

## WILLOW PARK HOUSING TRUST

# EQUALITY AND DIVERSITY POLICY

<b>Date of Issue</b>	<b>March 2009</b>
<b>Date of Review</b>	<b>March 2011</b>
<b>Officer Responsible</b>	<b>Chief Executive</b>
<b>Reference</b>	<p>Housing Corporation Regulatory code (2.7 and 3.5.4)) and Good Practice Note 8 - Equality &amp; Diversity.            Statutory code of Practice on Racial Equality in Housing (CRE).            Key Lines of Enquiry for Diversity            Statutory Code of Practice on Racial Equality in Employment (CRE)            Community Safety Strategy and related policies:</p> <ul style="list-style-type: none"> <li>• Racial Harassment</li> <li>• Lesbian, Gay, Bisexual &amp; Transgender Harassment</li> <li>• Harassment of people with disabilities or mental health difficulties</li> <li>• Domestic Abuse</li> <li>• Anti-Social Behaviour</li> </ul> <p>Resident Participation Strategy.            Human Resources Strategy and related policies:</p> <ul style="list-style-type: none"> <li>• Recruitment &amp; Selection</li> <li>• Harassment</li> <li>• Anti-bullying</li> <li>• Code of Conduct for Employees</li> <li>• Training</li> <li>• Equal Opportunities Statement</li> <li>• Special &amp; Parental Leave</li> </ul> <p>Diversity Strategy and Action Plan            Code of Conduct for Contractors.            Vulnerable Tenants.</p>

## **1.0 Key Objectives**

- 1.1** To provide good quality services which are appropriate and accessible to all sections of the communities it serves, by being responsive to the individual characteristics and circumstances of residents.
- 1.2** To create an environment where diversity is valued and embraced by Board Members, staff and customers alike.
- 1.3** To recognise and respect the valuable contribution which diverse groups can bring to a community and to treat individuals with dignity and respect.
- 1.4** To take action to address discrimination experienced by particular groups, as well as taking action to promote diversity in employment and provision of services.
- 1.5** To mainstream all equality and diversity issues throughout the organisation to improve its culture and performance and to enable staff to deliver services and proactively respond in ways which meet the needs of our diverse community.

## **2.0 Policy Statement**

- 2.1** The Trust recognises that it has a duty and role to play in maintaining community cohesion by recognising and respecting people's heritage and by promoting a shared sense of belonging for all communities. The Trust will continually review its policy and practice and consult with groups to ensure that needs are met and they are involved in decision-making.
- 2.2** The Trust has a specific legal duty to actively promote equality of opportunity and good relations between people from different racial groups. It also has a duty to actively promote equality of opportunity and positive attitudes towards disabled people.

This policy is aimed at tackling discrimination and disadvantage that groups in society may experience due to their:

- Age
- Disability
- Gender
- Race
- Religion
- Sexual Orientation

- 2.3** All employees and Board Members are required to follow and implement the Trusts Equality and Diversity Policy, and to undergo any training and development activities associated with the policy.

**2.4** The Trust will carry out equality impact assessments and involve staff and stakeholders throughout, and will take action in response to their findings.

### **3.0 Legal Duties**

**3.1** The Trust operates in accordance with the relevant statutory and regulatory framework. The main pieces of legislation are as follows:

- Sex Discrimination Acts 1975, 1986 and 1999
- Equal Pay Acts 1970 and 1983
- Race Relations Acts 1976 and 2000
- Statutory Code of Practice on Racial Equality in Housing (CRE)
- Statutory Code of Practice on Racial Equality in Employment (CRE)
- Disability Discrimination Acts 1995 and 2005
- Protection from Harassment Act 1997
- Public Order Act 1986
- Human Rights Act 1998
- Employment Equality (Age) Regulations 2006
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003

Further details are listed in **Appendix I**.

### **4.0 Employment**

**4.1** The Trust aims to employ a diverse workforce which is broadly reflective of the community which it serves.

**4.2** The Trust aims to develop a workforce that has the skills and understanding to achieve its goals by the provision of a quality service which is responsive to individual and community needs.

**4.3** The Trust is committed to ensuring that people are treated fairly and without unlawful discrimination. As an employer, we aim to ensure that all employees treat each other with dignity and respect and have produced a range of policies contained within its Human Resources Strategy and will act accordingly within these.

To achieve our aims we will:

- Provide full and fair consideration to all job applications.
- All job applicants will be made aware of the Equalities and Diversity Policy.

- As part of the induction programme for new staff, the Trusts Equality and Diversity Policy will be clearly explained.
- Endeavour to employ staff from under-represented groups, and where appropriate will provide training and support, and make reasonable adjustment to accommodate their needs to enable such individuals to compete or qualify for positions in the Trust.
- Maintain records in recruitment, training and employment and report and use this information as a means of identifying areas of inequality. We will also monitor promotion and representation at different levels within the Trust.
- Develop vigorous harassment, bullying and dignity at work processes which can operate within a safe and open environment.

## **5.0 Lettings**

- 5.1** The Trust will ensure that its application and allocation procedures are fair and transparent. We will work towards achieving balanced and sustainable communities.

To achieve our aims we will:

- Regularly review our allocation procedures and monitor outcomes of lettings to ensure that the needs of diverse groups are met.
- Work co-operatively with the local authority and other organisations to ensure best use of stock where aids and adaptations such as wheelchair access and stair lifts have been carried out in our properties.

## **6.0 Provision of New Housing**

- 6.1** The Trust will provide new homes when possible, and take into account diverse needs, through consultation, to meet needs which are not currently met within existing stock.

To achieve our aims we will:

- Provide a wide range of housing options where possible.
- Consult with local agencies
- Adapt existing stock to meet needs of larger families.

## **7.0 Tenant and Resident Involvement**

- 7.1** The Trust will encourage and support all tenants and residents to take an active part in community organisations and believes that positively engaging with people from diverse groups will help to contribute towards continuous improvement of the services we provide.

**7.2** All such groups funded by the Trust are required to adopt compatible equality and diversity policies

**7.3** The Trust will seek to achieve its aims as set out in its Resident Participation Strategy and Action Plan.

To achieve our aims we will:

- Seek ways to actively promote involvement in formal structures to a diverse range of residents, particularly where we are aware of under-representation (e.g. from young people or people from BME communities)
- Provide a wide range of alternative ways of getting involved for people who don't want to get involved in formal structures.
- Provide equality and diversity training to tenant and resident representatives
- Monitor and report on the work of groups supported by the Trust in relation to their performance in equality and diversity
- Be sensitive to the needs of different groups and individuals when planning and organising events.

**7.4** The Trust will involve tenants and residents in developing its Equality and Diversity Strategy and associated Action Plan.

## **8.0 Governance**

**8.1** We aim to have a Board that is broadly reflective of the communities we serve. The Board provides leadership and direction in relation to equality and diversity and drives ongoing improvement.

**8.2** The Trust has appointed a lead member of the Board to take responsibility for driving the organisation's agenda on equality and diversity.

To achieve our aims we will:

- Ensure that the Code of Conduct for Board members incorporates equality and diversity principles.
- Provide equality and diversity training for all members of the Board.
- Provide regular, accurate and clear information to the Board on our performance in relation to equality and diversity.

## **9.0 Service Delivery**

**9.1** The Trust aims to understand the wide range of needs and preferences of its community and to develop and deliver appropriate services in response to those needs. We will work with a wide range of statutory and voluntary agencies to provide support in accordance with our Vulnerable Tenants and their Carers

procedures. We will engage with people from BME groups to ensure that we provide effective services that meet particular needs.

**9.2** The Trust recognises its duty to promote equality of opportunity between disabled persons and other persons under the Disability Discriminations Act.

To achieve our aims we will:

- Work in partnership with other organisations, including voluntary and community groups, local authorities and other housing organisations to improve outcomes for specific communities or groups.
- Ensure that our buildings, staff and our services are accessible to all our customers and potential customers.
- Carry out regular accessibility audits to ensure that our offices comply with the requirements of the Disability Discriminations Act

**10.0 Positive Action**

**10.1** The Trust will take positive action where appropriate and achievable, to enable better and wider engagement with a range of groups.

To achieve our aims we will:

- Work towards achieving a balanced workforce through the establishment of a women's apprentice scheme.
- Increase the involvement and representation of issues of different groups in the community through the establishment of panels consisting of members of these groups.
- Offer volunteer training and support programmes to enhance the opportunities for local residents and young people to gain skills and build capacity within a community setting.

**11.0 Access to information and advice**

**11.1** The Trust provides appropriate means of communications and information about services to the visually and hearing impaired and will provide translations to appropriate languages as identified by the ongoing monitoring of customers.

To achieve our aims we will:

- Provide a copy of the Equality and Diversity Policy to all staff and appropriate training is provided as part of our induction procedure.
- Provide interpretation services for communication between customers and the Trust as appropriate.

## **12.0 Tenant Satisfaction**

**12.1** The Trust aims to ensure that all its tenants receive the same high quality services and that there is no disparity in satisfaction levels between different groups.

To achieve our aims we will:

- Carry out regular analyses of satisfaction levels between different groups of tenants for key service areas.
- Consult with residents to identify the reasons for any disparity in satisfaction levels between specific groups and the majority.

## **13.0 Dealing with Incidents**

**13.1** The Trust aims to ensure that all its residents can enjoy their homes without fear of harassment or abuse and that incidents when they do occur are dealt with efficiently and to the satisfaction of the victim.

**13.2** The Trust takes an active part in Crime and Disorder Partnerships as part of its Community Safety Strategy.

To achieve our aims we will:

- Actively encourage reporting of racial, homophobic and other types of harassment by widely promoting the Trusts policies on Anti-Social Behaviour.
- Work in partnership with other organisations and take part in multi-agency initiatives aimed at tackling hate crime.
- Establish links with other organisations where victims can be referred for support appropriate to their needs and preferences.

## **14.0 Complaints**

**14.1** The Trust will take all complaints seriously and aims to deal effectively with complaints of discrimination on the grounds of race, gender, disability, religion or belief, age, or sexual orientation.

To achieve our aims we will:

- Treat all complaints with sensitivity and anyone who makes a complaint will not be treated less favourably than others.
- All such complaints will be acknowledged and dealt with within a reasonable time frame.

## **15.0 Contractors and Agents**

**15.1** The Trust considers that a non-discriminatory approach is fundamental to all services and operations carried out by the Trusts agents. All contractors and sub-contractors are required to follow this policy when acting on behalf of the Trust.

**15.2** The Trust aims to ensure that its tendering processes are fair and transparent and give ethnic minority businesses equal opportunities to apply for contracts. The Trust requires all its contractors to operate within its Code of Conduct for Contractors.

To achieve our aims we will:

- Support local initiatives and companies that promote employment of people from groups and communities that experience disadvantage.
- Require all contractors to provide a copy of their Equality and Diversity Policy and a breakdown of its workforce by gender, ethnic origin and disability.
- The Trust encourages suitable minority ethnic contractors to join its approved list of contractors and tenderers.

## **16.0 Responsibilities**

**16.1** The Trust has set up an Equality and Diversity Group which will drive forward its equality and diversity agenda and regularly monitor progress against its diversity action plan.

**16.2** It is the responsibility of the Chief Executive (and others) to ensure that:

- All staff and Board Members are aware of the Trusts Equality and Diversity Policy, and their responsibilities within it.
- All staff and Board Members are trained and supported in the implementation of the policy and the Statutory Code of Practice on Racial Equality in Housing.
- Monitoring records are collected in accordance with the Trusts policies and procedures.
- Data collected is used to inform the development of policy and practice
- Customers are aware of the policy.
- Disciplinary procedures are invoked against employees whose actions do not comply with the policy.

## **17.0 Monitoring and Review**

- 17.1** Performance against actions plans and targets will be monitored and quarterly reports will be made to Committee and Board.
- 17.2** This policy will be reviewed every two years and related targets will be reviewed annually.

## APPENDIX I

### RELEVANT LEGISLATION

#### STATUTORY

##### **Sex Discrimination Act 1975**

The Trust has a duty under the Sex Discrimination Act 1975 not to discriminate in the provision of goods, facilities and services by treating a person less favourably than another on the grounds of their sex.

##### **Disability Discrimination Act 1995.**

The Trust has a duty under the Disability Discrimination Act 1995 not to discriminate in the provision of goods, facilities and services by treating a person less favourably than another on the grounds on their disability.

##### **Disability Discrimination Act 2005**

The Trust has a duty under the Disability Discrimination Act 2005 to promote disability equality and publish a Disability Equality Scheme.

##### **Human Rights Act 1998**

Article 14 of the Act (prohibition of discrimination) applies to a number of the Trusts policies.

##### **Public Order Act 1986**

The Public Order Act prohibits a person from causing harassment, alarm or distress though the use of abusive or insulting words or behaviour.

##### **Race Relations Acts 1976 (Amendment) Act 2000**

The Trust has a duty under the Race Relations Act 1976 (Amendment) 2000, to promote race equality and good race relations.

##### **Protection from Harassment Act 1997**

The Protection from Harassment Act prohibits a person from pursuing a course of action which amounts to harassment of another person.

##### **Employment Equality (Sexual Orientation) Regulations 2003**

##### **Employment Equality (Religion or Belief) Regulations 2003**

##### **Employment Equality (Age) Regulations 2006**

The Trust has a duty under these regulations which make it unlawful to discriminate in employment and vocational training on the grounds of sexual orientation, religion or belief or age.

### **Equality Act 2006**

The Equality Act makes unlawful (apart from certain exemptions), discrimination on the grounds of religion or belief or sexual orientation in the provision of goods, facilities and services. It also places a duty on public authorities to promote equality of opportunity between men and women and to prohibit sex discrimination in the workplace.

### **Equal Pay Acts 1970 and 1983**

The 1970 Act entitles an employee to the same pay and contractual terms and conditions as an employee of the opposite sex, if they are doing the same work. The 1983 Act extends this entitlement to employees who are doing work of equal value to that carried out by employees of the opposite sex, in terms of the demands made on them.

### **Statutory Code of Practice on Racial Equality in Housing - Commission for Racial Equality**

The Code explains the provisions of the Race Relations Act that are relevant to the provision of housing in England. The Trust has a duty under the Code to produce and publish a Race Equality Scheme.

### **Statutory Code of Practice on Racial Equality in Employment – Commission for Racial Equality**

The Trust has a duty under the Code to prevent unlawful racial discrimination and to achieve equality of opportunity in the field of employment.

## **REGULATORY**

### **Regulatory code**

Part 2.7 of the Code requires all Housing Associations to demonstrate their commitment to equal opportunities, work towards the elimination of discrimination, and promote good relations between people of different racial groups. The Regulatory Code and the Statutory code of Practice on Racial Equality in Housing impose duties similar to those of public bodies under Race Relations Legislation.

### **Housing Corporation Regulatory Good Practice Note 4: Race Equality and Diversity**

Good Practice Note 4 sets out the standards of performance that all Housing Associations must meet, covering the full range of equalities and diversity, and specific measurable expectations on race equality. Governing Boards must receive regular reports on all aspects of performance and the responsiveness of Willow Park to the individual characteristics and circumstances of residents. Targets for these standards have to be in place and monitored, with actions to rectify any shortfalls and showing continuous improvement thereafter.

## **Housing Corporation Regulatory Good Practice Note 8: Equality and Diversity**

Good Practice Note 8 emphasizes that there is a duty to demonstrate, when carrying out all functions, a commitment to equal opportunities. It sets out the Corporation's expectations on the broad equality and diversity agenda, covering race, religion, disability, gender, marital status, sexual orientation and age. The Trusts Equality and Diversity Strategy will demonstrate its commitment to this.