equality regarding age. These will be taken forward in more detail in future equality impact assessments. (see Appendix 3 for relevance and priorities.)

It is standard practice now for SLH to consult with and involve tenants and stakeholders in developing policy and monitoring outcomes. This is done formally through the Policy Committee, the Tenants Committee, regular service improvement groups and one-off focus groups.

SLH will also use its partnership working with the South Lakeland Equality and Diversity Partnership, Cumbria Race and Diversity Partnership and South Lakeland District Council for help with consultation. It will use local partners such as Connexions, Young Cumbria and Age Concern and refer to advisory groups: Gay Cumbria, Cumbria Disability network and AWAZ (for ethnicity/race issues).

Monitoring

SLH Targets

- There are currently no relevant Best Value Indicators relating to age.
- Annual CORE Data - New Lettings Summary Statistics

Reporting

We will report against the scheme every year and review the scheme at least every three years.

Appendix 1 Ethnic Group	South Lakeland 2001 census		SLH Tenants 10/2007		Housing Register					
	No	%	No	%	12/2004		11/2007		Change 2004 /07	
	No	%	No	%	No	%	No	%		
White British	99810	97.57	3302	85.43	3016	99.2	3208	97.3		
White Irish	458	0.45	14	.36			4	.1		
Other white	1213	1.19	13	.33	3	0.15	43	1.3		
Total White	101481	99.2	3249	86.12	3019	99.35	3255	98.7	+236	-0.6
Indian	53	.05			3		5	0.2		
Pakistani	23	.02			1		2	0.1		
Bangladeshi	6	.01					1			
Other Asian	22	.02	1	.02	3		3	0.1		
Total Asian/Asian British	104	0.1	1	.02	7	0.35	11	0.45	+4	+2
African	38	.04	2	.05	3		3			
Caribbean	38	.04	1	.02			1			
Any other black background	13	.01	1	.02	1		1			
Total Black/Black British	89	.09	4	.09	4	0.2	5	0.2	+1	
Chinese	253	0.3	0	0	2	0.1	3	0.1	+1	
White Asian	120	.12			1		1			
White/Black African	70	.07					1			
White/Black Caribbean	80	.08	1	.02			1			
Any other mixed	104	0.1			2		2	0.1		
Total Mixed	374	0.37	1	.02	3	0.2	5	0.2		+1
Total BME	820	0.8	6	0.12	16	0.85	24	1.3		
Not known/completed			525	13.75	5	0.2	18	.5		+13

Appendix 2: South Lakes Housing Comprehensive Equality Plan

Action Plan 2007-10

(This is an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

OUR COMMITMENT TO LEADERSHIP IN EQUALITY			Lead	2007-8	2008-9	2009-10
	To actively communicate SLH's commitment to equality to staff and community.	Provide information and images to help promote equality via newsletter and website	Strategy and Performance Manager	*		
	To set up a Steering Group to oversee and monitor the implementation of SLH's equality policy and action plan	Co-ordinate 6-monthly meetings with service managers to manage and review the implementation of the equality duties	Strategy and Performance Manager	*		
	To review all services annually to consider their affect upon the community and publish results.	Identify, prioritise and assess all SLH functions for relevance to the equality duties.	Strategy and Performance Manager		*	*
	To undertake a programme of Equality Impact Assessments - taking into account all equality issues including race, gender, faith sexuality, age and disability.	Publish a three-year programme of impact assessments for priority services. Set up a staff and community group to provide external scrutiny to assist impact assessments.	Strategy and Performance Manager	*	*	*
	To use the results of equality impact assessments to set targets for improving services in all corporate and service level plans and strategies.	Develop equality targets from the impact assessment process for inclusion in service plans.	All Managers		*	*
	To annually audit progress on equality targets and publish results.	Annual report to Board to assess our progress against the Equality Standard.	Strategy and Performance Manager			*
	To monitor the use of our services by the community and	Set up corporate procedures for collection and analysis of data	Director of Operations		*	

Appendix 2: South Lakes Housing Comprehensive Equality Plan

Action Plan 2007-10

(This is an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

	use this information to improve the way we work.					
	To profile customers, through monitoring, to ensure our users reflect the diversity of the community.	Monitor all services with the new customer monitoring form, analyse results and set targets to address any disparity.	Director of Operations		*	*
	To encourage the participation of disabled people in SLH activities.	Develop an action plan to meet this specific duty in consultation with disabled people.	Strategy and Performance Manager	*		
	To involve SLH staff in the development of our services	Set up a staff equality group to help implement develop the action plan relating to employment and prioritise tasks suggested by staff via consultations and appraisals.	Strategy and Performance Manager	*	*	*
	To consult with and involve equality groups in the work of SLH.	<p>Liaise with equality groups and staff to develop appropriate ways to consult in developing and prioritising actions.</p> <p>Work in partnership with other agencies to establish and support an equality forum to input into service reviews.</p>	Strategy and Performance Manager	*	*	
	To support the development of local forums that represent different groups within the community.	SLH will participate in local equality forums.	Strategy and Performance Manager		*	*
	To ensure equality of opportunity is integrated into SLH's procurement policy	<p>Promote procurement opportunities to the voluntary sector and ethnic minority business via the website and local media.</p> <p>Request all contractors demonstrate commitment to equality in complying with equality legislation in employment</p>	Director of Finance	*		

Appendix 2: South Lakes Housing Comprehensive Equality Plan

Action Plan 2007-10

(This is an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

		and service delivery.				
	To provide the community with accessible information about services.	Review in Communications Strategy.	Business Support Manager		*	
	To ensure that our public meetings are accessible to those with physical disabilities, have crèche facilities and are held at appropriate times.	Develop an accessible meetings guide and ensure key staff are briefed on how to implement access requests.	Community Participation Officer	*	*	*
	To eliminate direct and indirect discriminations, harassment and victimisation. To increase confidence in reporting a hate crime and increase the satisfaction in the way incidents result in further action.	Develop work with key organisations to form a multi-agency procedure for reporting and monitoring hate crimes. Support community relations and projects to help increase both confidence in reporting and the support given to victims.	Business Support Manager	*	*	
	To recruit and develop a workforce that reflects the diversity of the community we serve.	Monitor staff appointments to make sure it continues to be representative of the community.	Business Support Manager	*	*	*
	To provide all staff and Board members with training to better understand and, put into practice, our commitment to equality.	Develop a training programme relevant to the different needs of staff throughout the organisation.	Business Support Manager	*	*	*
	To monitor, by racial group, disability and gender: staff in post; applicants for employment, training and promotion; staff who receive	To publish the results of this monitoring annually in a report to the Board. To analyse the data from the annual report and take necessary action.	Business Support Manager		*	*

Appendix 2: South Lakes Housing Comprehensive Equality Plan

Action Plan 2007-10

(This is an outline plan which will become specific and detailed as actions are fed in from the impact assessment process.)

	training, staff who suffer detriment as a result of performance assessment; staff who are involved in grievance procedures and disciplinary procedures and staff who cease employment with SLH.					
	To undertake Equality Impact Assessment of all personnel policies.	Timetable the dates for undertaking Equality Impact Assessment of HR policies (involving staff and external challenge group)	Business Support Manager	*	*	
	Provide a safe, welcoming and non-discriminatory working environment	Provide information to staff on support organisations/networks for existing and potential employees - in partnership with trade unions	Business Support Manager	*	*	*
	Develop, publish and regularly review our approach for ensuring equal pay.	To implement and review SLH's job evaluation scheme	Business Support Manager			*
	To take positive action to address the promotion and development of women workers and address any occupational segregation within the workforce.	To ensure the HR Strategy specifically addresses the development and training needs of women employees / workers. In addition, the Plan will address any issues relating to gender segregation in the workforce.	Business Support Manager		*	*
	To provide opportunities for work experience to people within disabilities	Expand the current programme to offer training and work experience.	Business Support Manager		*	*

**Appendix 3: South Lakes Housing Equality Schemes
Assessment of Relevance and Priority**

Function	Written Policy	Quality System Procedure	Relevance to the Duty	Priority for Action	Timetable for Impact Assessment	Comment
			1-3 1=high	1-3 1=high		
Dealing with customer enquiries, comments and complaints	Customer Access Strategy Customer Care Complaints	2 Customer requirements 6 Complaints, Non-conformances, corrective & preventive action, 12 Complaints, customer care Quality system performance	1	1	2007-8	
Communicating with and Involving tenants and leaseholders	Tenant Participation RTB and Leaseholder Services Policy	38 Tenant participation 36 Right to buy, service charges	1	2	2007-8	New Tenant Compact under consultation
Letting dwellings and houses; maintaining waiting lists	Allocations & Lettings Mutual Exchange & Succession	17 Offering Tenancies Dwellings, 18 Allocation letting process - dwellings, 19 Allocation letting process garages 20 Mutual exchanges of tenancies	1	1	2008-9	Allocations policy is set by SLDC. New choice based lettings scheme proposed.
Rent Collection	Rent Collection & Arrears Rents & Service Charges	22 Rent collection & estate inspection, 23 Recovery of current tenant arrears	3	3	2008-9	
Administering the Right-to-Buy scheme	RTB and Leaseholder Services Policy	36 Right to buy, service charges	3	1	2007-8	
Maintenance of the estate environment	Estate Management	26 Unauthorised parking of vehicles	3	3	2008-9	

**Appendix 3: South Lakes Housing Equality Schemes
Assessment of Relevance and Priority**

including grounds maintenance						
Repair and invest in the housing stock	Repairs & Improvements Decent Homes Programme Major Works Agreement Rechargeable Repairs Void Management Gas Servicing Policy Compensation Policy Asset Management Strategy	27 Processing repairs 30 Prep of planned maintenance programme 39 Risk Assessments, 40 Inspections 43 Portable Appliance Testing 44 Vehicles 29 Gas leaks procedure 41 Gas Safety 13 Compensation Claims	2	1	2007-8	Higher priority due to DHP and new repairs contract.
Maintain independent living	Special Needs	28 Aids and adaptations	1	2	2008-9	
Maintain a safe secure environment for all tenants	Anti Social Behaviour Harassment Policy Hate Crime Policy & Domestic Violence Policy	25 Anti social Behaviour	1	2	2007-8	ASB policy under review to incorporate all 4 policies
Employment, management and care of staff	Equal Opportunities HR Policies	10 Staff Training	1	3	2008-9	Recently reviewed

**Appendix 3: South Lakes Housing Equality Schemes
Assessment of Relevance and Priority**