

'People 1st @ HSHA'

Equalities Strategy

Hanover (Scotland) Housing Association
2015 - 2018

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Appendix A: Action Plan

1 Introduction

1.1 Hanover (Scotland) Housing Association's (*the 'Association'*) Equalities Strategy sets out our commitment and activities in relation to equality and diversity as a provider of housing and related services; care services and community alarm services and as an employer.

1.2 Essentially the Strategy seeks to present a coordinated and structured approach to advancing equality of opportunity as can be reasonably expected of a best practice provider of services/ employment. This commitment will cover all the nine 'protected characteristics' as set out in the Equality Act (2010) and; i.e.

1. age;
2. disability;
3. gender reassignment;
4. marriage and civil partnerships;
5. pregnancy and maternity;
6. race;
7. religion;
8. sex; and/ or
9. sexual orientation.

The act also covers Prohibited conduct of employees in;

- Discrimination
- Failure to make adjustments for disabled people

It is unlawful to discriminate against anyone at work because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or membership (or non-membership) of a trade union.

The Association will ensure it monitors and takes actions against direct, indirect discrimination and discrimination arising from disability. Reasonable adjustments will be made for disabled employees and action will be taken when dealing with harassment of employees. Associative and perceptive discrimination and victimisation will be managed appropriately.

2 Scope of Equalities Strategy

2.1 Our Strategy is therefore intended to cover anyone who comes into contact with the Association; whether as an applicant, resident, employee, Committee member, customer/ service user, stakeholder or partner, etc. and to ensure that all are treated with dignity and respect.

- 2.2 This document is intended to address equality and diversity issues in their widest context and will enable the Association to learn from people's diversity to improve how we work together, plan our business and deliver services that are shaped by customers.

3. HR Strategy

- 3.1 The Equalities Strategy will complement and feed into the Association's Organisational Services Strategy (OSS), which considers the major people issues that affect or are affected by the Association's vision, aims and values, its business and departmental plans.

- 3.2 Equalities is one of the six priority themes and actions within the HRS; i.e. *"to ensure equality and diversity of opportunity as a provider of Housing and related services, as an employer and in all areas of our business;*

... the Association recognises its legal and moral obligation as a good and socially responsible service provider and employer to be fair and equitable in the treatment of its customers and workforce, regardless of age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion, sex, and/or sexual orientation, and to provide equal access to service and employment opportunities."

4 Strategic Aim & Objectives

- 4.1 The aim of this Strategy is to state how we will deliver our Equalities commitments by:

- ensuring that our services are relevant and accessible to all;
- recognising and using the skills, experiences, fresh ideas and perceptions brought to our organisation by people with diverse backgrounds and cultures,; and
- Supporting diversity by listening to and meeting the changing needs of our staff and customers; and
- Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, promotion, training or other developmental opportunities; and
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all and where individual differences and the contributions of all staff are recognised and valued; and

- Oppose and avoid all forms of harassment, whether physical, verbal or non-verbal, that is offensive, humiliating and viewed as unacceptable by the recipient; and
- Harassment of disabled employees will be a disciplinary offense and may constitute gross misconduct, which could lead to dismissal.

4.2 OBJECTIVE 1; to deliver excellent, responsive services and excellence in satisfaction levels with our service provision.

4.2.1 The Association is committed to delivering excellent services to our customers whether these are provided directly or procured or commissioned through others. We recognise that our services must be responsive to the needs of all customers and in particular we will proactively ensure that the needs of vulnerable and marginalised groups are taken into account when services are designed and delivered.

4.2.2 We also recognise that we cannot tackle inequality on our own and will work with others to ensure that customers are treated with dignity and respect.

4.2.3 To achieve our aims we will:

- look for opportunities in regard to equalities to work in partnership with other organisations, including voluntary and community groups, local authorities in our neighbourhoods where we have a development and/ or offer services;
- provide a range of documents that we offer upon request in translation and in alternative formats and those that contain language/format flags; and
- carry out regular analysis of 'customer' satisfaction levels seeking information to identify the reasons for any disparity in satisfaction levels relating to equalities and seek to address identified problems; and
- Train and develop Management and other employees about their rights and responsibilities under the equality policy. All staff will understand that they, as well as their employer can be held liable for acts of bullying, victimisation and unlawful discrimination in the course of employment against fellow employees, customers, suppliers and the public; and
- Deal with such acts of misconduct under the Association's grievance and / or disciplinary procedures and take any appropriate action up to and including dismissal without notice; and
- Deal with sexual harassment claims under the Protection from Harassment Act 1997; and
- Consider making reasonable adjustments for a disabled worker or job applicant; and

- Communicate any circumstance where the Association can objectively justify discrimination; and
- Take positive action and reasonably consider help to job employees or job applicants who are at a disadvantage due to a protected characteristic, are under represented due to protected characteristics or have specific needs due to a protected characteristic; and
- Ensure the Association is following equal pay guidelines when employees are conducting equal work.

4.3 OBJECTIVE 2; to have a diverse workforce.

4.3.1 We recognise that our ability to deliver responsive, tailored services will largely depend on the skills, knowledge and awareness of our workforce.

4.3.2 Provide an environment promoting equality, fairness and respect for all in our employment, whether temporary, part-time or full time.

4.3.3 To achieve our aims we will:

- apply equalities as a core business factor;
- promote an environment free from discrimination, bullying and harassment and tackle behaviour which breaches this;
- recognise and value individual contribution that people make;
- have policies and practices which are inclusive and respectful;
- develop equalities awareness across the Association;
- Provide training for our staff on equality and diversity;
- ensure all staff have equal access to learning and development opportunities;
- carry out equality impact assessments on all our employment policies when these are reviewed;
- promote action that helps us to create a workforce that is representative of our wider communities, removing barriers to employment that are real or perceived.
- Ensure that dual discrimination does not exist through the combination of two or more protected characteristics.

4.4 OBJECTIVE 3; to develop a culture that demonstrates organisational commitment and leadership in equality and diversity issues.

4.4.1 The Association recognises that leadership is key to promoting equality and fairness in everything that we do. Committee Members and staff at all levels will have a clear understanding of the principles of equality and diversity, as well as our commitments and approach to the delivery of our equality strategy. Our culture will encourage the promotion of equality and diversity and to challenge

inappropriate behaviours and statements to ensure dignity and respect for all our customers and staff.

4.4.2 All our staff and Committee Members have a central role in ensuring that equality issues are integral to the achievement of our Corporate and Business Plan objectives.

4.4.3 To achieve this aim we will:

- actively promote our equalities strategy, both internally and externally;
- ensure that our commitment to equality and diversity is reflected in our key corporate documents;
- ensure that equality assessments are carried out on all our business plans and corporate objectives; and
- set clear performance targets to drive improvement and regularly monitor performance against these measures.

4.5 OBJECTIVE 4; to know 'our' communities.

4.5.1 Our society and therefore our customer base is already and in the future is expected to become even more diverse. Understanding peoples 'diverse' needs is essential if services are to be accessible and sustainable. Unfortunately there is limited information on the profile of the communities in which the Association has a presence; i.e. our communities and this will need to be improved if we are to deliver services that are accessible and appropriate.

4.5.2 We will work collaboratively with partner agencies to develop robust information that can help us to deliver improvements in our services.

4.5.3 To achieve this aim we will:

- build as far as practically possible a comprehensive customer/ residents profile;
- develop consistent methods and classifications for the collection, analysis and presentation of information about our customers; and
- regularly review our information and ensure appropriate responses are provided.

4.6 OBJECTIVE 5; to achieve excellent customer engagement in and satisfaction with our services.

4.6.1 The Association recognises the importance of engagement and participation. Consequently and as outlined within our Tenant Participation Strategy we involve and work in consultation with our residents/ service users using a variety of methods so that we can

adopt an inclusive approach in decision making as well as service delivery.

4.6.2 To achieve this aim we will:

- seek ways to actively promote involvement in formal and informal structures to a diverse range of customers, particularly where we are aware of under-representation; e.g. disabled people and people from BME communities;
- offer a range of options for consultation and involvement that customers can choose from;
- be sensitive to the needs of diverse groups and individuals when planning and organising events; and
- work with tenant and other groups to help them operate in an open and inclusive way.

5 The Association – as a Provider of Services

5.1 The Scottish Social Housing Charter sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. From April 2012 Equalities will form one of the 7 sections of the reviewed Charter. The Association will be expected to perform all aspects of its housing services so that:

"Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services."

5.2 The above outcome describes what the Association, by complying with equalities legislation, should achieve for all tenants and other customers regardless of the 9 protected characteristics. The Charter also includes the expectation that 'landlords' will find ways of understanding the needs of different customers and delivering services that recognise and meet these needs

5.3 **Service Delivery;** as primarily a Housing provider for older people the Association will assess at tenancy commencement any specific needs the tenant and their family may have. Tenant/ family needs are then continued to be monitored on a regular basis.

5.4 The Association provides information on our services which is available upon request in different formats including community languages and large print as well as providing home visits and same sex interviews (where applicable). We will aim to improve our website to provide greater access for all. We will continue to consult and involve service users in our work to promote equality and diversity and to ensure no particular group of individuals experience barriers to accessing our service.

- 5.5 **Tenant Participation;** in accordance with our Tenant Participation Strategy we offer our tenants the opportunity to be involved in the decision making process in a way and level to suit individual needs. This ranges from Committee Membership to attending meetings or being part of a Registered Tenant Organisation. In planning any consultation activities we consider amongst others, the day, time, location, care needs, accessibility, language barriers, etc.
- 5.6 **Tenant Satisfaction;** we will monitor customer satisfaction to enable us to obtain comprehensive and meaningful feedback on service delivery. We will use the information to fully investigate any underlying reasons behind trends in high or low satisfaction in order to ensure we are continuously improving service delivery for all our customers.
- 5.7 **Complaints;** one of the key areas we will look at is our complaints procedure to ensure that we are able to respond effectively to any areas of discrimination or barriers to access, highlighted through the process. We will ensure our complaints procedure is accessible and promote it to all service users. We will learn from customer feedback, particularly complaints and amend our policies and procedures where appropriate to address any issues.
- 5.8 **Dealing with Harassment;** our procedures for dealing with harassment are set out in the Statement of Policy on Anti Social Behaviour Orders (HCS/Pol/004) and our Statement of Policy on Racial Harassment (HCS/Pol/017). We will monitor anti social behaviour and harassment to highlight any group within the protected characteristics who maybe particularly vulnerable. This will enable us to direct specific resources and work with appropriate partners to tackle these issues.
- 5.9 **Development and Regeneration;** we will be sensitive to the needs of the communities in which the Association has a presence. The Association will work in liaison with partners, Local Authorities and other stakeholders to ensure that all our current/ new developments and other services promote balanced and sustainable communities. In addition the location and design of homes or services will not knowingly adversely affect or discriminate against, directly or indirectly, the needs of any particular community or group.
- 5.10 **Maintenance and Adaptations:** we aim to provide solutions to barriers that a disabled person may experience by providing appropriate services and adaptations where resources are available. We will ensure that these are personalised where appropriate and that they are provided within reasonable timescales with regard to resources.

5.11 Procurement of Services; whilst acknowledging Housing Associations are not designated as public bodies and are therefore not covered by the procurement obligations within the Equality Act, the Association will work with contractors and partners who share similar equality and diversity commitments.

5.11.1 In the procurement of goods and services, the Association recognises its responsibility to ensure that there is no discrimination in the allocation of work and to advance equality issues. All those responsible for the procurement of goods and services will comply with the Procurement Policy.

5.11.2 Contractors appointed to carrying out services on behalf of the Association will be expected to:

- be aware of the principles and associated responsibilities within the Association's Equalities and Dignity at Work Policies; and
- ensure they are up to date with equality and diversity legislation and have an awareness and understanding of equality and diversity issues.

6 The Association – as an Employer

6.1 **Recruitment & Selection;** the Association shall aim to develop a workforce profile that reflects the diversity of the community it serves. The workforce profile will be monitored against the 9 protected characteristics and in conjunction with other policies including work-life balance and equal pay to ensure that no barriers are in place for any specific groups.

6.1.1 The Association will:

- aim to eliminate known unfair discrimination in recruitment and selection procedures, employment, career development and training and will judge employees on their merit and ability;
- ensure that the Association's Recruitment and Selection Policy complies with associated employment Equality Codes of Practice published by the Equality and Human Rights Commission (EHRC), as well as good practice guidance on equality and diversity, issued by the Scottish Federation of Housing Associations (SFHA);
- by training and other measures seek to ensure that employees making selection and recruitment decisions do not discriminate whether consciously or unconsciously, in making these decisions; and
- obtain registration with and membership of positive action schemes for example AgeUK, PATH (Scotland), Positive about Disabled People and Stonewall.

- Consider requests for reasonable adjustments for a disabled job applicant or employees who
- Carry out health questionnaires to determine whether an applicant can carry out the duties of the role and or take positive action to assist disabled applicants and monitor if the job advert is reaching disabled people and to make any required reasonable adjustments.
- All disabled applicants who meet the minimum requirements of the job will be guaranteed an interview for the post.

6.2 Learning and Development; the Association will provide all Committee Members, employees and volunteers with relevant training to ensure that they have an appropriate level of knowledge and understanding so that they can recognise the diverse needs of both employees and service users and deliver appropriate, high quality services.

6.2.1 Specifically the Association will:

- ensure all new Committee Members and employees will receive mandatory equality and diversity training as part of their induction programme;
- ensure all Committee Members, employees and volunteers have equal access to training opportunities regardless of their characteristics, working pattern or contract;
- identify training and development opportunities through employee performance reviews (EPRs), employee one to one meetings, induction/ probation review meetings and corporate requirements.
- Train Managers on Diversity and encourage the use of diversity discussions in EPR's to develop employees.

7 Roles and Responsibilities

7.1 The Association is strongly committed to advancing equality of opportunity across all of its business activities and to eliminate unlawful and unfair discrimination of any kind.

7.2 **Committee Members** will:

7.3

- consider all legislative and customer commitments when reaching decisions, including those affecting business development;
- seek to ensure that all service users, employees and contractors are treated correctly under the policies of the Association and provide any necessary support; and
- take prompt action if any breach of equalities legislation by fellow Committee Members, Tenants, employees, service providers or users.

7.2.1 Recruitment of prospective Committee Members will take full account of equality and diversity issues with all reasonable steps being taken to encourage and support applications from across the community.

7.4 **Chief Officers;** i.e. the Associations Directors, led by the Chief Executive are accountable for the delivery of the Equality Strategy and for ensuring that sufficient resources are made available to deliver the strategic objectives.

7.4.1 The Director of Organisational Services is responsible for the Association's Equalities Strategy and with the support of applicable Chief Officers, the delivery of its action plan (appendix A).

7.4 **Managers;** must consider the implications of equality and diversity in any activities that they plan or carry out. They should also work to increase awareness of equality and diversity issues amongst their teams in order to ensure that colleagues fully understand their contribution to equality and diversity within the Association and how to apply it to their working practices. They will take responsibility for, in consultation with the disabled employee, for ensuring that reasonable adjustments are made as and when required to enable the employee to work safely and effectively.

7.4.1 Disabled employees will be provided with access to training and development and opportunities for promotion and other career development based solely on abilities.

7.4.2 Managers will consider making reasonable adjustments for a disabled employee or job applicant if;

- It they become aware of their disability
- They ask for adjustments to be made and/ or
- A disabled person is having difficulty with any part of their job and/ or
- Either an employee's sickness record, or delay in returning to work, is linked to the disability

7.4.3 These adjustments may include, but are not limited to; provision of specialist equipment and training, job redesign, retraining, flexible working, remote working and / or redeployment to a suitable alternative vacancy. If redeployment is necessary and is of a lesser grade or salary, the employee's salary will be protected at the original salary amount for a period of two years.

7.4.4 The Manager will request a medical report from the Association's Occupational Health Advisor to support the Management of absence cases.

7.5 **Organisational Services;** will where appropriate provide training, advice and guidance on equality and diversity legislation and regulatory requirements to Committee Members, employees and customers (via the appropriate Officers).

7.6 **Employees;** will promote and offer support in matters of equalities in the work place. All employees will be expected to:

- contribute to the development of the Association's work on equality;
- take ownership for embedding equality and diversity within the Association;
- co-operate in the implementation of this Strategy and associated action plan with support from Committee Members, Directors, line managers and Organisational Services;
- recognise that they have a duty not to discriminate against anyone in carrying out their duties;
- report any issues or incidents of bullying or harassment in line with the Association's Dignity at Work policy and procedure; and
- attend any training or development that the Association considers necessary.

7.7 **Tenants;** will have a clear duty within their 'Scottish Secure Tenancy Agreement' to have respect for others. The tenant, those living with them and their visitors, must not harass or act in an anti-social manner to, or pursue a course of anti-social conduct against, any person in their neighbourhood. Such people include residents, visitors, employees of the Association, agents and contractors and those in their house.

8 Specialist Organisations/ Commitments

8.1 External advice and support will be sought from specialist organisations; e.g. Equality and Human Rights Commission (EHRC), Scottish Federation of Housing Associations (SFHA); Investors in Diversity (iD), AgeUK, PATH (Scotland) and Stonewall, etc. as appropriate on key equality themes or perspectives, as well as to support policy development and/ or training.

8.2 The Association as part of an award winning joint working initiative with Bield and Trust Housing Associations created and now subscribe to 'Happy to Translate' (HTT) membership. This scheme allows the Association to communicate effectively if service users require language or communication assistance. The service is provided free

of charge to 'customers' in the form of confidential professional translation and interpretation provision.

- 8.3 In 2011 the Association committed to a five year lottery funded community initiative through its collaboration with Bield and Trust Housing Associations. The 'Older Peoples Project' enables older BME (Black & Minority Ethnic) people across Scotland to access a range of services from benefits to housing and other entitlements which result in an improvement in their financial circumstances and their overall quality of life.
- 8.4 The Association gains advice and support from specialist organisations when requesting advice on reasonable adjustments in the workplace; RNIB, access to work, NHS, Occupational Health etc.

9 Equality Analysis (previously Equality Impact Assessment)

- 9.1 In the formulation of new or the amendment of existing policies on employment, service delivery and procurement of services the Association will aim to ensure that no individual or group is treated less unfairly.
- 9.2 Consequently a user friendly 'Equality Analysis framework' will be developed and implemented. This will provide a systematic assessment of the likely (or actual) effects on people with any of the 9 protected characteristics identified by the Equality Act (see para 1.2, above) in order to identify any adverse effect that a policy or function may have. If any such issues are identified, the Association will take steps to eliminate or mitigate those effects, particularly if they may be viewed as discriminatory.

10 Communication

- 10.1 All employees will receive training on equalities legislation, and associated policies / procedures and good practice guidance to ensure they carry out their responsibilities. All new employees will be made aware of the strategy and action plan and instructed in their role during induction.
- 10.2 Residents, customers and other service users will be kept up to date on equality issues via Tenant/ Owner Occupier newsletters and Tenant/ Owner Occupier focus group meetings in order to gain additional knowledge, share experiences and provide feedback.
- 10.3 The Association will upon request provide a copy of this Strategy in other languages or in alternative formats, large print and audio tape.

11 Monitoring and Review

- 11.1 The Director of Organisational Services, with support from other Chief Officers, has lead responsibility for the implementation, monitoring, evaluation and review of this Strategy and objectives as outlined within the action plan (see appendix A).
- 11.2 The Association's Chief Officers and the Board will oversee progress and delivery of equalities objectives contained within this Strategy's action plan. The Director of Organisational Services will report on a regularly basis to the Chief Officers and tri-annually/ annually to the HR Committee/ Committee of Management as appropriate.

12 Conclusion

- 12.1 Equality is an integral part of the Association's business. It is a commitment to create fairness and opportunities for everyone.
- 12.2 This Strategy sets out a new approach to delivering equality. One that moves away stereotyping people as groups and instead recognises the value, needs and contributions that lie within everyone as a unique individual.

13. Legislation

- Data Protection Act 1998
- Equality act 2010
- Equality act 2010 (Disability) Regulations 2010
- Draft Equality Act 2010 (specific duties) Regulations 2011
- Equality Act 2010 guidance on matters to be taken into account in determining questions relating to the definition of disability