

# **Gloucester City Homes**

## **Equality Framework**

### **Achieving Level**

#### **Assessment and Validation**

**July 2009**

Centre for Local Policy Studies

Edge Hill University

Ormskirk

Lancashire L39 4QP

#### **Assessors**

Julian Clarke

Mohammed Dhalech



Edge Hill University



# Contents

	<b>Section</b>	<b>Page</b>
1.	<b>Introduction</b>	<b>3</b>
2.	<b>Methodology</b>	<b>4</b>
3.	<b>Context</b>	<b>4</b>
4.	<b>Developing Level</b>	<b>13</b>
5.	<b>Formal Assessment – Achieving Level</b>	<b>14</b>
6.	<b>Improvement and consolidation</b>	<b>37</b>
7.	<b>Moving to the Excellent Level</b>	<b>42</b>
8.	<b>Conclusion</b>	<b>43</b>
9.	<b>Acknowledgements</b>	<b>44</b>
10.	<b>Assessors</b>	<b>44</b>
11	<b>Appendix</b>	<b>44</b>

## 1. Introduction

This report is based on the findings of an assessment and validation carried out for Gloucester City Homes (GCH) to examine their claim to have reached the Achieving Level of the Equality Framework for Local Government.

GCH is one of about 70 Arms Length Management Organisations (ALMOs) set up by local authorities to (independently) manage local organisation housing stock. Over the past ten years they have been one of the types of organisation through which Decent Homes finance has been channelled to improve local social housing stock.

The report forms part of the formal assessment against the elements of reached the Achieving Level of the Equality Framework leading to the award of the Equality Mark© once successfully completed and verified. Organisations that complete and are successful at the Achieving Level assessment are awarded the Equality Mark Certificate. The judgement of the assessors is that Gloucester City Homes has attained the Achieving Level of the Equality Framework for Local Government.

This report sets out the methodology used in the assessment and provides qualitative comments and recommendations, where relevant, to provide support for future improvement in equality policy and practice. Following a brief discussion of the assessment methodology, there is a review of the equality, based on documentary evidence - policies, self-assessment and any other reports including recent inspections and assessments. Section 4 comments briefly on Developing Level, Section 5 contains the detailed formal assessment for the Achieving Level and Section 6 identifies a number of areas for consideration in the next phase of equality improvement.

## **2. Methodology**

The formal assessment consists of three related parts:

- Critical examination of GCH's equality self-assessment and a sample from a portfolio of documents supplied by GCH
- Interviews with Members, staff and external stakeholders to test the self assessment across GCH
- Examination of documentary evidence for consistency with self-assessment and interview findings

Conclusions about the level reached are arrived at through qualitative examination of findings from the three parts of the assessment.

Where specific examples of good practice are referenced in this report, it simply reflects the areas sampled for documentary review and interview. It is not meant to imply that good practice does not exist in other parts of GCH

### **3. Context**

#### **3.1 Gloucester City: population and households**

Audit Commission reports, the Gloucester City Council website and the GCH self assessment provide detailed information about the Gloucester city population. This currently is 111,900 people living in about 47,900 households. The CLG has projected an increase both in population and number of households. Single person households have grown over the past decade and now constitute over 29% of all households countywide. This trend is expected to continue. 51% of single person households are lone pensioners and this, together with the increasing lifespan of pensioners, is also projected to continue. The city, however, has a comparatively young population - 21.5 per cent are under 16 compared with 19.8 per cent nationally, and 17.4 per cent are over retirement age compared with 18.4 per cent nationally.

20% of households in the city are headed by 25-34 years olds. Heads of households in Gloucester are younger than the national average. The percentage of households with dependent children stands at 31.4%, which is

higher than the average for England and Wales (29.5%). Gloucester city has the highest proportion of lone parents in the county at almost 7%

Approximately 9.9 per cent of the population is accounted for by black and other minority ethnic (BME) groups, compared with an English average of 13.5 per cent, which are concentrated in certain wards. The three main minority groups are Asian/Asian British (the largest group at 37.2 per cent of the BME population), Black/Black British and Mixed/Chinese. Along with other districts in the county, Gloucester has seen a substantial increase in the number of migrant workers, particularly from countries recently admitted to the EU.

Approximately 6% of Gloucester's households are overcrowded (2001 Census) but this varies considerably between wards. 40% of households in Gloucester have someone with limiting long-term illnesses. The ODPM's Indices of Multiple Deprivation 2004 showed that Gloucester is ranked 139th out of 354 local organisation areas. However, the City is by far the most deprived of all local organisation districts in Gloucestershire. 6 of the county's Super Output Areas are within the most deprived 10% nationally and 5 of these are in Gloucester. 22 of Gloucestershire's SOAs are ranked in the most deprived 20% nationally and 15 of these are in Gloucester.

Housing affordability in Gloucester is an issue with the average property price in the city being 7.5 times the average family income.

According to the City Council website the Gloucester City economy is strong and growing steadily. The main employment sectors are: public administration, education and health (24.1%); distribution, hotels and restaurants (22.0%); banking, finance, insurance etc. (16.6%); and manufacturing (16.4%). As one of the principal urban areas within the south West Region, Gloucester is a major employment centre. The annual business inquiry 2002 estimates that there are 3700 businesses in Gloucester employing a total of 60,700 people. The majority of business units are small employers with almost 60% of businesses in

Gloucester employing 1-4 employees in 2002. Our supplier analysis suggests many rely on city council trade. Tourism supports over 3,700 jobs in the city (7% of the workforce) and brings an estimated £100m into Gloucester each year. Unemployment currently stands at 3.4% which is the same average as England and Wales (3.4%), but significantly above the county average at 2.2%. Relatively low unemployment across the county has created some problems in terms of recruitment and retention for GCH and other employers. Gloucester's main challenge however is in ensuring local people have the right skills to take up local jobs.

22% of city residents were in receipt of state provided financial support in 2004 compared to a county average of 18.9% and unemployment is far higher in some wards. Inward investment is currently good, with a number of major sites around the city being redeveloped and further schemes in the city centre now coming on track.

Gloucester is in the “worst” 50% of areas nationally in terms of children and older people living in income deprived households. Information from 2004 indicates that about 1 in 5 children and around 1 in 8 people aged over 60 living in Gloucester lived in an income deprived household, the highest proportions in the county on both measures.

Gloucester City ranks 139th out of 354 local authorities in the government's indices of deprivation with two wards being in the 10 per cent most deprived in the country. Unemployment in the city is equal to the national average (3.4 per cent) but the area has the highest concentration in the country, of people who have been unemployed for in excess of 12 months.)

There is very limited information available from any of the sources on the disabled profile of the Gloucester City population. This is an extremely important absence and partnerships in the City should work quickly to generate a reliable and updateable profile of disability in the City accessible to all service providers.

### **3.2 Gloucester City Homes: customers**

GCH has done a good job in profiling its tenants/customers. It has comprehensive equality information on over 80% of tenants and leaseholders. GCH has less information about sexual orientation than for other protected categories but GCH has achieved a 50% response rate, which is much better than most other public service organisations. It has detailed information on those that are disabled but provided limited analysis of this in the self assessment. The headline figure indicates that almost a third of customers have some kind of disability indicating that disabled people are disproportionately dependent on social housing relative to the rest of the population. It would have been useful for the self assessment to cross-reference disability with the other equality strands (particularly with age where the proportion of GCH customers aged 65 and over is double the proportion in the City population). The proportion of customers from minority groups corresponds approximately to the proportion in the Gloucester City population. But, the proportions of different minority groups who are tenants do not match those proportions in the City population. This reflects a nationwide set of historical developments where people of Asian heritage are less likely than other minority groups to live in local authority owned housing.

The key statistical relationship for GCH from an equality perspective, apart from the characteristics of existing customers, is between the existing customer base and the waiting list (Housing Register). Quite detailed information was provided for the general population of Gloucester City in the self assessment. But, there was no profile for the Housing Register.

It is clear from the figures that GCH caters disproportionately for the older and disabled Gloucester City population. It is important to know if this is true for whole social housing sector in the City. If it is not some analysis of the disproportion should be undertaken to establish why it exists.

### 3.3 Gloucester City Homes: previous inspections

In 2005 the Audit Commission inspected Gloucester City Council Landlord Services. It was rated as a poor service but with promising prospects for improvement. The report made the following comments:

*A decent homes diagnostic report was also completed as part of the Council's CPA inspection in 2004. This found there was a high risk that the Council would fail to deliver the decent homes standard by the government deadline of 2010. Following this GCH applied for and was granted permission to set up an arms length management organisation (ALMO). (Audit Commission 2007, Landlord Services Gloucester City Council: 5)*

The report also recorded, among other areas for concern, low customer satisfaction.

GCH was established in 2005 and the company was inspected by the Audit Commission in 2007 who judged that the new ALMO had considerably improved the service:

*The track record of improvement is good. GCH has made improvements that are delivering direct and highly visible benefits to residents. Trends in customer satisfaction are positive and there are some good examples of improving value for money. (Audit Commission 2007, Gloucester City Homes: 6)*

The report also commented positively on the company's approach to equality and diversity

*Strengths outweigh weaknesses on equality and diversity issues. Equality and diversity is given a clear corporate lead and awareness of diversity issues is high. Progress has been made on undertaking impact assessments and the organisation has an increasing understanding of the profile of its customers. Services are tailored to meet customers' needs. (Audit Commission 2007, Gloucester City Homes: 21)*

But, the report also made the following recommendations. GCH should:

*Strengthen the focus on equality and diversity by:*

- *undertaking a systematic review of all policies, procedures and strategies to measure their impact on equality;*
- *becoming more involved in GCH's corporate equality group;*
- *making use of data collected on customer profiling to tailor services;*

- *and developing plans to ensure that the Board and senior managers are representative of the communities they serve.*  
(Audit Commission 2007, Gloucester City Homes: 11)

### **3.5 Gloucester City Homes: equality documentation**

GCH has an appropriate range of statutory equality documentation. There is a general Equalities and Diversity Policy with specific additional Religious and Belief and Sexual Orientation Policies. Also there is a Customer Domestic Abuse Policy and Procedure that ties into the Gender Equality Scheme and Customer Hate Crime Policy & Procedure that ties to the Cohesion Strategy and safer community partnership initiatives. The general Equality Scheme has sections that cover the six statutory areas and was the product of extensive consultation. The Equalities Annual report provides a useful snapshot of recent achievements.

The Financial Inclusion Policy and Inclusion and Income Management Strategy provide important support for sustainable tenancies and puts social inclusion firmly within the GCH equality agenda. The Worklessness Policy is also an important attempt to join up social policy initiatives at a local level.

The Community Cohesion Strategy makes a clear link between perceived equality of treatment, respect for diversity and a 'sense of belonging'. A serious attempt has been made to integrate it with the equality and inclusion policies and strategies to provide a coherent view social cohesion.

#### **Self assessment**

GCH produced a good quality self-assessment and like many other authorities produced one that represented their achievements in detail. But, there was also a lack of critical reflection and critical insight into the working of various aspects of the equality improvement process and its outcomes for service users. Without such reflection it can be difficult to work out why certain improvement action has

worked and some has not. It also becomes more difficult to present a useful account of why changes in policy and practice have taken place and why it is difficult to meet certain needs.

### **3.6 Gloucester City Homes: functions and management**

GCH has delegated responsibility for providing housing management and maintenance Services for the 4,739 properties owned by The City Council that provides housing for 10 per cent of the city's population. There are five main estates with the largest, Matson, containing one quarter of GCH's housing stock. There are 223 leasehold dwellings, 357 tenancies for older persons in 14 sheltered housing schemes and 67 shared ownership schemes. The City Council retains responsibility for:

- overall housing strategy and enabling;
- determining policies on lettings and anti-social behaviour (in consultation with GCH) and rents;
- managing the Supporting People programme;
- homelessness, general housing advice; and
- administration of the Housing Register.

*GCH also works closely with the **Strategic Housing Partnership Team** led by City Council and attended by other social landlords, to prevent homelessness and develop initiatives to tackle the high demand for social housing within the City. (Self Assessment 18)*

The Board of Directors has a balance of tenant members, councillors and independent members. The Board has overall responsibility for management of the company and for maintenance of contractual agreements. The board has a (tenant) diversity champion

Three committees responsible for Services and Operations, Partnering and Audit report to the main Board. There are three management teams: Executive

Management responsible for the strategic direction of customer provision;  
Tactical Management that deals with performance management and the  
Operational Management Team that manages delivery of housing services.

There are eleven delivery teams that deal with:

- Asset Management and Client Monitoring Services
- Anti-Social Behaviour in association with the Crime and Disorder Partnership
- Customer Services
- Income Management Services
- Neighbourhood Services
- Resident Involvement Services
- Sheltered Housing and Life Link Services
- Leasehold Management, Home Ownership and Right to Buy Services
- Financial Services
- Human Resources Services
- Business Support and IT Services

GCH strategic objectives are:

1. To be a customer driven provider of excellent services
2. To Build strong partnerships that help us to make a real difference to the local communities in which we work
3. To deliver value for money and maximise the use of all our resources
4. To deliver excellence in our governance & management arrangements
5. To be a first class employer nurturing top performing people
6. To be responsible towards our environment to protect it for future generations
- 7. To be a champion of diversity**
8. To achieve the long-term sustainability of the company through business growth

### **3.7 Gloucester City Homes: managing equality improvement**

The Equality Steering Group is made up of the members of the Executive Management Team, all other managers and team leaders and members of the GCH Board. The CEO is the senior Equality Champion and team lead is the HR Manager. The ESG, *'sets targets, monitors progress against equality targets and reviews outcomes for customers.'* (Self-assessment:27). It is thus central to performance managing equality improvement. In addition:

*Managers ... have specific responsibility for achieving equality outcomes and this is reviewed on annual basis as part of the appraisal process. As well as assisting with the setting of corporate equality targets managers also work with their team and the team's Diversity Champion to set and deliver Team based equality action plans (self-assessment:27 )*

Each management team has a diversity champion who sits on both the Diversity Working Group (which meets monthly). The role of the DWG is to:

*...identify and monitor team based equality targets and to work with their team members and manager to agree targets and achieve them. (Self-assessment:27)*

Each delivery team:

*...has identified a Diversity Champion. ...Their role is to identify and monitor team based equality targets and to work with their team members and manager to agree targets and achieve them. They are provided with regularly updated customer profile information, and additional layers of Equality and Diversity training to ensure they can effectively challenge current approaches and progress (Self Assessment: 27).*

The Diversity Champions sit also on the Customer Equality Proofing Group that meets bi-monthly. Also sitting on the CEPG are customers from a range of backgrounds and experiences, who work with the HR team and staff from across the organisation to impact access services, agree Equality targets and monitor progress.

The diversity champion system indicates that an actively critical approach to equality improvement is embedded in the overall functioning and the day-to-day performance management of service delivery. The members of DWG are

responsible for developing and implementing team based equality targets, which are agreed with the team and relevant line manager. The DWG member keeps the team and line manager informed of progress and developments in relation to E&D. The line manager sits on the equality steering group, which monitors performance across the organisation and sets strategic targets. Each manager will update the steering group on progress in their area.

A link is made at the team meeting where both the DWG rep and manager can update the team and involve them in setting targets, learning from customer feedback etc. Both groups come together on an annual basis as part of the annual review to review progress across the year and agree targets for the following year. The Equality steering group name comes from the terminology in the original Equality standard and refers to the strategic management of Equalities. This has been renamed as the Diversity Steering Group. The DWG has now been changed to the Customer Diversity Group and is made up of Diversity and Customer Champions.

#### **4. Developing Level**

In order to be assessed as a Developing organisation GCH had to show that:

- Board members and staff understand the significance of equality of opportunity in creating local areas that people want to live and work in. They visibly lead partnerships that address inequality.
- It has demonstrated clear plans to undertake equality mapping and understands the profile and needs of communities of interest within its locality.
- It has publicly committed to improving equality outcomes and the elimination of discrimination in both service delivery and employment based on race, gender, disability, age, religion and/or belief and sexual orientation and other areas of disadvantage.

- It is compliant with all legal requirements, including having all the public duty equality schemes in place.
- It has systems in place at corporate and service/unit levels to ensure the delivery, review and scrutiny of its equality and cohesion priorities.
- Key internal and external stakeholders and community members are involved in and consulted on equalities issues.
- It has earmarked specific resources for improving equality practice.
- It is carrying out both retrospective and prospective equality impact assessments.
- It is clear about its workforce profile and has plans to ensure equal pay and to improve representation where appropriate.

The self-assessment documentation, interviews and documentary evidence support the claim that all the criteria of the Developing Level have been met.

## **5. Formal assessment of the Achieving Level**

### **5.1 Evidence**

A numerical rating system is used in the formal assessment to support findings for each element of the Achieving Level. The scoring system is consistent with the approach taken by the Audit Commission in Best Value Reviews and Assessments and Equality Mark assessments against the Equality Standard. Scores are 4,3,2,1 with 4 being highest and 1 being lowest – a score of 0 would indicate a serious weakness or other lack of evidence. The scores summarise a qualitative judgement of an organisation's performance in relation to that element. The quantitative part of the assessment assigns an organisation number to each element.

- Good performance = 4

- Strengths outweigh weaknesses = 3
- Weaknesses outweigh strengths = 2
- Poor = 1
- No evidence for performance = 0

To get to the Achieving Level, an organisation should get an average score of 3 with no elements scored at 1 or 0. The assessors conclude that GCH has met this criterion. The scores assigned have taken into account the contents of the self-assessment document; documentary evidence and results of interviews with Board members, managers, staff and stakeholders (tenants and leaseholders).

## **5.2 The Achieving Level**

Having taken into account the evidence collated from the focus groups, interviews, documentation supplied and meetings held with managers, it is the judgement of the assessors that GCH is working well at the Achieving of the Equality Framework for Local Government. Comments are also made where there are areas in which GCH may need to make some changes in order to support continuous improvements both in service delivery and employment.

The rest of the assessment sets out an evaluation of the evidence made against each of the elements of the Achieving Level, and we have set out in summary format where GCH has met the requirements. We have identified, where relevant, the areas for improvement for the individual element/s. Comments and recommendations arising from the interviews and meetings held with the assessors have been included, where we felt that this added value to the summary and each area of improvement

## **5.4 Adaptation of Equality Framework**

Where elements of the framework refer to councillors and officers, we have referred to Board members and staff. Some other minor changes to the wording of the Equality Framework have been made to align it with the organisational context.

To attain the Achieving Level and organisation has to show that

- Board members and staff take direct and personal responsibility for promoting greater equality and test themselves on progress by the outcomes they achieve.
- It has undertaken equality mapping and has a good understanding of its communities, including the extent of inequality and disadvantage, and used the information to inform corporate and service priorities.
- It has set stretching equality priorities in consultation with partners in the public and voluntary and community sectors and these are reflected in its sustainable community and other relevant strategies, local and multi-area agreements, and local targets.
- It works with partners in the public and voluntary and community sectors to develop joint equality strategies.
- It uses equality impact assessments to review all major corporate and service changes in policy and regularly conducts service and employment.
- It has set appropriate corporate and service/unit objectives to address persistent inequalities and to narrow the gap related to race, gender, disability, sexual orientation, age, religion and/or belief, or other areas of inequality for service delivery. This is based on impact assessments and consultation with internal and external stakeholders and partners.
- It has set appropriate corporate and service/unit employment and pay related objectives for race, gender, disability and age, religion and/or belief and sexual orientation.
- Equality objectives are integrated into the ALMO's business and service planning processes.

- All relevant data on service access is monitored against the equality strands.
- There are good practices of delivery in all the sections of GCH with few adverse impacts found in impact assessments. Where adverse impacts have been found these have been mitigated.
- Key stakeholders and community members, including those who are vulnerable and marginalised, are able to scrutinise and challenge performance on equalities issues.
- It has developed information and monitoring systems that allow it to disaggregate data where appropriate and to assess progress in achieving objectives and targets. It reviews them in the light of changing needs, when necessary.

These outline criteria translate into the specific elements of the Achieving Level that are grouped under five headings

- Knowing your community and equality mapping
- Place shaping, leadership, partnership and organisational commitment
- Community engagement and satisfaction
- Responsive services and Customer Care
- Modern and diverse workforce

### **5.5.1 Knowing your community and equality mapping**

**5.5.1.1 Relevant and appropriate information is gathered efficiently using a range of techniques, across the local community, to inform the organisation's; corporate policy and strategy, the sustainable community strategy, local area agreements and to identify key equality gaps.**

**GCH can demonstrate that:**

It has made a major effort to obtain and analyse equality information about its customer base, which is central to managing equality improvement. From a low starting point it now has detailed equality information about more than 80% of tenants. It understands how its client base relates to the general population of Gloucester City. It has used a range of techniques to collect information. It has worked well with its partners to use this information in the development of its various equality and equality related policies and strategies.

**Areas for improvement/review:**

Although the size of the Housing Register and the number of potential transfer tenants is clearly stated in the self assessment there was no equality analysis of its composition. It is not clear how stable the GCH customer base is, how many properties are allocated to new customers on an annual basis nor to what equality categories they belong. The assessors realise that the Register is the responsibility of the City Council. But, some reflection on its composition and dynamics and the allocations process in the self assessment should be undertaken in partnership with the City Council

<b>Overall score 4</b>
------------------------

**5.5.1.2 Information and data are disaggregated and analysed corporately and at service/unit level to monitor and assess and set equality objectives**

**GCH can demonstrate that:**

It has comprehensive equality information on customers and uses it effectively to improve the delivery of its various services. This information is used by the service delivery teams to assess needs and to feed information into planning and objective setting processes.

**Areas for improvement/review:**

It would be useful to have a disaggregated assessment of disabled customers cross referenced with information on the other equality strands. This would

support GCH's efforts to deal with potential multiple disadvantage and provide a fair and equal service. Secondly, it would provide a window for any external assessments on to some of the major challenges facing GCH (and all ALMOs!)

**Overall score 4**

**5.5.1.3 Relevant and appropriate information and data (including data relating to the National Indicator Set) is mapped, disaggregated and used with partners, to assess and set equality objectives.**

**GCH can demonstrate that:**

It has comprehensive equality information on customers and uses it effectively to improve the delivery of its various services. Information has been used to develop strategies and policies that support partnership working.

**Areas for improvement/review:**

See comments above at 5.5.1.1 and 5.5.1.2. There has been limited use of available information in formal equality impact assessments

**Overall score 4**

**5.5.2 Place shaping, leadership, partnership and organisational commitment**

**5.5.2.1 Clear organisational and partnership equality priorities have been set and are owned and understood by all key stakeholders, including the voluntary and community sector**

**GCH can demonstrate that:**

It has worked closely with its customers to generate service level equality priorities (and to foster a wide understanding of these priorities within its customer base). The Financial Inclusion and Worklessness Strategies in particular are an important part of the GCH attempt to achieve sustainable tenancies in partnership with other public sector bodies. Neighbourhood partnership and project working is also an important part of GCH activity.

**Areas for improvement/review:**

In redeveloping the approach to equality impact assessment it would be worth while to impact assess the effect of the work done towards achieving sustainable tenancies and its equality impact

**Overall score 4**

**5.5.2.2 Equality and cohesion priorities are monitored regularly by partners, the organisation's political and senior managerial leadership, and appropriate resources are being allocated**

**GCH can demonstrate that:**

It has worked with customers and partners to develop a Cohesion Strategy. It has also worked to make sense of the idea of community cohesion within its areas of operation. Work has been done with Neighbourhood Partnerships in particular to reduce anti-social behaviour.

**Areas for improvement/review:**

Developing, testing and monitoring the effectiveness of the approach to cohesion laid out in the Cohesion Strategy.

**Overall score 4**

**5.5.2.3 Action is being taken to implement commitments within the equality schemes and monitored regularly by Board members and senior managerial leadership**

**GCH can demonstrate that:**

The CEO has taken an active lead in developing equality improvement work. The senior management team is also engaged with this work. The Board has supported these efforts lead by the Board diversity champion. GCH has an effective management structure for delivering on and tracking the progress towards the objectives set out in the Equalities Action Plan and in the Equality Scheme.

**Areas for improvement/review:**

Publication of success with equality objectives on GCH website.

**Overall score 4**

**5.5.2.4 Appropriate resources have been allocated and action has been taken to mitigate adverse impact and improve equality outcomes where shortfalls have been identified**

**GCH can demonstrate that:**

It has tested the impact of policies and procedures by through various means; for example, customer focus groups, the Customer Equality Proofing Group. The Equality Scheme and the Equalities Action plan indicate what action is being taken to mitigate any adverse impact. Service teams are active in identifying and meeting needs. There are clearly defined equality priorities that feed into delivery and project plans.

**Areas for improvement/review:**

GCH needs to rework its approach to formal impact assessments. Up to now they have mainly been used to forward equality proof new policies. They have not been used to test the actual impact of policies or procedures. We would suggest that the Proofing Group takes the lead in developing a new programme

of equality impact assessments and that it supports the appropriate GCH team in carrying these out.

**Overall score 4**

#### **5.5.2.5 Political overview and scrutiny processes review equality impacts and objectives**

##### **GCH can demonstrate that:**

GCH has a number of equality scrutiny bodies that include the Board, the Customer Equality Proofing Group, customer forums, the senior management team and the Diversity Working Group:

*The Board via the Equality Strategy reviews progress against all equality targets annually. Progress against performance indicators is reviewed by the Management Team monthly and by the Board quarterly as part of our Performance Management Framework. (Self-assessment:35)*

Appraisals already have an equality performance aspect and:

*An additional suite of Equality performance has also been developed and will be in place from 1<sup>st</sup> April 2009 (self-assessment:35)*

An Annual Equalities Report was produced for 2008 that detailed achievements:

##### **Areas for improvement/review**

GCH could produce an annual Equalities Report that more systematically reviews achievement against objectives and targets than the current one.

**Overall score 4**

**5.5.2.6 The organisation communicates effectively about its equality and cohesion priorities, how it is responding to its communities' needs and promoting good relations**

**GCH can demonstrate that:**

It is proactive in this regard. GCH uses its website, printed material and a variety of community events to publicise and celebrate equality and other achievements

**Areas for improvement/review:**

None noted

<b>Overall score 4</b>
------------------------

**5.5.2.7 The organisation ensures that contractors, commissioned services and grant receivers regularly review their services and access to them to ensure they continue to be appropriate and accessible**

**GCH can demonstrate that:**

It operates a Contracts Equality Scheme. The contracts equality scheme has been developed for use with employment agencies. GCH contractors are assessed for equality performance through the contract tendering process (pre qualification questionnaire being one part of this) where clear equality requirements and targets are set. For example; the provision of a robust equality policy, equality training for staff, details of their workforce diversity makeup, sample adverts and recruitment documentation. There are requirements around customer care and making special provisions for customers with particular needs. In terms of targets the provision of work experience placements are a requirement and apprenticeships are to be provided to local residents and for general posts to be advertised locally and filled, where possible with local residents. A member of the HR team sits on the evaluation panel for the tender process. Once the contract is awarded progress is monitored on an ongoing basis and reported to the Board.

**Areas for improvement/review:**

Regular review of monitoring reports

**Overall score 4**

**5.5.2.8 Work is being undertaken to promote equality of opportunity in terms of the participation of under-represented groups, including as elected representatives**

**GCH can demonstrate that:**

Customer representation is constitutionally built in at Board level. GCH has set out to diversify and make more representation more equal

*The diversity of the Board has been reviewed by a questionnaire to Board members. The results have been analysed and compared with the customer diversity database (GCH Board Diversity Information)*

GCH has developed a systematic approach to tenant capacity building. It provides access to a wide range of tenant focused events. It has run Respect and Dignity workshops and is engaging in succession planning

**Areas for improvement/review:**

Establish whether equality of representation improvement initiatives are working or likely to work.

**Overall score 4**

**5.5.2.9 The quality of community relations and harassment and hate crimes are monitored and analysed regularly. Appropriate action is taken to address the issues that have been identified**

**GCH can demonstrate that:**

It has a specific Domestic Violence Policy. It has a specialist Anti Social Behaviour Team that has as one of its improvement priorities to develop the experience of the team in dealing with Hate Crime and Domestic Violence. Evidence was provided during interviews of a substantial effort in both the areas of domestic violence and hate crime.

**Areas for improvement/review:**

Pursue developments in line with existing improvement plans. Interviews provided evidence that both domestic violence and hate crime in GCH properties were to be regarded as serious problems. This might be an appropriate subject for a more detailed equality impact assessment that explores in detail the equality dimensions of domestic violence and/or antisocial behaviour.

<b>Overall score 3</b>
------------------------

**5.5.3 Community engagement and satisfaction**

**5.5.3.1 Community engagement structures are working efficiently and effectively**

**GCH can demonstrate that:**

The range of means that it uses to engage customers is working well. These are clearly documented in the self-assessment. The customer focus groups supported this view. GCH is/has undertaken a major resident involvement and engagement project. This has had both a strategic purpose (long term development of capacity and involvement) and detailed current work.

**Areas for improvement/review:**

It is essential that the findings of the project and its different work streams are reported in a way that is useful to the development of local (estate) level involvement, GCH's strategic view of customer involvement and provides (potentially) good practice examples for the ALMO sector as a whole.

<b>Overall score 4</b>
------------------------

**5.5.3.2 Involvement and consultation influences and informs equality priorities and feedback is given to those consulted.**

**GCH can demonstrate that:**

It uses a range of mechanisms to involve and consult customers. The self assessment indicates that:

*Equality priorities are identified through ongoing review of our customer profile, feedback from our customers and review of best practice. These are shared and agreed with our customers, key stakeholders including the City Council and partners including Morrison and the Gloucester Partnership as appropriate. (self-assessment :33)*

Customers have been involved with the generation of project priorities and feedback mechanisms are clearly indicated.

**Areas for improvement/review:**

The way in which equality priorities in are formulated could be more effectively documented and in particular reviewed (the annual equalities report could perform an important role). For example project reports do not provide this information.

The approach the GCH has taken to formal equality impact assessment (forward equality proofing) has meant that they have not directly generated equality priorities. Although it is clear that impact assessment, monitoring, and impact

review happens, the processes and their outcomes could be also be more effectively documented.

**Overall score 4**

### **5.5.3.3 Consultation influences and informs equality priorities in relation to vulnerable and marginalised groups and feedback is given to those consulted.**

#### **GCH can demonstrate that:**

The Strategic and Business Plan clearly recognises that it needs to cater for the specific needs of vulnerable people particularly in relation independent living  
The Resident Involvement and Community Engagement project aims to extend engagement and involvement as widely as possible.

#### **Areas for improvement/review:**

The Resident Involvement and Community Engagement project plan does not specifically mention the involvement of vulnerable/marginalised people although it does mention 'hard to reach groups'.

This policy area to be reviewed and thought needs to given to the relationship between people belonging to equality categories and those regarded as vulnerable. Disability/ learning difficulties and vulnerability are clearly cross referenced. But, a review needs to consider whether members of other equality categories are vulnerable in other ways

**Overall score 2/3**

### **5.3.3.4 Partners work together to balance diverse, but sometimes conflicting interests in the locality**

#### **GCH can demonstrate that:**

The Cohesion Strategy has considered the sources of potential conflict of interest. It recognises that the distribution/allocation of social housing is one of these potential sources and elsewhere in the documentation provided that the current economic downturn may aggravate the situation. It recognises also that choice based lettings could generate ethnic and religious segregation. The Cohesion Strategy argues that the best way to deal with *perceived* conflict of interest is to be transparent about housing allocation and attempt to generate positive inter-communal attitudes. It has worked with partners to further this understanding and these aims.

**Areas for improvement/review:**

Analysis of perceived and real conflict of interest needs to be fuller and more explicit. There are also indications that some of GCH's partners have not developed their strategic and detailed thinking as fully as GCH, making more difficult to tackle these issues in a coordinated way.

<b>Overall score 3</b>
------------------------

## **5.5.4 Responsive services and Customer Care**

**5.5.4.1 A set of equality outcomes/ objectives/goals have been produced at service/unit level to meet the needs of identified equality target groups, and those who are most vulnerable.**

**GCH can demonstrate that:**

It has a comprehensive set of equality objectives that have been identified to meet the identified equality needs. These are embedded at corporate level in the Strategic and Business Plan 2008-2013. Action to realise these objectives is detailed in the project plan master document.

**Areas for improvement/review:**

Although the master document that outlines all GCH project plans is titled 'Service Improvement Plans and Project Plans 2009 -2010', it turns out that that project plans are the service improvement plans (that is, there are no separate service improvement plans). Service improvement/project plans are refreshed on an annual basis. Tasks are finished and new tasks added alongside the continuous service improvement element.

**Overall score 4**

**5.5.4.2 Appropriate resources have been allocated and action has been taken to mitigate adverse impact and improve equality outcomes where shortfalls have been identified**

**GCH can demonstrate that:**

The planning documents identified in paragraph 5.5.4.1 detail resources allocated to specific action and are managed through a traffic light system

**Areas for improvement/review:**

No additional comments

**Overall score 4**

**5.5.4.3 Mechanisms are in place to ensure that service equality objectives are delivered by contractors and providers through contract management, and that they are monitored properly**

**GCH can demonstrate that:**

See comments at 5.5.2.7

**Areas for improvement/review:**

See comments at 5.5.2.7

<b>Overall score 4</b>
------------------------

**5.5.4.4 Equality and cohesion objectives are monitored regularly by the Board and management teams.**

**GCH can demonstrate that:**

It is developing a strong evaluation, monitoring and review culture. The self assessment says:

*Over the last three years, GCH has developed a robust framework, which ensures that our Board, Managers and Staff are fully engaged and take responsibility for setting, delivering and monitoring equality targets and outcomes. Customers are engaged and given opportunities to challenge by via regular Diversity focus groups, the Customer Equality Proofing Group and reports and discussions at Customer Forum. (Self assessment: 26)*

There is a specific project plan (service improvement plan) for performance management and a specific diversity project plan which has the following aims:

- *Using business objects produce range of monitoring/ performance data from diversity info held on Arc house and Team based systems*
  - *Embed key performance info into scrutiny process*
  - *Provide all teams with key equality data for their areas*
- (Diversity Project Plan)

GCH believes that it can show:

- *GCH is able to clearly monitor service provision and take up by diversity group*
  - *Equal access to services for all tenants*
  - *Services which tailored to individual tenant needs*
- (Diversity Project Plan)

**Areas for improvement/review:**

Systematically develop and implement monitoring processes as outlined above.

Outcomes should be detailed in the Annual Equalities Report

<b>Overall score 3/4</b>
--------------------------

**5.5.4.5 The identified needs of vulnerable and marginalised groups are addressed and services are designed to ensure that customers and citizens are treated with dignity and respect.**

**GCH can demonstrate that:**

Consideration is given to the needs of vulnerable customers. It works within the county wide Supporting People Partnership.

*which helps to fund our housing related support services to vulnerable customers and funds partners who work with our vulnerable customers to help sustain their tenancies (self assessment:21)*

The Supported Housing Project deals specifically with the needs of vulnerable people

**Areas for improvement/review:**

Much of the good practice the GCH engages in meeting the needs of vulnerable people is implicit. If good practice is to be shared regionally and nationally it needs to be made explicit. Reporting should specify what groups or categories of people are considered to be vulnerable and in what way they are vulnerable and how their needs are met.

It is not clear to the assessors how the Housing Register identifies people in housing need as vulnerable, how these needs are planned for, nor how properties are allocated to them. This point relates to those made at 5.5.1.1 above.

<b>Overall score 3</b>
------------------------

**5.5.4.6 Human rights issues are considered and addressed when delivering services to customers and clients.**

**GCH can demonstrate that:**

It has a comprehensive documents detailing understanding of and compliance with the Human Rights Act

**Areas for improvement/review:**

Training for staff on the Human Rights Act. Monitoring compliance in accordance with GCH documentation

**Overall score 3/4**

**5.5.4.7 Access to and appropriateness of services is monitored regularly by Board and management teams**

GCH can demonstrate that it has a strong review culture

Not clearly distinct from 5.5.4.4

**Overall score 3/4**

**Areas for improvement/review:**

Reworking the approach to equality impact assessment will give, together with other review modes, an opportunity to assess whether the right equality objectives have been set and whether the desired results for customers are being achieved.

## **5 Modern and diverse workforce**

**5.5.5.1 The equality aspects of the workforce strategy are implemented and monitored**

**GCH can demonstrate that:**

Regular workforce monitoring takes place and reported on a monthly basis and further reported in detail in the Annual HR strategy which is through and set clear actions and targets. Key performance indicators are reported against as part of the performance reporting processes. It also is alert to gaps in workforce profile and where improvements need to be made and employment agencies used by GCH are equality assessed.

**Areas for improvement/review:**

GCH needs to update employment monitoring in line with the 2009 Equality Bill Further analysis is needed of the reasons for staff leaving GCH and of the initial findings of staff survey around stress, workload and work life balance. Further discussion of these issues, (which took place in focus groups) is already planned in the future. Targets and actions identified can be SMARTER, for example. responsibility and timescales in the HR strategy.

**Overall score 3**

**5.5.5.2 Employment objectives have been set based in internal monitoring staff consultation and the assessment of the local market and barriers**

**GCH can demonstrate that:**

It carries out annual workforce surveys and in 2008 used the survey by Times Best Companies award. The Annual HR Strategy clearly assesses local demography and identifies any further actions and targets and any positive action required through work experience. The Chief Executive has “Chat with the Chief sessions” providing regular opportunities for staff to talk with the CEO.

**Areas for improvement/review:**

Targets and actions identified could be SMARTER e.g. responsibility and timescales in the HR strategy.

**Overall score 4**

**5.5.5.3 The authority regularly monitors, analyses and publishes employment data to fulfill statutory duties**

**GCH can demonstrate that:**

It monitors and publishes employment data and has set out its intentions for fulfilling its statutory duties

**Areas for improvement/review:**

As 5.5.5.2 above

**Overall score 3**

**5.5.5.4 All employment procedures have been impact assessed and action has been taken to mitigate adverse impact and promote equality outcomes.**

**GCH can demonstrate that:**

Employment procedures are subjected to EIA in line with policy. The HR strategy also includes a risk assessment and SWOT analysis

**Areas for improvement/review:**

There is a need to rework employment EIAs in line with the comments made already about service delivery EIAs. See 5.5.2.4 above

**Overall score 3**

**5.5.5.5 The authority has made significant progress on its equal pay review and is working towards reaching agreement with unions.**

**GCH can demonstrate that:**

An equal pay review has been carried out and is kept under review

**Areas for improvement/review:**

No additional comments

**Overall score 4**

**5.5.5.6 It delivers a range of learning and development opportunities to support Board and officers to deliver equality outcomes.**

**GCH can demonstrate that:**

It has delivered training to support its equality objectives. Training and development support has specifically been undertaken to improve equality planning. This has including EIA training.

It has provided training that meets specific requirements for meeting the needs of priority groups – for example training to support staff meet the needs of the Local Muslim Community. Training for both staff and board members is provided jointly.

**Areas for improvement/review:**

Monitor outcomes and evaluate training development support has achieved changes in equality outcomes at service delivery level – e.g. improved equality targets and actions.

Evaluate Board development training and ensure that future training meets requirements of changing policy and legal framework for equalities.

**Overall score 4**

**5.5.5.7 Harassment and bullying incidents are monitored and analysed regularly. Appropriate action is taken to address the issues that have been identified.**

**GCH can demonstrate that:**

GCH has a range of policies in place to address harassment and bullying. Monitoring data relating to a range of employee is regularly collected and reported as part of normal HR processes and this includes harassment and bullying incidents data. A range of information is also made available to employees on harassment, bullying and other employee relations matters.

**Areas for improvement/review:**

- Continue monitoring – and consider external employee assistance where incidents can be reported is they arise
- Keep policies under review

**Overall score 4**

**5.5.5.8 Equality implications inform the setting of objectives in management and individual appraisals.**

**GCH can demonstrate that:**

Appraisal and Employee Development policies are in place. These are supported by a competency framework, which includes fostering respect and dignity.

**Areas for improvement/review:**

Staff competencies should be regularly reviewed to establish what individual and organisational equality training needs there are.

**Overall score 4**

#### **5.5.5.9 Staff are engaged positively in service transformation and in developing new roles and ways of working.**

##### **GCH can demonstrate that:**

Staff interviewed as part of the evaluation demonstrated a high level of commitment to equality and diversity and making to improve equality outcomes. They are also highly motivated to understanding customers and meeting their specific needs. Staff felt that they were informed about the direction that GCH was moving in and what it was striving to achieve. Staff are involved in Chat with the Chief sessions.

##### **Areas for improvement/review:**

Nothing noted.

<b>Overall score 4</b>
------------------------

## **5. Recommendations for improvement consolidation**

Most of our recommendations for improvement and consolidation are contained in section 5 of the report. We would emphasise a limited series of points here.

- GCH seems to have embedded effective equality improvement processes within both its strategic and day to day working. Maintenance and development of all aspects of the current equality improvement structure is essential.
- In particular formal equality impact assessments should be used more systematically in determining needs and requirements and tested by the critical challenge process. There should be a clear link between and fuller reporting of objectives derived from EIAs and those contained within corporate and team/service plans.

- The critical challenges currently in place are an important part of the improvement process and GCH is to be commended for its high level of stakeholder engagement. The outcome of the engagement and involvement project should now be reviewed and the work done there further developed to support scrutiny and challenge.

## **7. Moving to the Excellent Level**

GCH is well placed to move onto to the Excellent level of the Equality Framework. The general criteria are listed below with minor adaptations made.

- Board members and managers have a reputation for championing equality issues and ensure that the equality issues relevant to GCH customers and potential customers are embedded in their sustainable community strategy, strategic plans, local area agreements and-delivery plans.
- It works with all strategic partners and the voluntary and community sector acting as advocates to achieve defined equality outcomes.
- It has good evidence of the equalities profile of its customers based on data that is regularly reviewed.
- It is measuring progress on equality outcomes, is able to disaggregate data on relevant performance indicators and can demonstrate real outcomes that have improved equality in services and employment.
- It identifies the changing nature of its customer base and their expectations and then prioritises its activities and explains its decisions.

- It provides good customer care by ensuring that services are provided by knowledgeable and well-trained staff who understand their needs.
- It has improving satisfaction and perception indicators from all sections of the community and staff.
- Equality groups are integrally involved in engagement programmes.
- There are forums for all equality stakeholders to share experiences and evaluate the GCH progress.
- All parts of the organisation can show tangible progress towards achieving outcomes which address persistent inequalities and narrow the gaps.
- It has implemented action for equal pay outcomes and demonstrates progress on under-representation, flexible working, access to training and development and promotes an inclusive working culture based on respect.
- It reviews its equality strategy and public duty equality schemes every three years and seeks innovative improvement challenges.
- Through its achievements, it is an exemplar of good practice for other ALMOs and works with others to share best practice.

## **8. Conclusion**

The attainment of the Achieving Level is a major step forward for GCH. Since the formation of the ALMO, a vast amount of work has been done on equalities and diversity. As external assessors, it was evident to us that the leadership of the organisation wants the Company translate its headline values into everyday practice. There is straightforwardness and robustness in service reviewing and self-assessment and there is a genuine commitment to involving customers in

meaningful ways. This has been confirmed in comments by frontline staff and people from the customer groups that we met.

The Equality Framework is being used as a guiding performance measure and it is being used properly, as a tool to mainstream equality and diversity. There is a distinct absence of a tick box approach to equality improvement.

## **9. Acknowledgements**

Thanks are due to Anita Pope for timely presentation of documentation and the efficient organisation of interviews

## **10. Assessors**

Dr Julian Clarke and Mr Mohammed Dhalech, Centre for Local Policy Studies, Edgehill University, St Helens Road, Ormskirk, L394QP

## **Appendix: Improvement suggestions from staff arising from focus groups**

- Improvement in engaging under 25's
- Improving access and implementing data base on IT system
- Extend use of diversity information in terms of development of action plans to address social inclusion
- More hub working with sheltered facilities being the centre of the community for elderly clients – both tenants and owner occupiers
- A yearly statement to our staff, customers, stakeholders – the achievements in this area to measure the success of GCH
- To better understand the housing needs of minority groups e.g. how gypsy and travellers view the housing stock we can offer them
- Increased reports of hate crime form people experiencing it

- Having an in house translation service and everyone trained in sign language
- A bit more openness from local agencies
- Better tenant involvements in the board election process
- More young people on board
- More youth engagement
- Training /law updates for staff and residents
- More education/awareness of our diverse customers; their beliefs, backgrounds, expectations etc...
- Our website could be multi language capable “simple” button translate all sections