

NORTH VIEW Housing Association

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POLICY

EQUAL OPPORTUNITIES

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All North View policies and publications can be made available on tape, in Braille, large print and community languages.

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INVESTOR IN PEOPLE

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CONTENTS

Introduction.....	1
Purpose of this Policy	2
The moral case for Equal Opportunities	2
Who this policy applies to.....	2
Who is responsible for Policy Implementation?.....	3
Developing the policy	3
Legal and Regulatory Requirements.....	4
The Housing (Scotland) Act 2010 & Scottish Social Housing Charter.....	4
The Equality Act 2010.....	5
The Act – an overview	5
Protected Characteristics.....	6
Unlawful behaviour	6
Compliance with the Equality Act 2010.....	7
Awareness of the Equality Act 2010	7
Positive Action.....	7
Ensuring Equality of Opportunity as an employer	8
Recruitment & Selection.....	9
Advertising vacancies	9
Selection and recruitment	9
Personnel and monitoring records	10
Terms and Conditions of Employment	10
Salary and Benefits	11
Redundancy Selection.....	11
Workforce Monitoring	11
Reasonable Adjustments.....	11
Bullying and Harassment.....	12
Disciplinary and Grievance Procedures.....	12
Investigating allegations of harassment / disciplinary issues or grievances	12
Membership of NVHA	12
Committee of management composition	13
Committee Operations	13
Learning & Development	14
Specific Equality and Diversity Training	14
Ensuring Equality of Opportunity as a provider of Services	15
Service Delivery.....	15
Access to services	16
Management Services	16
Landlord Activities	16
Design Standards	16
Maintenance and Repairs.....	17
Quality of Housing.....	17
Rent arrears	17
Ensuring Equality of Opportunity in Allocation of Properties	17
Publicising of the Allocations Policy.....	18
Policy Development.....	18
Equality Impact Assessments	18
Resident Engagement.....	19
Information and Publications	19
Provision of Information.....	20

Complaints	20
Dealing with Harassment	21
Dealing with Serious Incidents	21
Performance Management	22
Equality Action Plan	22
Implementing this Policy	22
Policy Review	23

Introduction

North View Housing Association (NVHA) operates in the Windlaw area of Castlemilk, which is on the southernmost boundary of Glasgow. NVHA is a charity established in November 1993 and currently has 19 staff members and are governed by a voluntary management committee.

NVHA rents 673 properties, and provides factoring to 86 owners. Its properties are mainly mainstream rental except for three properties occupied by clients of an organisation specialising in the care of people with specific needs

NVHA places the interests of its tenants and residents at its heart and recognise them as our key stakeholders. Accordingly, they have developed a Community Profile for their area, drawing on published statistical information and their 2014 Residents' survey.

The Scottish Index of Multiple Deprivation (SIMD) 2012 shows the area in which NVHA operates is one of the most deprived areas of Scotland. There are five bands to the SIMD categories NVHA's area is in the lowest band for income, employment, health and education, whilst it is in the second lowest band for crime.

NVHA's Residents' survey findings were as follows:

- 36% of NVHA properties are occupied by a single person; 24% are occupied by single parent families.
- 14% of NVHA tenants are unemployed; 27.2% are long term sick or have a disability; 21% are retired; 13.7% do not work because they look after the family; and 21.6% of tenants are in full time or part time employment.
- 44% of tenants' households have at least one member with a disability – 65% of which are mobility related; 14.6% of which relate to mental health, and 8.9% to long term illness (or long term conditions).
- 97.2% of our tenants are White Scottish. Polish is the next highest ethnic group at 1.1%.
- 31% of tenant households have a net weekly income of less than £221

NVHA would expect the profile of their housing list client group to be broadly similar.

The Residents' survey found that 87% of those surveyed identified the lack of play / activities for children and young people as being problematic. The vast majority of those surveyed supported NVHA being involved in addressing this issue (including financial support), and our Equality Action Plan reflects this.

Overall, the most visible and prevalent equalities issues in the area relate to poverty, poor health and low educational attainment, and NVHA's overall strategy and Equalities Action plan reflects this. However, we are also committed to making our housing and services accessible to all sections of the community, including less visible minorities who are not covered by published statistical data (for example, lesbian and gay people), and any emerging Equalities groups within the area (for example Eastern European migrants).

Purpose of this Policy

This Policy describes how North View Housing Association (NVHA) will ensure equality of opportunity, by eliminating discrimination and providing fair treatment for everyone.

The Policy applies to all of NVHA services and activities, including:

- Membership and governance
- Services to tenants and other service users
- Resident participation and consultation
- Community regeneration
- Employment
- Contracts with external companies and organisations

The moral case for Equal Opportunities

NVHA believes that providing equality of opportunity for its staff, committee members, tenants and other stakeholders is fundamental to the ethos of the association and that the moral case for equality is as, or even more, important than any legal and regulatory expectations. This belief is a key driver behind this policy and its supporting Equality Action Plan.

NVHA is committed to promoting an environment of respect, understanding, where diversity is encouraged and discrimination avoided. This commitment covers all areas of NVHA work both as an employer of staff and a landlord / provider of services.

Accordingly there will be a consistent approach to promoting equality and diversity as an employer of staff throughout the entire employment relationship from the recruitment process to termination and references. Whilst as a landlord / provider of services, NVHA will strive to ensure it is fully accessible to everyone using their services i.e. prospective tenants, tenants, home owners, etc., and that equality of opportunity is provided for all.

Who this policy applies to

Compliance with the policy is expected from all staff, committee members, tenants and others with whom NVHA may work (e.g. contractors, consultants, suppliers, etc.).

NVHA will seek to ensure that all external suppliers of goods or services comply with equality legislation and have adequate policies and procedures in this area. Accordingly, information will be issued with all tender documents stipulating NVHA's expectations in respect of equal opportunities, and tendering organisations will be required to submit details of their own equal opportunities policies as part of any tendering process.

When working with organisations employing less than ten people, it will be acceptable for the organisation to confirm its willingness to operate in accordance with the NVHA's Equality Policy, and with any additional requirements we specify for a particular contract. NVHA expect contractors, consultants and agents to treat the Association's customers and employees with courtesy and respect at all times. We will not tolerate any form of discrimination or harassment.

Who is responsible for Policy Implementation?

The committee of management, as the strategic managers of the association, has overall responsibility for the development, monitoring and implementation of this policy, but delegates authority to NVHA's Director to ensure the policy's day to day implementation.

As stated earlier this policy applies to all employees, committee members and others with whom NVHA may work and all these groups have a responsibility to be alert to discriminatory behaviours and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the equality policy will be regarded as misconduct and lead to disciplinary action which may include dismissal.

Developing the policy

This policy was informed by consultation with NVHA's committee of management, staff and feedback from NVHA's customers via NVHA's quarterly newsletter.

The policy takes account of various pieces of legislation, regulatory and good practice guidance including:

- The Equality Act 2010
- The Housing (Scotland) Act 2010
- The Scottish Housing Regulator's "Equality in Practice Document 2002" and 2006 follow up study
- The Scottish Housing Regulator's "Regulatory Standards of Governance and Financial Management"
- The Scottish Federation of Housing Associations "Getting the Balance Right" good practice guidance
- Employers in Voluntary Housing model "Equal Opportunities Policy"

The policy also takes account of various NVHA policies including their committee and staff codes of conduct, their Training Policy, their Allocations Policy, etc.

Legal and Regulatory Requirements

Background

Tackling inequality is not something new, UK and Scottish governments have been addressing equality and diversity issues for many years and although progress has been made inequalities still exist within Scotland and the UK. This has led to both Westminster and Holyrood governments continuing to develop legislation designed to tackle discrimination, promote equality, and address inequalities.

This has included the development of the Equality Act 2010 by the UK Government, and the Housing (Scotland) Act 2010 by the Scottish Government, and this policy takes account of both of these acts.

The objective of this policy is to ensure NVHA not only actively promotes equality of opportunity as an employer and provider of services, but is compliant with various legislative and regulatory requirements including:

- The Housing (Scotland) Act 2010
- The Scottish Social Housing Charter
- The Equality Act 2010

This policy will discuss each of these.

The Housing (Scotland) Act 2010 & Scottish Social Housing Charter

The Housing (Scotland) Act 2010 states:

“Social Landlords, when performing housing services, must act in a manner which encourages equal opportunities and in particular the observance of the law for the time being relating to equal opportunities.”

This means NVHA is legally obliged to comply with the Equality Act 2010.

The Housing (Scotland) Act 2010 also established the Scottish Social Housing Charter, which set out the Scottish Government’s and Scottish Housing Regulator’s (SHR) expectations for Scotland’s Registered Social Landlords (RSLs).

The Scottish Social Housing Charter’s Equalities Outcome sets out the Scottish Government’s expectation 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.”

Whilst, the Charter's Performance Indicator 3 requires NVHA to measure and monitor the

“Ethnic origins and disability details of service users, staff and for RSLs only, governing body members.”

NVHA has systems in place to measure their performance against this indicator and report on this quarterly to their committee of management, and the SHR via their Annual Return on the Charter (ARC).

The Equality Act 2010

The Equality Act challenges organisations to be as **diverse** as possible, and to have the principle of **equality** at their heart. NVHA is fully committed to meeting these challenges and to that end has defined Diversity and Equality as follows:

Diversity - Is about valuing individual differences. NVHA is committed to valuing and managing people's differences to enable all employees and customers to contribute and realise their full potential. NVHA further recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit the association and the services it provides.

Equality - Is about making sure people are treated fairly and given fair chances and applies both to NVHA's employees and those NVHA provides services for. NVHA also recognises that **equality is not about treating everyone in the same way, but recognises that their needs are met in different ways.**

The Act – an overview

The Equality Act 2010 was developed by the UK government to deliver two key objectives which were:

- To harmonise discrimination law by consolidating nine major pieces of legislation (e.g. the Sex Discrimination Act 1975, the Race Relations Act 1976 the Disability Discrimination Act 1995, etc.) into a single Act, **and**
- To address issues of inequality experienced by various groups within society

The Act, which applies to both NVHA's staff and its customers centres on two key elements, which are:

- The identification of nine “protected characteristics” who require additional protection
- The identification of “unlawful behaviour” not allowed under the act

These two elements are outlined further on the next page:

Protected Characteristics

The act identified by the following protected characteristics:

- Age
- Disability
- Gender Reassignment
- Marriage, and Civil Partnership
- Pregnancy & Maternity
- Race
- Religion or Belief
- Sex (Gender) and
- Sexual Orientation

Further definitions of each of these characteristics is available in the SFHA “getting the balance right” good practice guidance, which is available on request from NVHA.

Unlawful behaviour

The key elements of unlawful behaviour, which should be avoided as both an employer and a provider of services, as set out within the act are defined below:

Direct Discrimination - Is treating someone less favourably than others based on a protected characteristic *e.g. refusing to give housing advice to someone because of their sexual orientation.*

Associated Discrimination - Discrimination against a person, because they have an association with someone with a particular protected characteristic *e.g. someone not appointed, despite being the best candidate, due to having a disabled partner.*

Perceptive Discrimination - Discrimination against a person, because the discriminator thinks the person possesses that characteristic *e.g. someone is discriminated against by their colleagues, because they think they are gay, or a middle aged employee is overlooked for promotion simply because they look younger and therefore not considered to have sufficient maturity for a senior role.*

Indirect Discrimination - A policy, practice, procedure, provision or criteria that applies to everyone, but might disadvantage a particular protected group, and cannot be objectively justified *e.g. not letting properties to people under a certain age, because it is believed as a group they generally act in an anti-social way.*

Harassment - Conduct that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant; it is the impact on the individual which determines if harassment has taken place.

Victimisation - 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.

Compliance with the Equality Act 2010

NVHA considers any form of discrimination on the grounds of age, disability, religion or belief, gender, sexual orientation, etc. to be unacceptable, and will strive to avoid any form of unlawful behaviour when carrying out its activities as an employer or a provider of services.

Awareness of the Equality Act 2010

NVHA will strive to ensure its committee members, staff, customers and contractors employed on their behalf are aware of the expectations the act places on them. This will be achieved through the delivery of periodic equalities training for committee and staff members, and various actions outlined within NVHA's Equality Action Plan to raise equality awareness within customers.

NVHA will also strive to ensure their policies, procedures, practices, etc. do not result in discrimination or contravene the act. Central to achieving this will be the development of an Equality Impact Assessment (EIA) tool which will help ensure the impact of any new policies, policy revisions, proposals, on anyone belonging to a "protected characteristic" are fully understood and taken into account. (EIAs will be discussed in more detail later).

Positive Action

The Equality Act 2010 allows employers to address imbalances in its workforce, by encouraging members of under-represented groups to apply for jobs. No quotas will be set by NVHA, but NVHA may actively encourage people from a particular group(s) to apply for any vacancies in NVHA where there is an under representation.

Ensuring Equality of Opportunity as an employer

Lack of equal opportunities is not only a serious moral issue, but also has a significant impact on business performance. Studies have shown that high levels of motivation are achieved in an environment of respect and fairness.

NVHA will therefore strive to ensure that all employees are treated with fairness and respect, not discriminated against on any grounds, or disadvantaged by any conditions or requirements which cannot be shown to be relevant to their performance. To deliver this NVHA will seek to ensure all employees have equality of opportunity in all stages of their employment starting from recruitment.

Overall **NVHA aims to be an equal opportunity employer**. This means that the Association will:

- Ensure that we have access to the widest labour market
- Secure the best employees for our needs
- Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, we help applicants to compete for jobs on a genuine basis of equality

In addition, NVHA will seek to:

- Ensure all employees, committee members, tenants, contractors and other stakeholders of NVHA are aware of, and abide by, this policy
- Set clear expectations for all employees, contractors and others acting on NVHA's behalf to treat people respectfully, politely and in a way that maintains their dignity
- Ensure NVHA's employment practices are non-discriminatory and support employees with specific / particular needs, as far as reasonably practicable
- Provide support to any employees, or committee members, who may experience discrimination or unfair treatment
- Foster working environments where people are free from discrimination, intimidation, harassment or bullying, and where any employees or committee members displaying such behaviours will be subject to disciplinary action, up to and including dismissal
- Provide fair access to learning and development opportunities, and support staff and committee members to fulfil their potential
- Provide appropriate equal opportunities training for all employees, and committee members (including induction training)
- Ensure that all potential employees are treated fairly and equally, and any decisions on recruitment and selection are based solely on essential and desirable job criteria
- Monitor employee profiles and remove barriers to employment, training or promotion

The policy will now outline how NVHA will ensure equality of opportunity in various key elements of its role as an employer.

Recruitment & Selection

NVHA is committed to ensuring all recruitment decisions are based on the merits and abilities of candidates and no other criteria. In order, to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

Advertising vacancies

Wherever possible, NVHA will advertise vacancies simultaneously, internally and externally. We will use internal only selection, only in cases where this is unavoidable, for example as a result of reorganisation or redeployment. We will also ensure that any workers on temporary contracts are aware of any suitable vacancies within the organisation.

Vacancy advertisements will include a statement affirming NVHA's commitment to equal opportunities in employment, and may also specify any groups currently under-represented in our workforce. We will not restrict any post to people of a specific gender or ethnic origin, unless this is essential to the nature of the post and is permitted under the relevant legal exemptions

To highlight NVHA's commitment to promoting equality any job adverts will state that an equality policy is in place and also display any signs of equality bodies NVHA is affiliated with (i.e. Positive about Disabled People).

The information contained in adverts and all vacancy literature will be clear and accurate to attract appropriate candidates from all groups across society. NVHA will strive to ensure that all applications have clear instructions for completion of application forms, which are free from personal questions irrelevant to the vacancy.

Selection and recruitment

The NVHA will use selection criteria based on job descriptions and employee specifications. These criteria will focus on essential skills for the effective performance of the job. The Association will keep job descriptions and person specifications under regular review.

NVHA will make decisions about short listing and selection based on job descriptions and person specifications and no other reasons. They will record its reasons for selection and rejection of individual candidates. NVHA will also, wherever possible, ensure more than one person will be involved in the selection interview and recruitment process.

NVHA will ensure all staff and / or committee members involved at any stage in the recruitment and selection process receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate by asking any potentially discriminatory questions.

Personnel and monitoring records

The Association will:

- Maintain records of selection processes for at least twelve months after an appointment has been made.
- Record the composition of selection panels.
- Ask all job applicants to complete a monitoring form which provides information about ethnic origin and disability status.
- Use this information to analyse outcomes in recruitment and promotions.
- Analyse the overall profile of the workforce in relation to ethnic origin, gender, age and disability, to help identify under represented groups.
- Adhere to the law on data protection and access to personal information.

Terms and Conditions of Employment

As part of the employment relationship covered under this policy, all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's terms and conditions will be standard across all employees regardless of any of the protected characteristics. Employees will not receive less favourable terms and conditions for any reason other than relating specifically to their job.

All new employees will receive a copy of the Employers in Voluntary Housing "**Statement of terms and conditions of employment**", which NVHA has adopted and thus forms part of all employees' terms and conditions.

This statement sets out the expectations of employees to avoid discrimination or harassment of other staff, committee members, customers, etc. The statement also outlines that NVHA will strive provide a supportive environment where staff are free from discrimination and harassment, and fully supported if they experience any form of discrimination during their work for NVHA.

In addition, all members of NVHA staff must sign a "*Staff Code of Conduct*" which states staff must:

"...not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

You should be aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex and sexual orientation."

and

"...treat others with respect at all times. This includes considering the views of others and being tolerant of differences. You must adhere to both the letter and the spirit of our equal opportunities policy"

Salary and Benefits

NVHA operates a pay and benefits structure that is fair, competitive, flexible, transparent, and objective with no disparities in salary due to belonging to any protected characteristics.

Redundancy Selection

Redundancy selection will be made according to the statutory requirements and in line with NVHA's 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.

Workforce Monitoring

NVHA will monitor equalities information about their current workforce and job applicants, and compare it against the most recent census information. NVHA will also benchmark its performance against other Registered Social Landlords and take appropriate actions as, and when, required.

All equalities monitoring information will be reported to the committee of management quarterly, and form part of NVHA's Annual Return on the Charter (ARC). This will include information about:

- Implementing the actions described in the Equalities Action Plan.
- Housing applications and rehousing outcomes
- Information about satisfaction with services and complaints
- Evictions
- Reports of racist incidents and outcomes
- Reports of harassment on other grounds and outcomes
- Any breaches by contractors etc. of the Association's equalities standards
- The profile of the Association's staff and management committee

Reasonable Adjustments

NVHA will, in accordance with the Equality Act 2010, make any reasonable adjustments required to allow new and existing employees with disabilities to perform the requirements of their employment.

In accordance with the act, NVHA will balance the need for change with the expense or effort involved. If an adjustment requires disproportionately high expenditure or disruption, it is not likely to be reasonable.

Bullying and Harassment

NVHA operates a Dignity at Work Policy, to ensure that no employee is subjected to any form of harassment by managers, co-workers or committee members. The Association will not tolerate any form of harassment or bullying. All cases will be dealt with sensitively, speedily and firmly and will be resolved with reference to the Association's disciplinary procedure and Dignity at Work Policy.

Disciplinary and Grievance Procedures

A breach of this policy will be considered a disciplinary offence and NVHA's disciplinary procedures will be followed to ensure matters are fully investigated. Procedures will be applied fairly, and disciplinary action will only be taken following a full investigation and after all other means of resolving the issue have failed, unless the breach is of such a nature that the individual concerned should be given a warning, suspended from duty or in extreme cases dismissed.

All employees have the right to take action under the grievance procedure. NVHA will deal with causes of a grievance quickly and effectively through a clear, fair and structured process.

Investigating allegations of harassment / disciplinary issues or grievances

The Employers in Voluntary Housing (EVH) "**Statement of terms and conditions of employment**" sets out in detail the grievance and disciplinary procedures, which will be followed to investigate any alleged instances of harassment, bullying and or any other grievances related to discrimination.

This statement sets out in detail the procedures which NVHA will follow in order to ensure that anyone involved in any alleged instances, whether they are the accused or the alleged victim will be treated fairly and according to the procedures set out in sections A12 and A13 of the EVH statement. This statement is provided to each new member of NVHA staff and will be made available to existing staff on request.

Membership of NVHA

NVHA's membership policy sets out the criteria relating to membership eligibility and seeks to ensure its membership reflects the communities it serves. NVHA encourages membership applications from:

- Tenants and sharing owners of NVHA;
- Other residents living within the NVHA's area of operation;
- Others who can contribute particular community, business or professional experience.

Membership is open to all sections of the community regardless of race, gender, age, etc.

Committee of management composition

Although the decision to stand for election to the committee is voluntary and open to any member of the association, NVHA will seek to ensure the committee's composition is as representative of their community as possible.

To achieve this NVHA will

- Encourage people from all sections of the community to become involved in its structures for decision-making and participation.
- Monitor trends in the composition of the management committee, based on members' age, gender, race and disability.
- Take action to attract committee members from under-represented groups.
- Provide all committee members with training on equal opportunities and diversity.
- Ensure that all committee members sign and abide by the Code of Conduct.

The composition of NVHA's membership and committee will be monitored, reviewed and reported to the committee of management quarterly and form part of NVHA's Annual Return on the Charter (ARC).

Committee Operations

NVHA's chairperson is responsible for ensuring committee meetings are conducted in a manner, which allows all committee members the opportunity to participate and contribute.

The chairperson should strive to ensure that:

1. The committee uphold and promote the principles of equality and diversity in the governance of NVHA
2. Individual committee members display no discriminatory behaviour in their dealings with fellow committee members, employees, NVHA customers or other NVHA stakeholders

In addition, all NVHA committee members adhere to their code of conduct which states:

"You must consider the views of others and be tolerant of differences."

"You must uphold our equality, whistleblowing and acceptable use policies." **and**

"You must always treat your Governing Body colleagues, our staff and their opinions with respect."

Learning & Development

NVHA will strive to allocate training courses and / or further education solely on organisational / individual needs and ensure no one is treated, more or less favourably, on the grounds of age, gender, disability, etc. NVHA also recognises that certain employees (e.g. those from minority backgrounds, those with disabilities, etc.) may require specific additional support from NVHA to access learning and development opportunities.

The identification of the training needs of staff members should form part of the NVHA's staff appraisal and supervision procedures, whilst committee members' needs should be identified through their annual assessment process. Progress on meeting these commitments will be monitored and annually reported to the committee of management in accordance with NVHA's training policy.

Specific Equality and Diversity Training

NVHA will periodically run equal opportunities training (to mirror policy reviews) for staff and committee members to enable them to understand their obligations, identify discrimination, and take appropriate action to challenge and address discrimination.

In addition, new employees and committee members will receive induction training which should include an overview of current legal and regulatory equality obligations, their implications for NVHA and an overview of NVHA's Equality Policy.

Ensuring Equality of Opportunity as a provider of Services

As a provider of services, NVHA aims to comply with, and exceed, regulatory and legislative expectations by promoting social inclusion, providing equality of access and eliminating unlawful discrimination in the delivery of their services.

To achieve this NVHA will seek to:

- Treat people respectfully, politely, and in a way that maintains their dignity
- Ensure no customer receives less favourable treatment or is disadvantaged by conditions or requirements, which cannot be shown to be justifiable
- Deal effectively with complaints of unfair treatment or discrimination in personal interactions with NVHA and / or in the provision of their services
- Liaise with police / local authority partners to deal effectively with complaints of victimisation, harassment, discrimination or criminal activity against individuals or groups belonging to a protected characteristic
- Respect community diversity and ensure that all services and opportunities offered by NVHA, and their partner organisations, are promoted appropriately and accessible to all sectors of our community
- Ensure good communication with all sections of its community, including traditionally excluded groups, by providing full, clear, accurate and accessible information regarding NVHA and its services
- Consult with different individuals, communities and organisations to ensure NVHA's services are responsive and reflect the diversity of their community
- Monitor its services to ensure they do not discriminate, or exclude

Service Delivery

NVHA aims to understand the needs / preferences of the diverse communities they serve **and** develop appropriate services in response. Furthermore, they will strive to ensure that their buildings, staff and services are accessible to all customers, and potential customers.

To achieve these aims, NVHA will seek to:

- Promote their services to as wide a cross-section of people as possible by using a range of accessible / alternative formats
- Develop a database of customers' communication preferences
- Gather information about the communities they serve to help plan their services
- Build links with local voluntary and community groups who work with, or represent, groups of people covered by this policy (i.e. protected characteristics)

Two key areas where equality of opportunity underpins NVHA's work are providing "access to services" and the "allocation of properties." Each will be discussed in turn.

Access to services

NVHA will take positive action to ensure that all members of the community are aware of the services it provides and seek to ensure that all people benefit equally from its services.

The Association will be open about what it is doing, and ensure that all policies and procedures are openly and widely advertised.

The Association will provide tenants with full, clear and accurate information about their particular tenancy in compliance with the law and good practice guidelines. This information will be accessible to all. An oral explanation will be given at the beginning of the tenancy. Tenancy agreements will not contain any unduly restrictive or unnecessary conditions.

The Association will avoid being seen as inaccessible to those in housing need and take any necessary action as reasonably practical to meet these needs e.g. child friendly rooms, access for disabled people, appropriate opening and closing hours. The Association will ensure that no communication barriers are put in place or maintained.

The Association will, where appropriate, provide its material in suitable formats e.g. computer disc, tape, Braille, community languages. All application forms and materials published will be in simple jargon free language and, where appropriate, help will be given to fill out the relevant forms. The Association will be sensitive to people with difficulties in communicating. The Association will accommodate, as far as possible, tenants preferences, e.g. interviews from male or female staff.

Management Services

Any management services provided by another organisation will be compatible with this policy. All services NVHA receives will be monitored to ensure that no discrimination takes place.

Landlord Activities

It is the NVHA's responsibility as a landlord to adhere to the following:

Design Standards

The Association will seek to ensure that all developments are built barrier-free and to agreed minimum standards to allow tenants to reduce their dependence on others and maximise choice in their daily life. Consequently, the Association will, wherever possible, involve tenants and potential tenants in the design process.

In the provision of suitable housing the Association will seek to provide housing which is sensitive to the cultural, religious and health needs of its tenants e.g. appropriate location, style, and colours, rooms and layouts for prayers and cooking.

Maintenance and Repairs

The NVHA will seek to ensure that properties are kept in good repair and installations maintained in proper working order to ensure that properties are fit for human habitation and that no defect places any person in potential danger. However, where cause for complaint arises, attention will be paid to tenants' complaints concerning disrepair and service provision, including seeking to ensure that tenants are able to report their complaints in their own language.

As maintenance is one of the most important services provided to tenants, NVHA will seek to ensure that all tenants receive the same quality of service. The Association will however, be mindful that certain groups, such as older people, may be more vulnerable and consequently will be given priority on certain types of repairs.

Publicity material on maintenance and repairs will reflect contractual and legal rights and will be available where possible in suitable format.

Quality of Housing

The quality of stock will be assessed regularly. The Association will ensure that all groups have equal access to good quality stock. NVHA will also ensure that their records regarding adapted properties are accurate and up to date to ensure those properties are allocated sensitively.

Rent arrears

All rent arrears will be dealt with sensitively and fairly. The Association will have policies and procedures highlighting the importance of arrears prevention, and action for control and recovery.

Ensuring Equality of Opportunity in Allocation of Properties

NVHA allocations policy is clear, comprehensive and unequivocally non-discriminatory, providing equal access for all. All selection and allocation procedures are designed to deal quickly and fairly with applicants for housing. NVHA will ensure proper recording, reporting and monitoring procedures are in place.

In addition, NVHA is fully committed to the principles of its policy and strives to ensure its allocations practices and procedures are non-discriminatory and based around each applicant's housing need. Moreover, NVHA will ensure its housing list is open to all by encouraging applications from all sections of its community throughout the year.

It is important to highlight that NVHA's allocation's policy and procedures allows referrals from outside organisations (i.e. social work) working with tenants with specific needs (i.e. access needs, additional support, etc.) to be considered sensitively where possible.

Publicising of the Allocations Policy

NVHA will make its Allocations policy available in other languages and formats (such as in Braille, in larger font or on audio tape) if requested, at a number of locations including:

- At NVHA's office
- On NVHA's website

Policy Development

When reviewing or developing policies NVHA will strive to avoid discriminating and identify any instances of potential imbalances in treatment or potential discrimination being encountered by disadvantaged groups.

The Equality Act 2010 expects public bodies to identify any adverse affects their policies might have on any protected characteristics. Although **not** a public body, NVHA will, as a good practice measure, develop an Equality Impact Assessment (EIA) tool to help identify any adverse affects any of their policies might have.

Equality Impact Assessments

A draft EIA tool is attached to this policy (Appendix 1) and the steps involved in developing this tool, including timescales, are outlined in NVHA's Equality Action Plan. The finalised EIA tool will take account of advice, recommendations and good practice outlined by the Equality and Human Rights Commission (EHRC) and the SFHA's "Getting the Balance Right" good practice guidance.

Resident Engagement

The Scottish Social Housing Charter challenges housing associations to ensure their services meet and exceed their customers' needs and aspirations. NVHA will therefore strive to engage with all sections of its community (including traditionally excluded / hard to reach groups). NVHA will be sensitive to:

- The needs of people with young children.
- The needs of people with disabilities.
- The needs of people who care for a dependent relative.
- The needs of people with communication difficulties, literacy problems, or whose first language is not English.
- Religious and cultural requirements.
- The need to provide safe, comfortable environments that are free from intimidation.

When developing any engagement or consultation activities, NVHA should ensure they have taken steps to maximise participation and minimise any barriers which might restrict customer participation.

Consideration of this was given within NVHA's Resident Involvement Strategy, which highlights that the need for resident engagement and consultation activities to be regularly reviewed by senior staff and the committee of management. This will help ensure these activities are accessible to anyone wishing to participate, and identify potential improvements for future activities.

NVHA's Resident Involvement Strategy also sets out a variety of ways tenants and other customers can contact NVHA including:

- In person at our local offices
- By telephone
- By letter or email
- Via their website – www.nvha.org.uk
- Via social media
- Via regular surveys
- By coming along to an event e.g. our Annual General Meeting, participation / consultation event
- By requesting a home visit

Information and Publications

NVHA will publicise its commitment to equal opportunities in a variety of ways, as set out in more detail within their **Equality Action Plan** including:

- Newsletter articles
- An equalities statement summarising their various commitments to equalities including their policy, action plan, etc.
- Displaying a range of relevant equalities information within NVHA's office

Materials to publicise its equality commitment will be developed in consultation with tenants, other customers and local community groups. NVHA will also seek to ensure that these materials, and others it produces, do not perpetuate stereotypes and discrimination, and are produced in concise plain language.

Provision of Information

NVHA recognises that indirect discrimination can occur through the provision of inaccessible information which creates inadvertent barriers thus limiting access to NVHA's services *e.g. a visually-impaired resident may not be able to read a policy in standard print size or someone whose first language is not English may not be able to communicate effectively with staff.*

NVHA is therefore committed to ensure information is available in alternative formats, on request, and these formats may include; large print, audio tapes or CDs, use of language or sign interpreters, Braille, etc.

As it would be impractical and cost prohibitive to have all possible formats available immediately, NVHA will strive to produce information in alternative formats within 10 working days of a request provided that request is reasonable.

All reasonable costs in relation to the provision of materials in alternative formats this will be borne by NVHA and any requests for materials in alternative formats will be recorded as part of its equalities' monitoring regime.

Complaints

NVHA will respond promptly to any complaints and treat complaints involving discrimination, harassment or victimisation very seriously, and ensure such complaints are tackled in line with agreed targets.

Complaints will be monitored by frequency, type of complaint, outcome and reported to the committee of management quarterly. In addition, NVHA will ensure that complaints' reports, separate general complaints from those related to equality issues.

Dealing with Harassment

NVHA will take decisive action to deal with cases of harassment, and discrimination on any grounds. NVHA will adopt specific policies and procedures for responding to harassment (racial, sexual or otherwise) which constitutes a breach of tenancy agreements.

Any tenant who feels that their complaint of harassment has not been dealt with satisfactorily will have a right to appeal. The appeal procedure will be clear, fair and accessible to all.

Dealing with Serious Incidents

The Offences (Aggravation by Prejudice) (Scotland) Act 2009, came into force on 24 March 2010 and recognises hate crime on grounds of sexual orientation, transgender identity and disability. NVHA aims to ensure that all our tenants can live in their homes without fear of hate crime, harassment or abuse and that if incidents occur, they are dealt with efficiently and effectively and to the satisfaction of the victim.

To achieve these aims, NVHA will seek to:

- Develop clear policies and procedures for dealing with reports of serious incidents
- Ensure all tenants sign an agreement stating they must not harass or act in an anti-social manner towards NVHA tenants, employees, committee members and anyone acting on behalf of NVHA (i.e. contactors).
- Revise the section on Equalities within the Tenants' handbook to reflect the requirements of the Equality Act 2010 and the Housing (Scotland) Act 2010, and emphasise the expected levels of behaviour placed on all NVHA tenants.

Performance Management

In accordance with the Scottish Social Housing Charter the committee of management will monitor the implementation of this policy annually through the analysis of statistical reports regarding the ethnicity, gender, disability and age of all:

- Applicants for housing or employment
- Allocations and appointments made
- Employee, tenant and committee profiles

In addition, the committee of management will receive regular monitoring reports, which identify any emerging trends in:

- Access to housing - who has applied, who has been allocated a house, and by what process (e.g. direct applicant, nomination or referral)
- Housing allocations - where applicants were housed, and the types of housing allocated
- Access to employment - who has applied, and been appointed, to vacancies within the organisation

Where reports reveal particular issues (e.g. under representation) appropriate action will be agreed by the committee of management.

Equality Action Plan

NVHA have developed an Equality Action Plan (Appendix 2) following discussions with the committee of management, employees, tenants and various partner organisations. This action plan identifies a range of objectives to help ensure NVHA provides equality of opportunity for all. The delivery of each objective of the action plan will be monitored by the committee of management, and the action plan will be reviewed annually.

Implementing this Policy

The success of this policy relies on the commitment of all NVHA staff and committee members to ensure it is applied in practice, and to attend equalities training arranged by the association.

All staff and committee members are expected to challenge discriminatory and offensive behaviour or poor practice, and draw them to the attention of NVHA's senior staff.

Policy Review

This policy will be reviewed every three years unless an earlier review is required by legislative or regulatory changes, whilst the Equality Action Plan will be reviewed annually.