

**INNISFREE HOUSING ASSOCIATION
ANTI-HARASSMENT POLICY
APPROVED JULY 2007**

SUMMARY

- Innisfree condemns all forms of harassment - racial or sexual harassment, harassment on the grounds of disability, sexuality, age, HIV Status or on any other basis.
- This policy should be used in conjunction with our Anti Social Behaviour Policy
- Innisfree's Conditions of Tenancy prohibit harassment, so perpetrators are in breach of their tenancy and can face possession proceedings if they cause harassment. Innisfree can also pursue other legal remedies eg, injunctions, demoted tenancies and Anti social behaviour orders.
- Definitions of harassment are included in the policy.
- Innisfree will encourage tenants who have suffered racial harassment to report such incidents and has set performance standards for responses to these reports. The approach is victim-centred.
- Victims will be supported through their Housing Officer, emergency repairs will be carried out within 24 hours, and security improvements will be offered.
- Perpetrators will be interviewed by the Housing Director and Housing Officer and legal advice sought where there is a breach of tenancy.
- We will work together with the Police, Local Authorities and other agencies to tackle harassment.
- The emphasis is on taking action against the perpetrator and enabling the victim to live without harassment or fear of harassment.
- Standard letters and interviewing proformas are included in the appendices.
- Each case will be monitored monthly and details of all cases will be kept on a shared spreadsheet for reporting quarterly to the Housing Services Committee.
- The Anti-Harassment Policy will form part of the induction process for new staff and all staff provided with regular diversity training.
- Officers will be provided with training on dealing with harassment at regular intervals.

INNISFREE HOUSING ASSOCIATION

ANTI-HARASSMENT POLICY

1.0 Policy Statement

1.1 This policy includes various references to new legislation and Government initiatives for tackling various types of anti social behaviour following the implementation of the Anti Social Behaviour Act 2003. Although harassment is a form of anti social behaviour, It was not considered appropriate to completely merge this policy with our anti social behaviour policy although some sections are the same or very similar. The harassment policy has very specific and important guidelines on tackling racial harassment and there was a risk of this being “watered down” if we tried to merge the two. Nevertheless, although the policies are separate the procedure for tackling them is more or less the same in terms of timescales and action. The Legal Remedies (appendix A) are also applicable to both policies. In many instances, this policy will need to be looked at in conjunction with the anti social behaviour policy.

2.0 Introduction

2.1 Innisfree is committed to equality of opportunity in all areas of its activities. The Anti-Harassment Policy and procedure forms an important and integral part of its Equality and Diversity Policy.

2.2 Innisfree condemns all forms of harassment. It will not tolerate any incidents of racial harassment, sexual harassment, harassment on the grounds of disability, sexuality, age or other serious harassment, whether perpetrated by its tenants, employees, agents or third parties. Innisfree will ensure that every step is taken to eliminate harassment.

2.3 All reported incidents of harassment will be fully investigated and appropriate action taken against the perpetrators of such harassment when it is proven. We will also ensure that complainants of harassment receive adequate support. If complaints relate to more general forms of anti social behaviour rather than harassment then officers should refer to the **Anti Social behaviour policy** and procedure instead.

2.4 Innisfree has developed a policy that:

- Incorporates most of the recommendations in the Code of Practice on tackling Racial Harassment as recommended in the Stephen Lawrence Enquiry;
- Adopts the definition of racist incidents put forward in the Lawrence enquiry;
- Adopts the requirements of the Race Relations (Amendment) Act 2000 and acknowledges the Association’s duty to work towards the elimination

- of unlawful discrimination and to promote equality of opportunity and good relations between people of different racial groups;
- Adopts the new legal remedies for tackling anti social behaviour available to Associations, following the implementation of the Anti Social Behaviour Act 2003.
 - Enables Officers to take swift and effective action against perpetrators with the aim of protecting the complainant, stopping the harassment and preventing further incidents;
 - Reassures all complainants and potential complainants that action will be taken, and sends a clear message to perpetrators;
 - Allows all residents to live peacefully, free from violence;
 - Adopts preventative strategies;
 - Includes a multi agency approach;
 - Monitors the number of incidents reported and action taken.

2.5 Innisfree is aware that racial harassment may not only be targeted at people who belong to minority groups who are visible because of their skin colour. We are painfully aware that the Irish Community continues to suffer racial harassment and discrimination. However other groups, for example, Jewish people, travellers and people from Eastern Europe can experience racial harassment. This is supported by the results of the Tenant Survey undertaken by Innisfree in 2006, which highlights the fact that 49 respondents had experienced some form of racial harassment due to the fact they are Irish. White people with black partners or mixed-race children may also be the targets of racial harassment, and white people may suffer racist harassment from members of other ethnic groups.

2.6 This anti-harassment policy focuses on racial harassment, however the procedure notes and standard forms must be used for other forms of harassment, although slight amendments to the forms may be necessary. The anti-harassment policy has links to the following Innisfree Policies and Strategies:

- Equality and Diversity Policy
- Anti Social Behaviour Policy
- Race Equality Strategy
- Staff Grievance and Disciplinary Policy and Staff Code of Conduct.

2.7 Innisfree's approach to racial harassment is victim-centred. This means that people making the complaint are supported, consulted and informed about how to proceed with the complaint and a course of action will be agreed with them. If we are to tackle racial and other harassment positively and effectively tenants who suffer harassment must feel that the Association is working with and for them. Consequently, the tenant should be the judge of whether harassment is racially motivated. Their views must be taken into account at each stage of the investigation process, particularly with respect to the action that could be taken.

2.8 The anti-harassment policy will form part of the induction process for new staff and regular diversity training will be provided for all staff.

3.0 Definitions

3.1(a) Innisfree has adopted the following definition of racist incidents recommended by the Stephen Lawrence Inquiry, chaired by Sir William Macpherson:

“a racist incident is any incident which is perceived to be racist by the victim or any other person”.

3.1 (b) The Commission for Racial Equality defined racial harassment as:

“an unwelcome or hostile act or series of acts carried out on racial grounds”.

3.2 These complementary definitions cover a wide range of actions from rudeness to murder. It means that if anyone - the complainant, a witness, a police officer, or a housing officer - perceives an incident as racist, it should be recorded as such, regardless of any other views. Racial Harassment can be direct or indirect and can affect anyone.

3.3 Harassment can take many forms, including:

physical assault, damage to property (e.g. breaking windows, vandalising cars), dumping of rubbish, excreta etc through the letter box, racist and other offensive graffiti, arson or attempted arson, verbal abuse, patronising remarks, jokes banter and insults, threatening or abusive behaviour, malicious complaints, noise nuisance, anonymous letters, nuisance telephone calls.

3.4 Innisfree recognises that individuals can suffer from harassment in different forms at the same time, e.g. racial and sexual harassment. Likewise, individuals can suffer harassment and other anti social behaviour at the same time.

3.5 Innisfree defines sexual harassment as:

“Any unwanted or unwelcome sexual comments, looks, actions, suggestions or physical contact that is found to be objectionable and results in an unpleasant or intimidating environment being created.”

3.6 Innisfree defines homophobia as:

“hatred, intolerance and fear of lesbians, gay men and bisexuals. This can result in harassment for which being gay is belittled, negatively represented, direct and indirect discrimination, hostility & intimidation, abuse and violence”.

3.7 Innisfree defines serious harassment as:

“Violence or threats of attack to a tenant or their household. This category includes those being harassed because they are disabled or have HIV.”

3.8 The effects of racial and other harassment are diverse. They include fear, illness, suicide, failure to realise personal potential and strained family relationships.

4.0 Principles

4.1 The definitions of harassment adopted by Innisfree accept a complainant centred approach. Innisfree’s anti-harassment policy will ensure that:

- a) We will convey to current and prospective tenants that the Association will not tolerate any harassment and will encourage tenants to come forward and report incidents ;
- b) all reported incidents will be recorded and action taken within specified time limits;
- c) every effort will be made to identify perpetrators and take appropriate action against them, including police prosecution and possession proceedings;
- d) support and assistance will be given to complainants by staff and support networks, including the other tenants, local community groups, the police;
- e) removal of graffiti and repair to damaged property will take place within specified time limits;
- f) mediation will be offered as a way to resolve “low level” harassment e.g. name calling, where the complainant agrees to this;
- g) security improvements such as window locks, spy holes, fire-proof letter boxes additional locks and increased lighting will be installed if possible;
- h) rehousing the complainant will be considered where violence has occurred or where there is a reasonable fear of violence, although Innisfree’s intention will be to take action against the perpetrator (usually only with the agreement of the complainant) and enabling the complainant to live without harassment or fear of harassment;
- h) an on-going programme of staff training will be undertaken to ensure an awareness of racial and other harassment, legal remedies and procedures, mediation and understanding and meeting the needs of victims;
- i) Staff performance will be monitored regularly by Senior Management, the Housing Services Committee and the Board. In particular, if timescales were met, the number of incidents reported and effectiveness of action taken.

5.0 Reporting

5.1 We are aware that the vast majority of racial incidents are never reported. Where racial harassment is reported it is often weeks or months following an incident. It is important that it is not assumed that a rise in reporting means the

incidents of harassment are increasing, as it is more likely that a rise reflects greater confidence by tenants that something might actually be done if they do report incidents.

5.2 The Association is endeavouring to increase the number of reports made by creating a climate that is more likely to encourage tenants to come forward. If we give the issue and our stance on tackling it a higher profile, tenants may feel more comfortable about reporting incidents to us. With the assistance of Brent Council's Community Safety Team, we aim to become a third party reporting centre for people to approach and report incidents of racial harassment. Third Party reporting enables a victim to report an incident of harassment to another person or Organisation that they may feel more comfortable with. For example, the Afro Caribbean Community may feel more able to report harassment to an Afro Caribbean Organisation than say a Local Authority. It will take time to set up third party reporting centres and may involve considerable effort to raise the profile of the centres in the community, but we are committed to participating in any initiatives that will make victims feel more comfortable and create a safe environment for them to come forward. It is important that we send out a clear message that we are prepared to take action to tackle racist incidents. This may also encourage people to report more incidents as they may have more confidence that we will act on the information supplied.

5.3 As already mentioned, In the Tenant Survey 2006, 49 respondents stated that they had suffered anti Irish or other racial harassment. This figure does not reflect the number of cases reported to the Association. This could mean that the harassment was experienced outside the home and tenants did not think it worthwhile informing the Association, however, we cannot assume that is the position for every tenant who responded.

5.4 In addition to the project mentioned, officers hope to increase reporting by placing regular articles in newsletters, putting up posters and notices in blocks, discuss the issue at meetings with our tenants. We will discuss with partners the possibility of using their out of hours services to enable 24 hour reporting of incidents of harassment as we realise that incidents are just as likely to happen in the evenings, weekends and public holidays.

5.5 As part of the Association's Race Equality Targets, we have set a target for increasing reporting by (1 case per year).

5.6 We, with the assistance of Brent Council's Community Safety Team and the Police, will ensure that adequate training is provided to front line staff in taking initial reports and providing a consistent service to victims.

6.0 Innisfree's Conditions of Tenancy

Innisfree has included specific “*no harassment or nuisance*” clauses in its Assured Tenancy Agreements, for example:

For Assured Shorthold Tenancies: (Under Part 1 of the Housing Act 1988 as amended by the Housing Act 1996) and Assured Tenancies:

Clause 4.7 Racial and Other Harassment: *Not to commit or allow members of his/her household or invited visitors to commit any acts or form of harassment whether on the grounds of race, colour, ethnic origin, national origin or religion, sex, age sexual preference, physical or mental disability, HIV status, ill health, appearance, marital status, family circumstances or otherwise which may interfere with peace and comfort or cause offence to any other tenant, member of his/her household, visitors, neighbours, employees, agents or contractors of the Housing Association or any person engaging in lawful activity in the locality of the premises (acts of harassment include but are not limited to any verbal abuse or deeds and acts of or threats of violence.*

Clause 4.5 Nuisance: *Not to cause or allow members of his/her household or invited visitors to cause a nuisance or annoyance to or violent or threatening behaviour or act in such a way as is likely to cause a nuisance or annoyance or violent or threatening behaviour to neighbours or other tenants of the Housing Association, or to employees, agents or contractors of the Housing Association or to any visiting or otherwise engaging in lawful activity in the locality of the premises.*

It should be noted that these clauses may be slightly different in older Tenancy Agreements.

7.0 Contacts/Multi Agency Working

7.1 Innisfree is committed to joint working to tackle racial abuse. We have been users of” **race action net**” which provides a range of multi-disciplinary contacts, up-to-date knowledge and new ideas to organisations committed to combating racial abuse and attacks. This website is also used for research purposes and to assist with developing policies and procedures.

7.2 Our main Borough Brent Council also runs a “Hate Crime Harassment Case Panel” which specifically monitors cases that arise in the Borough and provides advice and support to agencies tackling such crime.

We also participate in Brent Council’s BASBAG Meetings which is a multi agency steering group set up to monitor and tackle Anti Social Behaviour and Harassment in the Borough. Individual cases are discussed and action plans agreed and are monitored at each meeting. This group will be crucial in providing support, guidance and assistance to help us tackle anti Irish harassment as the group is involved in a number of initiatives to tackle racial harassment , for

example, encouraging third party reporting in Brent. It also produces a considerable amount of publicity.

7.3 The Group has close links to the Police, probation service, care and support services and many other Housing Associations working in the Borough. As a result the Association's front line staff can ensure that victims have access to local agencies and services that are able to provide adequate support to them. The group want to achieve consistency in approach from Housing Associations in dealing with instances of racial harassment. The Association has also been included in publicity produced by the Borough as part of its "hate no more" campaign to fight racial intolerance. The group also aims to promote prevention and as part of the monitoring process tracks "local trends" and "hot spots".

We aim to participate in multi agency forums in the other key boroughs we work in and will develop links with key officers in these Boroughs, using Brent's Steering Group as a good practice model to follow.

7.4 We are also signed up to a number of **Joint Protocols**, which control the sharing of information between agencies e.g. The Police & Local Authorities. Agencies must now demonstrate that the disclosure of information is necessary for the purposes of tackling crime and disorder.

Another useful site is www.cre.gov.uk, which is the Commission for Racial Equality's homepage.

A list of victim support agencies is listed at www.victimsupport.com/national.

7.5 The Respect Standard for Housing Management.

The Respect Standard for Housing Management is a voluntary standard for Associations to sign up to. It outlines the core components essential to delivering an effective response to anti-social behaviour (including harassment) and building stronger communities, such as accountability, leadership, giving greater resident empowerment, and supporting community efforts at tackling anti-social behaviour.

The Standard is built around six core commitments with a combined 68 "building blocks" Associations are expected to meet.

- **Accountability, leadership, and commitment**

Landlords need to make a visible commitment to the community so that everyone is clear they take issues of anti-social behaviour and Respect seriously and will deliver what they say they will.

- **Empowering and reassuring residents**

Landlords and the community need to work as one through involving residents and giving them input into decision making. Engagement and effective communications act to reassure and empower communities.

- **Prevention and early intervention**

Landlords can play a key role in preventing anti-social behaviour from occurring. Where it does occur if problems are addressed quickly this often gets the best results.

- **Tailored services for residents and provision of support for victims and witnesses**

Success rests on people being prepared to report and then give support to agencies in taking action. Every case and every person deserves a robust, tailored and sensitive response.

- **Protecting communities through swift enforcement**

Government has provided landlords with the tools they need to tackle a whole range of anti-social behaviour. Landlords need to understand how tools work and be prepared to use them quickly to protect communities

- **Support to tackle the causes of anti-social behaviour**

Provision of support can put an end to unacceptable behaviour by tackling underlying causes. This leads to sustainable outcomes and gets people's lives back on track.

The Government will be encouraging residents to get engaged and hold their landlord to account. The Audit Commission, who carry out inspections of landlords, are also looking to strengthen their guidelines to landlords on what they expect a good landlord to be achieving in tackling anti-social behaviour. This will reflect the content of the Standard.

7.6 Innisfree has signed a "commitment" to working towards meeting the 6 Core Objectives and we will be undertaking a "Gap Analysis" exercise to assess how well we meet them.

8.0 Supporting Victims/Adopting a Victim centred approach

8.1 The Association will adopt a victim centred approach in dealing with racial incidents and harassment. An initial incident will be accepted as harassment if

so defined by the victim or another person until further investigations prove otherwise. This does not mean that the alleged perpetrator is immediately assumed to be guilty.

8.2 It is important that the investigation into the case is carried out in a sensitive and sympathetic manner. Victims must feel that they have the confidence to tell officers about the harassment they are experiencing. During an interview, no attempts should be made to undermine the victim's confidence by challenging the validity of their statement or by under-estimating the effect the harassment has on the victim.

8.3 During any interviews, if it appears there are serious discrepancies in the validity of a victim's statement, under no circumstances should officers express this to the victim. The interviewer's role is not to judge the evidence but to sympathetically encourage the victim to give as much information as possible in order to facilitate an investigation.

8.4 Every effort must be made to gain the confidence of the victim. In some cases a victim may know who the alleged perpetrators are but may be unwilling to tell as they lack confidence in bureaucratic organisations. Typically, victims may initially only tell you of the single incident that led them to contact the Association. It is important that they are asked if there have been further incidents even if they would consider them to be minor.

8.5 Providing contact and support

This is an essential element of any action and support plan. During the formal interview the Housing Officer should provide a range of information, advice and assistance, which reflects the individual needs of the victim.

- Details of the Association's harassment procedure
- Confirmation of any emergency repairs or graffiti removal.
- What action we will take as a result of the incident
- Help with translation
- A follow up visit should be made 7 days after the initial report.
- It is important that the Housing Officer maintains regular contact with the victim. Confirmation of future visits / appointments (at least 2 should be arranged within the next 6 weeks) to monitor the situation.

8.6 Referrals to external support / counselling agencies.

The victim should be advised of local agencies that can provide support, advice and counselling. Housing Officers should develop a network of such agencies for the local area (details of these agencies can be given to the victim). If the victim is in fear of further incidents they should be provided with the number of the local police station and any other crisis support lines that are appropriate.

8.7 It is important that information about racial incidents is shared amongst local agencies:

- **voluntary & community organisations** – such organisations may provide practical and emotional support to victims. There may be local organisations specific to the victims ethnic origin.
- **local Authority Community Safety Units and ASB Teams**-who are heavily involved in monitoring crime in the borough and have had extensive involvement and experience of tackling Racial Harassment .
- **social services** - have responsibility towards those who suffer psychological and physical abuse as a result of racial harassment and violence. They may provide specialist counselling and support. They also have special responsibilities if the perpetrator is a child or has mental health problems. The local duty officer should be contacted.
- **the police** – have procedures for dealing with racially motivated incidents. It is important that all incidents are reported to them for monitoring purposes. If the incident is a criminal offence the police will investigate it and may be called upon to give evidence at a possession hearing.
- **local schools** – as many cases of harassment involve children as both perpetrators and victims, local schools may have an important role in supporting victims and taking action against perpetrators. The head teacher should be contacted in such cases as s/he has overall responsibility for ensuring equality of opportunity at the school.
- **Case conference and multi-agency panels** – in certain cases, case conferences may be an effective way of co-ordinating action between agencies. Co-operation between agencies will help to encourage the reporting of racist incidents.

9.0 Action against the perpetrator

9.1 The Association will as far as possible take action against the alleged perpetrator of harassment rather than moving the person affected by it. If the alleged perpetrator is also a tenant, action can be taken to enforce the tenancy agreement. In serious cases this could mean possession action, anti-social behaviour orders, demotion of tenancies or an injunction.(See legal remedies). If a criminal offence has taken place we refer the matter to the police to deal with. If the perpetrator is a tenant of another Association we will contact them and request that they pursue the matter.

9.2 We understand the importance of early intervention in cases to stop situations from escalating and to send a strong message to alleged perpetrators that we will not tolerate racist behaviour. If applicable, we will explain to perpetrators why their behaviour is unacceptable, especially if children are responsible.

9.3 Involving the police

Most racial attacks are crimes – assault, criminal damage and so on for which many legal remedies potentially exist. If the incident appears to be a criminal offence, staff should ask permission of the victim to involve the local police if they have not done so already. A copy of the incident form should be sent to the police within five working days. The letter should request an investigation into the incident and a report on any action taken.

9.4 It is vital that front line staff are fully trained and are aware of legal remedies available to advise a victim and warn a perpetrator. Officers should be aware of the role of the courts and importance of detailed record keeping for evidence purposes and prompt action at all times.

10.0 Monitoring, Performance Standards and Race Equality Targets

10.1 Cases should be classified in the following way to ensure that they are managed and dealt with effectively.

- Active – where incidents have occurred in the last three months (or legal action is ongoing)
- Inactive – where no incidents have occurred within the last three months
- Closed - where no incidents have occurred within the last nine months

10.2 Every month Housing Officers should meet with the Housing Director (HD) to review all live racial harassment cases. The Housing Officer (HO) should have up to date information on each case. The purpose of the review is to decide whether each case is ongoing or whether the harassment appears to have ceased.

10.3 If the case is closed the HO should write to the complainant explaining what the Association has done to date and why it does not consider it appropriate to take any further action at this stage. The case may be reopened at a future date if the racial harassment recommences.

10.4 Innisfree will monitor:

- The ethnic origin of victims and alleged perpetrators
- Location and frequency of reported incidents
- Targets and timescales set for responding to reports
- Refusals of offers of accommodation because of fear of racial harassment
- Action taken against perpetrators
- Support provided to victims
- The number of new cases reported.

10.5 A copy of the Initial Incident Report Form and Action Plan will be placed in a central file.

10.6 Our quarterly Report on “Equalities Targets” prepared for consideration by the Housing Services Committee monitors incidents of harassment and performance. The reports should be presented giving details of:

number of cases reported in the quarter

number of closed cases in the quarter

Depending upon the nature of the report, the reports should also provide the following details:

ethnic origin of victims and perpetrators

a summary of what the Association has done in each case:

- a brief summary of action taken against the perpetrators
- a brief summary of help and support provided to the victim

10.7 A central ASB ad harassment database has been set up and details of all harassment cases reported to the Association will be entered onto it.

11.0 Publicity

11.1 It is important that the Association’s anti harassment policy is widely known and understood by those who may have recourse to use it. This should be published in conjunction with our Anti Social Behaviour Policy. The Association will publicise its policies through the tenants’ newsletter, Tenants’ Handbook, posters and leaflets, our website and through other local voluntary and statutory agencies and at meetings with tenants. We will also publicise any successful prosecutions and resolutions in newsletters. The Association is part of Brent Council’s “Hate no More” publicity campaign which aims to stamp out racial intolerance.

11.2 We will ensure that all relevant policies and procedures eg. Allocations and Lettings have clear guidelines for responding to transfer requests as a result of racial harassment and ensure that they do not contribute to the creation of no-go areas defined by perpetrators. However, the policy will respect the wishes of the victim and, as far as possible, will aim to meet their rehousing needs.

11.3 We will provide translations of leaflets where considered appropriate

12.0 Training

12.1 Staff will receive compulsory training to help them identify incidents of racial harassment and deal effectively and sensitively with such incidents. This includes challenging any discriminatory language or behaviour when it occurs and reporting incidents of racial harassment if seen during other job duties e.g. racist graffiti on a site visit.

12.2 As part of the staff induction, training will be given on the anti harassment policy and procedure. We will also aim to provide training in interviewing victims and perpetrators specifically in relation to anti social behaviour and harassment cases.

13. Confidentiality

13.1 Innisfree is committed to confidentiality and will protect the interests and privacy of all tenants. We are aware of the requirements of the Data Protection Act 1998 and will treat all information provided in the strictest confidence. We will only divulge or request information with the written permission of the victim and we will respect their wishes throughout. Tenants can be assured that Innisfree will treat any breaches of confidentiality very seriously.

14.0 Continuous Improvement

14.1 Innisfree is committed to achieving high standards and continuous improvement in service provision. We will learn from our case work, feedback from tenants and will employ a range of prevention and diversion measures. We aim to maintain a peaceful and secure environment for our residents by:

- a) Taking positive steps to discourage racial and any other form of harassment at a very early stage in initial interviews with applicants, at sign up stage and during a 3 week follow up visit specifically to discuss tenancy conditions, tenant obligations and policies with new tenants. We will also encourage the signing of "Good Neighbour Agreements" and promote what it means to be a respectful and good neighbour.
- b) publicising our policy in tenancy agreements, newsletters, handbooks, on our website and during meetings with tenants.
- c) Responding to complaints quickly and in an efficient, sensitive and consistent manner, meeting publicised timescales and targets;
- d) Dealing with all complaints seriously and confidentially;
- e) Ensuring that sufficient support and advice is provided to those suffering harassment including rehousing a tenant if there is a serious threat of violence; supporting and guiding tenants who are to give evidence at court;
- f) Ensuring that properties are secure, graffiti is removed and repairs undertaken within published timescales;
- g) Consulting and working in partnership with residents and other agencies including local authorities, social services, the Police, environmental health, mediation services;
- h) Encouraging sustainable communities and community cohesion at our schemes.
- i) Using mediation where parties are agreeable;
- j) Consider taking legal action against perpetrators
- k) Adopting best practice and complying with legislation;
- l) Regularly updating policies and procedures;
- m) Providing training for staff;

- o) Providing translations/interpreters where required;
- p) Monitoring and review cases every month and reporting cases to Housing Services Committee quarterly;
- q) Allocating resources to tackle potential and actual problems with harassment
- r) Undertaking all action within Innisfree's Policy on Equalities and Diversity.

14.2 Tenant Involvement, views and feedback

We will implement changes to our procedures where we receive constructive feedback from tenants through:

- Satisfaction Surveys
- ASB Feedback forms
- Meetings and Focus Groups
- Complaints

We will actively involve tenants when reviewing our approach to tackling Harassment and seek their views on any changes to policy .

14.3 Staffing

Officers who deal with racial and other harassment are provided with training on legislation and best practice. All new staff are trained as part of their induction.

Staff dealing with harassment may face many stressful situations so senior management will offer advice, training and support where appropriate to ensure their safety and well being.

We will not tolerate racial or other harassment of staff and firm action will be taken against perpetrators when this occurs-in line with our policy. Refraining from harassment of our staff is a condition in our tenancy agreements.

15.0 Complaints

15.1 Innisfree is committed to providing a high quality and fair service to all tenants. If, for any reason, a tenant is dissatisfied with the service they have received they have a right to complain.

15.2 In the first instance, the tenant should speak to the housing officer for their property but If the tenant is still not happy they can make a formal complaint by using the Complaints Procedure. All staff will endeavour to respond quickly to remedy any complaint. Tenants will be informed of the steps that are being taken to investigate and deal with the matter. All tenants who complain will be provided with a copy of the Complaints Policy, which outlines the procedure and details tenants' rights.

16.0 Equality and Diversity

16.1 The Association has a clear strategic and operational approach to Equality and Diversity that reflects our purpose of addressing the housing and related support needs of the Irish community in London.

16.2 Our policies and practices attempt to reflect the community in which we work. We believe that Irish people have suffered discrimination in housing provision and we are committed to positive action to redress the imbalance.

16.3 We will assess all of our policies to ensure that, where appropriate, full Equality Impact Assessments are undertaken.

16.4 We will act within the scope of our own strategies, the Disability Discrimination Act and the Race Relations (Amendment) Act 2000 and aim to ensure that all tenants receive a fair and equal standard of service regardless of race, class, colour, ethnic origin, gender, sexuality, age, religious or cultural beliefs, marital status, disability, physical or mental health, HIV/AIDS.

16.5 It is vital that the response given to those approaching us is based on the principle of equality of service, customer care, good practice and courtesy.

16.6 We will provide translation and interpreting services where considered appropriate.

17.0 Review

This policy will be reviewed every 3 years, unless there are any further changes to legislation or if we have suggestions for further improvements from tenants and stakeholders that would require the policy to be reviewed at an earlier stage.