



**ARCON**  
**H O U S I N G**  
● ASSOCIATION ●

## **Black and Minority Ethnic Housing Strategy 2006-2009**

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## **Section 1**

### **Introduction**

#### **1.1 Why we are doing a strategy**

Arcon is a housing association working primarily in the Greater Manchester area with just over 1000 general needs properties in management. The organisation has 23 staff mostly working the field of housing management, maintenance and finance.

The Greater Manchester area has a diverse population. The 2001 Census shows that 154,000 people out of a population of 2.58m are from minority ethnic groups. In addition some parts of the region have a significant ethnic minority, for example the inner city district of Manchester has a 19% minority ethnic population, and Rochdale has a 11.4% minority ethnic population. Both of these are areas where Arcon has a significant stockholding.

Arcon is committed to ensuring that our services meet the differing needs of the communities we serve. We have an obligation to provide services that help to promote equality of access, respect diversity and set high standards. A dedicated Black and Minority Ethnic (BME) Housing Strategy is not only essential to ensure that we comply with regulatory guidance, research the needs of our customers and forward plan our services, but also because we believe that there is a moral and business case for meeting the needs of communities from different ethnic groups and with different faiths. This Strategy is also compliant with the growing emphasis on the part of the Audit Commission to use Key Lines of Enquiry (which have diversity both as an overarching theme) for inspection purposes.

Much of the stock managed by the Association is thus located in areas of social disadvantage with racially diverse local populations. There is an annual tenancy turnover rate of 10% so there is some potential for us to contribute to the rehousing and regeneration demands in these areas. During the course of the research undertaken for this Strategy it has been apparent that there is a commitment from both staff and Board Members to ensure that race equality issues are tackled in an open and transparent manner. The organisation recognises its legal and moral obligations in this field and is keen to do much more than 'just the bare minimum'

The production of a Strategy is therefore designed to ensure that activities are co-ordinated and planned in a systematic manner.

## **1.2 What does the Strategy contain?**

This document focuses on a number of key areas. These areas form the basis of the sections of the Strategy and feed into the Action Plan:

- A profile of the areas in which Arcon works, including an analysis of housing issues
- An assessment of the national context in terms of race equality in which the Association operates
- An analysis of the Association's performance against Regulatory guidance
- The results of Arcon's own research
- How we will ensure that the service improves

Through a wide range of research, analysis and consultation, three themes for action have emerged. These centre on:

- Access to housing
- Communication
- Partnership working

## **1.3 Aims of the Strategy**

This Strategy emphasises the three roles of Arcon – that as a deliverer of services, as an employer, and as an organisation that procures services from others - and the ways in which these roles can help tackle minority disadvantage.

At the heart of the Strategy are Arcon's aspirations in respect of race and equality. These have been articulated by the organisation as 'Arcon will be an Association that:

- Seeks to meet the needs of the whole community through understanding the communities needs and aspirations
- Is a fair employer that people want to work for, and reflects the community that it serves
- Appreciates diversity and deals fairly with all individuals
- Buys quality services and promotes its values to those with whom it works, including suppliers and contractors
- Works in partnership with other service providers.

Arcon has an ambition to deliver excellent services in respect of equality and diversity, as measured by the Audi Commission's standards in this area. This strategy therefore is a 3-year plan that will enable Arcon to deliver better services, and to ensure that there are greater levels of satisfaction with its services. An effective, achievable, measurable and realistic Action Plan has been developed from these aims.

## **Section 2**

### **Shaping the Strategy**

At the outset of this project it was clear that the Association had already done much of the groundwork in developing a BME Housing Strategy. There was at an early stage commitment from the Board and staff that further work needed to be carried out to ensure that the Association fulfilled its legal and business-case obligations in this field.

This housing strategy has therefore builds on existing work, and has been developed through consultation with a wide range of stakeholders. The key vehicle for consultation was the Association's Equality and Diversity Steering Group. This is a group mandated by the Arcon Board to oversee the development of the Association's strategic response to equality and diversity issues, and included the Board Champion on Equality, staff and tenants of the Association.

The approach taken drawing up this Strategy was flexible and proportionate to the size of the organisation, taking into account the information that was readily available. The key elements of the study therefore involved:

- An analysis of Arcon's performance against regulatory guidance
- A workshop with a number of key staff to ascertain understanding of BME issues, undertake some self assessment work and map the direction that the organisation wished to take
- Work with the Equality and Diversity Steering Group to assess priorities and determine the way forward
- A series of discussions with local authorities in which the Association operates to assess how Arcon can best fit in with their BME strategies
- Focus groups with members of the BME community to assess their views of the service that they received from Arcon.

This latter point was important as at an early stage it was apparent that much of the Association's activities were reactive and designed to comply with guidance, rather than meeting an identified need or aspiration. The Association was keen to do its own research in terms of the feelings of its tenants and applicants to help improve policy and procedure.

## **Section 3**

### **Minority Communities in the areas that we serve**

In order to develop the Strategy it is necessary to have an understanding of the BME Communities in the areas that Arcon serves. As well as having an understanding of the general population profile, an analysis of housing data is also useful. Arcon works principally in two local authority areas, and in both these areas the council has drawn up a BME Housing Strategy. It is essential that any plans drawn up by Arcon tie in with relevant local authority strategies; these strategies are discussed below.

#### **3.1 Manchester**

Most of Arcon's properties are in Manchester. The City serves 440,000 people, covering a narrow strip within Greater Manchester. It is the sixth largest metropolitan district outside London. According to the 2001 census, 19% of the population is from BME communities, which are unevenly spread across the City.

Seventy languages are spoken as mother tongue, including sign and other forms of communicative language and over the last 12 months the Council's Translation and Interpretation Service has been requested to provide interpretation in 40 different languages. The number of faiths in the City is also on the increase.

Ethnic groups in Manchester (2001 census)

<b>White</b>	<b>Number</b>	<b>%</b>
British	292,498	74.5
Irish	14,826	3.8
Other	10,689	2.7
All White Groups	318,013	81.0

<b>Mixed</b>		
White and Black Caribbean	5,291	1.3
White and Black African	2,414	0.6
White and Asian	2,463	0.6
Other	2,506	0.6
All Mixed Groups	12,674	3.2

<b>Asian or Asian British</b>		
Indian	5,816	1.5
Pakistani	23,104	5.9
Bangladeshi	3,658	0.9
Other	3,301	0.8
All Asian Groups	35,879	9.1

<b>Black or Black British</b>		
Black Caribbean	9,044	2.3
Black African	6,651	1.7
Other	2,039	0.5
All Black Groups	17,734	4.5

<b>Chinese or other ethnic group</b>		
Chinese	5,124	1.3

Other ethnic group	3,390	0.9
All Chinese and other ethnic group	8,514	2.2

The BME population has increased from 12.4% at the point of the 1991 Census to 19% at the time of the 2001 Census. The largest BME group is Asian at 9% of the population, of whom 64.4% are Pakistani. The next largest ethnic group is Black at 4.5%, of whom just over half identify themselves as Caribbean. The White Irish population is 3.8%, which is significantly higher than the national average of 1%. It is projected that BME populations will increase, in the five years to 2011, especially in the under 15 and the over 65 age ranges.

The largest concentrations of the BME communities in Manchester are in inner city areas, including areas in which Arcon has stock.

In addition to this the City is host to approximately 1,800 asylum seekers, mostly under the Government's dispersal programme. These are from many countries including Iraq, Afghanistan and parts of Eastern Europe. There are implications for the Association where asylum seekers receive a positive decision and require accommodation. The challenges presented by this community are different to other groups who have been here for generations.

Housing data provided by the City Council makes interesting reading. BME groups are over-represented in both the waiting lists and accepted homeless list;

City Waiting List (1<sup>st</sup> April 2006)

<i>Ethnicity</i>	<i>Family Applicants</i>	<i>Single Applicants</i>
White	59.4	69.2
BME	40.6	30.8

*Households Accepted as Homeless (snapshot 30<sup>th</sup> March 2006)*

<i>Ethnicity</i>	<i>Families (%)</i>	<i>Singles (%)</i>
White	48.3	73.2
Mixed	6.9	3.6
Asian or Asian British	4.5	5.3
Black or Black British	31.0	17.9
Chinese or other ethnic group	9.3	0

Although BME families form 19% of the City's population, they form 40% of the City's Waiting List for accommodation, and over 50% of the accepted homeless households. A closer break down of the categories shows the move from old to new BME communities, with a shift from Asian to Black households in the homeless acceptances. For example almost half the Black or Black British households classify themselves as Somalian.

The need for the association to adapt and change its services to the changing make up of the BME community is apparent.

The City Council has developed a BME Housing Strategy (2003), which has as its main aims the elimination of discrimination, promotion of equal opportunities, service improvement to all and the creation of sustainable communities. The following items in the Strategy are particularly important to Arcon:

- BME households tend to have longer waiting times for suitable accommodation. This may be down to a lack of certain types of (larger) accommodation.
- The success of the Choice Based Lettings scheme in attracting and rehousing BME households needs to be measured.
- A support programme to rehouse BME households in non-traditional areas has been well-received.

### 3.2 Rochdale

In Rochdale the BME population of 11.4% is almost exclusively made up of people who are Asian in origin, with Pakistani being the largest group, with a small proportion also originating from Bangladesh.

The Council has produced a Housing Strategy for the Asian Community, as it is recognized that this group are particularly disadvantaged in terms of their housing. The Council has also introduced some initiatives that are relevant to the Asian community. Amongst these is an out-of-hours reporting service for harassment, and an induction scheme to help BME tenants settle in areas where they are underrepresented.

## **Section 4**

### **The context in which we operate**

#### **4.1 The Requirements of Housing Organisations**

As well as responding to the requirements of the communities that they serve, housing organisations have legal and good practice obligations arising from national agendas for change. These obligations can be summarised as:

- Those under the Race Relations Act 1976, and the Race Relations (Amendment) Act 2000 which, as well as making discrimination unlawful, promote a positive duty on public organisations (such as the Housing Corporation) to promote race equality
- The Stephen Lawrence Inquiry 1999, introduced the concept of 'institutional racism' and mentioned housing as a key policy area where improvements could be made
- The Community Cohesion Report (2001) produced following disturbances in a number of Northern towns highlighted the 'parallel lives' that different communities led, arising in part from the polarisation in terms of housing provision and choice
- The Race Equality Code of Practice (2001) sets out how housing associations can develop their business to ensure that race equality is promoted and discrimination tackled. This led to the Housing Corporation developing Codes of Practice for Registered Social Landlords (RSLs).
- In 2000 the European Union agreed two new directives. These instruct each member country to take appropriate action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation.

Aside from these duties, the Housing Corporation believes that RSLs must aim for the highest possible performance in respect of Equality and Diversity. This is because the issue has a moral and business-case dimension as well as a legal one. Under this school of thought, good performance in this area will ensure that housing associations are better at understanding their customer base, developing new products and services in relation to this base, ensuring that there is a continued demand for services and in

winning new business. RSLs should also seek to draw the best staff from all sections of the community and have leadership that reflects the aspirations of the communities that they serve.

#### 4.2 Review of Key Policies

It is instructive to note that there has been a shift in both the legal and policy framework as regards race equality over the last decade. The emphasis has moved from duties on the producer of services (equal opportunities policies, for example) to the perception of the consumer as being of prime importance. This is in common with other areas of public policy. The BME housing consumer in particular has become more important as the focus on building sustainable communities has increased.

There has also been a move towards mainstreaming race equality in the housing sector with the focus on performance shifting from 62 BME housing associations to the sector as a whole containing over 2000 RSLs. A raft of new guidance over the past few years has stressed the need for all Boards, staff and tenants organisations to be representative of the communities that they serve. This policy is relevant to all housing organisations regardless of their size, geographical operation or the communities that they serve.

To add to all this the BME communities have themselves changed, with differences developing between the 'old' and 'new' communities, with the latter often having to endure the worst housing in economically declining neighbourhoods.

The challenge is therefore for all housing associations to assess their performance, define priorities, set targets for improvement and to engage with their local communities to deliver lasting improvements in meeting the housing demands of the whole population.

#### 4.3 Regulatory Code and Guidance

The Housing Corporation sets out the fundamental obligations of housing associations through a regulatory code with associated regulatory guidance. The Code is designed to ensure that Associations are viable, properly governed and properly managed.

Equality & diversity are primarily covered in the 'Properly Governed' section of the Code, with an expectation that Associations will 'work towards the elimination of discrimination...demonstrate an equitable approach... (and) promote good relations between people of different racial groups'.

The accompanying regulatory guidance identifies seven principle areas of activity and sets out the Corporation's expectations of performance in this area. These seven areas are expanded upon in GPN 4 and are further discussed below.

One other point in the Code is worthy of note. There is an expectation that Associations' services should be responsive to the individual characteristics and circumstances of residents, an especially important point for Arcon in view of the areas in which it operates.

#### 4.4 Good Practice Note 4

GPN 4 sets out the Corporations expectations of performance in the following areas:

- Lettings
- Tenant Satisfaction
- Dealing effectively with racial harassment
- Governing body membership
- Staffing
- Representation in tenants and residents associations
- Employment performance of suppliers, contractors and consultants

The Guidance Note recognises that improved performance cannot be achieved overnight and accepts that a phased introduction is an appropriate way of delivering these objectives. The timescales for improved performance in each of the key areas are detailed in the Note:

Area of activity	By April 2003	By April 2004	By April 2005	By April 2006
<ul style="list-style-type: none"> <li>• Lettings</li> <li>• Tenant Satisfaction</li> <li>• Racial Harassment</li> <li>• Staffing</li> <li>• Governing Body Membership</li> </ul>	Targets set and performance monitored	Action Plans to rectify any shortfall against target	Demonstrable improvements in performance	Continuous improvement
<ul style="list-style-type: none"> <li>• Tenant and Resident Association Membership</li> <li>• Employment of Contractors etc</li> </ul>		Targets set and performance monitored	Action Plans to rectify any shortfall against target	Demonstrable improvements in performance

#### 4.5 Good Practice Note 8

GPN 8 covers the wider Equality and Diversity agenda. It follows on from the more prescriptive GPN 4, and although it sets no targets it expects Associations to develop their own Equality & Diversity Strategy, with the policy going beyond race to cover other equality issues such as gender and disability. The Strategy should cover all aspects of an association's work, with the onus firmly on the Board to provide leadership to achieve success in this area.

The Note expresses the standard method for the production of a strategy and emphasises that the document will be based on the following:

- An assessment of need to ensure that the association properly understands the needs and aspirations of the communities that it serves
- The production of an Action Plan to address the issues outlined in the needs analysis
- The implementation of the Action Plan, ensuring that staff have the necessary tools and skills to fulfil their duties
- The development of systems to monitor progress against targets and the capacity to undertake remedial action where required.

The Corporation stress the cyclical nature of the strategy and the processes outlined above.

#### 4.6 Audit Commission Requirements

The Audit Commission has developed what it calls Key Lines of Enquiry. These KLOEs are used as the basis of its inspections of housing organisations including housing associations. Most of the KLOEs cover a specific topic e.g. repairs, tenant involvement. Diversity is one of three generic key lines of inquiry (KLOEs). The Audit Commission notes that these KLOEs 'will not be used independently for inspection purposes'. Instead the generic KLOEs have been 'embedded within each of the service specific KLOEs'. (e.g. stock management and asset management, resident involvement).

The Audit Commission recognises that anyone who reads through all of the KLOEs will find largely that very similar points are made throughout under Diversity. However, this means that each of the KLOEs 'can be used on a stand alone basis for each relevant service area'.

The Diversity KLOE poses the same question for all of the service areas, namely: How does the organisation respond to the diversity of its community to ensure that all users, or potential users, have fair and equal access to the relevant service area?

The Audit Commission has drawn up 'descriptors' of what an excellent organisation would look like for each of the service areas and generic KLOEs. The main points around diversity include:

An Excellent Service:

- Has a clear understanding of its local community using all relevant information, (e.g. census) including the input of local partners, and knows its own service user profile, making necessary adjustments where this is out of step in meeting the needs of those that require services.
- Knows, records, analyses and monitors information about the ethnicity, vulnerability and disability of service users and uses it to ensure services are delivered appropriately and to prioritise resources.
- Provides information about services and service standards in a comprehensive range of languages and formats appropriate to service users' needs e.g. large print, Braille, other languages etc.
- Works with its component communities to ensure fair representation and service take up.
- Does not discriminate against any person or other organisation on the grounds of race, ethnic origin, disability, nationality, gender, sexuality, age, class, appearance, religion, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.
- Ensures there is easy access to interpreting and translation services in local community languages. Works alongside service users to decide the best ways of involving them depending on their circumstances.
- Has mechanisms that facilitate involvement of service users that are representative of the organisation's customer base.
- Can demonstrate how the varied methods of resident involvement have led to black and minority, ethnic (BME) and hard to engage groups having an impact on the service they receive.

- Provides a range of support to enable service users with specific needs to be involved, for example by offering travel or carers' allowances, using accessible venues for meetings, translating information, providing hear loop systems, etc.
- Has a range of local compacts in place and a clear plan for introducing the remainder where service users want them.

The Action Plan assesses whether the proposed activities meet KLOE standards.

## **Section 5**

### **Research**

#### **5.1 National Picture**

There has been a great deal of research carried out in the field of race and housing. Both the Office of the Deputy Prime Minister (ODPM 2003) and the Housing Corporation (2003) have summarised emerging issues.

The following research and guidance is relevant to Arcon's own BME Strategy:

- There is considerable here is considerable diversity between the main ethnic groups. The different BME groups are different from one another and from white people.
- People of Pakistani and Bangladeshi origin (who are present in much of the areas where the Association works) are particularly disadvantaged compared with others. They are more likely: to be overcrowded; to live in poor housing conditions) and poor living condition; to be dissatisfied with their home; and to want to move.
- Members of BME groups make up 22% of households accepted by local authorities as homeless and are therefore considerably over-represented.
- Segregation: After five decades of settlement, Britain's BME population is still disproportionately concentrated in the poorest urban, usually inner city, locations and in the most deprived housing. The separation of groups living in different localities in itself is not necessarily a bad thing; it is the continuing association between BME segregation and deprivation that is problematic. Clustering has many positive attributes, which are evident through extended social and cultural relations, social support, a sense of belonging and well developed community infrastructures. There is a need to widen the housing choices

of minority ethnic groups, both through providing support for those who wish to move away from the established ethnic cluster, and by widening housing options within the ethnic cluster for those who wish to stay.

- **Racist harassment:** Members of ethnic minority groups were four times more likely to see racist harassment as a problem in their area than Whites. The research evidence suggests that harassment associated with residence remains widespread and can have a negative effect on household choice of residential area.
- **Housing needs:** Housing needs studies serve to highlight the diverse needs of the different communities and the commonality of housing experiences amongst some groups. All communities share the desire to live in areas where there are other members of their community and cultural and religious facilities close by and this becomes particularly important in later life. Common problems are affordability in terms of housing and access to social housing for some groups, while overcrowding and poor housing conditions are particularly important for some groups, e.g. Pakistanis and Bangladeshis.
- **Positive neighbourhood strategies:** In view of concerns about segregation, researchers have studied the issue of movement by minority ethnic groups into more peripheral areas and of overcoming barriers to entry to social rented housing estates outside existing areas of settlement. There is a need for sensitive and well-tuned policies to support minority ethnic households now wishing to move to non-traditional areas within the social rented sector. Shared ownership is potentially important for minority ethnic groups but affordability of even low cost homeownership is an important issue for some of them.

## **5.2 Arcon's Own Research**

Work was commissioned by the Association to conduct a series of focus groups with tenants and applicants. The purpose of the focus groups was to provide qualitative information about the opinions and ideas of a small number of the Association's BME tenants, and applicants on Arcon's waiting list. The information gathered through the sessions is intended to complement existing data gained through surveys and any further planned consultation exercises.

Due to the number of participants, the views articulated below cannot be seen as representative of all the diverse communities that constitute the Association's customer base. It is intended solely to provide the Association with an insight into some of the themes and issues could consider in order to deliver high quality services to the BME communities it serves.

### **5.3 Methodology**

The focus groups were held in the summer of 2005.

Tenants and applicants attended the groups, some of whom were accompanied by friends or family members. Many of the applicants who attended the groups had been informed of or nominated to Arcon by local authorities and were thus on the waiting list through nomination. Arcon was often one of a number of Associations to which they had applied for housing, and they had no particular loyalty to one association or the other. Their views were however very useful as they had been through the application process with a number of other Associations, and brought their experiences with them to the meetings.

The events attracted both male and female participants and people attended both from well-established Asian, Chinese and Caribbean communities and from more recently established refugee communities, such as from Eastern Europe and Africa.

Attendees represented a range of ages from their early twenties to sixty plus.

### **5.4 Summary of Key Discussion Points - Tenants**

#### *The Neighbourhood*

The majority of the tenants interviewed were generally positive about the neighbourhood that they lived in. The main reason given for this was the fact that the immediate environment had all the facilities that tenants needed.

Anti-social behaviour in the immediate estate environment was repeatedly stressed as a factor that made people dissatisfied with their home and neighbourhood. The groups felt that they were more likely to be victims of anti-social behaviour, and one tenant felt that the Association after he had reported damage to his property had not dealt with it properly. It was acknowledged that much of the responsibility for tackling such behaviour was a police matter rather than an Arcon matter. Participants felt uncomfortable approaching alleged perpetrators themselves, as a method of dealing with neighbour nuisance at the start, and much preferred going straight to the Association.

*It has been a terrible experience. The last occasion I contacted them they told me to contact the police... if I needed any further help from Arcon I would have to provide them with crime numbers...*

*I have been recording the details (of the anti-social behaviour) and they are waiting for further information before taking further action.*

### Relationship with Arcon

Tenants generally expressed satisfaction with Arcon as their landlord. They felt that services were provided to a high standard and the staff were approachable and friendly.

One tenant felt that the downside of the relationship was that the rent was too expensive. He was finding it difficult to hold down a job and pay the rent, and still have enough money left to live on.

Another tenant was unhappy after reporting a blocked drain, about being continually being reminded of the charge for unblocking the drain, rather than someone coming out to carry out the repair.

The only other dissenting issue was again around anti-social behaviour and the Association's help and response on this subject.

*Good. I have no complaints whatsoever. Every time I have needed them they have been there.*

*I had a problem with my gas meters... I must confess I was really, really impressed with their response.*

*Very expensive. I can't save any money.*

### Tenancy Support

One tenant had accessed tenancy support, and both groups felt that it was a good scheme to ensure that people were able to sustain their tenancies.

Another tenant viewed tenancy support from an alternative angle, and stated that the Association was visible on site and that her block of flats was very well maintained. The Housing Officer was a regular caller to her to see that things were okay.

### Tenant Involvement

There was agreement that Arcon needed to maintain a dialogue with tenants. This gave tenants a valuable opportunity to discuss their concerns with their landlord.

Events such as focus groups were a good method of consultation.

### Home Ownership

One of the groups believed that tenants should be allowed to buy their properties. They felt that a housing association tenancy should be a stepping-stone to owning your own home.

The group also wanted more information about home ownership schemes such as shared ownership.

### What would make Arcon a better landlord?

At the conclusion of the meetings, the groups came up with the following points:

- Build new houses in areas which are popular
- Enable people to buy their homes
- Deal better with instances of anti-social behaviour
- Continue the provision of high quality housing services

## 5.5 Summary of Key Discussion Points -Applicants

### The Neighbourhood

Prospective tenants were concerned about the neighbourhood in which they may be offered accommodation. The issue of anti-social behaviour was raised, and applicants would prefer properties close to areas where there was a significant BME population.

### Pathways for Applications

The main route for application to the Association was by referral from other agencies, especially when applicants were in a homeless or potentially homeless situation. In this case Arcon were one of a few Associations that applicants had applied to, and generally applicants did not feel that there was much difference between different associations.

Some applicants had been recommended to Arcon by word of mouth. In these cases the wish to move into Arcon accommodation was more defined, and applicants were able to distinguish between Arcon and other landlords.

A significant number of applicants were looking to move from private accommodation to housing associations. These applicants felt that housing association properties were better managed and cheaper than that available elsewhere.

One applicant felt suspicious about the phrase 'minority community', and did not like to give out their ethnic origin, as they felt that they were being discriminated against.

*I (have) heard the name Arcon and it is known for good service*

*I don't know much about Arcon, I have applied to a few housing associations for housing.*

*Housing associations are cheaper, especially for people who don't have much income.*

### The Lettings Process

One group had a long discussion about the lettings process, and how they were faring as applicants for housing.

The main points of this discussion were:

- Many applicants did not understand the process and felt that it had not been explained well to them. They felt that BME communities were at a disadvantage when applying for housing. These applicants did not understand the way in which applications were prioritised.
- Applicants felt that more should be done to keep them updated as to the progress of their application. They felt that the Association was 'a bit slow' in dealing with them through the process.
- More should be done to help people who are not articulate or do not have English as a first language.
- A minority of applicants were very knowledgeable about the letting process, and the information that was required to be rehoused. These applicants were also well informed about Choice Based Lettings, and how bidding for properties through this scheme worked. These applicants advised others on how to maximise their chances of being housed during the meeting.

There was some frustration at both groups at not being rehoused quickly, and this manifested itself in the discussions.

*(The lettings process) has never been explained to me. This is the first I am hearing...*

*You have got to fight for yourself (to get a property).*

*They won't take your word for it; you've got to provide evidence*

*There is a lot of confusion (about) where you are on the waiting list.*

### *Creating and Maintaining Communities*

The discussion in this part of the sessions centered around two main areas. The first of these was around the location and make-up of Arcon's properties and the second on areas that BME communities would like to live.

Applicants' knowledge about where Arcon had properties was mixed. Some people had a good knowledge of where possible accommodation could be located, whilst others had very little idea. In discussions it was stated that Arcon had flats in particular areas, which were not particularly suitable for BME communities.

One group suggested that the website would be an ideal mechanism to publicise the location of accommodation.

Houses were generally the preferred type of accommodation, especially houses with gardens. One older couple expressed a preference for a flat.

All groups were very clear about the areas where they wanted to live. Anti-social behaviour and the possibility of being victims of harassment were mentioned repeatedly as factors that limited people's choices.

In addition applicants felt safer in mixed areas, and welcomed the fact that a number of cultures lived side by side. Closeness to facilities and good transport links were also significant factors.

*They have got properties dotted around Manchester.*

*In some places they have anti-social behaviour it is a danger for foreign (looking) people... and the properties they have are not attractive to me for that reason*

*I don't want to live in an area that is majority white. Racism is still an issue.*

*A mixed (community) is better, you understand different cultures.*

*I feel safe and comfortable there.*

*How could Arcon make the application process better?*

The following points came out of this discussion:

- Keep applicants updated and better informed
- See people face-to-face to explain the process
- Give a better explanation of the process
- Develop a personal relationship with the applicant
- Rehouse people quickly

## **5.6 Summary of Key Discussion Points - General**

### *Communication*

Although the groups generally had a good knowledge of the English language they were also aware of the existence of interpretation and translation services. All of those attending considered that they did not require Language Line as they did not perceive there to be a substantial language barrier. Amongst participants there was a consensus that it is a good option to have available for tenants less confident in English.

One applicant stated that he was not aware of Language Line, but would not have used it in any case.

One tenant had used the Language Line service when he had first taken up his tenancy.

None of the people taking part specifically stated that they would prefer to receive information or correspondence in a language other than English. However, there was general support for the idea that tenants should be given a choice about what languages they would like to receive information in and that Arcon should respond positively to such requests.

In addition one group felt that the easiest way of getting information across was through face-to-face contact.

### The Website

Both applicants and tenants welcomed the website as a potential method of getting further information about the Association. A number of people asked for the web address at the meeting, and felt that it was a way of conveniently accessing information about the Association and the location of its properties.

The groups did feel that some people did not have access to the internet, and needed training and help in using new technology.

*I would like to use the website. It is a good idea.*

## **5.7 Conclusion**

Arcon's research has augmented the national research and that carried out by the local authorities in its major areas of operation. A picture is emerging of the strategy needing to tackle access to housing, racial harassment and supporting BME tenants who move into non-traditional areas.

Further issues will arise after assessing the organisation's current performance.

## Section 6

### Current Performance

To provide a firm foundation for service development, it is essential that the organisation has a firm understanding of current performance, including targets. It is instructive at this stage to use the seven elements of GNP 4 to examine the performance of Arcon as a landlord.

#### Lettings

In respect of lettings, the Housing Corporation expects that:

‘Lettings are proportionate to BME housing need or census data where this information is deficient, in the area where the association has homes...’

Arcon’s performance in this area can be summarised as follows:

Year	% Population BME (Greater Manchester)	% Waiting List BME	BME Target for Lettings %	Performance %
2004/05	10.7	13.7	15	18
2005 (April – Sept)	10.7	17.3	15	13.8

It is clear from this data and from interviews with staff that performance in terms of lettings to BME communities is good and adheres to the requirements of the regulatory guidance. Although there has been a slight decrease in the number of lettings to BME households in the first part of the year, the overall lettings ratio is still above target. There are some major strengths in this area and these are:

- Extensive monitoring systems in place for analysis of lettings, waiting list, ethnicity and census data
- Action Plans for performance improvement which are monitored and reported to the Board
- An ongoing dialogue with BME Associations to discuss performance and share good practice

However there is a feeling espoused by staff that the organisation 'should do more'. An analysis of waiting list data is revealing. The proportion of BME applicants on the waiting list is over 20%, which is double the figure that would be expected on census data. However the proportion of applicants from a BME community accepting tenancies is lower. This may be because of the lack of availability of suitable accommodation in the areas in which the Association operates, i.e. there is a proliferation of single person accommodation, which is not suitable for the majority of BME households. In any case some further research needs to be carried out on this.

Analysis of Waiting List

Ethnicity analysis	<u>30/9/05</u>		<u>31/12/05</u>	
	<u>Number</u>	<u>%</u>	<u>Number</u>	<u>%</u>
0 - No reply	0	0.0%	0	0.0%
1 - White - British	269	75.1%	244	73.1%
2 - White - Irish	8	2.2%	7	2.1%
3 - White - Other	7	2.0%	8	2.4%
4 - Mixed - White & Black Caribbean	7	2.0%	7	2.1%
5 - Mixed - White & Black African	12	3.4%	11	3.3%
6 - Mixed - White & Asian	1	0.3%	0	0.0%
7 -Mixed - Other	5	1.4%	4	1.2%
8 - Asian/Asian British - Indian	4	1.1%	4	1.2%
9 - Asian/Asian British - Pakistani	4	1.1%	5	1.5%
10 - Asian/Asian British - Bangladeshi	1	0.3%	1	0.3%
11 - Asian/Asian British - Other	2	0.6%	3	0.9%
12 - Black/Black British - Caribbean	12	3.4%	13	3.9%
13 - Black/Black British - African	15	4.2%	14	4.2%
14 - Black/Black British - Other	2	0.6%	2	0.6%
15 - Chinese/Other Ethnic group - Chinese	1	0.3%	1	0.3%
16 - Chinese/Other Ethnic group - Other	0	0.0%	0	0.0%
17 - Refused	8	2.2%	10	3.0%
	-----		-----	
	358	100.0%	334	100.0%
	=====		=====	
Total BME households (2 & 4-16)	74	21.1%	72	22.2%

In any case the use of census data as a measurement of housing demand in an area is somewhat crude and does not differentiate between demand for different types of property, housing choice or degrees of housing need. The need for a more sophisticated assessment of demand is apparent.

### Tenant Satisfaction and Involvement

The Housing Corporation's regulatory guidance states that 'tenant satisfaction is at least as high (for BME tenants) as for non-BME tenants.'

The Association's targets reflect the above and are that:

- Levels of satisfaction recorded for BME tenants are consistent with overall tenant levels of satisfaction
- Numbers of complaints received from BME households are consistent with the overall profile of BME tenants

For the year 2004/05 and part year 2005/06 the results in both the above areas are such that the BME results are consistent with the overall results. An Action Plan is in place to further enhance performance.

The Corporation's expectations of housing association performance in regard to tenant involvement are that there should be targets in this area and that 'representation in tenants and resident associations reflects the ethnic mix of the association's tenants in the relevant area'.

The Association's target is therefore for BME representation on each tenants association to be consistent with BME representation as a whole for that area or development. The Association has currently four tenants associations and intends to monitor BME representation against the set criteria.

The Association has no targets in place for encouraging participation by BME service users, although the ethnic origin of all those who attend scheme meetings or tenant forums is monitored. Complaints are monitored by ethnic origin.

### Dealing effectively with racial harassment

The Housing Corporation's expectations of performance are that 'the association establishes targets for reporting, victim support and satisfaction, and action taken against perpetrators'.

There were no reported instances of racial harassment in 2004/05 and thus far no reported incidents in 2005/06.

However the Association has been proactive in this area, and has followed up the responses from another survey where tenants stated that racial harassment was a problem in their area. Although this exercise did not substantiate any of the complaints, it ensured that the Association was seen to be carrying out its responsibilities in this area.

A racist incident report form is also available and this is crucial as Arcon needs to create a climate where the reporting of such crimes is encouraged, research has shown that up to 70% of incidents are not reported. Now procedures are in place staff training across the organisation is vital.

One further aspect that is important is developing the links with other agencies to combat hate crime. There are reports from Audit Commission inspections that evidence that these relationships are up and working needs to be provided, especially around links with the multi-agency Hate Crime Panel.

It is crucial also that the targets tackle the three aspects of this subject area - reporting, victim support & satisfaction and action taken against perpetrators. Most organisations seem to set some fairly general targets that do not specifically address all these areas. An initial assessment is that Arcon is stronger on the 'action taken against perpetrators' aspect and relatively weaker on the other two aspects. All neighbour nuisance cases are reported to the Board on a quarterly basis.

It is essential that procedures and processes comply with both the ODPM's 'Tackling Racial Harassment: code of practice for social landlords' and the Home Office 'Code of Practice on reporting and recording racist incidents in response to recommendation 15 of the Stephen Lawrence Inquiry Report.

### Governing Body Membership

The Corporation's expectations of performance for associations are that 'the proportion of BME new appointments and re-appointments to the governing body is the same as under 'lettings' above.'

Therefore the target for BME membership is set at greater than 10.7%, which is the BME population of Greater Manchester. Actual performance is that 16.6% of the Board are from BME communities, although there are none from the non-white BME community. In line with good practice one of the Board members is a Champion for Race Equality issues. There is a Code of Conduct for Board Members although this needs to explicitly state expectations of Board Members around equality and diversity.

In addition to the above a concerted effort to recruit a shareholding membership that is more representative of the communities served by the Association is being made so that in future there is a wider pool of people from which to recruit to the Board.

### Staffing

The Corporation's expectations of association's performance is similar to the Governing Body criteria set out above in that 'new appointments and promotions achieve the same levels of representation, at all levels of the organisation, as under the application of the 'lettings' criteria'.

Year	Target %	Actual Performance %
2004/05	10.7	13.6
2005/06 (so far)	10.7	22.7

Arcon is a relatively small organisation that has a low turnover of staff. However, performance in this area has improved in the recent past, although again the proportion of non-white BME staff is lower at 13.6%.

Race equality in the field of employment covers a wide range of policies and practices. Policies need to cover fair recruitment and career progression, and need to address issues such as culture and the working environment. There are already a number of commendable initiatives introduced by the Association:

- A comprehensive reporting mechanism is in place to monitor the ethnic origin of employees
- Arcon participates in an employment training programme specifically targeted at the BME community
- Race equality training to all staff has been provided.

#### Employment Performance of Suppliers, Contractors and Consultants

The Corporation's expectations of performance in this area are that 'as a criterion for the award of work or contracts and as a condition of doing business, associations should pass on requirements in respect of staffing, customer satisfaction and dealing with racial harassment to their consultants, contractors and suppliers'. Targets should also be set in this area of the association's activities.

In discussions with staff there was a feeling that the Association needed to be clearer about its requirements in this area and about the outcomes promoted by the Regulatory Code.

The thinking behind this part of Corporation guidance is that RSLs have considerable spending power in the local economy, and that some of this spending power should be directed towards the economic benefit of the community in which the RSL operates. There are two dimensions to this approach:

- Ensuring that methods for employing contractors are fair, that opportunities are created to use a wide variety of contractors, and that the services delivered by contractors embody race equality principles
- All contractors should 'sign up' to the Association's principles around race equality.

Due to the geographical spread of the association and its dependence on a number of small-scale contractors, it would be impractical to award work only to those suppliers that indicate that they have targets in place that equate to those of the Association.

However there are a number of short-term activities that can be carried out to ensure that the Association improves its performance in this area:

- A review of the methods that the Association employs for procuring services is undertaken so that the organisation can evidence that it is not unwittingly discriminating against BME contractors. The review could cover areas such as advertising, size of contracts, tendering procedures and track record of contractors.
- Arcon should pass on its obligations under the regulatory code to contractors by way of briefings, leaflets and consultation so that partners are aware of the organisations responsibilities.

Arcon should look towards employing contractors that sign up to its principles around race equality

## **Section 7**

### **Improving Services**

This BME Strategy is about improving services to all sections of the community. There are following the research, and analysis of current performance, a number of areas in which the Association needs to concentrate. Some of these are concerned with general service delivery issues and others relate specifically to the needs of BME customers and potential customers.

#### 7.1 Anti-Social Behaviour

The incidence of anti-social behaviour was recurringly mentioned both by tenants for whom it was an issue surrounding enjoyment of their tenancy, and for applicants who felt that it was a limiting factor when considering rehousing. Whilst this was not directly referred to as racial harassment, it should be dealt with in conjunction with racial harassment policy.

In dealing with cases of neighbourhood nuisance, it is important therefore that Arcon:

- Does not to focus too much on the need for paperwork and subsequent court action, as this could clearly be a deterrent for some tenants, particularly those who feel vulnerable.
- Reviews its racial harassment policy to take into account victim support and follow up satisfaction.
- Considers joining multi-agency hate crime panels where this is appropriate, as this has been picked up on in recent inspections.

#### 7.2 Communication

Following on from the consultation exercises Arcon should

- Continue to promote Language Line. Ensure that marketing material focuses on how the service works (practical description) and the benefits it has over other alternatives (e.g. using family member).
- Offer the provision of an interpreter as routine during consultation exercises.
- Revisit standard letters to check whether they could be improved/simplified to reflect the principles of Plain English and thereby increase accessibility for tenants where their first language is not English.
- Where possible, maximise the use of telephone contact and visits in recognition of the fact that (apart from any language barriers), tenants from some communities have a preference for non-written contact and hence respond more positively to it.
- Continue the development of the website, and ensure that it offers information on the services offered by the Association and the location of its properties.

### 7.3 Tenant Involvement

Arcon should adopt a strategic approach to involvement of and consultation with BME tenants, which includes:

- An opportunity for regular face-to-face contact in an appropriate format, such as focus groups, one to one interviews, a BME tenants panel etc.
- Consistent and sustained marketing of participation/consultation opportunities to BME tenants. The marketing to focus on approaches to individuals and joint working with community based organisations.

### 7.4 Lettings

To some extent Arcon is hampered at times, in common with other housing organisations, in having the wrong type of property in the wrong place. For example one-person flats in Rochdale are unlikely be in high demand from the local BME population, although we are now beginning to see the fragmentation of the extended family network.

In addition about half the lettings are from local authority nominations, over which the association has little control, although the association can ask the local authority for BME nominations in light of the above. This can lead to a distortion in performance, although the Association has thus far managed this well.

BME applicants are thus particularly affected by the lack of larger homes within the Arcon's own housing stock. This is due to the comparatively larger size of BME households, and Arcon has a general lack of bigger properties in areas which have a significant BME presence.

Much of the Focus Groups were taken up by applicants' perceptions of the lettings process and how they fared in the letting of properties. Some of the issues discussed were relevant to the community as a whole, but nevertheless are of special concern to minority communities.

Whilst some of the applicants had been referred to Arcon by other agencies, and the Association was often not the first point of contact for those in housing need, there are still some issues that the Association can focus on:

- Making the lettings process as simple and as easily understandable as possible.
- Explaining the process to applicants at an early stage so that they understand it. It is especially important that this is done to those who are nominated to the Association. An explanation of the process to applicants at the outset of nomination would be especially helpful. Further explanation of how Choice Based Lettings work may also be appropriate.
- Keeping applicants updated as to their progress for rehousing. Examples of how long people in a similar situation have been waiting for housing could be helpful in this.
- Carry out an impact assessment of the lettings process on BME communities

In addition to the above, it is important that the Association develops a tenancy support scheme for BME tenants who move into non-traditional areas. This will help Arcon overcome some of the reluctance of BME households to move out of their traditional areas, and allay some of the concerns expressed by people at the focus groups.

### 7.5 Home Ownership

If the Association has stock with the Right to Acquire, this should be widely promoted, along with applicable conditions.

Where the Association is involved in shared ownership schemes this should be marketed to existing as well as new customers, as it meets a demand for home ownership.

### 7.6 New Developments

Arcon is looking to be a developing association again, and is part of a consortium of housing associations seeking partnership status with the Housing Corporation. It is important therefore that the Association recognise that its stock portfolio and development plans (including the size, design and quality of properties) need to reflect local housing needs, including the specific needs of BME communities.

Where possible the Association needs to:

- Identify how the views and needs of BME residents and communities are reflected in plans for new housing developments, stock improvement programmes and in renewal and regeneration initiatives.
- Liaise with partner local authorities to review the housing needs of BME communities and identify how Arcon will contribute to meeting identified needs.

### 7.7 Training for Housing Services staff

Within the Association there is access to training on race equality and equalities and all staff in housing have attended such training. However, there is an argument that there needs to be a much more structured approach to equalities training, to ensure

that all staff and managers have received sufficient training on race issues to enable them to respond sensitively and appropriately to the differing needs of housing services users. Tenants and Residents Associations and contractors should also be included in training.

In addition there is a need for all staff to be trained in the racial harassment procedure. This project will also meet a MacPherson report recommendation, namely “that information on racist incidents and crime should be shared and made available to all agencies”.

### 7.8 Working with BME RSLs

Arcon recognises that BME RSLs can bring “added value” to housing because they provide culturally sensitive services and capacity build within the communities. They have access to networks and resources which other RSLs will always find difficult to reach. BME RSLs are well placed to form partnerships with BME communities that can make a contribution to social inclusion and cohesion.

“Added value” is likely to be provided amongst other things through the provision of translation and interpreting services and promoting culturally sensitive services.

Arcon needs to develop its relationships with local BME RSLs and ensure that;

- It draws on best practice from local BME RSLs to ensure it provides an equally high level of service to residents from different communities
- Training programmes are developed for example a cultural awareness guide and training programme for staff

### 7.9 Raising the Profile

There is clearly a need for Arcon to raise its profile in the BME community, especially as people who apply directly to the Association often hear of Arcon through word of mouth.

There are a number of actions that the Association will take, these include:

- Becoming known wider in the community through attending (or even sponsoring) community events.
- Continuing to work in partnership with BME organisations on training of staff, joint protocols and the delivery of services to BME residents.
- Encourage contractors to implement initiatives such as construction training placements to develop skills within BME communities.

## **Section 8**

### **Action Plan**

The success of this strategy will depend on its implementation. This section of the strategy presents the Action Plan, which shows how the organisation will deliver its objectives.

The action plan includes both long term and short-term targets

This strategy has a life of three years, at which time it will be formally reviewed. However this Strategy is not a static document, it will be subject to amendment and change during its lifetime if circumstances so warrant it.

The Equality and Diversity Steering Group, which was set up to oversee the development of the BME Housing Strategy, will play an important role in the ongoing monitoring and review of the Action Plan. Quarterly meetings will be set up to monitor progress against actions and discuss ways to take forward some of the action needed.

<b>Key Objective 1: Access to Housing</b>					
<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
1.1	Work out lettings target on a neighbourhood basis	Meet targets for lettings and allocations	GPN 4 KLOE CRE C of P* Inspection		
1.2	Analyse lettings and waiting list information (especially the impact of choice based lettings schemes)				
1.3	Produce plan for any remedial action				
1.4	Consult with BME RSLs and referral agencies	Improve access to housing by BME communities	CRE C of P		
1.5	Develop tenancy support scheme	Increased tenancy sustainability	GPN 8 KLOE		
1.6	Develop marketing strategy for BME groups	Increase in applications and lettings to underrepresented groups	KLOE		
1.7	Review application process	Increased access to services for BME groups	GPN 4 KLOE		

\* Commission for Racial Equality Code of Practice for Rented Housing

***Key Objective 2: New Homes and Refurbishment***

<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
2.1	Review design brief to incorporate the needs of minority communities	Ensure that stock is suitable for needs of BME and other communities			
2.2	Incorporate the housing needs of minority groups into future development plans	Increase in sales and lettings to underrepresented groups	GPN 8		
2.3	Develop partnership arrangements with BME RSLs	Better understanding of needs of BME community			

<b>Key Objective 3: Maintenance of Housing</b>					
<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
3.1	Ensure that staff and contractors have received equality and diversity training	Provision of culturally sensitive service and ensure that contractors are aware of Arcon's obligations			
3.2	Review methods for procuring services	Ensure that Arcon is not unwittingly discriminating against BME contractors	GPN 4		
3.3	Carry out survey of existing contractors, consultants and suppliers	Evaluation of performance of existing and potential contractors, consultants and suppliers			
3.4	Develop process for working with contractors, consultants and suppliers to set their own BME targets	Improving performance of contractors, consultants and suppliers in terms of BME input			
3.5	Continue to monitor Contractors, Consultants and Suppliers KPI				

<b>Key Objective 4: Harassment</b>					
<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
4.1	Continue existing monitoring arrangements and analyse results	Targets are established for reporting, victim support and action taken against perpetrators	GPN4		
4.2	Clarify targets for <ul style="list-style-type: none"> <li>• Reporting</li> <li>• Victim support and satisfaction</li> <li>• Action taken against perpetrators</li> </ul>				
4.3	Continue to report to Board on performance	GPN 4 requires board monitoring	GPN 4		
4.4	Investigate feasibility of participation in multi-agency hate crime panel	Improved and co-ordinated action			

**Key Objective 5: Customer Involvement and Consultation**

<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<u>Requirements</u>	<b>Completion</b>	<b>Lead Person</b>
5.1	Continue to use focus groups as a means of assessing BME tenant and applicant views	Improved information and levels of satisfaction for BME tenants are consistent with overall levels	GPN 4		
5.2	Continue monitoring of tenant repair reporting and analyse results				
5.3	Continue complaints monitoring	Number of complaints from BME households are consistent with overall profile of BME tenants			
5.4	Continue to monitor TRA KPIs including attendance at consultation events	TRA's are representative of community as a whole			
5.5	Continue to monitor tenant satisfaction and complaints KPIs	Performance on satisfaction and complaints in measured		GPN 4	

**Key Objective 6: Raising the Profile**

<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
6.1	Develop a marketing strategy for BME groups	Increased profile of Arcon in the community	GPN 8 KLOE		
6.2	Mark community festivals				
6.3	Ensure that Arcon documents reflect community profile				
6.4	Further develop website				

<b>Key Objective 7: Governance</b>					
<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
7.1	Continue monitoring of ethnicity of Board Members	Proportion of BME appointments to the governing body is in line with population	GPN 4		
7.2	Revise Code of Conduct for Board Members	Code of Conduct makes reference to discriminatory behaviour			
7.3	Develop Board Member training and support	Improved knowledge of equality and diversity issues	GPN 4		
7.4	Develop strategy for next round of Board recruitment to attract BME Board Members (could use Committee system as a starting point)	Maintain proportion of BME Board Members			

**Key Objective 8: Recruitment and Staff Development**

<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
8.1	Review recruitment procedures	Consistent recruitment and selection service			
8.2	Continue with PATH trainee scheme	Increased level of BME staff representation			
8.3	Train senior staff in recruitment skills	Increased knowledge of equality and diversity in respect of recruitment			
8.4	Continue monitoring of ethnicity of staff	New appointments and promotions achieve BME representation in line with the community	GPN 4		
8.5	Review advertising procedures	Attract staff from wide range of backgrounds			

<b>Key Objective 9: Communications</b>					
<b>Task No.</b>	<b>Detail</b>	<b>Desired Outcome</b>	<b>Requirements</b>	<b>Completion</b>	<b>Lead Person</b>
9.1	Develop communications strategy for BME and other minority communities	Increased marketing and PR, targeted information to service users		July 2006	
9.2	Develop database for preferred method of communication for all tenants	Ensure that all service users can access services	KLOE	August 2006	
9.3	Develop training programme for staff around issues of cultural awareness and communication	Improved service delivery	KLOE		