

IMPACT HOUSING ASSOCIATION

SINGLE EQUALITY SCHEME 2011 – 2014



Policy Statement

Impact is a Charitable Housing Association based in Cumbria. Through Partnership, we serve local Communities. We strive to meet Greatest Need. To do so, we provide high quality Community Investment, Housing & Support.

This means creating communities that embrace change and welcome diversity. Diversity helps build communities by celebrating differences and combining our talents.

To achieve this, Impact is committed to removing discrimination both within our own organisation and the communities in which we provide services. This includes commitments that establish Impact as a community leader and a catalyst for change.

Impact will work in partnership with anyone who shares the same aims, including Cumbria's strategic partnerships, local authorities, other housing associations, trade unions and other partner organisations.

We as the Board of Impact Housing Association are committed to this vision of a truly diverse organisation, fully accessible to all - both for our staff and members internally, but more importantly for our tenants and other service users across the whole range of our services.

This single equality scheme sets out our approach – through our values and commitments, and also our action plans aimed at achieving improved equality of services across the whole organisation.

We will monitor progress against our single equality and diversity action plan on a regular basis, at both the relevant committee and at the Board, and publish how we are doing on an annual basis.

These commitments are based on our organisational values and are as follows:

Our Values Meet Greatest Need

We believe all should be treated fairly, with respect and dignity, and have genuine choices in the issues that affect their lives.

Our Values Provide Good Quality Housing

We believe that all people have the right to a decent home. People should not be disadvantaged simply through their inability to purchase.

Our Values Develop local Communities

We believe in the principles of partnership, local democracy and community empowerment.

Our Values Encourage Resident and User Involvement

We value and are committed to the involvement of our residents and service users- both in planning our work and delivering our services.

Our Values Work Towards Shared Objectives

We work through partnership.

Our Values Staff and Committee Commitment

We value the differences and similarities between people. We work positively and proactively to achieve our charitable objectives.

Our Values Environmental Sustainability

We treat our resources with respect and use them with conscious thought.

Our Values Efficient and Effective

We strive to be efficient and effective. We are accountable and welcome feedback. We are driven by our purpose.

Our Commitment We will endeavour to house and support those people in greatest need, having regard always to our values. We will deliver services that enhance people's independence. We will take on real challenges to further our values, creating opportunities and new investment.

Our Commitment We will maintain our stock to a high standard and use our resources to provide, as far as we are able, the housing that people want.

Our Commitment We are accountable to both our residents and their communities. We will help them to develop their self-confidence and to influence the services which they use.

Our Commitment We will consult our residents and service users on key issues which affect them. We will support their involvement in ways which respond to their needs, including user groups, residents' associations and the overall direction and of our organisation.

Our Commitment We will work in partnership with other agencies- locally and nationally, both statutory and voluntary- and in partnership with the local community.

Our Commitment We will develop a culture which values people from all sections of the community and the contribution that they can make to our work. We will develop highly competent staff and Board who have a high level of commitment to our organisation and to our shared ethos and objectives.

Our Commitment We will use our resources in a way which minimises harm to the environment. We will actively consider new projects to help the environment.

Our Commitment Through Best Value and other measures, we will ensure we make best use of our resources. We will constantly review what we do and strive for continuous improvement to ensure that we are economic, efficient and effective.

Executive Summary

What is an Equality Scheme?

An Equality Scheme is a document that sets out our commitments to embed equality and diversity across everything that we do. Equality schemes are a combination of policy and action planning.

Do we have to produce an Equality Scheme?

As a non-public body Impact has no legal obligation to produce equality schemes. However, under the duties passed onto registered social landlords from the Tenant Services Authority (TSA), Impact has an obligation to comply with the General and Specific Equality Duties outlined in the Equality Act 2010 for each of the following equality areas:

- | | |
|----------------------------|-------------------------------|
| 1. Age | 6. Sex |
| 2. Disability | 7. Sexual orientation |
| 3. Gender reassignment | 8. Race- including ethnicity, |
| 4. Pregnancy and Maternity | national origin, colour and |
| 5. Religion or belief | nationality |

This is Impact's second equality scheme to cover Race, Disability and Gender but our first for the other equality areas. Although we have always ensured that we have complied with both our legal obligations and the TSA's guidance on the different equality areas throughout their existence.

We adopted a Diversity Policy for the first time in December 2005 that built on our existing Equal Opportunities Policy, but took us beyond a minimum statutory compliance approach to enshrining diversity across our organisation.

What is Impact's Single Equality Scheme?

Impact's Equality Scheme brings all of our existing equality and diversity policies, schemes and strategies, including Equality Impact Assessment actions into a single document for 2011 – 2014.

Impact's Equality Scheme:

- Defines Impact's policy around equality and diversity;
- Ensures that we meet our statutory and regulatory requirements around the eight equality areas.
- Outlines the following strategic priority areas for achieving equality:
 - Service Delivery/ Access to our services-
 - Lettings/ Access to our lettings
 - Employment and staffing (current and new)
 - Resident Involvement/ Complaints and Feedback
 - Reducing Hate Crime
 - Procurement

Developing our Single Equality Scheme

We will continue to use the following cyclical model when putting together and developing our scheme:

- Needs Analysis
- Planning
- Implementation
- Monitoring

To ensure that Impact complies with the model we will need to undertake the following steps:

Needs Analysis – Impact needs to ensure that it has a clear understanding of the needs of the communities that we serve. We need to determine whether resources allocated are sufficient to meet these needs. In particular we need to have an understanding of the diversity of needs and housing aspirations of the communities that we serve. This is not only to identify specialist accommodation that may be needed, but to ensure that as far as possible our mainstream housing can meet the needs of the range of people who want to live in it – including vulnerable people. As the largest provider of supported housing within Cumbria, we are well placed to understand these needs.

Planning – After we have carried out a needs analysis we will need to take any necessary action to meet the needs identified that are not already being met. If we do identify any outstanding, we will produce a plan that sets out the targets to be met and a timetable for meeting them. It is important that targets are SMART.

The Equality Duty expects HA's to work towards the removal of barriers to access to services.

Implementation – some of the main issues associations are likely to have to address in order to meet the Equality Duties requirements are:

- Under service delivery, associations should ensure that all residents receive equally good services; *Impact is committed to providing equality of services to all, whilst at the same time recognising that every individual is different, and has different needs and aspirations. Through the Equality Impact Assessment framework and our work with the Customer Forum and Access to Services Group, we will ensure that all existing customers and potential customers experience a fair and equitable service. In situations where we don't fulfil this promise, we will provide redress, through our customer service feedback and complaints procedures.*
- Under access to information, associations should ensure that all communities and vulnerable adults have access to the full range of information they provide. – *Impact has a full range of simple to understand brochures that set out the range of services offered in each part of the organisation. The main brochures are translated into the most popular languages in use in Cumbria. We make*

use of Languageline – so can obtain further translations of any language not permanently available. We also stock the jointly produced guide to Cumbrian services, supplied by the Cumbria Multi Cultural Service in the five most popular languages in Cumbria.

Our public offices, documents and website are all fully accessible.

- Under asset management associations should ensure they have an accurate up-to-date record of all adapted properties – *We have a paper and electronic database of our adapted properties.*
- Under dealing with harassment, associations should ensure they have a policy and procedure in place to deal with all forms of harassment – *Impact has clear policies and procedures for dealing with harassment.*
- Under procurement, associations should ensure their contractors' service delivery is consistent with their own equality and diversity commitments – *As part of our customer service initiative, provided a modified version of the same training for all of our contractors. That training set out our expectations for contractors in a number of areas including equality and diversity. We monitor contractor's equality and diversity policies as part of them becoming a contractor on our approved list.*
- If the specific duties are published with no amendments associations will have to publish detailed reports regarding our customer satisfaction and lettings by equality strand. *-Impact has collated equality data for our tenants and staff and is working to use this data to address any trends compared to local data.*

Monitoring – We will be using SHAIP a performance management system to monitor the new action plan and ensure our objectives are being achieved.

Impact will ensure that the issues mentioned in the guidance on the Equality Duty provided by the Equality and Human Rights Commission are included in the scoping of the monitoring procedures, as part of determining the key strategic priorities for this Single Equality Scheme, and also the outcome-focused action plans.

The scheme will be reviewed annually at Board to check progress against actions. Board will also agree a refreshed action plan annually, for the following year.

The Scheme and Plan are live documents which will be amended to reflect any changes in services, legislation and the local community.

Impact's commitment to Equality and Diversity

Throughout our organisational life Impact has committed to working with those in greatest need, which frequently are individuals and groups within local communities facing social exclusion. This is often to do with issues of equality and diversity. Due

to this our commitment to develop our staff in these areas has been extensive since 1996. This was the year that we made an organisational commitment to an inclusive staff development programme that included practitioners, managers, and the launch of a new appraisal and line management scheme. Alongside this programme were a series of enhancement modules one of which was called "Living and Working with difference", and all staff attended this module between 1998 and 2000.

We have ran internal "Bullying and Harassment" training events continuously since 2001.

In 2004 as part of adapting our former Equal Opportunities Policy to become a new Diversity Policy, we commissioned a new Diversity training programme for all staff. This programme has been very success with the majority of staff attending within their first six months of employment.

In 2006 we devoted the morning of our staff day, to Disability Awareness Raising, based on our awareness of the new duty. This involved representatives for the local Allerdale Disability Association, Action for Blind, Cumbria Deaf Association, and MIND.

In 2009 we commenced a training programme for key policy makers and service providers to ensure they held the skills and knowledge to compile robust Equality Impact Assessments which provide meaningful actions.

We are repeating the above programme (updated) in 2011 to new staff and Board members.

Staff have continued to attend Diversity related training events to ensure that our organisational knowledge keeps track of developments in societal and legislative changes.

At the end of November 2009 we commenced a scheme to help long term unemployed young people gain employability skills, experience and confidence. This was called Future Jobs and ran until April 2011.

In 2011 we launched the new County-wide Choice Based Lettings scheme to improve our services and their accessibility.

In 2011 we implemented our new and improved website with increased accessibility.

Equality and Diversity Legislation

Overview of Legislation

Since the 1970's laws have been introduced to tackle discrimination. The legislation was introduced piecemeal to address the needs of different equality strands but from April 2010 the Equality Act (2010) was introduced pulling all the equality legislation in to one compressive act.

Public Duties

From April 2007 all public authorities have had a public duty to promote equality around ethnicity, disability and gender. From April 2011 all public authorities will have a public duty to promote equality around age, disability, gender reassignment, pregnancy and maternity, race including ethnicity and nationality, religion or belief including lack of belief, sex and sexual orientation.

This public duty takes two forms:

- General Duty – sets out overall aims for promoting equality.
- Specific Duty – particular actions that the organisation needs to fulfil the general duties.

Impact as a non-public body is currently only required under our regulatory requirements to fulfil the general duty. However, as an organisation committed to equality and diversity and due to the obligations we have as a social landlord we may be required to commit to specific actions that go beyond the requirements of the general duties.

The general duty has three aims; it requires public bodies to have a due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010.
- Advance equality of opportunity between people from different groups; and
- Foster good relations between people from different groups.

The specific duty is underpinned by a number of specific duties which provide a framework for public bodies to meet the general duty, although due to be launched at the same time as the general duty the specific duty is receiving further consultation and will not become part of the Equality legislation until approximately September 2011. The original specific duty would have required the following actions:

- To set specific measurable equality objectives (by the 6th April 2012 and every 4 years there after)
- Publish sufficient data to show that they have considered the three aims of the general duty (by 31st July 2011)
- Publish evidence of equality analysis of policies and procedures undertaken (By 31st July 2011)
- Publish details of their engagement activities (by 31st July 2011)

As we are unaware of how the specific duties will now effect Associations we have prepared our Single Equality Action Plan with the current specific duties in mind to ensure we are able to meet these requirements should they be implemented.

The Equality and Human Rights Commission (EHRC)

The EHRC was established by the Equality Act 2006 and has a statutory remit to promote and monitor human rights; and to protect, enforce and promote equality across the eight "protected" grounds - age, disability, gender, race, religion and belief, pregnancy and maternity, marriage and civil partnership, sexual orientation and gender reassignment.

Below we have outlined our commitments to each of the equality strands:

Race including ethnicity, national origins, colour and nationality:

Ethnicity and Nationality in Cumbria

In 2007 the Office of National Statistics believed that the below figures were correct for Cumbria.

Area	All Groups	BME (number)	BME (%)	White British (number)	White British (%)
England	51,092,000	8,356,000	16.4	42,736,000	83.6
North West	6,864,300	726,500	10.6	6,137,800	89.4
Cumbria	496,900	19,700	4	477,200	96
Allerdale	94,500	3,200	3.4	91,300	96.6
Barrow	71,800	2,900	4	68,900	96
Carlisle	103,500	4,200	4.1	99,300	95.9
Copeland	70,400	2,400	3.4	68,000	96.6
Eden	51,900	1,800	3.5	50,100	96.5
South Lakeland	104,900	5,400	5.1	99,500	94.9

The proportion of BME residents in Cumbria (4%) is much lower than the national average of 16.4%. South Lakeland has the highest proportion of BME residents whilst Allerdale and Copeland have the lowest.

National Insurance data since 2002 indicates a steady growth in the diversity of Cumbria's working population. The table below gives the breakdown of the numbers of non-British nationals with a National Insurance number:

Year	No. of Nationalities	Main Nationality	Total non-British nationals and % increase on previous year
2002/3	20	South African (90 people)	790
2003/4	32	South African (140 people)	1050 +33%
2004/5	33	Polish (460 people)	1730 +65%
2005/6	30	Polish (1200 people)	2970 +71%
2006/7	40	Polish (1300)	2,940

Although there are no concrete figures provided by the County Council it is stated that between 2007 and 2009 a 29% decrease in National Insurance registrations has been seen.

Ethnicity and Nationality in Impact

Impact undertook a staff diversity survey in 2005/6 to establish a “baseline” position on the 6 equality strands. At that time for ethnicity what we found was the following:

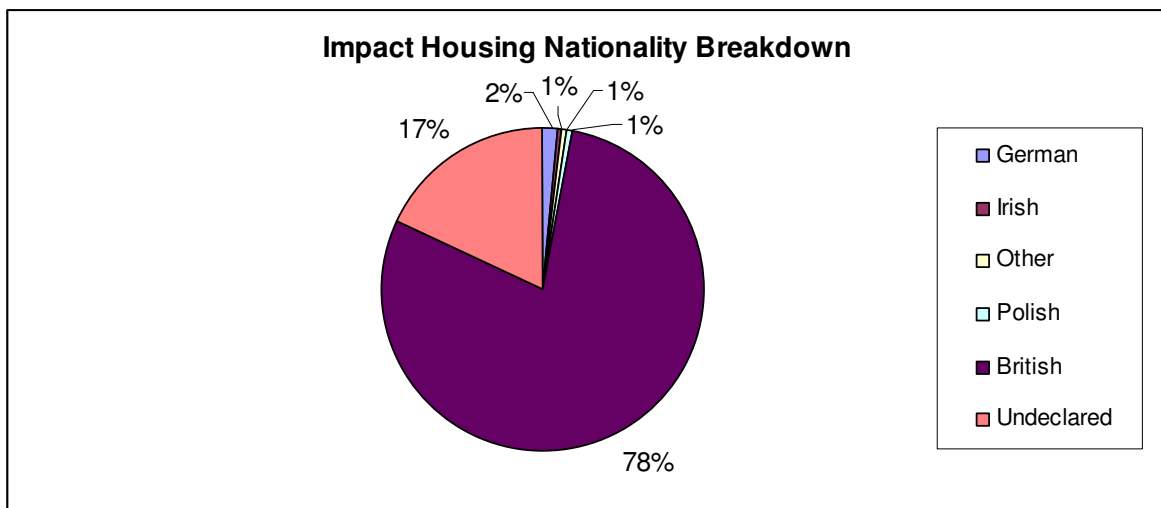
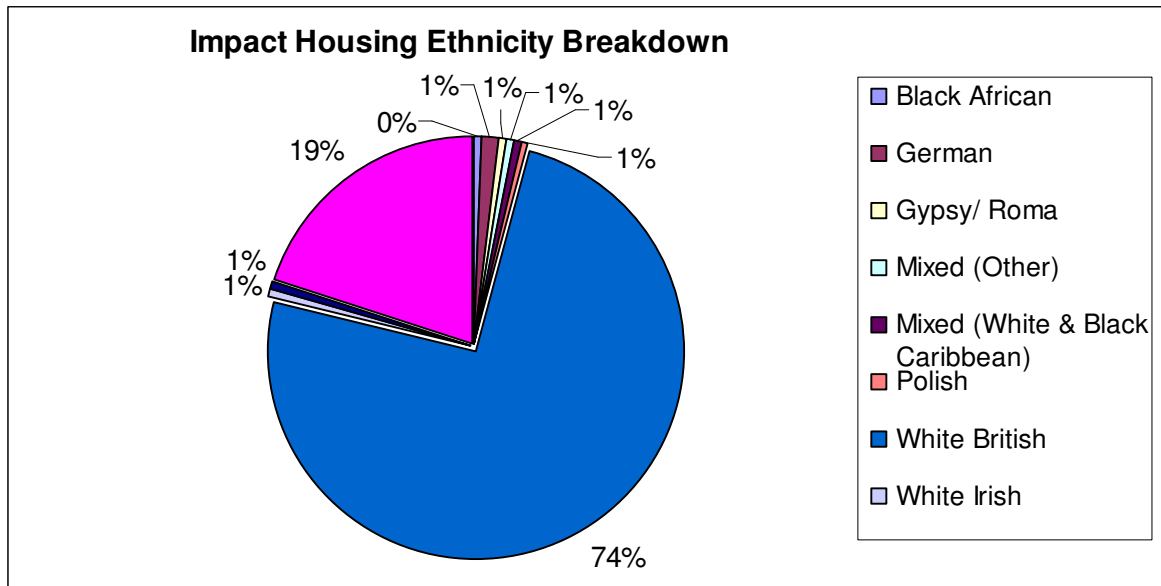
- 96% - white British; 1% white Irish; 1% other white background and 1% not specified.

Looking at the same information for our staff profile in 2007 showed a slightly different situation.

At 31st March 2007, 3.57% employees were of non-white, non-British origin. Almost double the figures at the end of 2005.

Based on the numbers of staff employed at 31st March 2008, the number of ethnic minority staff (non-white / non-British) had increased to 3.97%.

Based on the number of staff employed on the 31st March 2011, the number of ethnic minority staff (non-white non British) has increased to 4.1% which is 0.1% above the County’s average. The main Nationality is British (78% of staff).



From our tenant figures we can see that 98.6% refer to themselves as White British, 0.7% as BME, 0.7% as White Irish and 1.4% as Other.

Cumbria Multi-Cultural Service and Impact “Drop-In” Centre

In 2006 following an analysis of usage of our Cyber cafe facilities at the Eden Foyer in Penrith it emerged the majority of users were East Europeans working within the food processing, tourism and agriculture sectors. Working in partnership with the Cumbria Multi-Cultural Service (CMCS - based in Barrow), we established a “drop-in” service staffed by members of the CMCS and a Polish member of our own staff team. This service is now the main point of contact for migrant workers in East Cumbria, for information and advocacy services and continues to provide a weekly “surgery” and also a contact point for the evolving Polish language website developed with service users, and other local agencies.

This service is recognised as an example of good practice by the Cumbria Equality and Diversity Partnership.

AWAZ

AWAZ are an independent organisation registered as a Community Interest Company. AWAZ represent the interests of Black and Minority Groups in Cumbria. AWAZ is a membership organisation open to anyone in the county from a Black and Minority Ethnic community. The word AWAZ comes from the Persian word for Voices.

AWAZ's aims are to:

- Influence local authorities, statutory sector organisations and voluntary and community organisations on race equality.
- Raise the profile of Black and Minority Ethnic communities in Cumbrian public life.
- Develop a network of local Black and Minority groups who can support one another.
- Influence local media representation on race equality issues.

Impact has a service level agreement with AWAZ which covers:

- Input into our Equality and Diversity policies
- Feedback on our Equality Impact Assessments
- Consultation with Black and Minority people on satisfaction with Impact's services
- Support to particular services to resolve areas of race inequality.

Impact's Race and Nationality Commitments:

- We will improve our monitoring and review processes so that we fully understand the communities that we serve.
- We will work in partnership to ensure appropriate service delivery.
- We will focus on meeting the needs of the ever more diverse communities, particularly within Cumbria the emerging east European migrant communities.
- We will continue to develop our focus on increased resident and service user involvement and consultation with minority ethnic groups in better understanding the needs of local communities.

The detail of what we will be doing over the next 3 years to ensure that our obligations continue to be met are set out within our Impact's Single Equality & Diversity Action Plan – 2011-14.

Disability:

Legislative requirements

- Promote equality of opportunity between people with a disability and other persons.

- Eliminate unlawful discrimination.
- Eliminate harassment of people with a disability.
- Promote positive attitudes to people with a disability.
- Encourage participation by people with a disability in public life.
- Take into account a person's disability even if it means treating that person more favourably.
- Carry out Equality Impact Assessment on our policies to ensure no barriers to our services occur for people with a disability.
- Publish data and community engagement work to show our commitment to improving diversity.

Social and medical models of disability-

One of the key goals is to challenge the view that the inequality faced by disabled people is down to their medical "problems". The medical model has fed negative stereotypes held by non-disabled people such as:

- Focusing only on what a person cannot do.
- Making assumptions about what is best for the disabled person.
- Thinking that disabled people lack intelligence.
- Feeling embarrassed among disabled people.
- Bullying and harassing disabled people.

These negative stereotypes show that improving access is only one part of the story.

The table below contrasts the two models. The questions in the left hand column area adapted from questions asked to people with a disability as part of their assessment up until the 1980's.

Medical Model	Social Model
Can you tell me what is wrong with you?	Can you tell me what is wrong with society's attitudes towards you?
What complaint causes your difficulty in holding, gripping or turning things?	Are there problems in the design of everyday objects that give you problems in holding, gripping or turning things?
Does your disability mean that you need to live with your carers?	Are community services so inflexible that you need to rely on carers?
Does your disability make it hard for you to use public transport?	Does inaccessible transport make it difficult for you to use the available public transport?
Does your disability affect your ability to work?	Do you have problems at work due to the environment and the attitudes of others?

The Equality Duty firmly places public bodies within the social model. The key priorities in the scheme, and the action plan at the end, show what we need to do to make it happen.

What is a disability and how many disabled people are there in the UK?

The definition of 'disability' under the Equality Act 2010 is if:

- they have a physical or mental impairment
- the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities

For the purposes of the Act, these words have the following meanings:

- 'substantial' means more than minor or trivial
- 'long-term' means that the effect of the impairment has lasted or is likely to last for at least twelve months (there are special rules covering recurring or fluctuating conditions)
- 'normal day-to-day activities' include everyday things like eating, washing, walking and going shopping

People who have had a disability in the past that meets this definition are also protected by the Act.

Progressive conditions considered to be a disability

There are additional provisions relating to people with progressive conditions. People with HIV, cancer or multiple sclerosis are protected by the Act from the point of diagnosis. People with some visual impairments are automatically deemed to be disabled.

Conditions that are specifically excluded

Some conditions are specifically excluded from being covered by the disability definition, such as a tendency to set fires or addictions to non-prescribed substances.

Some examples of what would be classed as a disability can be seen below:

- Mobility impairments (requiring aids such as sticks or wheelchairs to move about).
- Sensory impairments (hearing or sight loss).
- Mental ill health (including depression, stress, Alzheimer's disease and schizophrenia).
- Cognitive developmental impairments (including learning disabilities, dyslexia, and autism).
- Muscular impairments (including spinal injuries).
- Asthma
- Cancer
- HIV / AIDS
- Phobias
- Arthritis
- Acquired brain injuries

This list shows that those claiming disability benefits are a minority of disabled people.

Using the DDA criteria in 2002 the General Household survey was able to suggest that 11 Million people in the UK have rights as disabled people.

Substance addictions and sexual offences are not considered to be a disability under the Act.

Disability in Cumbria

Over one in five people have a disability or long term limiting condition that affects their health according to Council data.

The 2001 census showed that out of 209,027 households, 76,365 had someone with a long term limiting condition. This means that 36.5% of Cumbrian households had someone with a condition that would be recognised under the Disability Discrimination Act.

The Place Survey carried out by the Council in 2009 showed that 28% of respondents from an 8,812 sample identified as having some form of disability. The majority of these were over 65 years old (49%).

In 2006 the Cumbria County Council Quality of Life Survey asked the Cumbria public about their level of satisfaction with the community and services in the county. 22% of respondents said they had a long-term illness or disability that restricted their daily activities.

The findings from the Quality of Life Survey highlighted the following issues for disabled people:

- **Safety**
 - Nearly a third of people with a long-term illness or disability felt unsafe outdoors at night (29%) compared with a fifth of all respondents (21%).
- **Employment and voluntary work**
 - 19% of people with a long-term illness or disability said they were in full-time employment compared with a county-wide average of 40%;
 - 44% of people with a long-term illness or disability said they had done two to five hours of voluntary work during the past year compared with 36% for the county-wide average.
- **Housing**
 - Fewer people with a long-term illness or disability own their own home (69%) compared with the survey average of 76%.
 - 17% of people with long-term illness or disability said they rent their home from a social housing provider compared with the county-wide average as reported in the survey of 9%.
- **Education**
 - 18% of people with a long-term illness or disability had a formal qualification compared with the survey average of 32%.

Disability in Impact –

5.6% of our employees have some form of disability. We are pleased to say that we make reasonable adjustments in the workplace and work with our staff to ensure they are able to carry out their role.

From information received back as part of our 2010 STATUS survey, we know that over 50% of our tenants registered that they have some form of disability, or a long-term illness.

Involving Disabled People

We have already commenced the involvement process with disabled service users. This has included a small group of disabled tenants identified from the STATUS survey. We contacted a sample of the people who had said they were disabled to ask them if they would be interested in getting involved looking at the issues involved in being a disabled tenant of Impact.

A small number of these people said they would, and a staff member of the Audit and Performance Team, met with them to see what their issues were. We used as a “prompt template” issues we as staff had extracted from the Access / Customer Service and Diversity KLOE’s, to encourage a dialogue about what might be issues for them. In addition to this staff have met with two groups of tenants with learning disabilities, and their support workers / carers from partner organisations. This enabled us to more broadly use the template into more pictorial resources, to simplify a range of questions - again based upon some of the key aspects of the Access / Customer Service and Diversity KLOE’s.

We have fed this information into the wider consultation with the Cumbria Disability Network (see below).

In addition to the above, when we commenced the Access Audits, we engaged with the Allerdale Disability Association, and we undertook joint access audits at all of our public access sites across Cumbria. This work was recognised as good practice, in the Disability Rights Commission document on guidance for Housing Associations on implementing the Disability Equality Duty (DED).

We continue to involve service users with a disability as part of our Access to Services and Customer Forum meetings.

Cumbria Disability Network

The Cumbria Disability Network is an independent organisation representing disabled people in Cumbria. Cumbria Disability Network is a membership organisation open to any disabled person in the county. The organisation’s aims are to:

- Influence local authorities and statutory sector organisations on disability equality.
- Raise the profile of disabled people in Cumbrian public life.
- Develop a consistent countywide coverage of local disability groups.
- Influence local media representation of disability equality issues.

Impact Housing Association has a service level agreement with Cumbria Disability Network that covers:

- Involvement of disabled groups in our Equality and Diversity policies.
- Feedback on our Equality Impact Assessments.
- Consultation with disabled people on satisfaction of our services.
- Support to particular services to resolve areas of disability inequality.

The details of Impact's disability plans are set out within Impact's Single Equality & Diversity Action Plan – 2011- 2014

Sex and Gender Reassignment:

The Impact Equality Scheme incorporates our duties under the Equalities Act 2010 relating to gender equality. The Equality Duty promotes equality for:

- Women
- Men
- Trans-gendered people

General Duty

To meet the general duty while carrying out all of our organisations functions we must have due regard to the need:

- To eliminate unlawful discrimination and harassment
- To ensure we meet all legislative requirements for equal pay
- To promote equality of opportunity between men and women.

This requires organisations to take action on the most important gender equality issues within their functions. The promotion of equal opportunities between women and men requires the recognition that the two genders are not starting from an equal footing and identical treatment will not always be appropriate.

Under the duty organisations also have to eliminate discrimination and harassment towards current and potential transgender service users and look to promote awareness and equality.

Specific Duty

Under the Equality Duty, Impact Housing Association may also be required to meet the "specific duties" and will therefore:

- In formulating its overall objectives, consider the need to include objectives to address the causes of any gender pay gaps.
- Gather and use information on how our policies and practices affect gender equality in the workforce and in the delivery of services.

- Consult stakeholders (i.e. residents, service users, employees and other, including trade unions and equality groups), taking account of relevant information to inform the Single Equality Action Plan. .
- Carry out Equality Impact Assessments.
- Identify priority areas for gender equality.
- Publish a 3-year action plan.
- Review the action plan annually

Gender in Cumbria

2009 estimates from the Office of National Statistics shows that Cumbria is fairly equally split by gender.

Population	Allerdale	Barrow	Carlisle	Copeland	Eden	South Lakeland	Cumbria
Total Population	94,300	70,900	104,700	69,700	51,800	103,800	495,000
Males	46,300	34,900	50,900	35,100	25,600	50,900	243,600
Females	48,000	36,000	53,700	34,600	26,100	52,900	251,400
Total Change 2008-2009	0	+100	-400	-300	+100	-200	-900

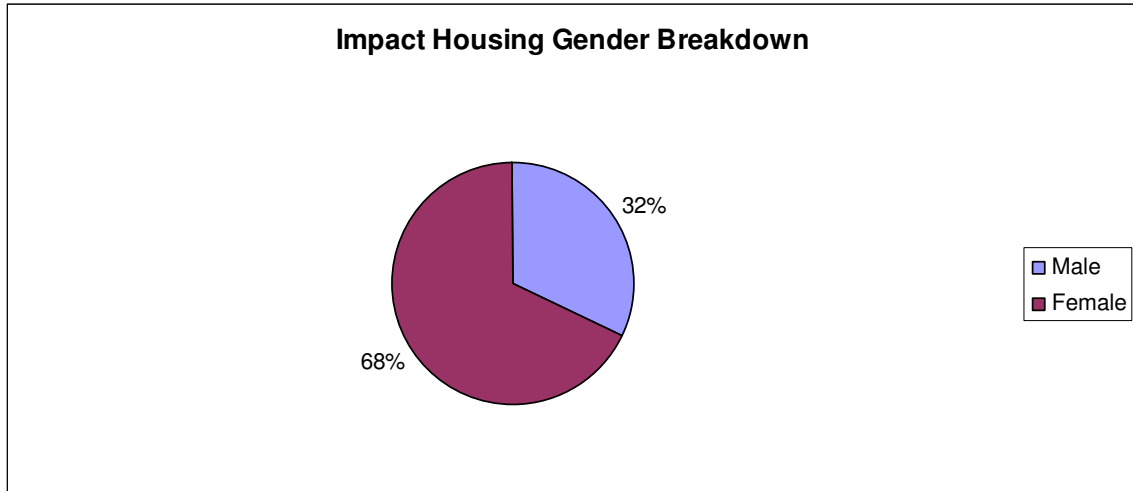
2008 figures from the Office of National Statistics show that three trends that indicate that Cumbria's gender inequality is wider than England as a whole and the North West Region.

1. A lower proportion of women who are self-employed compared to men;
2. A lower proportion of women are in full-time work compared to men;
3. A lower proportion of men are in part-time work compared to women.

Council research shows that 69% of people in Cumbria registered on the Assisted Living Allowance are women. This means the majority of carers in Cumbria are women.

Gender in Impact

We know from our employment data that Impact employ's roughly two thirds as many women as men. We know that men are under represented in the Manager and Senior Officer levels however at Director level, there are four men and one woman.



We will monitor this breakdown to ensure that we have an appropriate gender mix at all levels, as and when turnover allows. We will also undertake an analysis of our statistics compared to the Cumbria County Council survey, to address any gender inequalities that emerge about full time and part time working.

Grade	Male (No.)	Male (%)	Female (No.)	Female (%)
SMT	4	80	1	20
Manager	2	33.3	4	66.6
Snr. Officer	1	12.5	7	87.5
Officer	9	33.3	18	66.6
Snr. Asst.	4	15.4	22	84.6
Assistant	22	20.8	84	79.2
Driver	9	100	0	0
Cleaner	2	25	6	75
Totals	53		142	

(Based on staff profile at 31st March 2011)

We will work closely with the Unison representatives within Impact to consult with staff about their experience of gender discrimination.

Domestic Violence in Cumbria

In addition to the above the TSA specifically require that *“Housing Associations should ensure that adequate provision is made for the victims of domestic violence”*.

Domestic violence is an area considered in our Single Equality Action Plan. We are keen to reduce the amount of domestic violence in Cumbria and work with the emergency services and other providers to ensure we are supporting our service users to the best of our abilities.

£151m is spent each year in Cumbria on Domestic Violence relating to females.

Impact is the foremost housing association in the provision of domestic violence support within Cumbria. We provide the only domestic violence refuge within the County, and are also the main provider of safe houses. In addition we provide domestic violence, floating support workers across all local authority districts (excluding Barrow in Furness).

In addition, working in partnership with the Cumbria Domestic Violence Forum, Impact bid for funding from the Northern Rock Foundation to establish the "Let-Go" project. This project covering the Eden and Carlisle areas provides a range of advocacy, support and training services on behalf of the Forum partners. These include the Police, Probation Service, Social Services, and NHS Trusts etc. Impact hosts the project, employs the staff team and manages the service on behalf of the Forum.

Since July 2010, when the Northern Rock funding ended, a smaller service is continuing funded through a mix of alternative sources, which is currently limited to a year's duration. A new Supporting People tender is to be issued by the end of April 2011 which will provide longer term security for these DV services, (although it is not yet known whether Impact will be the potential provider of these services.)

Impact is committed to the benefits of a strong domestic violence support service for the people of Cumbria.

Developing links with Transgender people

Transgender people have a strong need to change the gender they were born with. This includes:

- Partial surgical procedures
- Full bodily gender reassignment.

Some descriptions of transgender behaviour also includes cross-dressing. If this behaviour is included it increases estimates to 1 in 100 people falling within the transgender category.

Impact along with other members of the Cumbria Equality and Diversity Partnership, work with Outreach Cumbria to establish the barriers faced by transgender people in the County, and create a safe place for transgender people to have a voice in public voice.

Impact also has a service level agreement with Outreach Cumbria which covers:

- Involvement of gay, lesbian and transgender groups in consultation on our equality and diversity policies;
- Feedback on our Equality Impact Assessments;
- Consultation with gay lesbian and transgender people on satisfaction with our services;
- Support to particular services to resolve areas of gender inequality.

Impact's commitment to gender issues:

- We will focus on removing barriers and set targets for achieving equality in both, representation in the governance structures of Impact and at all levels within the organisation's staff structure.
- We will ensure that adequate provision is made for the victims of domestic violence, and services will be provided for gender groups as appropriate.
- This will include advice and support that recognises the particular barriers to communication with the victims of domestic violence.

The details of Impact's gender plans are set out within Impact's Single Equality & Diversity Action Plan – 2011-2014.

Pregnancy and Maternity:

Legal Rights

Pregnancy and maternity has been covered by law for several decades. In addition to maternity leave and pay, women employees who satisfy the relevant qualifying conditions are entitled to:

- Return to the jobs in which they were employed (if returning from Ordinary Maternity Leave) or ones of equivalent status (if returning from Additional Maternity Leave), with protected rights to pay and conditions and benefits.
- Time off to attend appointments for ante-natal care at the normal rate of pay, on producing proof of the appointment.
- Request a risk assessment during pregnancy.
- Request alternative work where any risks to the health of the expectant mother and baby can be avoided.
- Remuneration on suspension on maternity grounds, if health and safety measures cannot be complied with.
- Not be subjected to a detriment, disadvantage, unfair treatment or dismissal because of the pregnancy, maternity leave, etc.
- Take up to ten 'keeping in touch' (KIT) days during maternity leave without losing any entitlement to maternity pay. The employer is not obliged to offer any KIT days and the employee is not obliged to work any that are offered.

Impacts Commitment to pregnancy and maternity-

- We will ensure that adequate provision is made for the pregnant women or those on maternity leave as appropriate to ensure that they are not at an unfair disadvantage.
- This will include advice and support that recognises the particular barriers for those who are pregnant or on maternity leave and allowances where required to ensure their fair treatment.
- We will look to provide suitable housing provision and support for service users who are pregnant or on maternity leave.

Sexual Orientation:

Legal Requirements

The Employment Equality (Sexual Orientation) Regulations (2003), gave all lesbian, gay and bi-sexual employees rights against discrimination. The Sexual Orientation Regulations (2007) extend these rights to the provision of goods and services and has carried on under the Equality Act 2010. This means that we have a legal duty to ensure that people of all sexualities are not discriminated when they work for us or use our services.

Sexuality in Cumbria

The 2001 census recorded 0.11% of Cumbrian's were in a civil partnership or same sex couple compared to 0.21% for England. This is 366 same sex households in Cumbria. In 2006 there were 117 civil partnerships in the county, 63 female and 54 male.

This lack of stable data on sexuality reflects a national issue, suggesting that there is an under-estimation of the numbers of gay, lesbian and bi-sexual people in local communities. The North West Regional Development Agency's estimate is that between 5 – 7% of people are lesbian, gay or bi-sexual. This would translate into 25,000 to 30,000 people in Cumbria.

Sexuality in Impact

Based on our 2011 staff diversity figures we know that at that time Impact employed:

Heterosexuals – 70.3%
Lesbian / Gay - 1%
Prefer not to answer – 28.7%

Outreach Cumbria

Outreach Cumbria is an established organisation which to represent the interests of gay, lesbian, bi-sexual and transgendered people, provide a number of support services and awareness raising sessions. In 2008 we signed a service level agreement with Outreach Cumbria to support their organisation. In return, the agreement will ensure that they will:

- Involvement in our Equality and Diversity schemes
- Feedback on our Equality Impact Assessments
- Consultation on satisfaction with our services
- Consultation with lesbian, gay bi-sexual and transgendered staff
- Support to particular services to resolve areas of inequality.

Outreach Cumbria will be supporting us on is sexuality monitoring for all services, with whom we have developed a service level agreement – mirrored on the Cumbria County Council SLA.

In 2007 we also undertook some joint work on best practice for gay, lesbian and bisexual people who are homeless or in the social housing sector.

Impact's commitment to sexual orientation

- Our employment practices will not unlawfully discriminate on the grounds of sexual orientation.
- Our lettings policy takes full account of recognising the rights of same sex partner relationships, such as equality in tenure rights in accordance with current legislation.
- We have adopted a rapid response to allegations of harassment – including victims of harassment on the grounds of sexuality.

The details of Impact's sexual orientation plans are set out within Impact's Single Equality & Diversity Action Plan – 2011- 2014.

Age:

Legal requirements

The Equality Act 2010 gives people of all age groups rights against discrimination at work. The regulations cover:

- Retirement.
- Dismissal and redundancy.
- Recruitment and selection.
- Terms and conditions of employment.
- Promotion and training opportunities
- Statutory sick pay and maternity pay.
- Harassment in the workplace.

Impact has already adopted a Retirement Policy setting out our approach to retirement issues. All of our other policies and procedures are age neutral, although we will do further Equality Impact Assessment work to ensure that this remains the case, as part of our action planning process.

Cumbria Breakdown

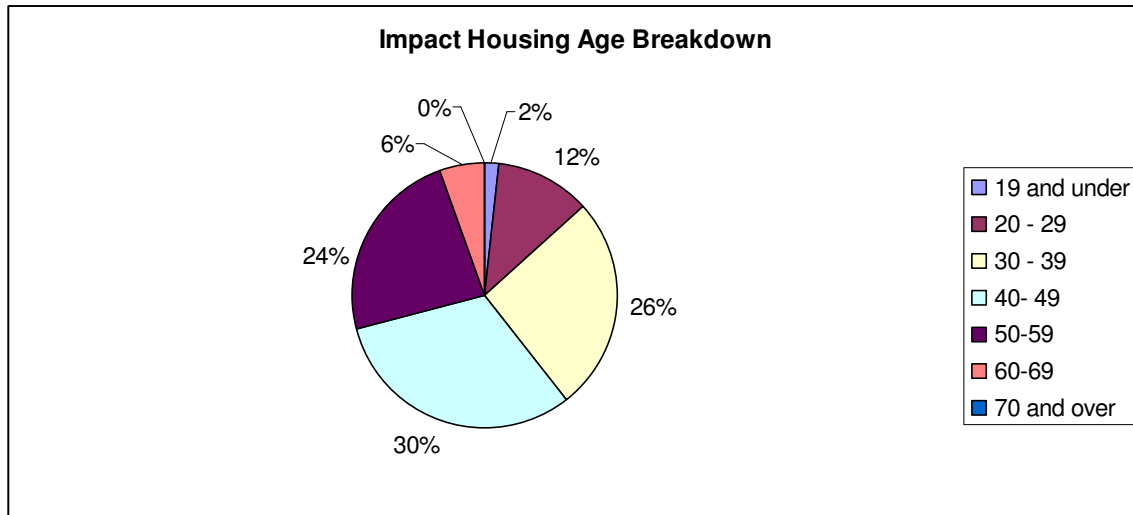
Below is the age breakdown for the County.

Age	%
19 and under	23
20 - 29	10
30 - 39	12
40- 49	15
50-59	14
60-69	12
70 and over	14

Cumbria is a County with an aging population. 29% of residents are between 40 years old and 59 years old, 27% are over 60 years old, compared to 22% nationally. The amount of people over 60 has increased by 16.1% compared to 11.6% nationally in the last 10 years and it does not look to be slowing down.

The issue behind this aging population are that a lot of people look to retire in the Lake District and young people leave for who they perceive is an improved lifestyle.

Impact's Age breakdown



As can be seen from the above chart only 14% of employees are 29 years of age, 54% of employees are between 40 years old and 59 years old, 6% are over 60 years old, compared to % in the County. Impact employ a larger percentage of 40- 59 year olds but no statistics compared to the County unfavourably.

Impact's commitments to age issues

- In our employment practices we will not discriminate against applicants on the basis of actual or perceived age.
- We will not perpetuate stereotypes of people based on age.
- We will validate satisfaction levels alongside performance indicators such as quality of home and service standards.
- We will ensure that services are not unfairly allocated on the basis of age.

The details of Impact's age plans are set out within Impact's Single Equality & Diversity Action Plan – 2011- 2014.

Religion or Belief including Lack of Belief:

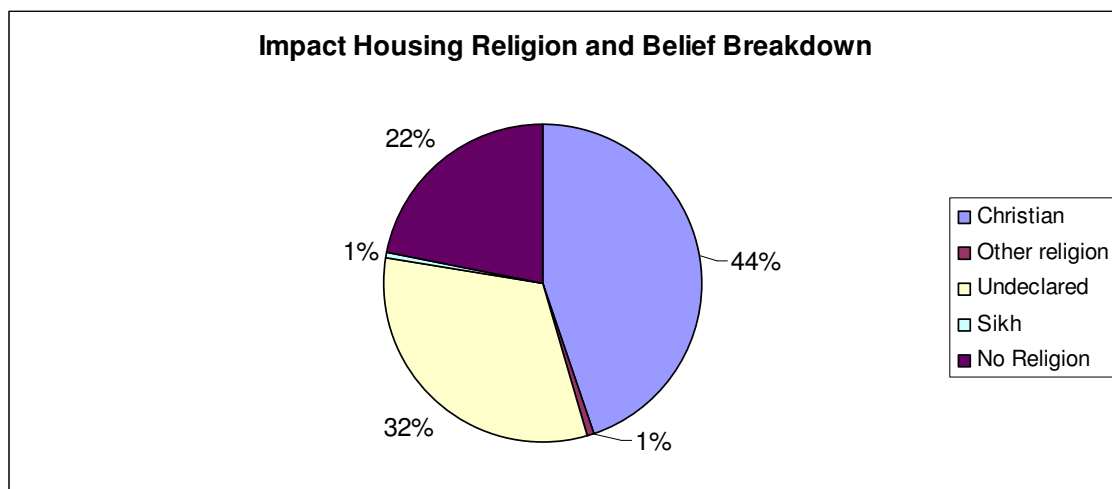
The Equality Act 2010 gave people of all religious faiths rights against discrimination in the workplace. This does not include political beliefs, but does include agnostics or atheists.

We have engaged AWAZ to help broaden our understanding and knowledge of faith and race issues. We will continue to monitor the religious beliefs of our staff and service users to ensure we are providing sufficient support and resources and will engage any other organisation that can enhance our understanding that is representative of prevalent religions and beliefs in Cumbria.

Cumbria's Religious breakdown

From the 2001 Census we are able to see that the majority of Cumbrian are Christian (82.2%) with only 0.6% specifying another religion.

Impact's Religious breakdown



The main religion within Impact Housing is Christianity. However we are also aware that 22% of our employees do not subscribe to any religious beliefs.

Impact's commitment to religion or belief issues:

- We will consider how we can work with local religious agencies and other community organisations to promote understanding and mutual respect between religious groups.
- We will ensure that we have clear strategy, policy and procedures in place for responding to incidents of harassment on the basis of religion or belief in a prompt and appropriate way.
- We will provide guidance and information to staff to ensure that they are aware of any sensitivities that may arise and to give a better understanding of the needs of individuals and the communities they serve.

The details of Impact's religion or belief plans are set out within Impact's Single Equality & Diversity Action Plan – 2011- 2014.

Socio-economic:

Legislative requirements

Although it is not a legal requirement under The Equality Act 2010 good practice guidance denotes the importance of considering socio- economic issues when making decisions or implementing a new product or service. In Cumbria this could be:

- Low incomes in rural wards/ urban areas
- People on benefits
- Socially deprived wards/ neighbourhoods

Socio-economic breakdown of Cumbria

The below table from the CACI, ACORN Research in 2010 shows that 18.2% of households in Cumbria are 'hard pressed' meaning struggling to pay bills and potentially in poverty, The highest area for this is Copeland with 28.1% of households in the 'hard pressed' bracket.

County and District Acorn categories (% of total population)						
Area	Category 1 - Wealthy Achievers	Category 2 - Urban Prosperity	Category 3 - Comfortably Off	Category 4 - Moderate Means	Category 5 - Hard Pressed	Unclassified
Cumbria	31.5%	2.2%	26.3%	20.5%	18.2%	1.4%
Allerdale	32.8%	0.9%	22.1%	20.3%	22.9%	1.0%
Barrow-in-Furness	11.6%	1.1%	25.6%	45.2%	15.8%	0.7%
Carlisle	27.1%	2.8%	28.3%	18.9%	21.9%	0.9%
Copeland	25.4%	0.7%	23.6%	21.1%	28.1%	1.2%
Eden	54.8%	2.2%	23.5%	10.2%	7.9%	1.4%
South Lakeland	40.7%	4.4%	31.8%	9.9%	10.4%	2.7%

8.7% of the potential working population in April 2009 were claiming Job Seekers Allowance in Cumbria. It is expected that due to the current economy this has risen significantly however current figures are unavailable.

Key Strategic Priorities

The Impact Single Equality Scheme has 10 strategic priorities that apply to all 8 equality strands. The table below lists each key strategic priority and the key activities that we will be carrying out.

Priority	Key activities
Service delivery	<ul style="list-style-type: none"> ▪ Equality Impact Assessments ▪ Customer profiling ▪ Monitoring uptake and outcomes ▪ Setting targets and objectives and plans for achieving them ▪ Procurement and supply diversity ▪ Complaints and user feedback
Access to our services	<ul style="list-style-type: none"> ▪ Information in alternative formats

	<ul style="list-style-type: none"> ▪ Accessible buildings – aids and adaptations ▪ Accessible services ▪ Access to our community / shared areas
Resident and service user involvement	<ul style="list-style-type: none"> ▪ Ensuring resident, service user and staff groups reflects the diversity of all equality areas ▪ Service level agreements with user groups (AWAZ, CDN, Outreach Cumbria)
Complaints and Customer feedback	<ul style="list-style-type: none"> ▪ Customer feedback – satisfaction surveys – that take account of access needs (inc. complaints) ▪ Developing appropriate SMART measures against customer service standards, that can be monitored
Lettings and Access to Lettings	<ul style="list-style-type: none"> ▪ Extending monitoring to include equality themes in addition to race and disability. ▪ Equality in tenure rights ▪ Allocations & Evictions
Harassment and Hate Crime (inc. Domestic violence)	<ul style="list-style-type: none"> ▪ Incident reporting / information sharing; ▪ Re-provision of refuge facilities / safe houses ▪ Continuation of “Let-Go” services, beyond Northern Rock funding period
Governance	<ul style="list-style-type: none"> ▪ Review of governance arrangements ▪ Board membership representative of local community equality profile
Staffing and employment	<ul style="list-style-type: none"> ▪ Recruitment and selection ▪ Training ▪ Flexible working ▪ Employment monitoring ▪ Reasonable adjustments
Development and regeneration	<ul style="list-style-type: none"> ▪ The new Impact Housing Standard; ▪ New schemes are aimed at satisfying demand and need, that has emerged from customer input and demand, and the requirements of community partners
Procurement	<ul style="list-style-type: none"> ▪ Supplier relationships ▪ Contractor relationships ▪ Support including Training and

	awareness raising for contractors
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