Equality Peer Challenge

Tower Hamlets Homes

July 2013

Report
1. Background

This report is a summary of the findings of an equality peer challenge organised by the Local Government Association (LGA) and carried out by its trained peers. The report satisfies the requirements of the Social Housing Equality Framework (SHEF) for an external assessment at the ‘excellent’ level. The peer challenge is designed to validate an organisation’s own self-assessment at this level by considering documentary evidence and by carrying out a series of interviews and focus groups with employees and other stakeholders.

The basis for the peer challenge is a benchmark against five areas of performance. They are:
- Knowing your customers
- Leadership, partnership and organisational commitment
- Customer engagement
- Responsive services, access and customer care
- A skilled and committed workforce.

The peer challenge is not an inspection; rather it offers an external assessment of an organisation’s own judgement of itself against the SHEF benchmark, by critical friends who have experience of delivering an equality agenda in their own organisation. The assessment is a reflection of the evidence presented to the peer team, through reading the documentary evidence submitted in advance, and the interviews and focus groups when on site.

The team was:
Councillor Marie Pye – LB Waltham Forest
Hayley Parker – East North East Homes Leeds
Stuart Malpass – Wolverhampton City Council
Steve Shaw – Royal Borough of Greenwich
Gill Elliott - Local Government Association

The team appreciates the welcome and hospitality provided by the organisation and would like to thank everybody that they met during the process for their time and contributions.

2. Executive summary and recommendations

Following this equality peer challenge, we have reached the following conclusion:

**Tower Hamlets Homes has completed a satisfactory self-assessment against the criteria for the ‘excellent’ level of the Social Housing Equality Framework.**

Tower Hamlets Homes (THH) is the arms-length management organisation (ALMO) for the London Borough of Tower Hamlets (LBTH). It manages over 21,000 homes on behalf of the council. THH gained the Achieving level of the SHEF in 2011 and was keen for an external assessment of the progress it has made on equalities since then.

The peer team found that equality is at the heart of everything THH does. The borough of Tower Hamlets is culturally diverse and THH’s customer base reflects that diversity. Over three quarters of its tenants are from a black or minority ethnic background and over a fifth
of them are over 65. Major challenges include overcrowding and economic exclusion from the wealth of Canary Wharf which is situated within the borough.

THH has strong and positive leadership on equalities from its Chief Executive, its new Board Chair and from the Mayor of Tower Hamlets, and this influence was evident throughout the organisation.

THH knows its community in detail. It collects a high percentage of customer profiling information including their protected characteristics, communication and other relevant needs. It systematically uses this information to plan and provide better services to its residents in the short and longer term. It regularly shares relevant information with its main contractors and other agencies and partners and is fully aware of recent changes in the local population where it operates.

THH monitors, reviews and updates its equality commitments and outcomes through its Diversity Scorecard and regular reports to its Board and senior management team. Tower Hamlets Council was highly complimentary about THH’s approach to equality, its practices and outcomes. It has also been commended by other social housing providers as a source of best practice in promoting equality and diversity.

There is data to show that a cross section of residents contribute to THH’s resident involvement work. THH has taken action wherever satisfaction data showed that one group of residents was significantly less satisfied than other groups with a particular service e.g. Somali tenants, who in addition were particularly hard to reach. There is evidence to show that THH is meeting its performance indicators when responding to harassment, hate crimes and domestic abuse faced by residents and staff.

The diversity of THH’s workforce has increased since 2009 and it has undertaken a number of positive actions to continue this trend. It recognises that there need to be more women and BMEs in senior positions and it is hoped that programmes like the “Stepping Up” talent development programme will help to achieve this.

3. Impact of the Challenge
The organisation has made the following observations upon the impact the peer challenge has had:

“The Equality Framework self-assessment and peer challenge is a thorough yet value-for-money approach which has helped us to ensure that the services we deliver to residents and staff are accessible, inclusive and fair.”

James Caspell, Tower Hamlets Homes
4. Detailed findings

4.1 Knowing your customers

Strengths:

1. THH has clearly demonstrated a huge improvement in data collection since it gained the Achieving award in 2011. Understanding the value of data goes right through the organisation. Data collection is sophisticated and THH can evidence analysis of data sets across services through equality analysis and projects which have led to clear outcomes for customers. Tower Hamlets Council (LBTH) spoke very positively about the data collection and analysis that THH are doing and the practical ways that it uses it, e.g. addressing the overcrowding of Bangladeshi tenants or Bengali and Somali tenants in rent arrears. Customer insight was the catalyst for 'We Speak Your Language' which has demonstrated clear equality outcomes based on respecting diversity and meeting communication needs.

2. Customer insights are used to define and set priorities which are, in most cases, tracked and equality outcome measured. The inquiry into aging used Customer Insight to drive forward the THH action plan for improvements to services for older people. THH commissions a wide range of surveys on issues such as customer satisfaction through an external company Kwest. The results are segmented by protected characteristics.

3. The 'Getting to know you' interview process is well embedded in the organisation. It is linked to the Diversity Strategy around creating services that are inclusive, accessible and fair.

4. The 'Neighbourhood at a Glance' toolkit brings together equality and diversity data and information for 27 individual neighbourhoods. They are kept up-to-date and take into account demographic and community changes. They are a useful tool for both staff and tenants. They also help to identify strategic priorities for neighbourhoods and feed them into neighbourhood plans. These neighbourhood plans act as a framework to inform how the neighbourhood community budget should be spent.

5. There is a robust data sharing system with all contractors. Data is shared with contractors such as Mears to ensure that a responsive and sensitive service is delivered. The Northgate system flags up diversity issues e.g. tenant disability or 'takes time to answer door' identified through the 'getting to know you' interview. This also serves to protect staff by highlighting safety issues e.g. violent tenants. Data sharing is a mutual-process and contractors regularly share information gathered from interactions with tenants. This is absorbed into THH systems to ensure respect of diversity and equality of outcome.

Areas for consideration:

6. THH has improved its customer insight of leaseholders through initiatives such as such as the recent Leaseholder Profiling Project. 41% of THH customers' are leaseholders and this is growing. However, information on the tenants of
leaseholders who sub-let properties is not held. There is evidence of information being picked up through the various services THH provides but a more systematic approach is required. LBTH are developing a private rented policy, which will impact on equality. THH could participate in this to develop solutions as leasehold properties will be main focus.

7. Equality information is well embedded in THH, however this will need to be sustained in the face of further financial constraints. THH needs to eliminate processes and projects that produce little return and focus on the good practice already developed and use these models across other protected characteristics and issues.

8. Face to face interviews are picking up additional equality information but this is not being fed into welfare reform figures. This will have an impact on the approach to risk mitigation.

9. The high percentage ‘not given’ equalities data on victim sexuality on Anti-Social Behaviour (ASB) reporting means it is difficult to identify whether there is an linkage to Lesbian Gay Bi-sexual Transgender (LBGT) hate crime.

10. The term vulnerable is used at THH to cover a wide range of characteristics, for example in the repairs booklet for tenants. THH needs to think about the definition of the term and what this means to tenants as it could offend some. THH should also consider reviewing the Equality Impact Assessments (EqIA) on the Vulnerability Strategy.

4.2. Leadership, partnership and organisational commitment

Strengths:

11. THH has strong leadership and commitment to equalities at a senior level. The Diversity Strategy 2012-14 articulates well its three element approach with Diversity Scorecards, Diversity Working Group and Diversity Champions providing a union of accessible, inclusive and fair services for residents and staff. This strategy is supported by business and team plans that embed equality objectives. The Diversity Strategy is embedded as a core strategy in current financial year Business Plan. The senior management team (SMT) is focused on achieving high performance across all areas and provides a robust challenge on equality performance indicators such as the scorecards.

12. The Board members peers met with are clearly committed to diversity and equality. The Board regularly receives reports on equality indicators/data and monitor these. All board reports consider diversity implications. There has been improved diversity of Board members following the recruitment of the new Board.

13. THH works well in partnership with LBTH and Council officers were very positive about THH’s work on equality. THH is an active and positive member of the Council’s equality network and was closely involved in the development of the Council’s new equality scheme especially around evidence and data gathering. Senior council officers believe THH’s good record on equalities stems from a
combination of its strong evidence base, the commitment from senior level staff and good relationships with community groups.

14. The Council’s Mayoral priorities, including to LBGT issues are prioritised in THH where they are addressing issues such as the workforce diversity.

15. THHH’s Diversity Strategy provides a good basis for targeted and practical approaches to advancing equality. Reports go to the Board on the Diversity Strategy every six months and include results from the Diversity Scorecard. The Diversity Scorecard itself is excellent and should be promoted as good practice. Quarterly reports from the scorecard go to SMT, diversity champions and the Diversity Working Group. Equality is included in other high level business critical indicator reporting mechanisms including the annual monitoring report to the Board.

16. EqIAs are excellent with focused actions that are tracked and lead to positive outcomes. All EqIAs go to SMT during their production and once they are completed. They are mainly done by the Business Development Team but actions are produced by relevant service teams to mainstream the process. Equality Assessments (EAs) provide high quality data analysis and have been used to inform decisions with over 100 outcomes delivered for 2012/13.

Areas for consideration

17. Any future recruitment to the Board should require experience of promoting equality or similar rather than just a commitment to equal opportunities and diversity as in the last recruitment exercise. As this is a very new Board, specific training on equality would be helpful, for example on the legislative framework and the difference between equality and diversity. Board reports should have an EA or EqIA presented as part of the papers.

18. The current Diversity Strategy runs out next year and thought needs to be given to the next step. Should THH produce a new equality strategy, be part of the Council’s strategy or take a partnership approach with contractors or other housing providers?

19. The Diversity Working Group has made some positive contributions in the past e.g. building consideration of access improvements into the Decent Homes programme and developing an over-crowding toolkit. However it may now be time to consider a review or refresh of the group to keep it effective as THH moves forward.

20. To a certain extent commissioning or undertaking EqIAs and EAs is discretionary. Consequently, there is a reliance on project leads identifying the need and acting upon it. This risks some equality issues being missed. THH should consider introducing some basic criteria for project leads to use to screen projects for EqIAs/EAs and providing guidance on screening. A system is needed to ensure teams have a method for monitoring and reporting progress and outcomes and sharing learning. There is some evidence of these getting into team plans but no process to check that this is being done.
4.3 Customer engagement

Strengths:
21. There are many routes for customers to engage and work with THH. Methods of engagement include digitally e.g. YouTube, talking leaflets, meetings, letters and face-to-face. Residents feel that they are heard on an on-going basis and in terms of developing priorities. Residents were positive about their involvement in contract development. The grounds maintenance contract was given as an example of where it has been possible to have a voice and potentially to influence the organisation’s thinking on the contract.

22. THH operates a “Getting Involved Register” which is largely representative. Engagement work has also resulted in improved services. It was positive to note the link here between engagement work and subsequent action in terms of services. THH undertook engagement work with the Somali community when it recognised a scarcity of information about this group of tenants. From this work services were reshaped, principally a regular surgery specifically for this community. As a result the organisation reaped financial gain, (reduced rent arrears) in having made these changes and in turn satisfaction rates reported by the community increased.

23. There are some really excellent examples of engagement work with young people such as the Youth Panel – youth ambassadors are encouraged to participate in the residents' scrutiny panels; “Bling my Hood” which involves young people working on environmental projects in their neighbourhoods has been very positively received; Youth Make A Difference which offers a £500 grant for young people to run projects. Eligible grants are decided by the Youth Panel.

24. Service users have been invited to use their equalities expertise as mystery shoppers to measure service responses and there is evidence of these being acted upon to make a difference. Mystery shopping is utilised really well with thematic mystery shops for instance homophobic hate crime, which has delivered clear outcomes e.g. Stonewall Housing training. Responses were also benchmarked against other local organisations. Mystery shoppers are recorded by protected characteristics to ensure that they are representative of the community.

Areas for consideration:

25. THH should consider how it can build stronger links with disabled tenants so that this is more systematic.

26. Government digital priority may affect THH tenants’ and Job Centre Plus arrangements may not be sufficient. On-line services can cause financial and social exclusion with older people and those who do not speak English. 7-10% of tenants cannot speak or read English. In addition to current THH work to map access points to IT facilities, community engagement projects aimed at improving digital literacy of its' tenants would be beneficial e.g. combined internet cafes and job clubs in community centres or communal Tenants Association facilities could
help tenants access THH services on-line and provide help to those 70% of BME women not in work in the borough.

27. THH has increased its knowledge about the profile of leaseholders but it now needs to strengthen relationships with leaseholders and their tenants.

28. Each neighbourhood has £20K to spend on community projects and neighbourhood improvements. More structure to the allocation of spending would be more equitable as at present it appears that it is down to officer discretion or which community groups are most vocal. There is no clear bidding or application system. Projects and improvements do not appear to be monitored long term for their impact on the community. This may be because they have been recently implemented. Monitoring the success of community funding through valuable social impacts is important. THH could give the 20K neighbourhood fund a title and promote in the community. There is also an opportunity to work with partners and generate match funding.

4.4 Responsive services, access and customer care

Strengths:
29. Customer satisfaction rates are rising amongst all sections of the community. Overall resident satisfaction increased from 58% in 2008 to 77% in 2012. The LEAP project led to significant improvements in its performance targets e.g. 48 hour call back. There has also been an uptake of services that have been provided for minorities e.g. a 21% increase in the talking leaflets and over 300 hits on the Bengali YouTube video since it has been posted. Somali specific surgeries and toolkits e.g. phonetic cards for staff have led to an improvement in the satisfaction of Somali tenants from 60% to 85%. Customer services monitor complaints by protected characteristics and respond to adverse trends. Customer Service Excellence Standard for whole of THH achieved in 2012.

30. The Decent Homes programme is addressing the needs of diverse residents in the way it is being carried out. Consultation and support provided to residents by THH and contractor resident liaison officers is good, including respite facilities and temporary decanting to other properties. The Decent Homes process also identifies needs for adaptations and aids and these are completed at the same time to minimize disruption to the customer. A toolkit is in place to assess tenant vulnerability in a consistent way and contractors are trained to record vulnerability and refer tenants to the housing officers. There is a Password scheme in place to protect vulnerable tenants.

31. There are many good examples of how customer services are provided in a responsive fashion for protected groups. THH has developed multiple and varied solutions to language barriers including the “We speak your language” project which addressed the needs of Somali, Bengali and East European residents via a language honorarium for staff; talking leaflets and the website. Staff also use colour coded letters to indicate importance; name badges to identify languages spoken and pictoral cards for low literacy. A ‘Safe and secure system’ is in place whereby neighbourhood officers contact vulnerable/elderly tenants on a regular basis.
32. Rent arrears are dealt with on a case by case basis. This ensures a personalised process whereby THH supports tenants to sustain their tenancy where possible. Evictions are dealt with sensitively. There is no blanket policy which defines financial criteria for evictions. The teams have been restructured to ensure the diversity profile of their staff reflect the tenants in neighbourhood patches. This has delivered an increase in direct debit payments. Having Somali staff has contributed to a reduction of arrears from this community. Information about rents are produced in Bengali and Somali; checked by Somali and Bengali speakers and the information provided has been amended in response to feedback. There are a range of recommended payment options to address low incomes of tenants who may not be able to pay minimal bills for repair works.

33. Estate improvements are targeted e.g. improved lighting and security for elderly tenants, community gardens to deter anti-social behaviour (ASB) by youths. Work is programmed sensitively to take account of religious celebrations. Welfare Reform advice is provided for tenants including those who are disabled around applying for discretionary housing payments to help with the "bedroom tax" in the short term.

34. THH is trying to address the problems of overcrowding in a number of ways. Overcrowded properties are reviewed and where possible redesigned to alleviate the overcrowding. e.g. building ground floor extensions or providing an extra bedroom. THH also considers under occupation and facilitating property moves to free up larger properties. This is a sensitive issue. Some success has been achieved with 50 homes released since the programme started two years ago. THH also provide a ‘swap shop’ facility to bring under occupiers and those overcrowded together to consider swapping properties.

35. ASB, hate crimes and domestic violence are handled on a case by case basis with a multi-agency approach. All cases are reviewed by a multi-agency group and an action plan put together. Satisfaction levels are good across this service. There are solid operational procedures for tackling ASB and hate crime e.g mediation, target hardening measures. Awareness training has been delivered across THH. The scrutiny group were given full access to the team and 57 recommendations have been taken forward and are being monitored. Thematic mystery shopping on homophobic hate crime led to improvements including training.

36. The procurement process addresses equality requirements at the Pre-Qualifying Questionnaire stage. Contractors are monitored closely by THH to produce equality and diversity action plans.

Areas for consideration:

37. The approach to overcrowding by targeting older people who are under occupying has been done with sensitivity but there are still over fifteen hundred overcrowded properties which relate directly to the large Asian population where it is culturally common-place to live in inter-generational households. THH needs to consult further and understand the different ways they can support families, as the rate of
alleviating the problem is not quick enough. THH is picking up these issues, however the engagement needs to be more structured.

38. There could be more strategic work done to prevent ASB and hate crime before it happens. There are some examples of work in this area such as the “Bling My Hood” project. However national trends indicate that there are particular protected characteristics at risk from hate crime and ASB, in particular people with learning disabilities. Tenants and local business owners indicated a desire for much quicker responses to ASB such as moving on drunks from regular meeting spots such as parks and open spaces.

39. The number of ‘Fair’ scores for Decent Home Works has identified that customer service aspects of the work by contractors could be further improved. This was triangulated by resident’s focus group with repairs completed. For example complaints regarding workers not wearing plastic covers on their boots. This should be easy to rectify with contractors.

4.5 A skilled and committed workforce

Strengths:

40. It is evident from the interviews with staff and trade unions that engagement with staff is very good. High numbers of staff participate in staff surveys, training, forums and working groups. The staff survey monitors by all protected characteristics. 70% of staff think that THH respects different cultures and backgrounds. Employees are very positive about THH as an employer and its leadership on equality and diversity issues.

41. Innovative positive action approaches have been taken as a result of having identified under representation in the workforce. Examples include using diversity job boards, positive and inclusive images and the Stepping Up talent development programme targeted at BME and women staff. A Graduate Programme supports the recruitment of local people. The latest intake included 77% from a BME background (although more female graduates would be desirable).

42. The Diversity Champions Staff Network is well embedded and functions effectively. For instance taking ownership of the staff survey has improved returns. There has been high quality engagement including staff feedback lunches which identified issues such as frustration of aspiring managers unable to access training. The group secured management training to be opened up to them. Following results of the staff survey the group are working on a new Dignity at Work policy.

43. There are also staff lead sub-groups. e.g. LGBT and BME. Since the LGBT group was established there has been an increase in self declaration to 4% which compares well with the Stonewall estimate of 6% LGBT in the UK population, indicating increased trust in THH and a positive working environment where people feel able to be themselves.

44. There are good examples of THH recognising diversity e.g. Two Ticks Disability accreditation, membership of MIND and encouraging staff to develop, e.g. via the Stonewall Diversity Champion programme.
45. THH has ensured that all contractors make a commitment to the borough of Tower Hamlets by recruiting local apprentices. This is written into contracts and is monitored. SkillsMatch has been used to ensure the best recruits and significant headway has been made by recruiting female apprentices. There are plans to drive some cultural changes and break down job segmentation at grassroots level by working with schools. THH needs to use their current apprentices and staff to create local role models and continue to work at grassroots level to promote jobs.

46. Caretakers and repair contractors have been trained on domestic violence, hate crime and alerting supervisors to potential issues. As a result caretakers have increased the number of referrals to housing officers. ASB officers are about to be trained on homophobia, mental health issues plus older persons and disability abuse. Safeguarding and training on adult social care is provided for all staff.

Areas for consideration:

47. The profile of the senior management team, Heads of Service and middle management grades team could be more diverse (for example middle management is 75% white and more than 60% male) which represents no significant change since THH gained the Achieving level of the Equality Framework in 2011. THH needs to consider how to accelerate appointments of BME and women into management positions e.g. use of positive action tie-breaks with equally qualified candidates at interview, more targeted use of mentoring, secondments and training programmes.

48. Greater analysis of workforce data should be undertaken to identify short, medium and long term trends. THH should consider compiling an annual employment monitoring report, scrutinised by SMT and the Board for progress at the end of each financial year. It could include key headlines regarding trends in workforce composition including job types and grades, recruitment, turnover, training and development, employee relations (grievances/disciplinary proceedings/ET claims). This information could then be fed into service plans. Where there is under representation by grade, occupation or service area, there should be actions and targets to make the roles more attractive to under-represented groups e.g. increasing the numbers of female caretakers from 10 to 20%.

49. Within a new Diversity Strategy THH could give greater emphasis on the strategic aim to have a workforce that reflects the community. This would outline the demographics of Tower Hamlets and include an action plan to achieve a modern and diverse workforce for THH. It could include targets for under-represented groups and a local indicator or target for different groups of residents in the workforce e.g. Somali staff. The Action Plan could be more detailed using the SMART format.

50. Some front line staff do not receive regular supervision meetings or appraisals which means that setting of equality objectives has not filtered down to them. There should be clear equality objectives that staff own and which are linked to service plans and monitored in annual appraisals.
51. There is a recently set up staff group for LGBT but little or no mention of other staff groups for example a Disabled Staff Forum or a Women’s Fast Forward Network. This means there is no obvious mechanism to consult different groups of staff with protected characteristics when changing policies, practices or procedures.

52. The declaration rate for disability is only 3.4% but the staff survey indicates that 6% of staff are disabled. More could be found to positively promote the work that Tower Hamlets Homes is already doing on disability, including work with tenants and reasonable adjustments for staff. Within this work it may be helpful to promote a wide range of different impairments to emphasise the range of people who would meet the definition of disability. Consideration should also be given to establishing a disabled staff group. Further work should also be undertaken to identify staff members who have not completed the section in relation to disability and to try to ascertain the reasons for this.

5. Examples of innovative projects and initiatives

Getting to Know You Visits
The ‘Getting to know you’ visits have ensured that vulnerable residents are able to receive additional support. The target is to complete all getting to know you forms at the first 1-2-1 visit with a housing officer. In 900 of the last 1400 visits there has been a range of actions as a result including signposting and tracked referrals e.g. mental health support.

Property Guardians Scheme
“Dot Dot Dot” a social enterprise scheme places trained and selected ‘property guardians’ in flats that would otherwise be left empty so the flats remain more secure and reduces the risk of squatting. In return guardians commit to at least 16 hours a month to local charities such as Stepney Green Farm and Arbour Community Centre so there is a positive social impact. There are quarterly social impact reports to evaluate success in various areas.

Somali Tenants Engagement Project
This project helped Somali residents in Tower Hamlets change from being one of least satisfied groups of Tower Hamlets Homes’ residents, to be one of the most satisfied. Services are now more accessible, inclusive and fair for this community group.

The project had a number of strands including:
- successfully supporting over 200 Somali households to tackle issues such as rent arrears and overcrowding;
- changes to the way information was provided to make it accessible e.g. producing talking leaflets and picture cards for those who don’t read either English or Somali;
- helping three local Somali women find employment;
- recruiting a Somali tenant onto the Resident Scrutiny Panel;
- an engagement project with the local mosque set up by the Somali community;

1. Signposting to areas of good practice
1. EHRC Hidden in Plain Sight report for issues around disability hate crime.
2. Bristol City Council for its work on recruiting minorities
3. Harvest Housing now Arena Housing Trust for its 90 Day Challenges which bring together staff from different areas for three months to tackle a specific issue. The
challenges enable focused and continuous improvement e.g. “Knock Knock” project around customer knowledge; challenge on tenant profiling.

4. Harvest Housing for its Transgender Re-assignment Plan

5. Salix Homes is a national leader in community engagement. There are a range of levels at which its customers can become engaged with Salix, depending on commitment and interest. These include the Senate; Customers Inspectors, tenants and area representatives, Youth Senate and Equality forums. Salix adopts a variety of methods to encourage participation such as driving trailers around Salford, road shows neighbourhood representatives walking around with badges etc…

6. Newcastle City Council, LBTH or Royal Greenwich all produces comprehensive annual employment monitoring reports.

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