



Equalities & Diversity Policy

Policy Title:	Equalities & Diversity Policy
Risk Priority:	Medium
Policy Author:	Kenny Stocks
Date of Approval:	4 th April 2017
Date for Next Scheduled Review:	April 2020
Review Body:	Board
Equality Impact Assessment Complete:	Yes
Policy Published on Web:	Yes
Scottish Social Housing Charter Standard	N/A
Scottish Housing Regulator Standard:	5
Scottish Housing Regulator Guidance:	5.3

Equalities & Diversity Policy

Ardenglen Housing Association can provide this procedure on request, in large print, in Braille, on tape or in other non-written format, and in a variety of languages.

1. Introduction

- 1.1 The Ardenglen Group ('the Group'), comprising Ardenglen Housing Association as the parent and Ardenglen Developments as a subsidiary, is committed to the highest standards of openness, probity and accountability.
- 1.2 Regulatory Standard 5 states that an RSL must "*conduct its affairs with honesty and integrity*". To ensure this, the Association has clear policy and procedures in place which make sure the organisation acts with transparency, honesty and propriety and avoids any public perception of improper conduct.
- 1.3 Ardenglen believes in providing a caring honest environment for customers and colleagues that promotes equality and diversity, tackles discrimination and values openness and accountability. We aim to treat people as we would wish to be treated ourselves.
- 1.4 We aim to ensure that all applicants, residents, employees and other customers receive fair treatment, free from direct or indirect discrimination on any grounds
- 1.5 We aim to ensure that our services are effectively tailored to the needs of our existing and future customers and that all section of the community has equal access to those services
- 1.6 Throughout Ardenglen there will be a consistent approach in promoting equality and diversity across all areas, including the entire employment relationship from the recruitment process to termination and references.
- 1.7 All employees are required to abide by this policy. This policy also covers discrimination by and towards members of the public, governing body, members, contractors and staff from other agencies.

2. Why Equality & Diversity Matters

Ardenglen is firmly committed to the principles of equality and diversity. We believe it really matters for the following reasons:-

2.1 Moral Grounds

The principles of equality and diversity are about social justice and fairness. Simply put, they are the right things to do!

2.2 Business Grounds

These can be summarised as follows:-

- Customer Care – equality and diversity is all about customer care, it is knowing customers and tailoring services to meet their diverse needs
- Changing Society – the world in which we live is changing and a forward thinking organization must recognize and respond to these changes.
- Recruitment & Retention – inclusive workplaces become employers of choice in competitive markets, attracting and retaining the best talent and reducing staff turnover
- Competitive Edge – diverse teams bring different talents and can recognize the diverse requirements of new customers and new markets
- Reputation - Inclusive work environments encourage loyalty, teamwork and maximize personal contributions and development
- Risk Management- we recognise that tribunals and legal actions have both personal, reputational and financial cost implications.

2.3 Personal Grounds

- We are all human beings and expect to be treated with equal respect
- During our lives we all have different experiences. We all have a young person within us and we are all ageing
- We all perform better when we can be open and be ourselves
- We know that any of us could become disabled at any time

2.4 Legal and Regulatory Grounds

The Equality Act 2010 applies to Ardenglen both as an employer and as a service provider of affordable housing. As such we have a legal requirement to comply, subject to wide ranging sanctions for any subsequent breach.

As a provider of social housing, Ardenglen works in a regulated sector. The Scottish Housing Regulator specifies the requirements for Housing Associations through their Regulatory Standards and Guidance framework.

Standard 5.3 confirms that:

“The RSL pays due regard to the need to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics in all areas of its work including its governance arrangement”

Ardenglen therefore self assess our performance against both the legal and regulatory requirements.

3. Legislative Framework

3.1 Tackling inequality is not something new. UK and Scottish Governments have been addressing equality and diversity issues for many years. Although progress has been made, inequalities still exist in Scotland and in the UK.

3.2 As the Government continues to tackle discrimination, promote equality, address inequalities and inconsistencies that were present in the previous discrimination legislation, the **Equality Act 2010** was introduced. The introduction of the Equality Act 2010 saw previous discrimination legislation abolished and replaced with one single piece of legislation. This policy will be compliant with the current legislation and promote a culture of dignity and respect for all.

4. Definitions

4.1 Protected Characteristics

There are nine protected characteristics. These are the grounds on which discrimination is prohibited by law. Claims cannot be made on any other grounds other than:-

- Age
- Disability
- Gender reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

4.2 Diversity

Is concerned with valuing and managing people’s individual differences. It is recognizing and embracing the backgrounds of different people, their skills, attitudes and experiences and being open to them being able to bring fresh ideas and view that will enhance Ardenglen.

4.3 **Equality**

Means making sure people are treated fairly and given fair chances. It is not about treating everyone “the same” way, but recognizing that different needs may have to be met in different ways

4.4 **Direct Discrimination**

Occurs when a person is treated less favourably than others are or would be treated and that is because of a protected characteristic.

An example would be refusing to give someone housing advice because of their sexual orientation.

4.5 **Indirect Discrimination**

Occurs where a policy, criterion or practice applies to everybody, but has a disproportionate impact on people with a protected characteristic.

An example would be not letting properties to people under a certain age because it is believed that such people generally act in an anti social manner.

4.6 **Associated Discrimination**

Means discriminating against a person because they have an association with someone with a particular protected characteristic.

An example would be a non disabled person not being given a job, despite being the best candidate, because they have a disabled partner.

(Does not apply to Marriage and Civil Partnership)

4.7 **Perceptive Discrimination**

Means discrimination against a person because the discriminator thinks the person possesses that characteristic.

An example would be not short listing a person for a job interview because 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.

(Does not apply to Marriage and Civil Partnership)

4.8 **Harassment**

Means unwanted behavior related to a protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive 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.

An example might be displaying a topless calendar in a canteen used by all staff.

(Does not apply to Pregnancy & Maternity or Marriage and Civil Partnership)

4.9 **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 behavior of someone harassing them or given evidence in someone else's discrimination.

An example might be refusing to consider someone for promotion because they gave evidence on behalf of a colleague who had complained of unlawful racial discrimination.

4.10 **Positive Discrimination**

Means giving advantage to groups in society which are often underrepresented. Positive Discrimination is illegal in the UK

4.11 **Positive Action**

Positive action enables employers and providers of services to take steps to help particular groups experiencing disadvantage, or even increase engagement with those groups.

Through positive action, the Act makes it lawful to take measures that involve different treatment of various equality groups, which would otherwise be unlawful.

An example might be encouraging applications to become Board members from suitably experienced/qualified people from under-represented groups, for example, encouraging applications from people from different ethnic groups, if those groups are insufficiently represented.

It is important to note that positive action initiatives can **only** be adopted where they can demonstrate that the group that will benefit is currently underrepresented on its governing body, in its workforce or with regard to a particular service. The initiative should stop when the under-representation has been addressed.

4.12 **Failure to make Reasonable Adjustments**

It is comprised of 3 requirements which apply where a disabled person may be placed at a substantial disadvantage in comparison with non disabled people.

- The first requirement covers changing the way that things are done (such as changing a working practice)
- The second covers making changes to the built environment (such as providing access to a building)
- The third covers the provision of auxiliary aids and services (such as providing a hearing induction loop)

5.0 Policy Principles

The Equality and Diversity Policy aims to:

- Ensure that all employees are treated with fairness and respect and are not discriminated against or disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance. We will therefore ensure all employees are provided with equality of opportunity in the course of their employment.
- Ensure the integration of equality and diversity practices into everything we do, and ensure that employees are treated with fairness and respect from each other and from members of the public, Board members and contractors.
- Require us to implement fair and just employment practices, ensuring that no job applicant or employee will receive less favourable treatment.
- Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment, as all decisions will be based on only relevant merits.
- Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.

6.0 Policy Implementation

6.1 We are responsible for the policy's day to day implementation.

- 6.2 We will ensure that all new employees and Board members receive induction on this policy. The policy will be widely promoted and integrated into all our policies and procedures. Copies of the policy will be available on our website.
- 6.3 Appropriate training and guidance will be available to promote equality and diversity among existing staff.
- 6.4 As part of our commitment to Equalities & Diversity, we have adopted a Disability Policy Statement – **Appendix 1**, which has been approved by the Employment Service as a Disability Symbol User.
- 6.5 We will produce an Equalities Action Plan and will set a budget for its implementation. The Action Plan will be set for the first year of implementation of this policy and thereafter will be reviewed annually – **Appendix 2**.
- 6.6 We will produce a summary statement of this policy and the Equalities Action Plan. This will be made available to tenants, applicants, the general public and interested organisations – **Appendix 3**.
- 6.7 This policy applies to everyone and all have a responsibility to be alert to discriminatory behaviours and practices when they occur. Unacceptable behaviour and practices must not occur, however if or when a situation arises it will be dealt with immediately, as inaction is not an option. Breaches of the equality and diversity policy will be regarded as misconduct, which could lead to disciplinary action, which could include dismissal.

7.0 Access to Services

- 7.1 We will, as far as practical, make sure that access to our premises, meetings and housing complies with the provisions of the Equalities Act 2010.
- 7.2 We will take positive action to make sure that all members of the community are aware of the services we provide and how to access them.

8.0 Provision of Services

- 8.1 In providing and managing housing and delivering service to customers, we will ensure equality of opportunity in relation to the quality of housing, access to housing, policies relating to harassment and nuisance, provision of services and complaints.
- 8.2 In developing new houses, we will provide housing wherever possible that complies with the basic criteria of Housing for Varying Needs. We will continue to support positive action to address identified housing needs within particular equalities groups and to provide housing opportunities reflecting the diversity of the local population.

- 8.3 We will endeavour to ensure that all written material is clear, simple 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.
- 8.4 We will ensure that the content of our website is easily accessible to all our service users and stakeholders.
- 8.5 We will make all reasonable efforts to ensure that appropriate translation services can be accessed by our service users as required.
- 8.6 We recognise that harassment is a serious breach of tenancy and if it occurs we will make sure that it is dealt with appropriately (we have a separate policy that sets out how we take action on this).
- 8.7 We will engage in regular consultation with service users, and encourage tenants to be involved in our activities.

9.0 Referral Arrangements

- 9.1 We will establish referral arrangements with appropriate agencies. When considering an application from such an agency, we will aim to ensure that their Equalities & Diversity policy is consistent with our own. If an agency does not have such a policy or fails to meet the required standards, we will encourage them to comply with our own Equalities & Diversity policy.

10.0 Contracting Role

- 10.1 We will ensure that all contractors comply with relevant Health & Safety, employment and Equalities & Diversity legislation.
- 10.2 When we receive an application to our list of contractors or consultants, we will ask the applicant to provide a copy of their Equalities & Diversity policy or confirm that they will abide by our own policy.
- 10.3 We will ensure that where practicable, a wide range of contractors and consultants provide services.
- 10.4 We will include equality clauses relating to the behaviour of the contractor and their employees when we award a contract. If required, we will offer training to contractors and their staff to ensure that they reflect the ethos of the organisation.

11.0 Governance

- 11.1 We will aim to ensure that membership and participation in our affairs is open to everyone.

- 11.2 We will ensure that we have the range of skills and expertise required to lead AHA and that we regularly review the range of skills and expertise the Board has or requires and will base our succession and recruitment strategies on this assessment.
- 11.3 We will provide regular training to our Board members on equalities and diversity awareness and practice.

12.0 Recruitment & Selection

- 12.1 All recruitment decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.
- 12.2 A fair recruitment process will remove barriers where possible to the employment of people of different backgrounds. This will enable us in recruiting from the widest pool of talent, potentially raising the standard of the intake and therefore increasing the opportunity of a more diverse workforce which reflects the community we serve. A more diverse workforce should improve our service delivery, as it will include staff with more knowledge and experience about meeting the needs and aspirations of service users and potential service users.
- 12.3 To highlight our commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with an application.
- 12.4 For those that wish to apply we will ensure that all applications will have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that could otherwise lead to discrimination.
- 12.5 We will ensure all staff involved at any stage in the recruitment and selection process are fully aware of our equalities and diversity policy, and will provide regular training to all staff on equalities and diversity awareness and practice.

13.0 Terms & Conditions of Employment

- 13.1 As part of the employment relationship covered under this equality and diversity policy all contracts of employment will be issued in accordance with the job role and not the job holder.

13.2 Employee's terms and conditions will be standard for all employees (except where TUPE prevents this). Employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and the grade it attracts, or because existing Terms and Conditions prevent this.

14.0 Training & Development

14.1 Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role and in agreement with their line manager.

14.2 It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image of and equality of opportunity.

15.0 Redundancy & Selection

15.1 Redundancy selection will be made according to the statutory requirements and in line with our Redundancy Policy. Criteria will be discussed with the Trade Union and/ or nominated representatives. The criteria will be set out and will be objective, fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

16.0 Harassment & Victimisation

16.1 We will deal with complaints of discrimination and harassment with particular care, sensitively and effectively. We will protect any employee from victimisation if they raise such a grievance, see **Appendix 4**.

16.2 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 our grievance procedure.

16.3 Issues of harassment of tenants will be dealt with through our Anti Social Behaviour Policy.

16.4 Staff will be expected to comply with our Staff Code of Conduct at all times.

17.0 Support & Counselling

17.1 We provide a confidential Employee Counseling Service and also our recognized Trade Union which is Unite. Information on the Counseling service and how to become a member of the union is provided to all employees at induction.

18.0 Discrimination involving members of the public, Board Members, Contractors & Staff from other agencies

- 18.1 The right to be treated equally with dignity and respect extends to outside contractors, Board members and other agencies whilst at work. They can complain and the complaint will be investigated by us and appropriate action will be taken.
- 18.2 Employees also have a right to complain if they feel they are being discriminated against by those not directly employed by us.
- 18.3 If a staff member or colleague feels that they are being discriminated against in the course of their working day from any of the above, the procedure set out in **Appendix 5** should be adopted.

19.0 Employee & Board Members Responsibilities

- 19.1 Whilst we aim to maintain high standards in Equalities & Diversity, we recognise that the existence of a policy in itself does not guarantee or provide equality in access, opportunity or outcome, and that the success of the policy depends on the degree of commitment in practice of all Board Members and staff.
- 19.2 The Board has the overall responsibility for ensuring that this policy is implemented across all areas of our activities.
- 19.3 The Director is responsible for the day-to-day implementation of this policy and is responsible for ensuring that Managers implement the policy within their departments. They are also responsible for ensuring that our policies, procedures, publications, information material, advertisements and application forms do not contain any statements or conditions which would breach this policy.
- 19.4 We expect all Board Members and staff to:
- apply the policy in their activities and work for the Group
 - challenge any discriminating behaviour they become aware of
 - report to a Manager, or to the Director, any instances of actual discrimination

20.0. Equality Impact Assessments

An Equality Impact Assessment involves assessing the likely or actual effects of policies or services to our customers or employees in respect of their disability, age, gender, race, religion/belief, sexual orientation or gender identity to ensure equal and fair access for all.

It helps us make sure the needs of people are taken into account when we develop and implement a new policy or service or when we make a change to a current policy or service.

Equality Impact Assessments will be made publicly available.

Our procedures are detailed in **Appendix 7**

21.0. Training

The Association through its Internal Management Plan is committed to training and developing staff and committee members to their full potential in order to deliver a high quality of service in all areas.

Induction training will be provided to all new Committee members and updates as required to existing members.

22.0 Equalities and Diversity

This policy is subject to an Equality Impact Assessment to assess the likely or actual effects of the policy to our customers in respect of their disability, age, gender, race, religion/belief, sexual orientation or gender identity to ensure equal and fair access for all.

22.0. Review

This Policy will be approved by the Board. It will be reviewed every three years unless amendment is prompted by a change in legislation, or monitoring and reporting reveals that a change in Policy is required sooner.

23.0. Distribution

This policy will be provided to every employee and committee member and will be made freely available to any tenant, member or interested party.

24.0. Legal Framework

- The Equality Act 2010

25.0. Related Policies

- All Policies and Procedures

--- End of Policy ---

Disability Symbol Policy Statement

1.0 Introduction

Equalities & Diversity Policy: Approved by Board 04/04/17

As part of our commitment to Equalities & Diversity, Ardenglen is registered with the Employment Service as a Disability Symbol User. Using the sign is a positive step, it will give a clear message to those with disabilities that we will recognise and make the most of their abilities, wherever possible.

2.0 Commitments

Our use of the symbol will let people with disabilities know that, as a minimum, we have made the following commitments to help them develop their job and career opportunities:

- **A Guaranteed Job Interview:** We will offer an interview to all applicants with a disability who meet the essential criteria for a job vacancy. They will be considered on their abilities.
- **Consulting Disabled Employees Regularly:** Any employee with a disability will be asked, at least annually, what we can do to ensure they are able to use and develop their abilities at work.
- **Keeping Employees If They Become Disabled:** If an existing employee should become disabled, we will make every reasonable effort to ensure they can stay in employment.
- **Improving Knowledge:** We will provide regular opportunities, formal and informal, for staff to develop their knowledge and awareness of disability issues. This includes training as part of Equalities & Diversity education, so that staff may fulfil the commitments of this Statement.
- **Checking Progress and Planning Ahead:** Each year we will:
 - review these commitments and what has been achieved
 - examine ways to improve on the commitments, if possible
 - keep all staff advised on progress made, and future plans

3.0 Conclusion

We believe it is right to display the Disability Symbol, as:

- it makes sense to have the widest possible choice when recruiting or developing staff. If disabled people were excluded, the best person for the job might be missed; and
- by having and implementing good employment policy and practices on disability, all existing employees will be treated fairly, should they become disabled.

--- End of Appendix 1 ---

Equality & Diversity Policy

Appendix 2

Equality & Diversity Action Plan 2016-17

Ref	Action	Responsibility	Target Date
ED1	Ensure that a review of the Equalities and Diversity Policy is included in the staff ongoing induction Programme	CEO	Complete

ED2	Ensure updated Equalities and Diversity Policy is on the website	BSO	Complete
ED3	Ensure all policies are reviewed in line with the Equalities Act 2010	SMT	Complete
ED4	Publish summary statement in Tenants' newsletter	SMT	Complete
ED5	Review Equalities budget to ensure it is sufficient for implementation of the Equalities Action Plan	Finance Manager	Mar 2017
ED6	Undertake Equalities & Diversity training for staff and Board Members	CEO	Complete
ED7	Review monitoring arrangements	SMT	Complete
ED8	Invite equalities group to carry out a disability audit	CEO	April 2017
ED9	Establish local statistics for equalities groups	Housing	TBC

--- End of Appendix 2 ---

Summary Position Statement

“Everyone associated with Ardenglen Housing Association will understand what it means to treat people fairly and will act on that understanding. We will be able to show clearly how we embrace and promote equality and diversity by creating opportunities for residents, employees and the wider community we serve. We will take prompt and

robust action to deal with unfair discrimination by any individual or organization connected with Ardenglen”

Policy aims and objectives

The main aims of the policy are to ensure that;

- Our culture, structures, policies, procedures and practices actively contribute to developing a diverse organisation, delivering appropriate services.
- We will provide appropriate, accessible and effective services and facilities to all section of the community, without prejudice or bias.
- The particular needs of each person are recognised and respected whether or not they are covered by legislation
- Staff, contractors and clients are fully aware of our commitments
- We develop and maintain a proactive approach to diversity issues
- Our commitments are widely known and respected in the external environment
- We comply with and exceed statutory and regulatory requirements

We expect everyone involved in our organisation to uphold the principles embodied in this policy, including

- Board members
- Employees
- Contractors
- Other stakeholders.

Is Brier, Chairperson

Kenny Stocks, Chief Executive

Equality & Diversity Policy

Appendix 4

If You Are Being Discriminated Against?

This procedure is also complemented by our **Dignity at Work Policy**.

Where an employee feels they have been discriminated against, victimised or harassed, there are different ways in which a claim can be dealt with depending on the

circumstances. In the first instance the employee should raise the issue informally with their line manager (unless the claim is against their manager, in such circumstances the employee should raise the issue with the manager next in line.)

Informal Stage

- Initially the employee and manager should aim to resolve the matter informally as it may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted. This is often the most efficient way with dealing with such circumstances in order to maintain current working relations.
- However, even though the matter has been treated informally a file note should be kept on the complaining employee's file of the incident and should include a statement that the note will only be taken into account if further complaints are made. The file note may be necessary if there is a requirement at a later date, should any unacceptable behaviour or practice continue.
- Dealing with the matter informally does not remove the individual's right to have the matter dealt with formally should that be the most appropriate next course of action.

Formal Stage

- If the employee is dissatisfied with the outcome, or the complaint is very serious, the employee should raise the matter in writing, detailing the complaint. The complaint should then be actioned under our grievance policy. In line with this process an investigation into the claim will be carried out. Employees who feel they are being subjected to harassment should raise the issue in line with our Dignity at Work Policy.
- If the outcome of the investigation is that a formal disciplinary hearing should take place this should be conducted in line with our disciplinary procedures.

--- End of Appendix 4 ---

Discrimination involving members of the public, Board Members, Contractors & Staff from other Agencies

The right to be treated equally and with dignity and respect extends to outside contractors, committee members and other agencies whilst at work (sometimes referred to as third parties)

They can complain and the complaint will be investigated by Ardenglen and appropriate action will be taken. Employees also have the right to complain if they feel they have been discriminated against by those not directly employed by Ardenglen.

Informal Stage

- Where possible, incidents should be dealt with informally. If the employee, member of the public, Board member, contractor or agency worker feels able to do so they should inform the bully or harasser if possible at the time, that they find their actions/remarks and behaviour to be unacceptable.

If the situation warrants the need for a witness individuals are advised to approach a colleague to accompany them when approaching the alleged bully or harasser. The individual should then report the matter to their line manager if the employee is the victim or the matter should be reported to any manager should the behaviour be directed at a member of the public, Board member, contractor or agency worker from a member of staff within the Group as soon as possible.

As with before it maybe that the discriminatory action is unconscious and easily resolved once the situation is highlighted. However, again a file note should be kept on the complaining employee's file of the details of the situation and the outcome.

- If the employee does not feel able to speak to the individual in person they can ask their manager or where appropriate any manager to do so and it will be the responsibility of the manager to discuss the situation and explain what will happen if any further incidents occur.

It will be made clear to the individual that continuation of conducting themselves in this way may be deemed to be refusing services altogether which could result in either the withdrawal of a service or refusal of access to our premises. Where the situation involves our employee being the bully/harasser then this could lead to disciplinary action.

Any action will be carried out in line with our disciplinary and grievance policy. Regardless of future action a file note will be kept in the complaining employees file providing details of the incident and the action taken where applicable.

- If informal action proves insufficient to deal with persistent inappropriate behaviour, the employee or management may instigate formal action.

Formal Stage

- Where formal action is the most appropriate way to deal with the person in question, they will be written to officially by the relevant senior manager informing them that their comments, actions, behaviours are not acceptable and are

potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in the withdrawal of services.

In the situation of an employee acting inappropriately towards a member of the public, Board member, contractor or agency worker, then they will be investigated under our disciplinary procedures, where disciplinary action may be an outcome including dismissal. In cases of physical violence or serious threats the senior manager should also involve the police if appropriate.

- In cases where the discrimination involves contractors or staff from other agencies the stages as detailed above will be carried out.

Due to the specific nature of the relationship between the organisation and these individuals/organisations, the following additional step should be included in the informal stage:

The manager will contact the appropriate senior person within the company/organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned may be refused entry to organisation premises.

--- End of Appendix 5 ---

Proposed Annual Monitoring Reports

The proposed annual monitoring report on our Equalities & Diversity policy will be produced under the following headings. These headings follow the section headings in the policy document, and refer also to the related policies.

Area	Monitoring Report
-------------	--------------------------

Board Membership	Ethnic Composition
	Age
	Gender
	Disability
Employment	Ethnic Composition
	Age
	Gender
	Disability
	Report on vacancies filled during the previous year
	Report on any actions taken to assist existing disabled staff to remain in employment or to assist a disabled applicant to be employed
	Report on any positive action to assist any particular group e.g. school leavers
	Statement confirming compliance with Recruitment and Selection Policy & Procedures
Training	Report on any Equalities & Diversity training undertaken
	Statement that Equalities & Diversity is included in the EPDP
Advancement & Promotion	Summary report on any actions taken
Harassment & Victimisation	Summary report on any actions taken
Support	Summary report on any actions taken
Allocations	Breakdown of Housing Register and allocation made during the year
Consultants and Contractors	Statement of Equalities & Diversity compliance

--- End of Appendix 6 --

Equality & Diversity Policy

Appendix 7

Equality Impact Assessments

What are they?

An Equality Impact Assessment involves assessing the likely or actual effects of policies or services to our customers in respect of their disability, age, gender, race, religion/belief, sexual orientation or gender identity to ensure equal and fair access for all.

It helps us make sure the needs of people are taken into account when we develop and implement a new policy or service or when we make a change to a current policy or service.

Why we do them?

We currently have neither a legal or regulatory obligation to carry out Equality Impact Assessments. We have however, our own aspirations and a commitment to provide a fair and accessible service to all our customers, as set out in our Equality and Diversity Policy.

By undertaking Equality Impact Assessments, we are able to:

- take into account the needs, experience and circumstances of those people who will (or may be) affected by our policies or services.
- identify any real or possible inequalities people will experience if we go ahead with new policies or services.
- think about the other ways in which we can achieve the aims of our policy or service that will not lead to inequalities.
- increase transparency in the things that we do and improve the confidence in the fairness of our policies and services.
- develop better policy making procedures and services.
- become more accountable to the people we serve.

How we do them

Procedures and appropriate Templates are built into our policy development and change management activities and consist of two stages.

Stage 1 – deciding if we need to do an equality impact assessment

Stage 1 of the equality impact assessment is a short exercise that involves looking at the overall policy or service and deciding if it relevant to equality.

Stage 2 – carrying out an equality impact assessment

Stage 2 examines in detail the proposal to find out what kind of equality impact there might be and which groups of people it will affect most. There are 8 steps in the process.

- Step 1 - Identify the purpose of the policy or service
- Step 2 - assess the impact using information and evidence
- Step 3 - remove or reduce s negative impact
- Step 4 - make sure the policy or service promotes equality
- Step 5 - arrange to monitor or assess the policy or service
- Step 6 - sign off the equality impact assessment
- Step 7 - arrange to publish the equality impact assessment
- Step 8 - review the policy or service and update

--- End of Appendix 6 ---