North Wales Local Authorities

Black and Minority Ethnic Housing Strategy

Interim Regional Framework and Action Plans

April 2004
Table of Contents

Acknowledgements 2

Methodology 3

Contact List 4

Chapter 1     Introduction 5

Chapter 2     The Regulatory Framework 7

Chapter 3     The BME Population of North Wales 11

Chapter 4     A Regional Framework 21

Action Plans

Isle of Anglesey
Conwy
Denbighshire
Flintshire
Gwynedd
Wrexham
Acknowledgements

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Equilibra
Filipino Association
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West and South West Rhyl Community Strategy Partnership
Women’s Aid
Wrexham Maelor Hospital
Wrexham Refugee Advice Service
Wrexham Tenants Federation
Ysbyty Glan Clwyd
Ysbyty Gwynedd,

The staff of Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd and Wrexham who were interviewed individually or who took part in the Partnership Team.
Methodology

The first chapter of our Regional Strategy describes how little knowledge there currently is of Black, Minority Ethnic people in North Wales: where they live, how they live and what their housing needs and requirements are.

The Welsh Assembly Government’s Black Minority Ethnic (BME) Housing Action Plan for Wales has been a catalyst for social landlords to formulate their housing strategies and for them, and other organisations to carry out research into BME communities in North Wales.

Our research has coincided with a number of other projects, such as the North Wales RSL Equality Partnership, which had already produced a draft strategy at the time we commenced our work. A number of other projects are beginning work with BME communities and it is hoped that a better picture will be achieved once these projects are completed.

The North Wales authorities have varying degrees of awareness of BME issues, and some have only just begun their race awareness training programmes for staff. Our project has brought a greater awareness to managers and staff of an issue which has been largely ignored in the past because of the low numbers of BME people in the region.

Initial regional research was initiated during the Cross Boundary Housing Study undertaken by Anglesey, Conwy, Denbighshire and Gwynedd in 2002/3. This culminated in the report: Local Challenges: Regional Solutions. Housing providers and other agencies were asked of their perception of BME people and the result was a general lack of awareness of any BME people wishing to access social housing services, and very little information generally of BME communities in the region.

Much of the research for this strategy was carried out by personal interview with organisations one would “expect” to have encountered contact with BME people and their problems. However, because so very little ethnic monitoring has been carried out, we were dealing with peoples’ personal perceptions, and those people were mainly non-BME people. Interviews were also carried out with a number of BME people currently participating in the North Wales Race Equality Network.

The research also drew from information contained in current policy documents and other research and literature all of which are referred to in the footnotes to the Regional Framework.

Finally, there were six challenging workshops (one in each authority) held in January 2004, where the proposed Regional Framework was discussed with staff and other invitees.

The report has been called an interim framework because we realise that there is much more work to be done to engage with BME people in North Wales and to develop a cultural shift in our methods of delivering services which make them more reflective of diversity.

Ros Tyrrell
BME Strategy Co-ordinator

ros.tyrrell@conwy.gov.uk
Regional Framework

For further information and contact on issues relating to this Report:

<table>
<thead>
<tr>
<th>Isle of Anglesey County Council</th>
<th>Conwy County Borough Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heulwen Roberts</td>
<td>Andrew Bowden</td>
</tr>
<tr>
<td>Principal Housing Officer</td>
<td>Head of Housing</td>
</tr>
<tr>
<td>Council Offices</td>
<td>Housing Offices, Conway Road,</td>
</tr>
<tr>
<td>Llangefni LL77 7TW</td>
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</tr>
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<td>01248 752269</td>
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</tr>
<tr>
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<td><a href="mailto:andrew.bowden@conwy.gov.uk">andrew.bowden@conwy.gov.uk</a></td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Denbighshire County Council</th>
<th>Flintshire County Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duncan Jones, Principal Housing Officer</td>
<td>John Hoogerwerf</td>
</tr>
<tr>
<td>“Fronfraith”, Russell House</td>
<td>Head of Customer and Housing</td>
</tr>
<tr>
<td>Churton Road, Rhyl LL18 3DP</td>
<td>Flintshire County Council</td>
</tr>
<tr>
<td>01244 704875</td>
<td>PO Box 4 FLINT CH6 5WS</td>
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<td>01244 (fax)</td>
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<table>
<thead>
<tr>
<th>Gwynedd Council</th>
<th>Telford County Borough Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Humphreys</td>
<td>Fred Czulowski</td>
</tr>
<tr>
<td>Housing Policy Manager</td>
<td>Landlord Services Manager</td>
</tr>
<tr>
<td>Care Directorate</td>
<td>Housing Services</td>
</tr>
<tr>
<td>Gwynedd Council Council Offices</td>
<td>Ruthin Road, Wrexham LL13 7TU</td>
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<tr>
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<td>01978 35300</td>
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<td>01978 35320 (fax)</td>
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<td></td>
<td><a href="mailto:fred.czulowski@wrexham.gov.uk">fred.czulowski@wrexham.gov.uk</a></td>
</tr>
</tbody>
</table>
Chapter 1: Introduction

In September 2002, the Welsh Assembly Government published a Black, Minority Housing Action Plan for Wales. This requires all social landlords in Wales produce a Black, Minority Ethnic Housing Strategy by April 2004. The six counties of North Wales (Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd and Wrexham) have combined to produce this Regional Strategy.

We believe there are enough similarities between each county in the region to warrant a common, regional framework.

These similarities are:

- A Black Minority Ethnic population which is diverse, isolated and dispersed
- A very low percentage of BME people compared to the rest of the UK.
- Little history of settled migration by BME people in pursuit of employment.
- A diverse community, a significant number of which are professionals, business people and students.
- No significant numbers of asylum seekers or refugees.
- A general lack of awareness of BME issues in the overall population and in local authorities and other institutions.
- Local authorities with under-developed policies, strategies and awareness.

As part of this regional strategy, each authority has its own Black Minority Ethnic (BME) Action Plan. This is because there are some differences in the ethnicity of each county, and in local conditions that make an individual action plan necessary. There are also differences in the degree to which each authority has, so far, achieved its race equality strategy. Flintshire and Wrexham Housing Departments, for example have had equalities strategies for some time, and their respective action plans reflect this.

It is also important for each authority, its staff and elected members to take on the ownership of a strategy that tenants and residents can relate to and to which it, the authority and its elected members are accountable.

In producing this strategy, we are mindful that equality and diversity does not only include ethnicity but it includes disability, gender, religion, age and sexual orientation. In this respect, where relevant, some references will be made to equality and diversity and not just race. This is not to deflect from the overall purpose of a BME Strategy, but is intended to avoid exclusion of other groups in our community who are marginalised. North Wales Police have a diversity agenda that includes issues of sexuality and have expressed a wish for our strategy to be as inclusive as possible.
Unitary authorities also have a corporate agenda on equality and diversity. The Welsh Assembly Government drives the corporate agenda through the Welsh Local Government Association’s Equalities Unit. The Welsh Assembly Government’s BME Housing Action Plan is driven through the Housing Subject Committee of the All Wales Ethnic Minority Association (AWEMA). Local authorities are therefore subject to some duplication of work, at present in the area of race equality. It is possible however, through this BME Housing strategy to enter into more specific detail as to how housing services can develop more responsive services to BME people in the region.
Chapter 2: The Regulatory Framework

Legislation relating to race equality is contained within several pieces of legislation, but there are also a number of Reports and Policy Documents that are of importance.

The Main Legislative Framework

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race Relations Act, 1976</td>
<td>This Act, outlaws racial discrimination, direct or indirect, in employment, education, the provision of goods, facilities and services, and the disposal and management of premises in England, Scotland and Wales.</td>
</tr>
<tr>
<td>Criminal Justice and Public Order Act 1994 and associated circular DoE 18/94</td>
<td>The Criminal Justice and Public Order Act 1994 repealed previous legislation, which required local authorities to provide permanent Gypsy sites. However this was accompanied by Circular 18/94, which gave guidance for local authority eviction policies advocating tolerance. The Welsh Assembly Government has issued separate guidance outlining local authority powers and good practice¹ Further legislation is currently under discussion.</td>
</tr>
<tr>
<td>Asylum and Immigration Act, 1996</td>
<td>The Asylum and Immigration Act, 1996 introduced restrictions in the way local authorities could deal with certain classes of persons from abroad.</td>
</tr>
<tr>
<td>Human Rights Act 1998</td>
<td>The Articles of most relevance to housing organisations are:</td>
</tr>
</tbody>
</table>

   - Article 8 provides that everyone has the right to respect for private and family life, home and correspondence
   - Article 1 of the First Protocol provides that “every national or legal person is entitled to the peaceful enjoyment of his possessions”
   - Article 14 provides that “the enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any

¹ Review of Service Provision for Gypsies and Travelers, National Assembly for Wales, 2003.
The Children Act, 1989 places a duty on local authorities to consider the racial and cultural needs of children looked after by the authority.

Part III of the Children Act 1989 and the Housing Act 1985 Part III places a duty on local authorities to assess the circumstances of families before taking enforcement action against unauthorized Gypsy or Traveler encampments.

The NHS and Community Care Act, 1990 recognises that different ethnic groups may have different care needs.

Commission for Racial Equality (CRE) has the following Codes of Practice relevant to housing:

- Rented Housing (1991)*
- Non-Rented (Owner Occupied) Housing (1992)

The Race Relations (Amendment) Act 2000

This Act extends the application of the 1976 Act to include the police and other public authorities, which were previously exempt. It strengthens the duty placed on local authorities and other public bodies to carry out their functions having due regard to the need to eliminate unlawful racial discrimination and promote equality of opportunity and good race relations.

It places a specific duty on local authorities to promote race equality and produce a Race Equality Scheme.

Introduced a number of changes in the way some asylum seekers are dealt with, including the introduction of “accommodation centres” and restrictions on support that can be offered by authorities.

The Nationality, Immigration and Asylum Act, 2002

grounds such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status."
Local authorities in England and Wales are required to tell the Audit Commission, within their performance indicator framework, whether they are implementing this Code of Practice, which among other things recommends:

- The implementation of an equal opportunities policy giving particular attention to training staff and ensuring that the services it provides are understood by clients;
- Keeping ethnic records and monitoring systems, including information on the nature of the enquiry or problem, and its outcome. This data should serve as a source of information on the needs of the various communities and should be analysed to ensure that services are being provided in an equitable way.2

The Code of Practice does not impose any legal obligations in itself, but if its recommendations are not observed it may result in breaches of the law where an act or omission falls within any of the specific prohibitions of the Race Relations Act. The Commission for Racial Equality has been particularly concerned about discrimination in social housing leading to:

- The denial of access to housing in general
- Discrimination in the quality of accommodation offered to ethnic minorities by social landlords.

**European Directives:**

The Race Directive 2000  
The Employment Directive 2000  

**The McPherson Report 1999**

Following the murder of Stephen Lawrence, this Report made a number of recommendations about the way racist incidents should be dealt with, including the need for a universal definition. It defined a racist incident as:

“*any incident which is perceived to be racist by the victim or any other person*”. Even if the victim does not refer to the incident as racially motivated, it is important that the mechanisms are in place to identify racially incidents, whoever perceives them to be so.

The Report also defined institutional racism as:

“The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitude and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.”

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Guidance on Community Cohesion, Local Government Association 2002

A Home Office Independent Review Team was set up after disturbances in some towns and cities in northern England in 2001. Recommendations for housing providers included the need to review allocations systems and development programmes to ensure more contact between communities. It emphasised the need to build strong and positive relationships between different communities, foster a positive appreciation of people’s diversity and encourage a commonality of vision and belonging.

Black and Minority Ethnic Housing Action Plan for Wales 2002

The Welsh Assembly Government published this major policy document in September 2002 as part of the “broader agenda to meet (our) duties under the Race Relations Amendment Act, 2000.” The overall aim of the Plan is

“To ensure that clear directives and targets are set for social landlords and other housing providers of housing, to ensure that discrimination and disadvantage is eliminated across Black, Minority Ethnic communities living in Wales.”

The recommendations of the Black and Minority Ethnic Housing Action Plan for Wales have formed the basis for our regional framework, which is dealt with in Chapter 4.

Other Reports

(i) Review of Service Provision for Gypsies and Travelers – National Assembly for Wales, 2003 – an informative and comprehensive Report on the services local authorities should be providing and can provide for the Gypsy and Traveler community.

(ii) Planning Policy Wales, March 2002 places a duty on local authorities/planning authorities’ Unitary Development Plans to contain information on the regard authorities have had to meeting the accommodation needs of Gypsies.

Other legislation

2. Rehabilitation of Offenders Act 1974
3. Sex Discrimination Act 1975
4. Welsh Language Act 1993
6. Employment Equality (Sexual Orientation) and Employment Equality (Religion or Belief) Regulations, 2003
Chapter 3: The BME Population of North Wales

There is very little information published on the history of ethnic minorities and immigration in North Wales. Some of the following is taken from *A Tolerant Nation? Exploring ethnic diversity in Wales*. Even this publication mostly relates to research carried out in South Wales.

By far the majority of migration of ethnic minorities into Wales has been in the south Wales industrial centers and ports, particularly around Cardiff and the mining valleys. In the nineteenth and early part of the twentieth centuries, in migration to south Wales was mainly of English, Irish, Italian and Spanish.

Wales in the post (Second World) War period was not a major centre of black immigration. There had been a persistent problem of unemployment in Wales, unlike many other areas of the UK, and in 1961 the population had only just regained the level it had been in 1921 when there began a significant out migration. The West Indian immigration of the late 50s and early 60s largely by-passed Wales in favour of areas of more favourable employment opportunities, and where white residents were leaving certain types of work and abandoning certain areas of poorer housing. Most of the more recent immigrants to Wales were from the Indian sub continent.

In *A Tolerant Nation?* Neil Evans contends that studies of Britain generally show that the lack of proximity to black immigrants increases hostility to them in the short run. He also supposes that although Welsh society may have an outward appearance of tolerance towards racial minorities, it is not in fact tolerant, and the apparent tolerance only exists to racial minorities in Wales due to the fact that the politics of race has not been a prominent one in Wales as it has for instance in England. He contends that Wales has been more concerned with nationalism and the growing divisions over language. For instance, language came to the political agenda in Wales just as race was coming to prominence in England. English incomers have been seen as more of a challenge to a way of life and culture. Neil Evans concludes that in the past 150 years Wales has been the host to substantial numbers of immigrants in the period before the First World War and relatively few thereafter.

In North Wales, there has been no significant immigration from ethnic minorities following a particular source of employment and there appear to be no “clusters” of particular ethnic minorities. However, there appear to be higher percentages of BME people in some areas such as Bangor, Deeside and in Wrexham, which is looked at later. The presence of ethnic minorities in North Wales appears to have come about gradually, with settlement being through long-standing family connections, individual employment opportunities, movement to centres of learning and individual entrepreneurs setting up businesses, often restaurants. Wrexham is the only county which has received asylum seekers under the UK Government dispersal programme.

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4 Ibid
5 Ibid
6 Ibid
The low numbers of ethnic minorities in the region has led to some neglect of the needs of ethnic minorities by local authorities in the past. Ethnic minorities are discriminated against in the region and low numbers are no excuse for complacency.

In the rural areas of North Wales, ethnic minorities are in even fewer numbers and the geographical distances and lack of public transport can lead to even more isolation.

The question of rural racism is explored by Vaughan Robinson in *A Tolerant Nation* using a case study in Powys in 1999. When Victim Support applied for funding to set up a help line for victims of racism they were initially met with disbelief. After an initial six-month period they had dealt with over a hundred enquiries and sixty-five people received practical help as a result. Callers were from a range of ethnic groups and included people who had lived in the county for a number of years as well as recent migrants from inner city areas in England. The problems reported included verbal racist abuse, physical attacks, and bullying of children in school. Many service providers had denied that ethnic minorities lived in rural Powys.

In North Wales the population of BME people today continues to be very low. However, according to the Census statistics it increased overall by 60.3% in the ten years from 1991 to 2001 (see Table 1).

Table 1

<table>
<thead>
<tr>
<th></th>
<th>Numbers of non white residents 1991</th>
<th>Numbers of non white residents 2001</th>
<th>Percentage of population (2001)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isle of Anglesey</td>
<td>347</td>
<td>481</td>
<td>0.7</td>
</tr>
<tr>
<td>Gwynedd</td>
<td>985</td>
<td>1389</td>
<td>1.8</td>
</tr>
<tr>
<td>Conwy</td>
<td>730</td>
<td>1157</td>
<td>1.05</td>
</tr>
<tr>
<td>Denbighshire</td>
<td>540</td>
<td>1073</td>
<td>1.15</td>
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<tr>
<td>Flintshire</td>
<td>704</td>
<td>1403</td>
<td>0.8</td>
</tr>
<tr>
<td>Wrexham</td>
<td>872</td>
<td>1403</td>
<td>10.9</td>
</tr>
</tbody>
</table>

7 Ibid *A Tolerant Nation* Chapter 10 Exploring Myths About Rural Racism.
Table 2 shows the distribution of non white residents throughout Wales

2001 Census of Population: Non-white ethnic population by local authority area of residence

Table 2

<table>
<thead>
<tr>
<th>Authority</th>
<th>Non White Residents – thousands</th>
<th>Non White residents, percentage total population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isle of Anglesey</td>
<td>0.5</td>
<td>0.7</td>
</tr>
<tr>
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<td>14</td>
<td>12</td>
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<tr>
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<td>11</td>
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<td>12</td>
</tr>
<tr>
<td>Flintshire</td>
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</tr>
<tr>
<td>Wrexham</td>
<td>14</td>
<td>11</td>
</tr>
<tr>
<td>Powys</td>
<td>11</td>
<td>0.9</td>
</tr>
<tr>
<td>Ceredigion</td>
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<td>14</td>
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<td>Pembrokeshire</td>
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<td>0.9</td>
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<td>Carmarthenshire</td>
<td>16</td>
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<td>Swansea</td>
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<td>11</td>
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<td>Bridgend</td>
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<td>14</td>
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<tr>
<td>Vale of Glamorgan</td>
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<td>2.2</td>
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<td>Cardiff</td>
<td>25.7</td>
<td>8.4</td>
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<td>Rhondda Cynon Taff</td>
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<td>Merthyr Tydfil</td>
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<td>0.9</td>
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<td>Wales</td>
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<tr>
<td>Brecon Beacons</td>
<td>0.5</td>
<td>14</td>
</tr>
<tr>
<td>Pembrokeshire Coast</td>
<td>0.2</td>
<td>0.7</td>
</tr>
</tbody>
</table>
The map shows the distribution of BME people in North Wales by electoral ward in 1991. It shows that there were higher concentrations of BME people in some areas, particularly in Bangor, Wrexham and in north Denbighshire. There is no doubt that some, but not all of these higher percentages are explained by the presence of centres of higher education and major accident and emergency hospitals. For instance 10% (approx 700) of the students at the University of Wales, Bangor are from overseas and some bring their families with them. Approximately 200 doctors at Ysbyty Gwynedd in Bangor are from overseas. In 2000, the North Wales NHS Trusts recruited about 50 Filipino nurses to work in North Wales, some of which have brought their families to stay. The ability to recruit medical staff from overseas is at present, essential for the functioning of the NHS in North Wales.

Our research to date has not been detailed enough to establish reasons for the higher percentages of BME people in some of the other electoral wards, especially when percentages are so low. However, the urbanisation and industrialisation of some areas and their ability to provide employment and trade must have some effect. An example of this could be on Deeside where the BME population is higher than the surrounding wards. Additionally there are a number of refugees in Wrexham, dispersed by NASS.8

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8 A map showing distribution from 2001 census figures was not available at the time of publication.
9 Source: The Housing and Socio-Economic Circumstances of Black and Minority Ethnic People in Wales, Welsh Assembly Government 2003
10 National Asylum Support Service.
Table 3 shows the ethnic breakdown of the non-white population in North Wales.  

Ethnic Group Percentages

<table>
<thead>
<tr>
<th>County</th>
<th>Total Non-White</th>
<th>Mixed Race</th>
<th>Asian or Asian British</th>
<th>Black or Black British</th>
<th>Chinese or Other ethnic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gwynedd</td>
<td>12 (1389)</td>
<td>0.4 (467)</td>
<td>0.4 (467)</td>
<td>0.1 (105)</td>
<td>0.3 (350)</td>
</tr>
<tr>
<td>Denbighshire</td>
<td>11 (1073)</td>
<td>0.5 (420)</td>
<td>0.3 (280)</td>
<td>0.1 (93)</td>
<td>0.3 (280)</td>
</tr>
<tr>
<td>Wrexham</td>
<td>11 (1403)</td>
<td>0.4 (514)</td>
<td>0.3 (385)</td>
<td>0.1 (19)</td>
<td>0.3 (385)</td>
</tr>
<tr>
<td>Conwy</td>
<td>11 (157)</td>
<td>0.4 (438)</td>
<td>0.3 (305)</td>
<td>0.1 (19)</td>
<td>0.3 (305)</td>
</tr>
<tr>
<td>Flintshire</td>
<td>0.8 (194)</td>
<td>0.4 (594)</td>
<td>0.1 (148)</td>
<td>0.1 (148)</td>
<td>0.2 (304)</td>
</tr>
<tr>
<td>Anglesey</td>
<td>0.7 (481)</td>
<td>0.3 (200)</td>
<td>0.1 (74)</td>
<td>0.1 (74)</td>
<td>0.2 (133)</td>
</tr>
</tbody>
</table>

Table 3

The distribution of people calling themselves “mixed race” is significant in terms of the overall percentage. Some commentators on the accuracy of the 2001 census data in Wales have claimed that the numbers of ethnic minorities are under-recorded. There could be several reasons why this might be so; for example the reluctance of mixed race people to classify themselves as BME, the fact that the census date was in the university spring term, and the lack of resources to follow up forms which were not returned and the alleged effect that this would have for people with language difficulties.

There is also a significant “seasonal” population of BME people. These are mainly tourists from the rest of the UK and abroad who visit throughout the year, but especially in summer. There are also a number of summer schools that take place in the region which attract people from ethnic minority communities, e.g. at Llandrillo College, Rhos on Sea and in Bangor. The use of locations in the UK for “Bollywood” movies has increased the number of Asian visitors to the UK from abroad by 13%. Some of these locations have been in North Wales, particularly Conwy, Dolbaern and Harlech castles.

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11 2001 Census.
12 BBC Television Gate 24 programme, September 2003.
The relevance of this visiting population to this housing strategy may not be apparent to many. However the institutional way in which we, as local authorities present ourselves to BME people as a whole, must have a significant effect, directly and indirectly, on how the public at large treat and welcome visitors from overseas.

The relatively low numbers of BME people, particularly in rural areas, does not mean we can be complacent about racism. Charlotte Williams, a Lecturer at the University of Wales, Bangor and a specialist in Equal Opportunities issues in Wales, believes that there is an “invisible” BME population, who are isolated and suffer discrimination quietly. “There is a legacy of neglect of racism, sluggishness and denial that it exists.” She maintains that professional BME people can be protected by their affluence and “respectability” as professionals. They are not living at the “blunt end” where BME people are more vulnerable. There have been some individual cases taken up by the North Wales Race Equality Network where discrimination has been severe.

Medical staff in the major accident and emergency hospitals form a significant percentage of BME people in the region. 93% of doctors below consultant level at Ysbyty Gwynedd (Bangor) are from overseas, mainly from the Indian sub continent, although some are from Germany, South Africa and South America. This pattern is repeated in Ysbyty Glan Clwyd, Denbighshire. Most doctors are not on permanent contracts and live in accommodation provided by the hospitals. Those on permanent contracts usually purchase their own accommodation. Others may use the private sector to rent accommodation while looking for a house to purchase. The major hospitals have their own accommodation managers and may use private sector accommodation for “overspill”. They sometimes involve the local authority housing officers to assess the suitability of accommodation in terms of fire regulations etc. Apart from Glan Clwyd, they do not encounter difficulties finding accommodation for their staff and in Wrexham especially, a number of landlords specifically purchase properties to rent out to medical staff. There is an Overseas Doctors’ Association based at Ysbyty Glan Clwyd.

In 2000, there was a recruitment programme aimed at nursing staff from the Philippines into hospitals in North Wales. All Filipino nurses that have remained in North Wales are now living in private rented accommodation or have purchased property and some have brought their families to live with them. They are on 3-year temporary contracts, which can be renewed. The Filipino Association is actively helping a number of nurses who they claim are being exploited by some private landlords, who charge high rents for sub standard property, particularly in Denbighshire. A number of care workers have also been recruited with government help, again particularly from the Philippines.

Some medical staff from overseas do not have residency status and are not therefore eligible to apply for council housing. Some have already approached local authorities for help because of the high rents they are paying. Wrexham Maelor hospital engaged the services of a private developer to help house the recruitment of nurses, taking over a block of flats in the centre of town.

Recruitment of doctors from overseas is likely to increase in the next few years because of new working time regulations for medical staff, which will be changing to a shift working system. Ysbyty Glan Clwyd, in Denbighshire, currently has 60 Consultant and 50 nursing vacancies. It’s position away from town centres and lack of suitable accommodation may be some of the reason for its staff shortages.

As mentioned previously, 10% of students at the University of Wales, Bangor are from overseas. The university adequately accommodates most, but others will wish to access the private sector. Further research is required into the needs of overseas students at NEWI and Yale colleges in Wrexham, and other centers of learning such as the Nursing School in Wrexham and Llandrillo College, at Rhos on Sea.

Our initial research has also shown that:

- There is a number of restaurant workers, who may migrate weekly into north Wales to work and live in accommodation provided by their employers during the working week.
- There are a number of (mainly) Portuguese migrant workers employed in the food industry living on Anglesey or in Wrexham in “tied” accommodation which is alleged to be substandard. The plight of these workers was highlighted in a recent BBC Wales programme.\(^4\)
- There appears to be an agreement with some residential nursing homes in Rhyl to train Bulgarian nurses.
- There is evidence of a number of BME people working in care homes in the region, particularly from the Philippines.
- The BME population is very diverse. According to the North Wales Police website there are over 130 languages spoken in the region. Children in Conwy and Denbighshire Schools speak 33 different languages at home.
- Only three of the six authorities have permanent campsites for Gypsies and Travelers. None of these sites provide “occasional” pitches for Travelers passing through the region.
- A number of BME women may approach local authorities through referrals from Women’s Aid.

Apart from the employment groups mentioned above, BME people in the Region form no community or pattern, but are “diverse and dispersed”. Some of course are Welsh born and Welsh speaking, whose families have lived in Wales for some time. Our research has shown that in particular there are a number of Welsh speaking Chinese, mainly the children of business people who began to settle in the region in the 1960s. Others may be of mixed race – all are potentially vulnerable to discrimination.

The Filipino Association has 600 members in the six counties. The Chinese Association has 2000 members, but covers perhaps a wider area than the 6 counties, with some members as far east as Chester. Individuals in both of these associations help people of their community to access services, including dealing with housing problems. The major purpose of both associations is to bring people together for social events, such as Chinese New Year. There is a Chinese Sunday School in Bangor whose purpose is to educate people of any community about Chinese culture.

\(^4\) Week in Week Out, 31st October 2003.
The community describing themselves as originating from India (rather than Pakistan or Bangladesh) in North Wales is primarily one of professional and business people who prefer to own their own homes, and not to rely on state benefits or social housing.

There is a significant Islamic population in the region - there are mosques in Bangor, Llandudno, Rhyl and Wrexham. Like the Indian and Chinese communities, many Islamic people will be business people and will own their own homes.

Romany Gypsies and Irish Travelers are recognized as a racial group. Flintshire, Wrexham and Gwynedd have permanent campsites, but these sites do not have “occasional” pitches for people passing through.

The Commission for Racial Equality has published a Gypsies and Travelers Strategy and the National Assembly for Wales has produced a Report on service provision for Gypsies and Travelers. The lack of permanent campsites in some counties can increase the number of unauthorized encampments and friction between Gypsies and local residents. Statistics collected by the Office of the Deputy Prime Minister (January 2003) have estimated that whilst 0.6% of the settled population are homeless, some 216% of the Gypsy and Traveler population are, by virtue of the fact that they are living in mobile homes and have nowhere they can legally place their caravan or mobile home. When the European Union enlarges in April 2004, the number of Roma arriving in the UK is likely to increase, since the accession states include large Roma and other Traveler populations, all of whom will have the right of freedom of movement to the UK.

There is a large group of “other” white people identified on the Census statistics. Historically, there has been prejudice against immigration from overseas generally, particularly from Ireland. There are communities of Polish settlers in the region, also Italian, German, and more recently Spanish. However the accuracy of the census data in expressing the presence of BME people could be called into question, especially when there are such low numbers. People who have declared themselves “other white” could be Welsh people with strong views about their culture, but for which there was no specific box for Welsh on the census form. However other breakdowns of the census data show a significant number of Irish people living in the region.

It is also relevant to point out that North Wales does not appear to follow the national trends relating to deprivation and housing of ethnic minorities. That is, that BME people tend to live in the most socially deprived areas. Bangor is a good example of the different trend, where Menai and Deiniol Wards have the highest concentrations of BME people but are certainly not the most deprived.

Further research is required to qualify these assumptions. Additional research also needs to be carried out concerning the health and education needs of BME people in the region. Census statistics indicate that there is a younger age profile amongst ethnic minorities in the region and only a small proportion in retirement age. Issues of diet and climate change can be an important factor affecting the health of some ethnic minorities. The most well known perhaps is that some ethnic minorities are particularly susceptible to sickle cell anaemia.

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16 ibid
In other cases, the incidence of diabetes and high blood pressure is more common. The Welsh Assembly Government had produced a paper *The Health Information Needs of Ethnic Minority Groups*\(^7\).

In conclusion, there is further work to be done to identify where BME people are in the region and what their housing needs and aspirations are. To date, some of the 2001 Census data has not yet been extracted. The North Wales RSL Equality Partnership\(^8\) is currently carrying out a household survey of BME people in the region. This will include the development of a website. Cymdeithas Tai Hafan is carrying out research into the needs of vulnerable BME women in the region, together with MEWN\(^9\) and BAWSO\(^20\). There is a Community Legal Services Partnership in Gwynedd and Ynys Môn carrying out research into the BME community\(^21\) and two other pieces of research currently being undertaken. The Community Development Agency in Rhyl has received Home Office funding for work with BME groups. There are also other BME housing strategies being developed elsewhere in the UK that we can learn from, especially those carried out in rural areas. These are areas in which we must look for continuous improvement.

We need to use our individual Action Plans to develop co-operation with other research projects in order to update our information and move forward to a better knowledge and understanding of the issues affecting BME people in the region, and better methods of consultation.

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\(^{17}\) Public Health Strategy Division, WAG April 2003.

\(^{18}\) The partnership of housing associations or RSLs.

\(^{19}\) Minority Ethnic Women's Network.

\(^{20}\) Black Association of Women Stepping Out.

\(^{21}\) This project also involves MEWN.
Chapter 4: A Regional Framework

This chapter explains how the six authorities will begin to develop a BME housing strategy and how we will begin to implement the key headings of the BME Housing Action Plan for Wales. We realize that these issues cannot be dealt with by just putting pen to paper; rather this is an initial commitment to a new way of working that requires continuous scrutiny and improvement. Developing a strategy also depends on how well we understand the issues involved. We cannot eliminate discrimination in our work without understanding it.

Key Aims and Objectives
Based on the requirements of the BME Housing Action Plan for Wales

1. We need to understand and articulate local BME housing requirements.

2. We should be committed to race equality and the prevention of unlawful discrimination.

3. We should make equalities issues central to our work

4. We need to ensure that the designs of properties are adapted to cultural and religious needs.

5. We need to make our services accessible and fair to all, irrespective of diversity.

6. We need to make sure that the needs of different communities are addressed in any stock transfer schemes.

7. We will aim to maximise the involvement of different communities in tenant participation, community development and regeneration initiatives.

8. We must take prompt and high profile action against hate crime.

9. Through the mechanisms within our authorities\(^{22}\) we will examine our recruitment and employment practices and procedures to ensure that they are non-discriminatory.

10. We need to ensure that contractors and consultants\(^{23}\) have a commitment to equalities issues.

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\(^{22}\) In local authorities these are dealt with corporately.

\(^{23}\) ibid
II. We need to promote a private rented sector that is non-discriminatory and tackle unlawful discrimination in the private sector.\footnote{In Anglesey, Denbighshire, Flintshire and Wrexham private sector regulation is not presently done within the same department as housing.}

I2. We need to be aware of the current issues affecting asylum seekers and refugees and keep our staff fully informed of their responsibilities in giving appropriate support and advice to all people from abroad.

I3. We will aim for continuous improvement and will welcome outside scrutiny at all times.

In the following pages we discuss a number of ways in which we can aim to achieve each of the key objectives.

1. We need to understand and articulate the housing requirements of BME people

The housing requirements of BME people in the region have not, so far, been properly researched and cannot be done justice by this brief study, or without further contact with BME people and communities.

At the same time as our study, a number of other research projects are being undertaken, for example Cymdeithas Tai Hafan is initiating research into the needs of vulnerable BME women in North Wales, together with MEWN and BAWSO, and the partnership of housing associations (NWREP) is also undertaking research.

Understanding and articulating means that we can demonstrate knowledge of what the housing needs of BME people in the region are. We cannot do this adequately at the moment. However, we have found out the following:

- Professional BME people such as doctors can afford to, and do access home ownership
- Significant numbers of medical staff on temporary contracts will either live in hospital accommodation on site, or access the private rented sector.
- A number of nurses and care workers have been recruited overseas. Some may be living in unsatisfactory conditions in private rented accommodation.
- Business people and restaurant owners will own their own accommodation
- Employees of restaurant owners may “live in” above restaurant premises.
- Students will either live in university accommodation or access the private sector. Students are not generally eligible to apply for housing benefit to help with their rent.
- There is little accurate data, at present, which records the ethnicity of applicants for social housing. Housing associations and some local authorities collect data but it is not regularly analysed. However figures collected by Gwynedd and Wrexham show that a small percentage of BME people roughly proportionate to their representation in the population as a whole, wish to access social housing.
• BME people may not be aware of the services offered by local authorities and how to access them, and of the difference between local authorities and housing associations.

• Migrant workers from the European Union living in tied accommodation may need advice and assistance to improve their living conditions, or access the social housing sector.

• Women's Aid may wish to seek rehousing for BME women fleeing domestic violence.

• BME people in all types of tenure or home ownership may need the assistance of their local authority or other public bodies if they find themselves subject to racial harassment.

• Anglesey, Conwy and Denbighshire do not have permanent Gypsy caravan sites. The issue of Gypsy camp sites should be looked at in relation to each county's Local Housing Strategy and Homelessness Strategy, and in regard to recent Report from the National Assembly for Wales.

• There is a significant population of Polish 'elders' in the region and there is a Polish Housing Association in Pwllheli.

• Young, second generation BME people may have different housing needs from their parents.

• Further research is needed into the requirements of elderly BME people and whether there is a need for sheltered accommodation that takes account of language and other cultural needs.

• Local authorities' Supporting People Operation Plans are beginning to provide some useful data relating to ethnicity and the need for specialist housing.

In order to understand the housing requirements of BME people in more detail, we will need to:

• Undertake further consultation with BME people and organizations, and to establish on-going consultative arrangements. These will need to be reviewed and scrutinised on a regular basis. The research currently being developed by the housing association partnership, NWREP, should assist us to achieve a more accurate picture of the housing needs of BME people in the region.

• Ensure that ethnicity is incorporated into housing needs assessments and surveys. The private sector and home ownership appear to play an important part in housing for BME people in the region.

• Consult with organisations currently representing BME people in Wales and the rest of the UK, e.g. MEWN, BAWSO, Black Environment Network, BEST People's housing choices can be in addition, be limited by their immigration status. They may need to remain in the private sector because of temporary residence, ineligibility to access social housing or limited financial resources and ineligibility for welfare benefits.

• We need to ensure that our staff understand these limitations and that they give appropriate advice and assistance.
We do not know at present, how many BME people in the region wish to access social housing, because not all housing providers carry out ethnic monitoring of their waiting lists, or if they do, do not regularly extract the information.

Shelter Cymru collect ethnic data on the cases they deal with, which shows a very low number of BME people seeking advice from them in all six counties. This could either mean that BME people do not require advice or that they are unaware of the services that Shelter offers.

2. We should be Committed to race equality and the prevention of unlawful discrimination; and
3. We should make equalities issues central to our work

A commitment to equality is an integral part of the work of a local authority and this has statutory implications beyond the provision of housing and housing advice. Unlike other registered social landlords, a unitary authority has a corporate responsibility that involves the interaction of staff in other departments, the public, its tenants, clients, elected members, and visitors. The public image that an authority portrays will influence other organisations, businesses and the community and the way in which they behave. The perception of the welcome that BME people will get in an area will play a decisive point in business investment and therefore economic prosperity.

Through this regional strategy, the six housing authorities of Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd and Wrexham are committing themselves to an equalities policy that will publicly and actively acknowledge the diversity of cultures within the Region and will ensure that race equality is promoted at every level of their organisation.

We realise that a lot more needs to be done to understand and address the housing needs of different racial groups and cultures within and outside our borders. We are seeking to provide a framework in which we can improve our performance as departments, show example to our colleagues and the public and to promote social inclusion.
For example:

- We should ensure that our officers take full part in the corporate equality agenda and that they are fully informed of local (and national) developments of BME issues, and that they take these responsibilities seriously. Senior officers will be responsible for ensuring their staff are well brief and trained.

- Equality issues should be a standard item in our team meetings. We cannot demonstrate a commitment unless we can record what we have done. We will designate at least one “BME Housing Champion” in each of our housing departments who will be a Principal Officer and who will have a portfolio to inform staff, scrutinise and to disseminate information on BME issues.

- We should ensure that existing and future policies and procedures are examined and brought to acceptable standards and in line with current legislation and Codes of Practice on equalities. We will carry out “impact” assessments of our policies and procedures and publish them as part of the corporate duty to do so as part of the Race Relations Amendment Act 2000.

- We should ensure that our employment practices do not discriminate on the grounds of race or other diversity and that the content of job advertisements explain that posts are open to people of all racial backgrounds. We should be looking at whether pre-entry qualifications are likely to discriminate against disadvantaged groups.

- We will adopt individual local authority BME Housing Action Plans as part of this strategy, which have clear targets.

- We will continue to carry out consultation to enhance and develop this strategy at a local and regional level.

- We will monitor progress through our Team meetings.

- We will continue to involve ourselves in other research and in the development of a regional and cross-disciplinary approach to race equality.

- We will need to co-operate with other BME projects in the region, such as the research being conducted by M E W N and the “positive images” project in Denbighshire.

4. We need to ensure that the designs of properties are adapted to cultural and religious needs.

The cultural needs of BME communities in Wales have already been the subject of some previous research and these mainly relate to:

- The need to accommodate extended families which are larger than average.

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26 To include Welsh language issues, BME, gender, disabilities and sexuality.
27 See proposed portfolio Appendix 7.
28 Funded through Connecting Communities (Home Office) and due to commence in April 2004.
The need to separate day and eating accommodation for men and women in some cultures;
Different cultural and/or religious requirements in the preparation of food;
The religious requirements relating to washing and bathing in some cultures.
The aspiration for home ownership being stronger in some cultures.
The aspiration for some nationalities experiencing harassment and discrimination to live in proximity to one another for mutual support.
The need for the provision of specialist housing for BME elders

Local authorities are strictly limited in the stock they hold, and the right to buy has seriously affected the supply of properties available. There is pressure on our waiting and transfer lists from large families of all races. However, ignoring the cultural needs of families from other backgrounds is unlawful and discriminatory and housing departments need to be aware of the differing needs of some cultures that are absolutely essential to the way in which they live.

We should be operating our housing lists in a non-discriminatory manner and should, as a matter of good practice examine each individual family’s needs when considering an offer of accommodation, irrespective of their race or religious belief. This may involve asking a housing association to house, or to acquire a property to suit a family’s needs through Social Housing Grant. It could also involve assisting a family to obtain private rented accommodation, because the local authority does not have anything suitable in its own stock. When a housing association is beginning a development we need to consider whether we should include specific design requirement for BME applicants.

Homeless applications from ethnic minorities are few, and local authorities monitor ethnic origin for the Welsh Assembly Government. At September 2003, the Wrexham CBC general waiting list was recorded as having 1% BME applicants and Homeless Applications were 3% to date (2003). Local authorities need to analyse their applications regularly as the Welsh Assembly Government take a year to publish a breakdown of the statistics. In the quarter October - December 2002, the numbers of BME households recorded as having been accepted as unintentionally homeless and in priority need, by each authority are as follows:

<table>
<thead>
<tr>
<th>Authority</th>
<th>Recorded as BME</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anglesey</td>
<td>0</td>
<td>35</td>
</tr>
<tr>
<td>Conwy</td>
<td>0</td>
<td>42</td>
</tr>
<tr>
<td>Denbighshire</td>
<td>1</td>
<td>32</td>
</tr>
<tr>
<td>Flintshire</td>
<td>1</td>
<td>67</td>
</tr>
<tr>
<td>Gwynedd</td>
<td>1</td>
<td>49</td>
</tr>
<tr>
<td>Wrexham</td>
<td>3</td>
<td>54</td>
</tr>
</tbody>
</table>
Women's Aid has experience of BME women fleeing violence, but there are no statistics available of how many women choose to remain in the region.\textsuperscript{30} And monitoring of ethnicity is not currently standard.

Current legislation does not legally require local authorities to provide Gypsy campsites. However, there are indications that the Welsh Assembly Government will be consulting local authorities concerning a change in legislation, following similar proposals for England. This strategy recognizes that the provision of permanent and well-managed sites for itinerant people, with proper liaison, is preferable to having unauthorized encampments that may lead to friction between itinerants and local residents. Wrexham has a liaison officer dealing with the Traveler community who has worked hard to gain the trust of the occupants of the local site and visits “unauthorised” pitches. By appropriate action, the Council has managed to provide a number of services to the local Traveler community such as health and education.

\textbf{5. We need to make our services accessible and fair to all, irrespective of diversity}

We believe that the very low percentage of BME people in North Wales has been an excuse for public institutions to neglect people from ethnic minorities. Our initial research has shown a distinct absence of comprehensive ethnic monitoring of housing services in the local authorities and a general lack of race awareness training. From other research\textsuperscript{31} it has been established that BME people are less aware of the facilities offered by social landlords than the general population.

The public profile we present, particularly in the way our staff are trained and in our literature, is key to the promotion of equal opportunities for disadvantaged minorities. Failure to present a welcoming atmosphere and public profile can lead to the marginalisation of minorities and a manifestation of the institutional racism described in the Macpherson Report\textsuperscript{32}.

We need to:

- Ensure that our staff are properly trained in customer care and in race and cultural awareness.
- Provide literature, which is welcoming to all and portrays diversity.
- Where appropriate, provide translation of key literature in addition to Welsh, which is either in published format, or “on line”.
- Subscribe to a translation and interpreting service that can help customers at the first point of contact with the Council.
- Target diversity groups and associations for information about our services.

\textsuperscript{30} Applicants will not necessarily be from North Wales, but may have contacted a local refuge and been moved to the area for safety.
\textsuperscript{31} See footnote 12
• Include diversity issues in all aspects of performance review.
• Provide accessible and private interviewing facilities where interpretation can take place.
• Examine the accessibility and appropriateness of our services and ensure that shortfalls are targeted for resources in our business plans.
• Examine recruitment procedures and recognise the need to recruit BME people to reflect client groups.
• Allocate specific resources for improving equality practice, for example for training, literature, translation.
• Include pages dedicated to diversity and housing on our authority websites, and tenant newsletters.
• Introduce ethnic monitoring as standard across all our service areas. We will ensure that this information is regularly extracted and used for service appraisal and review.
• We will review (annually) with housing association partners, local lettings to BME households in comparison to our waiting lists.
• We will ensure that our staff are familiar and kept up to date with the housing rights of people from abroad including asylum seekers, refugees and European Union citizens.

6. We will make sure that the needs of different communities are addressed in any stock transfer schemes.

If consideration is being given to the transfer of council stock to a housing association, we will need to assess whether our consultation methods take into account the needs of BME communities, taking account of the levels of BME people and needs. If necessary, we will provide appropriate literature in languages other than English and Welsh.

Stock transfer is a matter for the individual authority. Currently Wrexham and Denbighshire have gone some way down this road. Some ways in which authorities can be more inclusive in this process is to:

► Ensure that information to tenants is either available in minority languages, or that (in the case of very low numbers of BME tenants) a specific effort is made to visit families, or hold meetings where there may be language difficulties.

► Encourage/invite BME people to be Board members of the proposed housing association.

► In our transfer documents, explain in particular, the ways in which the housing needs of BME people will be addressed in stock transfer.

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32 See page 8.
33 See page 35 - as legislation is so complex it may be more realistic to designate an “expert” point of reference.
7. We will aim to maximize the involvement of different communities in tenant participation, community development and regeneration initiatives.

The six local authorities are currently working with the housing association partnership to develop a form of consultation suitable for BME people who are dispersed throughout rural Wales. A number of other studies are also taking place in Wales and England, into the needs of dispersed and often isolated BME communities. We are hopeful therefore that “models” of consultation will be produced in the future, which will greatly assist our efforts to improve contact with BME people throughout North Wales.

In the meantime we can do the following:

- We can improve on our current legal responsibilities to consult with our tenants by actively promoting the involvement of BME tenants and users. We need to include elected members, tenant and resident association representatives in our equalities training.
- We will review our Tenant Participation Compacts and strategies to ensure they include positive steps to encourage the involvement of BME tenants and residents.
- We will review our consultation methods in order to maximize the involvement of people that may be isolated from existing groups or communities. This could include telephone interviews, email, post or holding small focus groups, or encouraging a “community voice” scheme.
- We will ensure that all types of tenant and resident groups and schemes operate according to a code of conduct on equality of diversity.
- We will invite independent audit of our services and procedures and will welcome scrutiny at all times. We will particularly engage with the North Wales Race Equality Network, the Commission for Racial Equality and the Housing Subject Committee of the All Wales Ethnic Minority Association (AWEMA) and the Welsh Refugee Council.
- When we identify a suitable model for consultation (i.e. one which the BME community themselves find helpful) we will include the BME community, staff and stakeholder groups in consultation about the future of our services and funding of stakeholder groups, development of projects and bids for additional resources.
- We will consult on Welsh language equality issues in our service delivery and examine our policy on translation into other languages.
8. We will take prompt and high profile action against hate crime

In an area where the population of BME people is very low, BME people may be even more vulnerable to hate crime.

North Wales Police has a Regional and three Divisional Diversity Groups within North Wales, where incidences of hate crime are reported and monitored. Figures collected by North Wales Police for September 2003 indicate a downward trend in reported racial crime in the Central Division (Conwy and Denbighshire) but an upward trend in the Western (Gwynedd and Anglesey) and Eastern (Wrexham and Flintshire) Divisions compared to September 2002. The percentages of racial crime which is detected is increasing but is still overall, less than half. It is difficult to ascertain how much hate crime is not reported at all, but judging from the interviews undertaken as part of our research - BME people spoken to do not report much of the verbal abuse they receive, and may not report more serious abuse or harassment.

North Wales Police has recently introduced a self-reporting hate crime form, in an effort to encourage people to report hate crime. The form enables people to retain anonymity.

Victim Support receive daily reports from the police detailing all crimes recorded in the previous 24 hours together with a record of self-defined ethnicity. Anything defined as a racist crime is automatically picked up and the victim is sent details of how VS can help and details of NWREN.

Local authorities are beginning to introduce complaints procedures that include ethnic monitoring. It is important that housing officers are sufficiently trained, and procedures are in place, to record ethnicity in complaints about harassment and anti-social behaviour, and that complaints are taken seriously, even if they “appear” minor. Housing departments should be taking swift and effective action to deal with racial abuse where they have the power.

We want to:

• Make sure that complaints about racial harassment use the MacPherson definition.35
• Ensure that procedures are in place to respond to reported incidents swiftly and that our actions improve the satisfaction levels among BME tenants and residents and that they encourage reporting. These procedures should be robust and should
  
  VEncourage the reporting of incidents
  VSupport victims
  VDeal with perpetrators
  VHave monitoring mechanisms that produce reports for councillors
  VSeek to prevent racism in the future.

• Ensure that the procedures are widely publicised and reviewed on a regular basis and that we involve relevant community organisations in this.

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34 Using as a start, the model developed in Powys.
• Lobby to encourage more participation by housing officers in Diversity Groups and other meetings where hate crime is discussed.
• Review our conditions of tenancy to ensure that clauses prohibiting and dealing with hate crime are strongly emphasised.
• Make sure that our staff are properly trained in these procedures.
• Enter into arrangements for the swift removal of graffiti.

9. We will examine our recruitment and employment practices and procedures to ensure that they are non-discriminatory

The examination of recruitment and employment practices should take place as part of the corporate equalities agenda and impact assessments bringing procedures in line with the Race Relations Amendment Act, 2000. However, there is an additional element involved in making staff involved in interviewing, drafting job advertisements and job specifications aware of the equalities implications involved.

It is good practice for our staff composition to reflect the communities they serve and we need to set organisational targets to do this. In co-operation with the corporate equalities procedures we need to review employment policies, procedures and practices to ensure they are non-discriminatory.

• We should include key competencies for managing diversity in the recruitment procedures for our managers and senior staff.
• We should make sure procedures are in place to tackle harassment in the work place.
• We need to put procedures in place to make sure that all staff are aware of opportunities for career advancement, training and development, secondment and mentoring.
• We will continue to arrange for race equality training for all staff, elected members and tenant and residents groups.
• We should carry out the ethnic monitoring requirements of the Welsh Assembly Government in respect of: employment, training, grievances received, disciplinary procedures, etc
• We will take the necessary steps to rectify any adverse trends identified as the result of the monitoring of employment practices.
• We will ensure that any reports on ethnic monitoring are widely disseminated.

35 See page 9.
10. We need to ensure that our contractors and consultants have a commitment to equalities issues.

Local authorities have a legal duty under the Race Relations (Amendment) Act to promote racial equality in the planning, tendering and awarding of contracts for the provision of goods and services.

While we may make every effort to make sure that our directly employed staff are adequately trained, our contractors and sub-contractors may not be so aware of the needs of different ethnic groups. Many of these contractors and sub-contractors may be in direct contact with the public and acting on our behalf. The Race Relations (Amendment) Act, 2000 outlaws discrimination in all public authority functions. This extends to services provided by outside contractors and the local authority remains responsible for meeting the duty irrespective of who is carrying out the functions.

We need to:

- Review our contracting arrangements to ensure that the procedures make clear our requirements and expectations concerning equality
- Ensure that any organisations that we fund to carry out services on our behalf are aware of our expectations on race equality and provide ethnic monitoring.
- Ensure that contractors, sub-contractors and funded organisations comply with basic equality standards in their employment practices.
- Monitor and review contractor performance on equalities issues and take action where appropriate standards are not met.
- Provide an equal opportunity for BME contractors to be selected for work with the authority.

11. We need to promote a healthy private rented sector that is non-discriminatory and tackle unlawful discrimination in the private sector

Housing in the private rented sector is often the only option for people who are not permanently resident in the UK or are subject to immigration control, for example overseas students, medical staff, asylum seekers and refugees. The private sector is therefore the only option for housing for some BME people. We also recognise that due to the limitations of our existing housing stock, it will sometimes be necessary to use the private sector to discharge duty under homelessness legislation and to acquire properties whose design may more adequately suit a family’s cultural needs.
Private sector regulation, renewal policies and grants are managed under separate departments from housing in some of our authorities, and not necessarily therefore under our direct management. We will need to work with our colleagues in other departments to achieve this aim.

Housing benefit administration is also a key element for a healthy private rented sector and the way that benefit staff deal with claimants and landlords affects the stability of a private tenant’s accommodation, and the ease at which someone could find their own accommodation.

We need to

- Ensure that private sector regulation takes full account of the equalities implications of dealing with people of diverse backgrounds and that Council staff dealing with enforcement issues are full trained in equalities and cultural awareness.
- Always anticipate whether there is a need for interpretation when dealing with enforcement issues.
- Ensure, wherever possible, that equalities clauses are contained in any HMO licensing or registration schemes.
- Cover BME issues in all guidance to landlords, agencies, bond schemes and advice.
- Influence housing benefit departments to be aware of race equality issues in respect of both claimants and landlords.
- Make sure that renewal policies and strategies deal with equalities issues.

12. We need to be aware of the current issues affecting asylum seekers and refugees and keep our staff fully informed of their responsibilities in giving appropriate support and advice.

The 1999 Immigration and Asylum Act introduced new ways of managing the asylum application process. It established the National Asylum Support Services, or NASS, which was given overall responsibility for a new accommodation and support system for destitute asylum seekers and for determining their eligibility.

It also introduced a dispersal scheme, which meant that asylum seekers were dispersed to furnished accommodation in designated authorities outside London. In North Wales, Wrexham is the only county currently receiving dispersed asylum seekers under this scheme, and has 78 places available in private rented accommodation. In April 2003 Wrexham had a total of 49 dispersed asylum seekers originating from 15 different countries. Due to the cultural diversity of these groups, it follows that the asylum seekers may often be isolated and without the support offered by shared cultural identity with other people near by.
There are also a number of “subsistence-only” asylum seekers who come to Wales on a subsistence-only package, but may be living outside the dispersal cluster areas. Accommodation in this case is usually provided by family and friends.

The distribution of “subsistence-only” asylum seekers in North Wales (April 2003) was as follows:

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of Units</th>
<th>Number of People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anglesey</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Conwy</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Denbighshire</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Flintshire</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>Gwynedd</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Wrexham</td>
<td>6</td>
<td>7</td>
</tr>
</tbody>
</table>

Refugees are people who have had their claim for asylum accepted by the immigration authorities. Successful applicants acquire rights to apply for accommodation and state benefits, and to work. In Wrexham, many refugees take up work which local people refuse, while some are doing work well below their personal qualifications or expertise.

In June 2003, the Welsh assembly Government produced a pre consultation draft, “Asylum Seekers and Refugees: Guidance for accommodation providers in Wales”. This document is a good point of reference for social landlords.

Following the disturbances on the Caia Park estate in 2003, Wrexham Council decided that it could do more to support the needs of refugees who were rehoused in the community. It has now established a more effective support mechanism for refugees by seconding staff to specific duties, and is looking to build up a permanent unit to do this.

All authorities should be aware of legislation relating to asylum seekers and refugees and training should be provided for staff irrespective of whether the county is involved in the NASS dispersal scheme. We also recommend that staff dealing with the public receive training, in appropriate questions to ask and what documents to request.

The Audit Commission Report “Another Country, Implementing Dispersal under the Immigration and Asylum Act, 1999” details the critical success factors in developing appropriate and accessible asylum services. This document and the guidance for accommodation providers should be available in each housing authority whether or not it hosts a dispersal scheme.
The minimum action we can recommend at this time for authorities other than Wrexham is:

- Training for staff on the housing rights of persons from abroad.
- A joint Investment in schemes for the integration of refugees into the local community.
- Linking in with Supporting People Operational Plans to provide floating support for vulnerable tenants.

This is the conclusion of the North Wales Regional BME Housing Framework.

The following section contains the individual Action Plans for each authority.