



POLICY

Subject/Title: Equality & Diversity

Business Units: The Community Housing Group & all Subsidiaries

Date of Document: June 2009

Date of Next Review: June 2012

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1.00 INTRODUCTION

1.01 The Community Housing Group Ltd (hereafter referred to as TCHG, or the Group) as the Parent Company of the Group of companies including Wyre Forest Community Housing Ltd [WFCH], Worcestershire TeleCare [WTC] and Wyre Forest Sheltered Housing Ltd [WFSH]) is fully committed to incorporating the twin key principles of equality of opportunity and respect for diversity throughout its business. The Group is committed to ensuring that no individual or group is discriminated against.

1.02 WFCH and WFSH are both providers of good quality rented homes and services to residents throughout the Wyre Forest area. The Group is also a very significant employer in the local community.

1.03 TCHG is dedicated to conducting its business in accordance with the statutory requirements set out in:

- (i) Acts and regulations regarding equality and diversity
- (ii) Codes of practice and guidance issued by the Government, the Tenant Services Authority (TSA), and other relevant agencies
- (iii) Guidelines from our Internal and External Auditors

where these set out our responsibilities to each other and to our current and future customers in terms of race, nationality or ethnic origin, disability, age, gender, marital status, sexual orientation, religious belief, cultural background (to include travellers), caring responsibilities, sexual health or HIV status.

1.04 The Group therefore aims to

- (i) Promote equality of opportunity and respect for diversity, and
- (ii) Identify and eliminate unlawful discrimination

across all its business activities, including those occasions where we interact with our customers, partners, contractors, other agencies and

the public, as well as with future customers and applicants for our services.

- 1.05 TCHG also firmly believes that no one it employs should have to suffer unfair or unequal treatment from other staff members, or from bodies or individuals with whom the Company works or provides services to. It will therefore adopt appropriate guidance to deal with such matters.

2.00 DEFINITIONS

- 2.01 **Equality** – Equality between individuals, where everyone has the same opportunities. No-one should be discriminated against because of their sex, ethnic background, age, disability, sexuality or religious belief.
- 2.02 **Diversity** – Valuing the fact that individuals are different. Recognising that people with different backgrounds, skills and attitudes bring fresh ideas and opinions.
- 2.03 **Direct Discrimination** – Deliberately setting out to exclude people by setting conditions which are different for men and women, ethnic groups, and those with a disability, which cannot be justified.
- 2.04 **Indirect Discrimination** – When a condition or practice is put in place that disadvantages a person or group of people compared with others in the same group.
- 2.05 **Harassment** – Unwanted behaviour that violates a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive home/working environment.
- 2.06 **Victimisation** – Less favourable treatment of a person because they have been involved or brought legal proceedings against individuals or organisations.

3.00 AIMS AND PURPOSE OF THIS POLICY

- 3.01 TCHG is dedicated to demonstrate that the twin concepts of equality and respect for diversity are fully embedded in all our work. Should the Group *not* comply with the legal requirements regarding equality and diversity, of course, it could be challenged by users, which could result in legal and reputational risk to the Group.
- 3.02 This Policy covers all aspects of housing, providing services, employment and other areas of work.
- 3.03 Our aim is that our residents, Board and Regional Committee Members, contractors, forums and staff reflect the communities in which we work.

We have created our Equality and Diversity Policy and the measures to put it into practice on the basis of advice from the relevant

organisations, reflecting best practice, and through consultation with residents and the Staff Committee.

3.04 **The General Parts of the Policy**

- In providing housing services and jobs, we will aim to get rid of all discrimination and make sure we treat everyone equally.
- We will not treat anybody applying for housing, receiving services or working for us less favourably than anyone else.
- To make sure that this policy is operating effectively (and for no other purpose) we will keep records of residents, contractors we work with, employees, job and housing applicants. Information collected on staff and job applicants includes their race, sexuality, religious beliefs, sex and any disability. Ongoing monitoring allows us to take appropriate action to get rid of discrimination, victimisation or harassment and promotes equal opportunities.
- We will set targets and collect and monitor information on equal opportunities from all those applying for housing, receiving services or working for us so we can prevent discrimination.
- We will set targets for improving the number of people from groups in the communities that we identify as being under represented in terms of residents and our workforce. If we need to, we will take positive action to help disadvantaged or under represented groups to find housing or compete for jobs and provide services on a genuine basis of equal opportunities
- We will take positive action when we need to, to allow members of a minority group to receive equal opportunities in housing, services and work.
- The members of the Boards, Committees, and Resident Forums will aim to reflect our commitment to equal opportunities. Following our equal opportunities policy is essential for a Tenants' and Residents' Group to be recognised as well as contractors who have reached partnership status with us.
- All main contractors, consultants and other agencies we hire will have adequate equal opportunities policies, appropriate targets for representing minority groups within their workforce and systems for monitoring and reporting progress. If we discover unlawful discrimination, we will do everything possible to influence the partners, consultants, contractors or suppliers to take action and we may review our agreements with them.

- We will take effective action to tackle victimisation and harassment and we will always place the victim at the centre of what we do. We will provide support to residents and will follow the processes in the various resident centred harassment policies. Additionally, our staff and our named partners will follow all of our Harassment and Victimisation policies and procedures that apply to the service they provide, and will provide extra support through our various assistance programmes to help employees.
- To make sure people have equal access to services, we provide access to an interpreting service and translate policies and documents to meet people's needs. Staff with a second language, volunteer their services as interpreters at the first point of contact to help residents whose first language is not English. Our offices are accessible, and we aim to build all new housing in line with the National Strategy for Lifetime Homes. We will make sure there is equal access to information and services by providing appropriate facilities and equipment in our offices. We will continue to consult with residents and stakeholders to ensure that our Development programme helps us to meet our stated aim in the Business Plan.

3.05 **Access to Housing**

- In providing services to our clients, we will:
 - (a) Make sure our properties are let through a system that aims to produce a fair assessment of housing need and to prevent prejudice or discrimination, and
 - (b) Make sure we deal with complaints promptly, fairly and without discrimination.

3.06 **Employment**

This section of the Policy makes sure we keep to the Commission for Racial Equality's, the Disability Rights Commission's and the Equal Opportunities Commission's codes of practice for employment.

- (i) **Advertising Jobs**
 - Wherever possible, we advertise all jobs both inside the organisation and to the public at the same time.
 - We will take steps to make sure that under represented groups know about all our vacancies.
 - All advertisements will include an appropriate short statement on equal opportunities.
- (ii) **Selection and Recruitment**
 - We will constantly review our candidates for selection (job description and employee specification) to make sure we can

justify them as essential for the effective performance of the job.

- More than one person must be involved in the selection process, and all should have received training in recruitment skills and awareness of equal opportunities.
- Wherever possible, we will involve women, people from ethnic minorities and disabled people in the shortlisting and interviewing processes.
- We will record our reasons for choosing and rejecting applicants for jobs.

(iii) **Positive action – training, promotion and conditions of service**

- We will encourage under represented groups to apply for training and employment opportunities with us.
- Wherever possible, we will provide special training for these groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, the people we choose will be chosen strictly on merit.
- Wherever appropriate, we will use legal exemptions (genuine occupational needs) to recruit suitably qualified people to cater for the special needs of particular groups.
- Wherever possible, we will try to identify and remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under represented groups.
- We will monitor training and career development to make sure we are fair.

(iv) **Staff records**

- To make sure our Equality and Diversity Policy is fair (and for no other purpose), we will keep a record of all employees' and job applicants' sex, age, sexuality, religious beliefs, ethnic origins and disability.
- Each year, employees will be able to check or correct their own records. Otherwise, we will restrict access to this information in line with the data protection regulations.
- We will analyse these records regularly and take appropriate follow-up action.

(v) **General**

The aims of the employment section are to:

- Make sure that we have access to the widest range of people and get the best employee for the job;
- Make sure that no applicant or employee receives less favourable treatment and that, wherever possible, we give them the help they need to reach their full potential;

- Achieve a workforce based on ability, which is in line with the working population in the communities in which we work;
- Make sure all staff co-operate in this policy; and
- If there any breaches to this policy, appropriate action will be taken against that person.

4.00 IMPLEMENTATION

- 4.01 The Group have set up an Equality and Diversity Monitoring Group to make recommendations to the Board, Executive Management Team and Service Teams on equality and diversity issues. The Monitoring Group includes representatives from all service areas and the Board Equality and Diversity Champion.
- 4.02 The Equality and Diversity Monitoring Group will ensure that all Service Teams establish annual work programmes and Action Plans which address the Group Equality and Diversity Targets within the Business Plan.
- 4.03 The Equality and Diversity Monitoring Group will be responsible for monitoring the Equality and Diversity Action Plan targets and reporting the outcomes against these targets to the Board(s).
- 4.04 This policy and its supporting statements and policies will be published to other agencies and groups with an interest in Equality and Diversity matters that work with the Group.

5.00 CONSULTATION

- 5.01 When new or revised policies, services or developments are being considered we will carry out an Equalities Impact Assessment and where there are issues of equality or diversity, appropriate consultations will be undertaken with relevant customers, communities, staff and stakeholders. Points raised by the consultation will form part of the report to Board(s) before plans are finalised.

6.00 STANDARDS OF DELIVERY

- 6.01 TCHG will publish its annual work plan and any equality and diversity Action Plans, containing key targets, by making the work plan and Action Plans available on its Intranet, with hard copies made available to those who do not have access to the Intranet.
- 6.02 This policy will be included on our internet site.
- 6.03 Copies of the Action Plans and performance will be made available to our key stakeholders, and to the Tenant Consultative network, Customer Scrutiny Panel, as well as any parties we have consulted during the preparation of the Action Plan in question.

7.00 EQUALITY AND DIVERSITY/TRAINING

7.01 TCHG is committed to Equality and Diversity and has an appropriate policies and procedures in place.

7.02 All Board Members, employees and contractors are committed to promoting and following an Equality and Diversity policy in relation to this policy.

7.03 All relevant employees will receive appropriate training in the effective implementation of this policy.

8.00 RESPONSIBILITY

8.01 The Managing Director will chair the Equality and Diversity Monitoring Group and be responsible for ensuring that all staff members of the Group are aware of this policy and that they have received appropriate training.

8.02 Managers are responsible for ensuring staff are aware of and understand this policy and its supporting procedures and code of conduct.

8.03 Staff are responsible for ensuring that they understand this policy and its supporting procedures and code of conduct.

8.04 The Equality and Diversity Monitoring Group will develop, review and monitor this policy and will be responsible for referring to Board for approval.

8.05 The Equality and Diversity Monitoring Group along with the relevant service managers will be responsible for monitoring the delivery of Action Plans against agreed targets and reporting performance to Board(s).

9.00 REVIEW

9.01 This Policy will be reviewed tri-annually by TCHG unless:-

- There are significant changes to legislation or regulation
- There are found to be deficiencies or failures in the Policy as a result of complaints/customer feedback or findings from any independent organisations
- Any changes to the Business Plan, Internal and External Audit, Risk Assessment and current Best Practice

10.0 ASSOCIATED DOCUMENTS

Internal

- Code of Conduct for Board Members
- Code of Conduct for Contractors

- Code of Conduct for Tenant Representatives
- Confidentiality Policy
- Data Protection Policy
- Domestic Violence Policy
- Employee Code of Conduct
- Employee Handbook
- Equipment and Adaptations Policy
- Harassment Policy
- Nuisance and ASB Policy
- Recruitment and Selection Procedure
- Resident and Involvement Policy/Compact
- Services for Older and Vulnerable People Policy
- Tenants Handbook
- Whistle Blowing Policy

External

- Anti Terrorism, Crime and Security Act 2001
- Audit Commission Key Lines of Enquiry on Diversity (KLOE)
- Code of Practice on Age Diversity in Employment
- Commission for Racial Equality Codes of Practice - Employment and Rented Housing
- Crime & Disorder Act 1998
- Criminal Justice and Public Order Act 1994
- Disability Discrimination Act 1995 and 2005
- EC EQUAL initiative
- Employment (Equality) (Age) Regulations 2006
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Relations Act 1999
- Equality in Housing– A Code of Practice (NHF)
- Equal Pay Act 1970
- Equal Pay (Amendment) Regulations 1983
- Equality Act 2006
- Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Framework for Excellence in Equality and Diversity (FEED) - Based on the Business Excellence Model
- Housing Acts 1988 and 1998
- Human Rights Act 1998
- Part time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Protection From Harassment Act 1997
- Race Relations Act, 1976
- Race Relations Act 1976 (amendment) Regulations 2003
- Race Relations (Amendment) Act 2000
- Race Equality - A Framework for review and action. J Jeffrey & R. Seager

- Rehabilitation of Offenders Act 1974
- Sex Discrimination Acts 1975 & 1986
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Tenant Services Authority: Circular 10/07 – Housing Association Disability and Gender Action Plans
- Tenant Services Authority Good Practice Note 8: Equality and Diversity 2007
- The Challenge Report
- The Civil Partnership Act 2004
- The Gender Recognition Act 2004
- Towards Equality and Diversity (Dec. 2001)

Equality and Diversity