



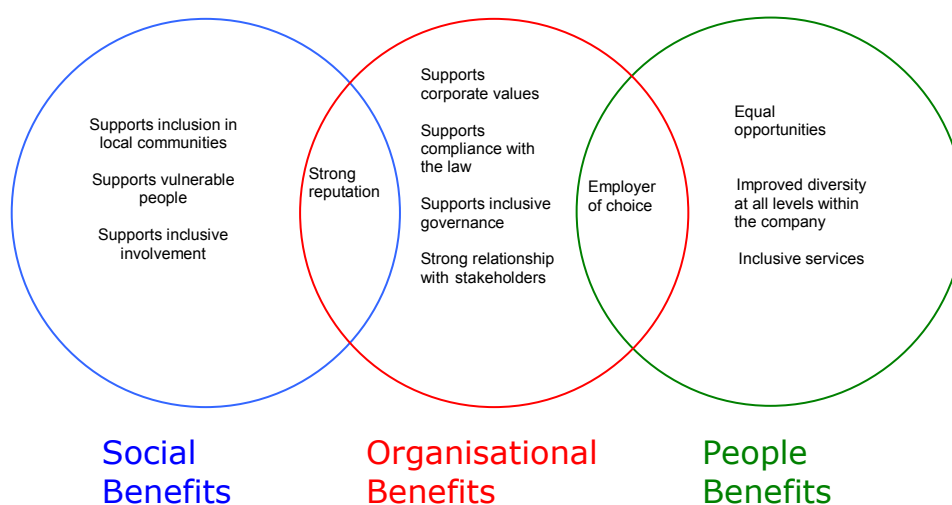
INCLUSION POLICY

CONTENTS

- 1. INTRODUCTION**
- 2. INTENT, AIM AND RESPONSIBILITIES**
- 3. WHAT DOES THE POLICY COVER?**
- 4. ACTION PLANS TO DEVELOP INCLUSION**
- 5. MONITORING AND REPORTING**

1. INTRODUCTION

- 1.1 Acis has been externally accredited as an **Investor in Diversity** and being **Positive About Disabled People**. These accreditations recognise how we value diversity, seek to promote an inclusive culture, and commit to equality and fairness in our activities.
- 1.2 This policy seeks to bring existing company policies - Equality and Diversity, Black and Minority Ethnic, and Vulnerable Applicants and Tenants together into a single consolidated policy, which is intended to support Acis being fully inclusive in its operations, activities, and service delivery. This single scheme approach is further intended to reflect the Equality Act 2010 coming into force, harmonising and replacing previous legislation.
- 1.3 The policy has been drafted having regard to the Equality Act 2010, good practice, and the Regulatory Framework for Social Housing in England from April 2010. This confirms diversity as a cross cutting standard, and sets out the need for Acis to treat all tenants with fairness and respect as set out as a required outcome. It further requires that it demonstrates an understanding of the different needs of tenants, including in relation to the diversity strands (protected characteristics) and tenants with additional support needs.
- 1.4 The policy cross references with the Community Cohesion and Financial Inclusion strategies which have been approved and implemented over the last 12 months, and which confirm our wider approach to inclusion.
- 1.5 The policy sets out our intent, aims, and identifies responsibility for its delivery. It seeks to give rounded coverage and includes details of actions to ensure inclusion.
- 1.6 We recognise the importance of monitoring performance in delivering this policy, and associated activities and services. The final section sets out what will be monitored and reported.
- 1.7 The intended benefits of the inclusion policy are summarised in the diagram below:



- 1.8 The policy will be posted on our website so that it can be viewed by any interested party. It will be publicised to staff via employee briefings, and brought to the attention of all third party contractors working for the company. Staff and company notice boards will continue to include information on inclusion issues

2. INTENT, AIM, AND RESPONSIBILITIES

2.1 INTENT

To assist in meeting our corporate priorities of **Putting People First** and **Creating Better Places to Live**, Acis is committed to fairness and equality for all, operating with professionalism, integrity, and openness, and a belief that everyone is entitled to be treated with dignity, respect and fairness, regardless of their age, disability, sex, sexual orientation, race, religion or belief or any gender re-assignment – these being the protected characteristics set out in the Equality Act 2010.

2.2 AIM

Our overall aim is to ensure that we operate in an inclusive way and do not knowingly create an unfair disadvantage for anyone, either directly or indirectly. When reviewing existing or introducing new policies, procedures or strategies, we will complete an Equality Impact Assessment (as shown at Appendix 1) and ensure that our policies comply with The Equality Act 2010.

2.3 RESPONSIBILITIES

Everyone in the company has a responsibility to ensure that our approach to inclusion is put into practice. Specific responsibilities are as follows:

2.4 The Board and Executive Leadership Team have responsibility for Strategy and Policy:

- ✓ Ensuring that everyone within the organisation complies with the ethos of Fairness and inclusion
- ✓ Making resources available for implementation
- ✓ Monitoring, analysing performance, and agreeing corrective action where necessary
- ✓ Assessing the impact of this policy on an annual basis and monitoring performance in delivering related action plans

2.5 The Chief Executive and the Executive Leadership Team are responsible for:

- ✓ Implementing the company's vision of "Better Home and Better Services for Better Lives" through the Corporate Strategy (2009 – 2019)
- ✓ Monitoring to ensure that our commitment to equality and diversity, and the commitment of third parties who provide services for us, is consistently applied in all areas of work

- ✓ Ensuring that all employees are aware of our stance on equality and diversity, and about their own specific roles and responsibilities in achieving its objectives
 - ✓ Reporting to the Board on inclusion matters
- 2.6 The **Diversity Service Improvement Group** champions our approach to diversity and equality. It meets at least on a quarterly basis, and reviews and monitors progress of actions within the Diversity Service Improvement Plan.
- 2.7 **Each manager** is responsible for actively promoting equality of opportunity, encouraging diversity, and eliminating unlawful discrimination in their specific area of responsibility.
- 2.8 **All employees** have a responsibility to ensure that they practice and promote equality and diversity in their day-to-day activities. We will continue to provide appropriate training to support the effectiveness of the policy.

The expectations of contractors, consultants, and suppliers are set out in section 2iv) below.

3. WHAT DOES THE POLICY COVER?

- 3.1 This policy covers a range of activities and services which support inclusion:

i) PROFILING TENANTS

We have profiled and will continue to profile tenants via the "Getting to Know You" (GTKY) surveys, which have been issued to all tenants and shared owners. Customer profiling activity seeks to establish preferred means of communication with Acis, alongside personal circumstances, as part of ensuring that we are able to shape and tailor our services to meet their needs. The survey has been revised to incorporate all protected characteristics, as contained in the Equality Act 2010. We have produced a leaflet "Why Do You Want to Know" to advise why we seek "personal" information and what we will do with it. Pre-populated survey forms will continue to be circulated annually, with a view to obtaining updated information.

ii) ACCESS TO AND SATISFACTION WITH SERVICES

We aim to ensure that all people have equal access to services via a Freephone telephone service (including emergency "out of hours" facility) via accessible office/reception facilities which include a hearing loop system, via email and text contact, and personal visits to housebound or vulnerable tenants as required. We will seek to be inclusive by arranging interpreters for minority languages where this is the most practical solution, and by offering publications in large print or via audio cassette and in different languages also as required. Our website includes a Browse Aloud facility and allows on line reporting of repairs, complaints, and payment of rent.

The Customer Feedback policy (incorporating complaints and compliments) will continue to allow for expressions of dissatisfaction by protected characteristics.

iii) SUPPORT FOR VULNERABLE HOUSING APPLICANTS AND TENANTS

We aim to support vulnerable tenants, to limit instances of tenancy breakdown, and provide a responsive housing service in line with the regulatory framework for social housing's expectations that we develop and provide services which support tenants to maintain their tenancy.

Our definition of vulnerability is as follows:

"An individual or household experiencing difficulties with everyday living due to financial, educational, health, employment, learning, language, behavioural, family, social or other circumstances/issues or any combination of these".

3.2 In seeking to provide support for vulnerable tenants we will:

- **Provide housing related support** in 9 sheltered housing schemes (commissioned by Lincolnshire County Council's Supporting People service) which seeks to enable residents to maintain their independence. We are reviewing how services can be most effectively delivered from 2011, with the proposed introduction of the integrated community floating support service
- **Provide Community Alarms** to enable vulnerable residents, both in Acis and other accommodation, to contact a control centre in the event of an emergency. The control centre is staffed 24 hours a day, and responses can range from providing verbal reassurance to calling the emergency services.
- **Relet properties to a defined standard.** The relet standard defines the baseline standard which all vacant properties must meet before being considered suitable for letting.
- **Undertake post tenancy visits** around four weeks into a tenancy. This visit has several purposes, including checking that support packages which were agreed with providers through the allocations process, are being delivered. Occasionally, these visits indicate that new tenants are struggling with their tenancy obligations. In such cases, additional support may be provided through more intensive housing management, referrals to support providers, or through a formal referral to a statutory agency.
- **Deliver bespoke provision as part of improvement programmes and in new developments**

We will design kitchens and bathrooms around both existing and prospective tenants' needs as part of improvement programmes and in new developments, wherever necessary and possible.

- **Communal Areas**

Where identified as necessary, and when reasonable or feasible, (as set out in the Equality Act 2010) consideration will be given to undertaking improvements to ensure that communal areas of estates or blocks are accessible.

- **Provide Aids and Adaptations**

Our Aids and Adaptation Policy sets out how we will support, fund, and assist tenants with works to their home, to help meet their special needs, and to maximise independence and inclusion. This includes providing adaptations identified as required when undertaken improvement works to properties under planned maintenance or improvement programmes.

- **Operate a sensitive repairs and maintenance policy**

An equality impact assessment was undertaken in the formulation of the repairs policy which recognises that the needs of certain individuals may require special consideration. The repairs policy confirms the commitment to employees being trained and given guidance to ensure that the special needs of groups including the elderly, disabled, and those customers suffering from ill-health are given sensitive consideration in the way that a repair is completed.

All contractors involved in repair works are required to demonstrate their commitment to and empathy with our approach to inclusion.

- **Support Financial Inclusion**

Acis' Financial Inclusion strategy has the key aims of:

- Promoting access to welfare rights and money advice
- Improving access to financial products
- Improving financial capability
- Aiming to reduce the number of tenants who find themselves in fuel poverty

- **Support inclusive involvement**

Acis's approach to involvement has been accredited by TPAS and this recognised the approach to delivering equality of access involving 'hard to reach' groups. The accreditation standard was met in that we demonstrated:

- A written explanation of non-discriminatory behaviour by both staff and residents
- Evidence that the standard is understood and acted upon within the organisation.
- Its main strategy document relating to involvement identifies priorities for under represented groups
- Evidence that action is being taken to understand why groups are not engaged
- Evidence that the approach to involving under-represented groups is programmed and considers impacts
- Evidence of consultation with all sections of the community to determine the best way of achieving involvement of a diverse range of residents.
- Evidence of balanced approaches to gaining views used (e.g. targeted surveys, targeted focus groups and balanced citizens' panels)

Our approach to involvement will continue to recognise the need for and importance of equality of access and ensuring that the diversity of involved tenants represents the profile of our customer base.

We will continue to produce an annual **Resident Involvement Statement** which confirms the commitment to being clear on how tenants can get involved, offering flexible ways for them to do this, along with giving necessary support.

- **Operate inclusive scrutiny arrangements**

A tenant scrutiny panel has been established and membership encouraged from all tenants. The panel has agreed a Code of Conduct with the following clauses:

- No member will discriminate on any ground against any other member of the Scrutiny Panel or public. Discriminatory language will not be used in discussions.
- All those who attend meetings have the right to be treated with dignity and respect, regardless of their age, disability, gender, race, religion or belief, sexual orientation, gender identity, or any other matter, which causes people to be treated with injustice.
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- Support **Community Cohesion**. Our Community Cohesion Strategy is aimed at tenants who might be particularly at risk of social exclusion and may be supported or assisted by the strategy. These were identified as:
 - The unemployed and persons on low incomes
 - Persons with educational/skills needs
 - Persons living in areas with crime/community safety issues
 - Persons with health Issues

The strategy is also focused on specific geographical areas with the highest levels of deprivation/risk of social exclusion in order to meet corporate aims of developing community cohesion. Particular wards being focussed upon are in Gainsborough (East/North/South West wards) and the Lower Manor and Woodthorpe estates in Sheffield.

- **Respond to Anti social behaviour (ASB) and Harassment**

We believe that no one should live in fear of harassment or other forms of anti-social behaviour, and have a specific ASB strategy, policy, and supporting resources to support victims of all forms of anti-social behaviour. Our commitment to tackling ASB and supporting inclusion has been recognised via the accreditation of the service by HouseMark/Social Landlords Crime and Nuisance Group.

Tenancy Agreements will continue to require tenants and members of their households and visitors, not to harass, intimidate or create any nuisance, and tenant's handbooks. We will continue to publicise these and encourage tenants to inform of any breaches so that they can be investigated.

We recognise that victims of Racial Harassment, Domestic Violence, and severe Anti-Social Behaviour may feel vulnerable, and will remain committed to providing support to these victims either directly, or through referrals to statutory and voluntary agencies, and monitoring the effectiveness of our intervention alongside satisfaction with them across key diversity strands.

iv) SUPPORT FOR BLACK AND MINORITY ETHNIC (BME) COMMUNITIES

Tenant profiling confirmed that at the end of March 2010, BME Communities made up 1.5% of our overall tenants. Whilst this is a relatively small percentage, we will continue to take reasonable steps to ensure that our services are inclusive to BME communities. We will seek to do this by:

- Complying with the CRE Code of Practice in Rented Housing
- Arranging interpreters for minority languages where this is the most practical solution, and by offering publications in different languages also as required.
- Dealing effectively with racial harassment as per our ASB policy
- Aiming to ensure that lettings to BME households represent the profile of communities and housing registers in the areas in which we operate.
- Analysing formal actions taken in respect of rent arrears
- Analysing ethnicity of complainants to assess if they are proportionate or highlight issues preventing inclusion
- Analysing the ethnicity of job applicants and starters and leavers to assess any trends or patterns requiring action in response.
- Providing all employees with diversity training to develop their knowledge and awareness of the specific needs of persons with protected characteristics, including persons from BME communities

v) CONTINUOUS IMPROVEMENT

Service reviews and developments will continue take into account of Inclusion issues.

vi) AWARDING CONTRACTS

As part of pre qualification assessment, prospective tenderers will be required to provide specific information about equality and diversity issues. This will be assessed and scored as part of the process leading a contract being awarded.

Decisions on contracts awards will be based on objective criteria to assess the ability to carry out work to required standards, timetables, and budgets, representing overall value for money. As stated in the Corporate Procurement Strategy, we will seek to focus services on the needs of customers.

When engaging external agents to work on our behalf, we will require them to agree to the principles of this policy. Details of other company's' own relevant policies will be required. Assistance will be given to smaller companies where necessary to ensure that requirements are satisfied.

vii) EMPLOYMENT AND TRAINING

In recognising the value of diversity and promoting an inclusive culture, the company aims to ensure that the make-up of the workforce reflects the communities served, and the geographical areas in which it works. Where appropriate, positive action will be taken to tackle under representation.

Employees will be recruited on their ability to carry out the work required by a position. All employees are appointed according to the written Recruitment and Selection Policy, the intention of which is to ensure there is a wide range of applicants to choose from, and a fair selection process.

Additional responsibilities apply to those who recruit and or manage employees to ensure that terms and conditions of employment, including access to training, development and promotional opportunities, and other benefits, such as achieving a work-life balance, do not directly or indirectly discriminate against any groups or individuals.

Consideration will be given using positive action to encourage under-represented groups to take advantage of opportunities available within the Company, in appropriate circumstances.

Employing people with disabilities

Acis is committed to employing disabled people and is accredited by the Jobcentre Plus as

Positive About Disabled People

We will continue to aim to ensure that anyone with a disability, whether an applicant for a job or an existing employee, is protected from harassment and less favourable treatment by others and, as far as possible, is not disadvantaged by their disability.

We will do everything reasonably possible to enable staff with disabilities to carry out their job and to make any such adjustments as far as are reasonably practicable to the working environment, working practices, role responsibilities and to the terms and conditions of employment to ensure no disabled person is placed at an unreasonable disadvantage and to enable anyone who becomes disabled to remain in their job or to be redeployed to a suitable alternative.

viii) Governance

The company will mainstream inclusion issues into business and planning mechanisms, so that decisions made are relevant to the needs and aspirations of the people it serves.

It is recognised that, in order to be effective and accountable, all sections of the community should be represented at the heart of the decision-making processes in the organisation. Thus under-represented groups will be encouraged to apply for Board membership when vacancies occur.

There is a written Recruitment Policy and Procedure for appointment of Board Members, which allows for monitoring of applicants by protected characteristics.

Board members are chosen on the basis of their knowledge, skills, and abilities to take an active role in governance. Training will be provided on equality and diversity to board members so that they are comfortable discussing the issues and are able to demonstrate their personal commitment to it.

4. ACTION PLANS TO DEVELOP INCLUSION

- 4.1 As stated in the introduction, this is a consolidated policy which cross references other related strategies. As such, there are current Service Improvement Plans which support inclusion (*Creating Better Places, Equality and Diversity, and Financial Inclusion*). These will continue to be monitored and managed as at present. Future actions to support inclusion will routinely be incorporated into the service improvement planning process.

5. MONITORING AND EVALUATION

- 5.1 The Board will receive an annual impact assessment of the policy, evaluating and detailing how it has been adhered to and recommending any changes required to ensure Acis delivers inclusive services.
- 5.2 The annual impact assessment will set out how we have responded to and can demonstrate compliance with the commitments made in the policy. As such, ongoing monitoring will be in the form of demonstrating compliance with commitments made in respect of:
- Profiling
 - Access to and satisfaction with services – focusing on key analysis of access and satisfaction by diversity categories
 - Supporting vulnerable tenants – across all key aspects mentioned. The profile of those who have benefitted, to what extent, and their satisfaction with it by diversity profile
 - Support for BME communities – as above
 - Continuous Improvement – how has inclusion been taken into account?
 - Awarding Contracts – monitoring of contractors
 - Employment (recruitment and workforce)
 - Governance