



## EQUALITIES AND DIVERSITY POLICY

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## 1.0 POLICY STATEMENT

### 1.1 Introduction

As a Registered Social Landlord, employer and service provider, Castlehill Housing Association (CHA) is committed to ensuring equality and diversity (E&D) and promoting a culture that actively values differences in peoples' backgrounds and experience.

Equality is about ensuring that all people are treated equally. CHA is committed to ensuring that no person is treated less favourably than any other.

Diversity is recognising, understanding and appreciating differences in peoples' life experiences, skills and perspectives. CHA is committed to finding ways of understanding the needs of different customers and delivering services that meet these needs.

CHA is committed to ensuring that E&D principles are fully embedded in all areas of work undertaken by, and on behalf of, CHA.

This policy sets out CHA's aims, how it will implement E&D and how it will monitor its performance.

This policy applies to all staff, volunteers, Management Committee members and contractors of CHA.

### 1.2 Aims

The following overarching aims support CHA's commitment to ensure E&D is embraced:

- Service provision - accessible services and homes are provided to all
- Communication – a range of communication methods, appropriate to the needs of a diverse society
- Employment - a diverse, talented and motivated Management Committee and workforce that understand and reflect the needs of the communities served

### 1.3 Legislative and Regulatory Framework

This Policy aims to cover the obligations and requirements set out in relevant legislation and in the Scottish Social Housing Charter.

The Equality Act 2010 sets out nine protected characteristics, which cannot be used as a reason to treat people unfairly. The protected characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- race

- religion or belief
- sex
- sexual orientation or
- pregnancy and maternity

CHA is not listed as a public body for this legislation but the principles of good practice are adopted to ensure no individual or group of individuals are disadvantaged.

## 1.4 Discrimination

CHA is opposed to any form of discrimination and will take appropriate steps as both a service provider and employer to counteract discrimination. CHA recognises that discrimination can take many forms:

- Direct Discrimination – treating a person less favourably because of a protected characteristic.
- Associative Discrimination – direct discrimination against someone because they are associated with another person who possesses a protected characteristic.
- Discrimination by Perception – direct discrimination against someone because others think that they possess a particular protected characteristic.
- 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.
- Harassment – behaviour that is deemed offensive by the recipient. Employees can now complain of the behaviour they find offensive even if it is not directed at them.
- Victimisation – when someone is treated badly because they have made or supported a complaint or grievance under this Policy.

## 2.0 ROLES AND RESPONSIBILITIES

CHA's Management Committee has overall responsibility for CHA's approach to E&D 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.

Department Directors have responsibility for promoting and implementing this Policy within their departments and ensuring that staff have the correct training and awareness of E&D issues. Directors are responsible for considering the need for and use of Equalities Impact Assessments (EIAs).

Managers are responsible for promoting a culture of E&D and managing the day to day implementation of this policy and culture both with service delivery and in the management of staff.

Staff are responsible for ensuring they are aware of and embracing the culture of E&D in order to deliver fair services with equality of opportunity to all. All staff have an obligation to treat others fairly and to challenge and report inequalities.

Contractors must work in a way that promotes E&D and must operate in accordance with CHA's E&D principles and relevant legislation.

## 3.0 SERVICE PROVISION

### 3.1 Introduction

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

CHA's policies and procedures all reflect the positive principles of inclusion, accessibility and diversity.

When drafting or revising policies, CHA carries out appropriate "equalities proofing" measures to assess the impact of proposed policies on equalities groups.

### 3.2 Housing Allocations – Homehunt NES Choice Based Lettings

CHA's Allocations Policy incorporates 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.

### 3.3 Development Programme

New developments will consider, and where appropriate, accommodate a range of physical and wellbeing needs to ensure accessibility and sustainability;

CHA will continue to work in partnership with local RSLs, 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. CHA will continue to support action to address identified housing needs within particular equalities groups and to provide housing opportunities reflecting the diversity of the local population.

## 4.0 COMMUNICATION

CHA uses a range of communication methods to ensure equality of opportunity. Key documents can be available in alternative formats such as audio, easy read and if appropriate, braille. Large print is available on request. CHA makes all reasonable efforts to ensure that appropriate translation services can be accessed by service users, as required, and is a member of Happy to Translate. CHA also endeavours to provide facilities, such as hearing loop systems, where possible.

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

CHA commits to publicise all services as widely as possible to ensure that all sectors of the community are aware of the services provided and how to access them.

Where required, CHA will refer / signpost tenants and other customers who need specialist support, to service support providers with that particular expertise.

CHA work with its customers to find effective ways of reaching, understanding, communicating and overcoming barriers associated with tenants and applicants with particular equality characteristics.

## 5.0 EMPLOYMENT

### 5.1 Introduction

CHA will develop, implement and monitor good practice in employment covering recruitment, staff retention, training and development for all staff.

### 5.2 Recruitment and Selection

The recruitment process will be supportive of, and accessible to, those with protected characteristics. All candidates will be given the opportunity to demonstrate their abilities and therefore no aspect of the recruitment and selection process will be carried out in a way which could be discriminatory or indicate a bias towards any protected characteristic.

CHA's Recruitment and Selection Policy incorporates relevant best practice. Equalities data is collected anonymously through the recruitment process and is reported on to Committee to ensure that policies and procedures promote equality of opportunity.

### 5.3 Learning and Development

CHA ensures employees and Committee Members receive appropriate equalities and diversity training, information and advice. All new employees will be made aware of the Equalities & Diversity Policy and will undertake Equalities & Diversity eLearning during the formal induction training.

CHA has developed a Learning and Development Policy and Procedure to ensure opportunities (including training, development and promotion) will be made available to all employees. Similarly, any requests relating to learning and development for staff or Committee Members will be treated equally.

### 5.4 Employment Terms & Conditions

CHA will not discriminate against any member of staff in relation to salary and other terms and conditions of employment.

Information on gender, age and disability is collected on staff to as part of the reporting requirements we commit to from the regulatory. This information is handled in line with our policy on data protection and special category data.

Reasonable adjustment will be implemented to support individuals who have alternative requirements. This will include the provision of fair and flexible terms and conditions.

## 5.5 Harassment and Victimisation

CHA will deal with complaints of discrimination and harassment sensitively and effectively and will protect any employee from victimisation should they raise such a grievance. 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 CHA's grievance procedures.

Procedures for dealing with disciplinary issues will be consistently applied and CHA will ensure that all employees have clear access to appropriate internal procedures.

Issues of harassment of CHA's tenants will be dealt with through CHA's Anti-Social Behaviour Policy.

## 5.6 CHA Membership / Management Committee

CHA seeks to develop a broad membership reflecting diversity of the communities served. Membership is open to all who support the aims of CHA.

CHA's Management Committee and Senior Management Team ensure that CHA have the required range of skills and expertise to lead the organisation and are proactive in encouraging participation from under-represented groups. Equalities data is collected from Management Committee to comply with regulatory reporting requirements.

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

## 6.0 PROCUREMENT

### 6.1 Procurement of Goods and Services

CHA will 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 CHA can demonstrate a commitment to equalities.

When CHA receives an application for inclusion on the list of approved contractors or consultants, the applicant is asked to provide a copy of their Equalities Policy or to confirm that they will abide by CHA's policy.

We will ensure that, where feasible, a wide range of contractors and consultants provide services. CHA asks through the 2 stage Procurement Contracts Scotland (PCS) portal to demonstrate how they support disadvantaged groups.

## 7.0 REPORTING

In order to effectively manage CHA's performance with regard to E&D, sufficient and appropriate data must be collected and reported. This will be managed under CHA's Performance Management Framework.

CHA provides E&D information as part of this system of management and use it for benchmarking purposes.

The Management Committee receive regular reports on performance and recommendations/updates on equalities through the Performance Management Framework reporting.

CHA's Audit & Risk Sub-Committee and Corporate Services Committee receive regular reports on monitoring arrangements for equalities issues.