
Gwalia Housing Group Limited

ACCOMMODATING DIVERSITY

***BME Housing Strategy
& Action Plan***

December 2002



Ymddiriedolaeth Tai Gwalia
Gwalia Housing Trust



Tai Cartrefi



Grŵp Gwalia



Tai Cymdogaeth



Tai Trothwy

ACCOMMODATING DIVERSITY

Black and Minority Ethnic Housing Strategy for Gwalia Housing Group

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1. Introduction

- ◆ **The Gwalia Housing Group Board, the Group Chief Executive and its Directors' Team recognise the diversity of cultures and needs within the areas that the Group operates, and they are committed to ensuring that race equality is promoted at every level throughout the organisation.**
- ◆ The Strategy document starts from the premise that more needs to be done to understand and address the housing needs of Black and Minority Ethnic (BME) communities in Wales. It seeks to provide a framework through which Gwalia Housing Group can improve its own performance, and have an influence on other organisations with which it works, in order to provide quality housing and services that meet the needs of BME communities and individuals.
- ◆ Although the primary objective is to address the needs of BME communities and individuals, it is intended that the benefits and good practice arising from implementation of this Strategy should be absorbed into mainstream service delivery.
- ◆ A number of the proposals contained in this Strategy are already in place and operating effectively; others are aspirational and it will take time to implement them.
- ◆ The Strategy is intended to address the needs of individuals and of both geographical communities and communities of interest that exist within the BME population in Wales.
- ◆ The Strategy is supported by a Race Equality Plan (see Appendix) that establishes a timetable to assist in achieving the aims and objectives set out within the Strategy.
- ◆ The Strategy and Race Equality Plan is applicable to all types of tenure, housing and services provided by the Gwalia Housing Group. It will be adopted by all Registered Social Landlords (RSLs) and departments that are part of the Gwalia Housing Group.



2. Overview

- ◆ Gwalia Housing Group is fully committed to tackling all aspects of social exclusion and endeavours to promote equal opportunities throughout its business and with all its customers. Consequently, Gwalia Housing Group is similarly committed to combating racism and racial discrimination, and promoting racial equality and good race relations between people of different racial groups.
- ◆ Gwalia Housing Group recognises that BME groups and individuals may have particular needs in relation to housing and support services, and a social housing provider must be able to demonstrate both openness and fairness in meeting those needs.
- ◆ It is recognised that responding to BME needs cannot be tackled in isolation and that any strategy will be one element of an overarching Equal Opportunities Policy, and will need to be reflected in all that we do through all of our policies, procedures and working practices.
- ◆ This Strategy document explains what Gwalia Housing Group is seeking to achieve in terms of race equality in housing and support services, and how it expects to achieve its goals. The Strategy is intended to be flexible and adaptable in response to evidence of the changing needs of black and ethnic minority communities. It requires a continuous process of developing, promoting, implementing and monitoring and this document should be read in conjunction with the Race Equality Plan and will be subject to regular review.
- ◆ This Strategy draws upon research and reports undertaken by the National Assembly for Wales, the Chartered Institute for Housing in Wales, the Commission for Racial Equality, the National Federation of Housing Associations and the Welsh Federation of Housing Associations, and the Housing Corporation. It seeks to integrate with the BME strategies being developed by the local authorities within the areas where Gwalia Housing Group operates, as well as that of the National Assembly for Wales.

- ◆ The Strategy and Race Equality Plan is based upon and complies with National Assembly for Wales regulatory requirements, legislation and good practice, specifically:

Legislation:

- **Race Relations (Amendments) Act 2000**
- **Employment Rights Act 1999**
- **Human Rights Act 1998**
- **The Asylum and Immigration Act 1996**
- **Race Relations Act 1976**

Codes of Practice:

- **Elimination of Racial Discrimination and the Promotion of Equal Opportunities in Employment 1984 (CRE)**
- **Elimination of Racial Discrimination and the Promotion of Equal Opportunities in Rented Housing 1991 (CRE)**
- **Promotion of Equal Opportunities in Employment 1984 (CRE)**
- **The Challenge Report 2001.**

- ◆ Although housing associations are not legally bound by the Race Relations (Amendments) Act 2000, Gwalia Housing Group, in keeping with the spirit of the legislation, accepts the responsibility and duty placed on the wide range of public authorities to promote race equality.

By developing, implementing, promoting and monitoring a BME housing Strategy, Gwalia Housing Group expects to:

- ◆ Provide a framework for tackling racial discrimination and disadvantage.
- ◆ Provide clarity to Gwalia Housing Group staff, board members, residents, service users, contractors and partners what it is seeking to achieve in the field of race equality.
- ◆ Demonstrate to BME communities and individuals Gwalia's commitment to race equality by setting out measurable objectives and performance targets that can be monitored in order to determine how far progress has been made.
- ◆ Promote awareness amongst staff, tenants and partners of racial equality issues, by involving them in the composition and delivery of the Strategy.

- ◆ Use the lessons learned by focussing attention on methods of consultation, research and service provision for BME communities, to improve services for all users.

3. Aims and Objectives

The aims of the BME Housing Strategy are:

- ◆ To eliminate all racial discrimination whether unlawful or unintended.
- ◆ To promote equal opportunities for all ethnic groups
- ◆ To deliver a high standard of service to people from BME communities within a framework of empowerment and Best Value
- ◆ To provide services that are sensitive to differences in needs, languages and culture
- ◆ To recognise the diversity of local communities, support multiculturalism and to foster good relations between different communities
- ◆ To take positive action to address existing disadvantage and encourage a more inclusive society.

4. Identifying Needs

- ◆ In order to deliver housing services that meet the needs of BME groups, it is essential that those needs are first identified and understood.
- ◆ Gwalia Housing Group will work with the National Assembly, local authorities, RSLs, BME community groups and organisations and other agencies and stakeholders to establish the profile of BME housing need within the areas that it operates.
- ◆ Once a BME housing needs profile is complete, it will be possible to identify specific aims within the strategy and to prioritise objectives which address those aims (see Race Equality Plan).
- ◆ Objectives will be realised through achieving operational targets, which will be set after consultation with relevant service users and

staff. Targets will be measurable in order to allow progress to be assessed. This can be done by measuring:

- processes or performance
- outputs
- outcomes.

- ◆ Objectives can often be achieved by using different options. Meeting the needs of BME communities may require untried options to be considered (e.g. self-build). Identifying the most appropriate option must be an inclusive process.

5. Implementation

- ◆ In order to implement this BME housing strategy effectively, a Race Equality Plan has been drawn up that identifies responsibilities and resources and establishes a timetable for achieving objectives and for review.
- ◆ Although responsibility for implementation and overview of parts of the strategy has been designated to specific individuals within the organisation, it is stressed that this intended to be a mainstream activity. Every person within the Gwalia Housing Group has a responsibility to support and assist in ensuring the Strategy is delivered effectively. In addition, a senior officer, the Assistant Chief Executive, will have overall responsibility for ensuring the implementation of the Strategy through the Race Equality Plan.
- ◆ As a mainstream activity, it is anticipated that any resource implications will be initially absorbed within existing budgets. This will be reviewed annually.
- ◆ To assist in the implementation, a number of headings are used within the Race Equality Plan:
 - a) Housing Development and Provision
 - b) Housing and Support Services Provision
 - c) Contractors and Consultants
 - d) Staff - Employment and Training
 - e) Consultation, Communication and Participation
 - f) Monitoring and Review.

6. Housing Development and Provision:

- ◆ Gwalia Housing Group will utilise current research findings and best practice guidance, as well as consulting with BME groups and individuals, in order to establish particular needs in relation to property design, site layout, dwelling mix and location and tenure.
- ◆ Gwalia Housing Group will endeavour to offer choice in meeting identified needs.
- ◆ If requested, we will work with appropriate organisations to improve housing in areas of traditional concentrations of BME groups.
- ◆ Gwalia Housing Group will offer accommodation to BME applicants in any area where they state a preference. However, where these areas are away from support networks and facilities, we will work with other relevant agencies and organisations to endeavour to provide appropriate facilities that are accessible.
- ◆ Gwalia Housing Group will consult with BME communities to identify areas for development, even though those areas may lie outside of the current stock profile.
- ◆ We will exploit available opportunities, including new-build, rehabilitation of existing homes, purchasing of existing satisfactory dwellings or management of existing buildings, and offer as far as possible a mixture of tenures in order to meet identified needs.
- ◆ We will seek to develop new housing that is sensitive in design to the cultural needs of tenants. Where feasible, we will adapt existing properties to meet the needs of BME applicants.
- ◆ We will publicise our housing services broadly and with a variety of techniques to ensure that BME groups and individuals are aware of our role and the accommodation we can offer.
- ◆ Where appropriate, community development and tenant participation initiatives will be used to assist BME involvement in community regeneration and integration.

7. Housing and Support Services Provision

- ◆ Gwalia Housing Group recognises that, in order to make informed choices, people need to receive information in a manner that they can understand. We will provide



information about our housing and support services which is clear, comprehensive, accessible and easily understood. The importance of being able to facilitate translation and instant access to appropriate community languages is recognised, and procedures will be put in place to enable this service to be offered, if required. We will regularly review the mechanisms used for dissemination of information to ensure that they are appropriate and effective.

- ◆ We will ensure that we actively publicise our services to BME communities, and we will consult with BME groups and individuals in order to develop an appropriate marketing strategy.
- ◆ Gwalia Housing Group operates a letting policy and procedure that seeks to be fair, equitable and accountable. We will monitor performance to ensure that BME communities are featured on the waiting list and allocated housing at least proportionate to their local population and profile. We will regularly review our allocation policy to ensure that it is accessible and non-discriminatory to BME individuals or groups.
- ◆ We will regularly review our assessment procedures to ensure that BME individuals and communities are not discriminated against when seeking to access support services.
- ◆ Applicants from BME groups will not be penalised if they refuse an offer of accommodation in an area with which they are not familiar or where they feel that they would be isolated from their existing support mechanisms.
- ◆ Gwalia Housing Group will operate a victim-centred approach to racist harassment. We will pursue a policy that accepts that a racist

incident is any incident, which is perceived to be racist by the victim or any other person. We will ensure that staff are trained in dealing with racial harassment and are made aware that racial harassment can be targeted at people who belong to minority groups who are visible not necessarily by their skin colour. We will regularly review our racial harassment policies and procedures to ensure that they conform to best practice guidance.

- ◆ We will review all of our policies and procedures to ensure that any BME issues are addressed within the policy and procedure and become mainstreamed.
- ◆ We will identify the key service areas to be ethnically monitored, set targets and regularly review these areas to monitor progress.
- ◆ We will establish mechanisms to facilitate regular consultation with BME groups and individuals regarding the delivery of our housing and support services.

8. Contractors, Consultants and Suppliers

- ◆ Gwalia Housing Group is conscious that many of its services are delivered to its tenants by contractors. They are often identified in tenants' minds as representatives or employees of Gwalia.
- ◆ Before accepting contractors, consultants or suppliers on to any of its approved lists, Gwalia Housing Group will ensure that all firms with more than 20 direct employees will:
 - Have their own written equal opportunities policy based on the Race Relations, Sex Discrimination and Disability Legislation and Codes of Practice.
 - Take disciplinary action over racial harassment or discrimination at work.
- ◆ Contractors will be required to ensure, if they sub-contract, that their sub-contractors also meet the above criteria.
- ◆ Contractors or sub-contractors with less than 20 employees will be required to sign an undertaking to comply with the above Codes of Practice.

- ◆ We will give compliance with equal opportunities requirements the same weighting as financial and quality factors when assessing the suitability of contractors for inclusion on the approved lists.
- ◆ We will actively encourage ethnic minority contractors to apply for registration on the approved lists.
- ◆ When reviewing contractors' performance, Gwalia Housing Group will take into account any incidents of racial harassment or complaints from BME individuals.
- ◆ Gwalia Housing Group will provide advice, guidance and training on BME issues for contractors and consultants throughout the contractual process.
- ◆ Gwalia Housing Group will undertake to take action against any tenant or member of staff who is found to have been responsible for racial discrimination against a contractor. In the case of a tenant, this will be treated as a breach of tenancy. In the case of a staff member, this will be treated as a disciplinary matter.

9. Employment and Training

- ◆ Gwalia Housing Group will regularly review its employment procedures and working practices to ensure that it does not discriminate unfairly against any section of the community in its employment practices.
- ◆ Gwalia Housing Group will take positive action to encourage and/or train ethnic minority job seekers.
- ◆ We will regularly review our employment practices to ensure compliance with Regulatory Requirements, Best Value and the Race Relations legislation and Codes of Practice.
- ◆ We will analyse the workforce, promotion, and job applicants according to ethnic origin, gender, grade and place of work annually.
- ◆ Gwalia Housing Group will ensure that its Training and Staff Development Strategy will incorporate race equality considerations in all relevant training; for example in customer care or quality assurance training.

- ◆ We will provide training for all staff in order to assist them to work and deliver services in a non-discriminatory way. All our annual performance reviews will discuss equality issues and how staff have addressed and incorporated this into their everyday working.
- ◆ We will provide training for all new and existing employees and committee members, which raises awareness of racial equality issues.
- ◆ Gwalia Housing Group will consult with BME groups and individuals, as well as appropriate organisations, in order to identify relevant training that will assist staff deliver services.
- ◆ We will offer appropriate race equality training for other organisations with which we deal, such as tenants associations and contractors.
- ◆ Gwalia Housing Group does not tolerate harassment of any of its staff and will fully support any member of staff who is subject to racial abuse from tenants or members of the public and will take appropriate action. We will draw up a policy clarifying the details of this support.
- ◆ We will monitor training provision by ethnic origin to ensure equal access for ethnic minority employees.

10. Consultation, Communication and Participation

- ◆ Gwalia Housing Group will review its Board structure annually to ensure that it is as open as possible and that it reflects the composition of the local communities within which it operates.
- ◆ In order to achieve a proportionately representative membership, Gwalia Housing Group will, from time to time, advertise in the local press and target BME groups for new voluntary board members specifically from the BME communities.
- ◆ We will seek to establish working relationships with local ethnic community groups and organisations in order that their views are incorporated into the development of our housing and support services.
- ◆ We will report annually to our Boards of Management and our tenants regarding the delivery of services to the BME communities and individuals.

- ◆ We will require all tenants associations, panels or other groups and key tenants to adopt an equal opportunities statement, and to practice the principles of non-discrimination before being awarded formal recognition or funding by Gwalia Housing Group.
- ◆ We will seek to establish a key tenant scheme that is intended specifically to help BME groups and individuals overcome any difficulties that may arise in their relationship with their landlord and to be consulted with on various issues.
- ◆ Gwalia Housing Group will devise and implement a programme of publicity that emphasises our commitment to promoting race equality in all its activities.

11. Monitoring, Evaluation and Review

- ◆ Gwalia Housing Group has developed a Race Equality Plan to assist in the delivery and implementation of this Strategy. The Race Equality Plan identifies specific responsibility for each of the actions, and sets a clear timetable for implementation.
- ◆ Each RSL will be responsible for implementing specific aspects of the Strategy and for reporting to the appropriate Board. The Gwalia Housing Group Board of Management will have overall responsibility for supervision of the monitoring of the Strategy.
- ◆ The officers identified in the Race Equality Plan will have the responsibility to ensure the performance is reported to the relevant Board at least annually.
- ◆ Gwalia Housing Group will develop appropriate IT systems to assist in the statistical monitoring of this Strategy.
- ◆ All staff and Board Members have a responsibility to assist in the implementation, monitoring and review of this strategy. The Assistant Chief Executive will be responsible for the co-ordination of the Strategy.

BME December 2002.

**GWALIA HOUSING GROUP
RACE EQUALITY PLAN
(03.12.02)**

Action	By when?	By whom?	Actual completion
<i>Strategy & Plan:</i>			
Develop BME Housing Strategy (have regard to the LA strategy)	April 04	Asst. Chief Executive	
To have a Race Equality Plan in place (to include: priorities/targets, timetable for action, systems for monitoring & review, systems for consulting)	April 04	As above	
To publish the BME Housing Strategy & Action Plan and report and publish annually progress made against the targets set	April 04 Annual	As above	
Input into regional BME strategies	Ongoing	As above & Chief Executive Tai Cymdogaeth	
Develop systems for involving and consulting BME representatives & tenants and staff in development, monitoring & review of Strategy & Race Equality Plan	April 04 Ongoing	As above & Chief Executive Tai Trothwy	
Assess the impact of policies & procedures on race equality and identify the housing needs of different BME groups.	April 04	Asst Chief Executive	
Consider resource implications of implementing Race Equality Plan & mainstream into budgets	April 04	Director's Team Director of Finance	
Best Value Service Review Teams to address BME issues when conducting reviews & drawing up programmes of action for improvement	From April 02 Ongoing	Asst Chief Executive, BVSR Team Leaders	
Thoroughly review and measure impact of Strategy & Race Equality Plan and revise accordingly	April 07 Ongoing	Asst Chief Executive	
<i>Leadership & Commitment:</i>			
Establish personal race equality objectives for Group Chief Executive & Directors Team and publish these	From 2003	Group Chief Executive	
Consider signing up for the CRE's Leadership Challenge	April 2003	Group Chief Executive & RSL Chief Executives	

Publicly launch Strategy & Race Equality Plan	April 04	Asst Chief Executive	
Widely publicise Gwalia's commitment to promoting race equality through policy statements & by advertising and promoting various BME initiatives & service access and provision	Ongoing	Asst Chief Executive; Chief Executives of Tai Cymdogaeth & Tai Trothwy	
<i>Housing Development Provision:</i>			
In developing new housing & schemes (and with refurbishment projects) consider the requirements of BME people especially with regard to: design of individual dwellings, site layout & dwelling mix and location (eg design semi's so that they can be converted to one house & back again)	April 2004 Ongoing	Chief Executive, Tai Cartrefi	
Investigate whether LCHO is a priority for some BME groups, if so, liase with local authority in relation to HSOP priorities	April 2004	As above	
<i>Housing Services Provision:</i>			
Consult with tenants & BME groups and draw up programme for reviewing all policies & procedures in respect of service planning, delivery & performance to ensure BME issues are incorporated	April 2003	Chief Executives of Tai Cymdogaeth & Tai Trothwy	
Review all policies & procedures ensuring BME dimensions have been mainstreamed	Ongoing	As above	
Review & identify areas to be ethnically monitored	Sept 2003	As above	
Establish ethnic monitoring systems & time-scales for review and remedial action	April 2004	As above	
Meet annually with local authorities to monitor & review local lettings policies with aim of ensuring equality of access for BME people to housing	Initial meeting by 03 Ongoing	Chief Executive, Tai Cymdogaeth	
Review the allocations & lettings policies to ensure that they are fair & non-discriminatory	April 2003	As above	
Set local targets for lettings to BME people	Sept 2003	As above	
Assess & compare the "quality" of housing allocated to BME tenants compared with their white counterparts & take any appropriate action to address any discriminatory practices	April 2004	Director, Technical Services; Chief Executive, Tai Cymdogaeth	
Work with local authorities to ensure that nomination agreements address BME issues	April 2004 Ongoing	Chief Executive, Tai Cymdogaeth	

Review whether support services are compatible to the needs of BME individuals and communities	Dec 03 Ongoing	Chief Executive, Tai Trothwy	
Review assessment procedures for accessing support to ensure that they do not discriminate against BME clients & applicants	April 2004 Ongoing	Chief Executive, Tai Trothwy	
Work with partner agencies to ensure that they consider the needs of BME clients in their referrals	April 2004 Ongoing	Chief Executive, Tai Trothwy	
Review Tai Cymdogaeth's racial harassment policy, procedure & working practises to ensure the following are covered: adopt MacPherson definition of a racist incident; encourage reporting of incidents; support victims, including practical support eg additional security to the home; deal with perpetrators; monitoring mechanism & report to Board; seek to prevent racial harassment in the future.	End 2003 Ongoing	Chief Executive, Tai Cymdogaeth	
Consult tenants & community groups on the review & implementation of the racial harassment policy & procedures	Ongoing	As above	
Widely publicise the racial harassment policy	End 03 Ongoing	As above	
Contribute and participate in multi-agency for a established to tackle racial harassment	End 03 Ongoing	As above	
Review tenancy agreements & licenses to ensure they include a clause dealing with racial harassment (include harassment of neighbours and staff, contractors & consultants etc)	From 2003	As above & Chief Executive, Tai Trothwy	
Provide appropriate training for staff dealing with racial incident cases	From 03 Ongoing	Chief Executive, Tai Cymdogaeth	
Review provision of information to BME groups with regard to language by adopting appropriate and wide ranging formats and channels of communication and information	End 03 Ongoing annually	Chief Executives of Tai Cymdogaeth & Tai Trothwy	
Investigate & consider using and developing Language Line and other translation services	April 2003	Chief Executive, Tai Cymdogaeth	
Consider the most effective ways to publicise translation services	April 2003	As above	
Develop equality issues (including race) page on website	April 04	Group Chief Executive	
<i>Contractors & Consultants:</i>			
To review contracting procedures & ensure that they set out: expectations & requirements on race equality and arrangements for working with BME-led contractors & consultants	April 2003	Director, Technical Services; Chief Executive, Tai	

		Cartrefi	
To require contractors, their sub-contractors & consultants to comply with basic race equality standards in their employment practices (making compliance a precondition of contract)	Sept 2003	As above	
To require contractors to provide training for their staff on race equality issues	April 2004	Director, Technical Services	
To monitor, review & report contractor performance on race equality & to take immediate action where race equality standards are not being met.	Sept 2003 Ongoing	Director, Technical Services	
<i>Employment & Training:</i>			
To monitor staff, by racial group, in relation to: staff in post, applicants for employment, training & promotion, training received, staff involved in grievance procedures, staff subject to disciplinary procedures, performance review outcomes, staff that leave & the reasons for doing so and publish the results annually.	April 03 Annually	Director, Central Service	
To report to the Gwalia Boards the outcome of employment ethnic monitoring data	April 04 Ongoing	Director, Central Services & RSL Chief Executive's	
To develop & implement an action plan, including consideration of positive action, to remedy any action in response to the outcome of the monitoring especially if any employment policies, procedures or practices are: leading to unlawful discrimination or having an adverse impact on equality of opportunity or good race relations.	April 04 Ongoing	Director, Central Services	
Set employment targets for staff to reflect the communities served and at different levels throughout the organisation	April 04 Ongoing	As above	
Establish personal race equality objectives for all members of staff as part of the performance review process	From 2003	As above	
Consider awarding an extra increment for staff for speaking a minority language including Welsh, and include on all job person specifications	April 2003	As above	
Review all employment policies , procedures & practices to ensure that they do not discriminate against BME people	By 2003 Ongoing	As above	
Identify key competencies to manage diversity for Gwalia managers	April 2003	As above	
Review staff handbook section for dealing with racial harassment in the workplace and publicise procedures to staff	April 2003	As above	
Consider extending the positive action initiative (PATH) to address BME under-representation in the workforce	From 03 Ongoing	As above	
Consider how to target job opportunities for BME communities (eg sending flyers to community groups, provide school placements)	April 2003	As above	
Review the skills of current BME staff and work with them to identify career	Jan 03	As above	

progression opportunities	Ongoing	Director's Team	
Consider positive action initiatives to enable BME people to access career progression opportunities, including secondment & mentoring opportunities	Jan 03 Ongoing	As above	
Review training & development policy, procedure & practice (to ensure that they do not discriminate and provide opportunities for BME staff to progress to senior levels)	April 2003	As above	
Provide appropriate race equality training: for all staff, Board Members & tenant groups/representatives & key tenants (consult with BME groups, individuals & organisations to identify relevant training content to assist staff deliver services in a non-discriminatory way. Also consider joint training with the above groups)	End 2003	As above & Asst Chief Executive	
Review existing course content to include race equality dimensions eg customer care, quality assurance, induction courses	April 2003	Director, Central Services	
<i>Consultation, Communication & Participation:</i>			
Establish & develop working relationships with local BME community groups to ensure their views are incorporated into the development of our services	Ongoing	Asst Chief Executive, Chief Executives of Tai Cymdogaeth & Tai Trothwy	
Devise & implement publicity programme to emphasise commitment to promoting race equality, the services available and specifically the racial harassment policy & procedure (consider using local radio, local press & ethnic press)	End 2003 Ongoing	As above	
Review Tenant Compact(s) to ensure they include & involve BME tenants in all aspects of our business	April 2003	Asst Chief Executive	
Establish Key Tenant Scheme focussing on assisting BME tenants	End 02 Ongoing	As above	
Review the extent to which tenant representatives are representative of their area	2003 Ongoing	As above	
Review code of conduct for tenant groups & schemes to ensure that race equality issues are central to their operation	April 2003 Ongoing	As above	
Ensure adoption of code of conduct by all tenant groups & schemes	Sept 04 Ongoing	As above	
Review BME representation on all Gwalia Boards	End 2002	Group Chief Executive	
Draw up a plan, with targets, to achieve recruitment & retention of BME Board Members	April 2003	Group Chief Executive	
Monitor the percentage of BME Board Member appointments against targets	Ongoing	Group Chief	

		Executive	
<i>Monitoring & Review:</i>			
Monitor progress on the Race Equality action points	Quarterly	Asst Chief Executive	
Progress reports to be received, considered and any remedial action to be approved by Director's Team	Six monthly	Asst Chief Executive	
Progress, monitoring & review reports to report on appropriate actions and identify any remedial action to be received by each RSL and an overview report to be received & considered by the Gwalia Board of Management	Annually	Asst Chief Executive; RSL Chief Executives	