



Equality and Diversity Policy

1. Introduction

Manor Estates Housing Association is committed to promoting an environment of respect and understanding; encouraging diversity and eliminating discrimination by providing equality of opportunity for all. Throughout the Association there will be a consistent approach to promoting equality and diversity in all aspects of our work – as a landlord, an employer, a provider of services, a purchaser of goods and services and through our dealings with other organisations.

The Equality Act 2010 was introduced to bring together all relevant previous legislation. This policy complies with the current legislation and promotes a culture of dignity and respect for all. In all areas of our activity no-one will be treated less favourably on the basis of unfair criteria but specifically the nine protected characteristics specified in the Act:

- Age
- Being or becoming a transsexual person
- Being married or in a civil partnership
- Being pregnant or having a child
- Disability
- Race, including colour, nationality, ethnic or national origin
- Religion, belief or lack of religion/belief
- Gender
- Sexual orientation

We will not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation. Management Committee members and everyone who works for us or with us are required to abide by this policy and support us in its application.

2. Definitions

Diversity: means valuing individual differences. It is concerned with recognising and embracing the backgrounds of different people, their skills, attitudes and experiences and being open to them and welcoming fresh ideas and views that will benefit the organisation.

Equality: means making sure people are treated fairly and given fair chances. It is not about treating everyone in the same way but recognising people's different needs may have to be met in different ways. Equality focuses on those areas covered by the law and described as protected characteristics.

Direct Discrimination: means treating someone less favourably than others based on them belonging to one of the groups covered by the Equality Act 2010.

Indirect Discrimination: occurs where a policy, procedure, provision or criteria applies to everyone in the same way but might disadvantage a particular protected group and cannot be objectively justified

Associative Discrimination: means discriminating against a person because they have an association with someone with a protected characteristic. For example, a non-disabled person is discriminated against because of the action they need to take to care for a disabled dependent.

Perceptive Discrimination: means discrimination against a person because the discriminator thinks the person possesses that characteristic. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct Visa to work in the UK as they have a foreign looking name on their application form.

Harassment: means conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment for that individual. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

Victimisation: means treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

Positive Discrimination: means giving advantages to groups in society which are often under represented. Positive discrimination is illegal in the UK.

Positive Action: means addressing imbalances in the workforce by encouraging members of underrepresented groups to apply for jobs. Positive action may be applicable in setting equality targets.

Failure to make Reasonable Adjustments: this is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

3. Policy Principles

This policy aims to promote equality and diversity in all aspects of our business and applies to everyone in the organisation. All have a responsibility to be alert to discriminatory behaviours and practices should they occur. Our commitment to equality and diversity is clearly set out in our respective Codes of Conduct for Management Committee members and staff.

Unacceptable behaviour and practices will not be tolerated and will be dealt with immediately should this be required. Breaches of the equality and diversity policy will be regarded as misconduct and will lead to disciplinary action which may include dismissal.

The Association's Management Team is responsible for this policy's day to day implementation. The organisation will ensure that all new members of staff or the Management Committee receive induction on this policy. The policy will be widely promoted and integrated into all policies and procedures within the organisation and copies of the policy will be freely available.

4. Implementation

This policy will be implemented across all our areas of activity.

Access to services

We are committed to ensuring all customers can access our services and to make sure this happens in practice we will:

- Aim to ensure that all members of the community are aware of the services we provide and how to access them.
- Regularly review the extent to which all our services are accessible to current and prospective customers. This includes access to our office, other facilities and the ways in which we provide information to customers.
- Identify any individual requirements that may need to be met to enable a customer to fully access our services and will record such information in our Special Considerations Register.
- Ensure that all written material is clear 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
- Make appropriate translation services available to service users as required through our membership of Happy to Translate

Provision of services

We provide and manage housing and deliver services to a wide range of customers. To implement this policy in our role of service providers we will:

- Be aware of, and proactive about, managing the diverse needs of customers to ensure we are able to provide the right services to meet the right needs.
- Aim to meet the needs of our customers by creating a work culture which values diversity, inclusiveness and respect. Our staff will reflect these values in their dealings with customers
- Ensure we comply with the requirements of the Scottish Social Housing Charter which requires that we perform all aspects of our 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
- Provide customers with clear and accurate information about the services we provide.
- Ensure that anyone applying for housing is dealt with fairly and without discrimination. We will adhere to our Allocations policy and monitor the outcomes and the service we provide to tenants and applicants. The Association is a member of EdIndex which operates the common housing register for Edinburgh. All members of EdIndex endorse and implement the principles of this policy.
- Ensure that any new housing we build complies with the basic criteria of Housing for Varying Needs as far as possible
- Assist tenants in identifying adaptations they may require to continue living in their home and provide these within the funding available
- Recognise that harassment is a serious breach of tenancy and if it occurs we will deal with it appropriately through our policy on Anti-Social Behaviour
- Consult customers on any proposed changes to services, policies and procedures which affect them. We will be aware of the variety of individual needs and use a range of methods to consult individuals and groups

Employment

As an employer, we will ensure that:

- We integrate equality and diversity practices into all we do, and ensure that staff are treated with fairness and respect by each other and by customers, Management Committee members and contractors

- We implement fair and just employment practices ensuring that no job applicant or member of staff will receive less favourable treatment on any grounds
- Staff are not discriminated against or disadvantaged by any conditions or requirements which cannot be shown to be relevant to work performance.
- People are recruited and promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions are based solely on relevant criteria
- We operate a fair recruitment process which removes barriers where possible to the employment of people of different backgrounds. This will enable us to recruit from the widest pool of talent and increase the opportunity for a more diverse workforce
- All vacancies are advertised as widely as possible taking account of cost considerations. We will ensure that recruitment information is clear and application forms are free from personal questions that are not relevant to the vacancy and could lead to discrimination
- All staff involved in the recruitment process are fully aware of this policy and have appropriate training and guidance.
- Terms and conditions of employment for all staff will be in line with the standard set by EVH in consultation with the recognised trade union (except where TUPE prevents this)
- We provide an environment appropriate to the needs of those from all backgrounds and ensure a culture that respects and values difference and promotes dignity, equality and diversity.
- We keep the workplace free from any form of discrimination or harassment and have policies and procedures in place to deal with these if they arise.
- Training and development opportunities will be given to all employees according to their job role and in agreement with their line manager through the staff appraisal system

Contractors:

- We will ensure that all contractors and consultants we work with comply with the Equality Act. Before we admit contractors and consultants to our approved list we will ask them to provide a copy of their equalities policy or confirm that they will adopt our policy. We have included a commitment to equality and diversity in our Code of Conduct which all contractors must accept before carrying out any work for the Association.

Governance:

- We have an open membership policy which welcomes all sections of the community. We will attempt to ensure membership of the Association and the Management Committee is representative of all sections of the community as far as this is achievable.

Complaints:

- We will respond quickly to any complaints that involve allegations of discrimination or harassment and ensure these are dealt with in line with agreed timescales. Complaints will be monitored to ensure any equalities issues are highlighted and reported.

5. Action Plan

The main method through which we put this policy in effect is through developing an equalities action plan each year. This will identify the actions we need to take and how we will monitor the outcomes of the policy. Over the next three years, the action plan will focus on a series of equalities impact assessments. The traditional approach to conducting impact assessments involved considering how an individual strategy, policy or procedure was likely to impact on individuals or groups of people within the protected characteristics identified in the Equalities Act. Having carried out such analyses in the past we found they had little practical application.

Our new approach to equalities impact assessments will look at different aspects of service delivery from the customer perspective. This will enable us to identify whether any equalities issues are likely to arise during the process of service delivery. This approach asks whether there is any impact on the different equalities groups of how we deliver services in practice. We believe this is a more comprehensive approach which can take account of the real experience of customers and staff.

**Originator: Lynn McDonald
February 2016**