

Castlehill Housing Association

Equalities and Diversity Policy

Date of Management Committee Approval – August 2008

Date of Policy Review – August 2011

SECTION 1 – POLICY STATEMENT

1.1 Introduction

As a Registered Social Landlord, employer and service provider, Castlehill Housing Association is committed to ensuring equality so that no person is treated less favourably than any other on the grounds of age, race, disability, gender, sexual orientation, religion and belief or other relevant grounds.

Castlehill recognises that discrimination can be direct or indirect and may take place at a personal or institutional level:

Direct Discrimination – treating a person less favourably on grounds of race, age, gender, disability, sexual orientation, etc.

Indirect Discrimination – applying any requirement or condition, which though applied equally to everybody, is such that a considerably smaller proportion of people of one group can comply with it than the proportion of other groups of people, unless the requirement or condition can be shown to be justifiable irrespective of race, gender, disability, age, sexual orientation, etc.

This policy is intended to ensure that the Association complies with current legislative requirements and best practice including SFHA Raising Standards and the Scottish Housing Regulator (Scottish Government) Performance Standards. The main relevant standard is Guiding Standard GS 2.1: Equal Opportunities

“We embrace diversity, promote equal opportunities for all and eliminate unlawful discrimination in all areas of our work.”

Castlehill will publicise our approach to equality and diversity in appropriate communications and publications accessible to our stakeholders and any interested parties.

1.2 Statement of Policy

- 1.2.1** Castlehill is opposed to any form or level of discrimination and will take appropriate steps, in its role as an employer and service provider, to counteract it.
- 1.2.2** We will seek to ensure that no one receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be shown to be justifiable.
- 1.2.3** We will seek to ensure good communication with all diversity groups and will make information available in suitable formats for those with particular communication needs or difficulties.
- 1.2.4** Castlehill will respect community diversity and seek to ensure that employment vacancies, service provision and voluntary opportunities are accessible to all sectors of the community.
- 1.2.5** Castlehill will seek to provide our customers with clear and accurate information on our services and will seek to consult with service users and other stakeholders with regard to the provision of appropriate housing in a suitable environment.
- 1.2.6** We will seek to ensure that all individuals will be treated fairly and equally and any decisions on recruitment and selection will be based on the relevant job criteria.
- 1.2.7** The Association will provide equalities and diversity training for staff and Committee members and encourage active participation.

- 1.2.8** The Association complies with relevant anti-discrimination legislation and codes of practice in employment and service provision.
- 1.2.9** This policy will be issued to staff and Management Committee members and compliance with the policy will be a condition of service or of working for Castlehill in a voluntary capacity.
- 1.2.10** Castlehill's policies and procedures are subject to regular review and any such review will take account of the Equalities and Diversity Policy to ensure compliance and compatibility.

1.3 Legislation and Best Practice

Legislation governing Castlehill's equality actions are:

- Sex Discrimination Act, 1975/ Sex Discrimination Act, 1975 (Amendment) Regulations, 2003
- Race Relations Act, 1976/ Race Relations (Amendment) Act, 2000
- Equal Pay Act, 1970/ Equal Pay Act, 1970 (Amendment) Regulations, 2003
- Disability Discrimination Act, 1995
- Disability Discrimination Act, 2005
- Human Rights Act, 1998
- Housing (Scotland) Act, 2001
- Employment Equality (Sexual Orientation) (Religion or Belief) Regulations, 2003
- Equality (Age) Regulations, 2006.

Other relevant legislation includes: Asylum and Immigration Act, 1996, Matrimonial Homes Act, 1991 and Working Time Regulations, as amended 2003.

Relevant guidance includes:

- SFHA Raising Standards in Housing – Equalities
- Equality and Human Rights Commission Scotland – various publications

1.4 Implementation

Castlehill's Management Committee has overall responsibility for our approach to equalities and diversity in terms of approving policy and monitoring practice.

Responsibility for policy implementation and ensuring best practice is delegated to the Chief Executive, with day to day responsibility further delegated to departmental Directors. Individual members of staff and committee members have responsibility in terms of their own conduct and in the exercise of their duties to comply with this policy and to promote a positive approach to equalities generally.

The Association will take the following key actions to implement the policy:

- Production of an annual Equality Action Plan. This will be incorporated into the Association's Internal Management plan with specific actions detailed in departmental workplans.
- Ensure adequate resources are available for actions to promote equality and diversity.
- Put in place suitable monitoring arrangements for equalities issues with reporting to the Association's Audit Sub-Committee on progress against the agreed Action Plan.
- Provide suitable training on equalities issues and awareness for staff and committee members.

- Involvement in partnership working with local RSL's and voluntary agencies to develop good practice and jointly promote a positive approach within the sector.
- Continue to work towards 'mainstreaming' of equalities into all relevant aspects of the Associations work.
- Ensure that all policy and procedure review and development takes full account of all relevant equalities issues.

SECTION 2 – SERVICE PROVISION

2.1 Introduction

Castlehill provides services with regard to applicants for housing, tenants, sharing owners, and owner-occupiers e.g. Care and Repair services. The Association is committed to ensuring good practice with regard to equalities across all services it provides.

2.2 Housing Allocations – Homehunt NES Choice Based Lettings

The Association's Allocations Policy and application procedures incorporate relevant best practice in this area. The homehuntNES registration does not request information that is not relevant to assessing the "housing need" of the applicant's household e.g. marital status, race, religious belief or sexual orientation.

Information on ethnicity and gender is sought for monitoring purposes only and plays no part in the allocations or assessment process.

Information on age is used only where relevant e.g. in allocation of housing specifically designed to meet the needs of older people or where the age of children needs to be used to assess the number of bedrooms required. An applicant's date of birth will also be used to confirm if they have reached the age where they can legally hold a tenancy.

With regard to physical disability, information will only be sought and used on factors relevant to assessing needs for suitably adapted properties e.g. if the applicant is a wheelchair user.

2.3 Communications & Translations

Castlehill will make all reasonable efforts to facilitate verbal and written communications with service users with disabilities or whose first language is not English. Our housing application registration form will ask all applicants to detail their preferred first language and communication method.

The Association will endeavour to ensure that all written material is clear, simple and jargon-free. In preparing written material we will ensure that the content is open and inclusive and does not discriminate against any group or individual.

Castlehill will ensure that the content of our website is easily accessible to all our service users and stakeholders

The Association will make all reasonable efforts to ensure that appropriate translation services can be accessed by our service users as required. We will also endeavour to provide facilities, such as hearing loop systems, where possible.

2.4 Access to Services

We will, as far as practical, make sure that access to our premises, meetings and housing complies with the provisions of the Disability Discrimination Act.

We will take positive action to publicise all our services as widely as possible to ensure that all sectors of the community are aware of the services we provide and how to access them.

2.5 Development Programme

Castlehill will continue to work in partnership with local RSL's, relevant local authorities and the Scottish Government in ensuring that plans for future housing development in our area of operation take account of the needs of all sectors of the community. The Association will continue to support positive action to address identified housing needs within particular equalities groups and to provide housing opportunities reflecting the diversity of the local population.

SECTION 3 – EMPLOYMENT

3.1 Introduction

Castlehill will develop, implement and monitor good practice in employment covering recruitment, selection, staff retention, training and development for all staff. The Association is committed to ensuring the appropriate equalities practice in relation to employment and will not discriminate, either directly or indirectly when recruiting staff or in their subsequent employment.

3.2 Recruitment and Selection

The Association will operate its policy on recruitment of staff incorporating the following criteria:

- 3.2.1** All job vacancies will be advertised both internally and externally except where a temporary post, recruited by open advertising, is being made permanent or where a vacancy arises due to an organisational review approved by the Management Committee.

As a minimum requirement all vacancies will advertised externally via the "Jobs" section on the Associations website. Additional external advertising will be considered dependant on the assessed requirements of each vacancy and may include local press, national press, recruitment websites or agencies, specialist publications or publicity via representative organisations.

3.2.2 Job descriptions, person specifications, advertisements, application forms, shortlisting and interview procedures will use appropriate, unbiased, open and fair criteria. Staff involved in recruitment and selection will be able to access appropriate training.

3.2.3 All job applicants will be asked to complete the Association's standard job application form. Internal applicants need not complete sections containing information already held e.g. employment history.

Applicants will be asked to provide information on ethnic origin, gender and disability and this information will be held separately to the application form to be used solely for monitoring purposes. Information on health will be considered only where this is likely to affect ability to attend work or carry out the duties detailed on the job description.

3.2.4 The Association will not have specific requirements on grounds such as gender unless there is a "Genuine Occupational Qualification" involved as defined in relevant legislation.

3.3 Positive Action

Castlehill will consider implementing positive action initiatives if there is evidence that members of particular groups are under-represented within the staff complement and within different employment categories.

Examples of positive action may include: adaptation of workplaces to suit the needs of employees with disabilities; advertising in specialist press; creating trainee posts or making a commitment to interviewing applicants from a specific group, such as disabled people, who may apply for a particular post.

3.4 Training and Development

Policy and procedures relating to staff training and development are contained in Section 3 of the Staff Handbook.

The Association will take adequate steps to ensure that employees and Committee Members receive appropriate equalities and diversity training, information and advice. All new employees will be made aware of the Equalities and Diversity Policy during the formal induction training.

Training will aim to inform staff about their obligations under anti-discrimination legislation and this policy and provide guidance on how to translate policy into good practice. Training will promote a positive approach to equalities and staff will be encouraged to participate.

3.5 Harassment and Victimisation

- 3.5.1** The Association will deal with complaints of discrimination and harassment sensitively and effectively. We will protect any employee from victimisation should they raise which a grievance.
- 3.5.2** Any employee who considers that they are being subjected to unequal treatment on any equalities grounds will be encouraged to report this. Such a complaint will be dealt with through our grievance procedure.
- 3.5.3** Procedures for dealing with disciplinary issues will be consistently applied and the Association will ensure that all employees have clear access to appropriate internal procedures.
- 3.5.4** Issues of harassment of Castlehill's tenants will be dealt with through our Harassment and Anti Social Behaviour Policy.
- 3.5.5** Staff will be expected to comply with the Association's Staff Code of Conduct at all times.

3.6 Employment Terms and Conditions

- 3.6.1** The Association will not discriminate against any member of staff in relation to salary and other terms and conditions of employment.
- 3.6.2** The Association will produce a comprehensive Staff Handbook, accessible to all employees and including a copy our Equalities and Diversity Policy.

SECTION 4 – GOVERNANCE

4.1 Introduction

Castlehill will aim to ensure that participation in the organisation is open to all irrespective of gender, marital status, family circumstances, age, ethnic origin, religion, sexual orientation, disability or other relevant grounds. This will apply both to staff and voluntary contributions.

4.2 Association Membership / Management Committee

Castlehill will seek to develop a broad membership reflecting diversity of the communities that we serve. Membership will be open to all who support the aims of the Association.

Within our Management Committee and senior staff team we will ensure that we have the range of skills and expertise to lead the organisation and we will be proactive in encouraging participation from under-represented groups.

4.3 Procurement of Goods and Services

Through our approach to procurement, the Association will seek to ensure that there is no discrimination in terms of allocation of work to contractors and consultants or in purchasing from suppliers. Effort will be made to ensure that firms used by the Association can demonstrate a commitment to equalities.

When we receive an application for inclusion on our list of approved contractors or consultants, we will ask the applicant to provide a copy of their Equalities Policy or to confirm that they will abide by Castlehill's policy.

We will ensure that, where feasible, a wide range of contractors and consultants provide services. We will be proactive in encouraging applications from disadvantaged groups.

4.4 Policy Review and Reports

When drafting or revising policies in all areas of the Association's work, we will carry out appropriate "equalities proofing" measures to assess the impact of proposed policies on equalities groups. We may approach ethnic groups or representative organisations to assist and inform this process.

Where appropriate and relevant, any reports to the Management Committee will highlight the equalities and diversity implications of any actions or decisions included in this report.