

# **NORTH VIEW Housing Association**

*North View is a registered Scottish charity – charity registration number SC032963*

## **POLICY**

### **EQUAL OPPORTUNITIES & HUMAN RIGHTS**

Passed:-

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**All North View policies and publications can be made available on CD/data-to-voice, in Braille, large print and community languages.**

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# CONTENTS

|  |    |
|--|----|
| Introduction.....  | 1  |
| Purpose of this Policy .....   | 2  |
| The moral case for Equal Opportunities .....                                   | 2  |
| Who this Policy applies to .....   | 3  |
| Who is responsible for Policy Implementation?.....                             | 3  |
| Developing the Policy .....  | 3  |
| Legal and Regulatory Requirements .....  | 5  |
| The Housing (Scotland) Act 2010 & Scottish Social Housing Charter.....         | 5  |
| The Scottish Housing Regulatory Framework .....                                | 6  |
| The Equality Act (2010).....   | 7  |
| The Act – an overview .....  | 7  |
| Protected Characteristics .....  | 7  |
| Unlawful behaviour.....  | 8  |
| Compliance with the Equality Act 2010.....                                     | 9  |
| Awareness of the Equality Act 2010.....  | 9  |
| Positive Action.....   | 9  |
| Supreme court ruling on definition of ‘sex’ under UK Equality Legislation..... | 9  |
| The Human Rights Act (1998).....   | 10 |
| Article 6: Right to a fair trial.....  | 10 |
| Article 8: Right to respect for private life, family life and the home.....    | 10 |
| Article 14: Prohibition of discrimination .....                                | 10 |
| Workers Protection Act (2024).....   | 11 |
| Data Collection.....   | 11 |
| Ensuring Equality of Opportunity as an employer.....                           | 13 |
| Recruitment and Selection .....  | 14 |
| Advertising vacancies .....  | 14 |
| Selection and recruitment .....  | 14 |
| Personnel and monitoring records.....  | 15 |
| Terms and Conditions of Employment.....  | 15 |
| Salary and Benefits .....  | 16 |
| Redundancy Selection.....  | 16 |
| Workforce Monitoring.....  | 16 |
| Reasonable Adjustments .....   | 16 |
| Bullying and Harassment .....  | 16 |
| Membership of NVHA .....   | 17 |
| Management Committee Composition.....  | 17 |
| Committee Operations.....  | 18 |
| Learning and Development.....  | 18 |
| Specific Equality and Diversity Training.....                                  | 19 |
| Ensuring Equality of Opportunity as a provider of Services .....               | 19 |
| Service Delivery .....   | 20 |
| Access to services.....  | 20 |
| Management Services .....  | 21 |
| Landlord Activities .....  | 21 |
| Design Standards .....   | 21 |
| Maintenance and Repairs .....  | 21 |
| Quality of Housing .....   | 22 |
| Rent Arrears .....   | 22 |

|  |    |
|--|----|
| Ensuring Equality of Opportunity in Allocation of Properties ..... | 22 |
| Publicising of the Allocations Policy .....                        | 23 |
| Equality Impact Assessments.....                                   | 23 |
| Resident Engagement .....  | 24 |
| Provision of Information.....                                      | 25 |
| Complaints.....  | 26 |
| Dealing with Discrimination or Harassment .....                    | 26 |
| Allegations relating to Staff or Committee Members .....           | 26 |
| Allegations relating to Tenants (other customers).....             | 27 |
| Allegations relating to Consultants .....                          | 27 |
| Dealing with Serious Incidents .....                               | 28 |
| Performance Management .....                                       | 28 |
| Equality Action Plan .....   | 29 |
| Implementing this Policy .....                                     | 29 |
| Policy Review.....   | 29 |

Appendix 1  
Appendix 2

Equality Action Plan  
Equality Impact Assessment Form

## 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 20 staff members and is governed by a voluntary management committee.

NVHA rents 695 properties, and provides factoring to 81 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 recognises them as its key stakeholders. Accordingly, it has developed a Community Profile for its area, drawing on published statistical information and its 2024 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:

- 48% of NVHA properties are occupied by a single person; 18% are occupied by single parent families.
- 46% of tenants' households have at least one member with a disability – 21.2% of which are Physical and 10.8% of which relate to mental health.
- 88.1% of our tenants are White Scottish. African, Scottish African or British African and Pakistani, Scottish Pakistani or British Pakistani are the next highest groups at 2.5% each, followed by Polish at 2.2%.

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

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, NVHA is also committed to making its 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.

## **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. It updates the previous “Equal Opportunities and Human Rights Policy”, which was approved by the Management Committee on 12<sup>th</sup> August 2015 22<sup>nd</sup> June 2022. The update was informed by training with the staff and committee during March and April 2025 and consultation between Stuart Eglinton of SE Training and NVHA’s senior staff. ~~been developed in collaboration with staff and committee members who formed part of a Working Group during 2022.~~

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 human rights 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, homeowners, etc., and that equality of opportunity is provided for all.

It is also important to note that NVHA understands that equality is not about treating everyone in the same way, but recognising that people have different needs which need to be met in different ways.

## **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, 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~~ Equal Opportunities and Human Rights 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~~ It will not tolerate any form of discrimination or harassment.

## **Who is responsible for Policy Implementation?**

The Management Committee 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 Management Committee, staff (during staff training), feedback from the Equalities Working Group, and feedback from NVHA's customers in response to newsletters and other correspondence.

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 "Regulation of Social Housing in Scotland" framework published in February 2019
- Section 5.3 of the Regulatory Standards of Governance and Financial Management

- The Scottish Housing Regulator's: "Collecting Equality information: National Guidance for Scottish Social Landlords" (revised April 2022)
- The Scottish Social Housing Charter Outcome Number 1
- The Scottish Housing Regulator's "Standards of Governance and Financial Management"
- Human Rights Act 1998
- The Equality and Human Rights Commission "Human Rights at Home" guidance for social housing providers
- The Scottish Federation of Housing Associations "Getting the Balance Right" good practice guidance
- "Is Scotland Fairer?" report by the Equality and Human Rights Commission, Scotland (2018)
- Workers Protection Act 2024

NVHA's equality strategy includes various documents in addition to this policy including:

- An Equality Action Plan
- An Equality data collection procedure
- An Equality Impact Assessment procedure

The policy also takes account of various NVHA policies including committee and staff Codes of Conduct, Protocol for Dealing with an Alleged Breach of the Management Committee Code of Conduct, Dignity at Work Policy, our 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 Scottish Housing Regulatory Framework
- The Scottish Housing Regulator's: "Collecting Equality information: National Guidance for Scottish Social Landlords" (revised April 2022) – This will be referred to as 'SHR data collection guidance' through the rest of this policy
- The Equality Act 2010
- Human Rights Act 1998
- Workers Protection Act 2024

This policy will discuss each of these.

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

Although equalities is a matter reserved to the UK parliament, the Scottish Parliament has powers under the Scotland Act 1998 to "encourage and promote" equal opportunities. Accordingly, 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, and any other equality legislation passed with Westminster (UK wide legislation) or Holyrood (Scottish Legislation).

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.”*

## **The Scottish Housing Regulatory Framework**

In ~~February 2019~~ February 2024, the Scottish Housing Regulator (SHR) published its updated regulatory framework and statutory guidance for social landlords. ~~through the publication of the “Regulation of Social Housing in Scotland”.~~ This ~~new~~ framework took effect from 1st April 2024~~19~~ and sets out “how we (SHR) regulate both Registered Social Landlords (RSLs) and the housing and homelessness services provided by local authorities”.

Section 3 of the framework outlined its regulatory expectations of every RSLs with respect to equality and human rights, as follows:

“Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.

To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff.”

These expectations are reflected in this policy and the Association's Action Plan. This will include:

- how the Association will ensure it is compliant with the expectations of the Equality Act (2010) and The Human Rights Act 1998 both as a landlord/provider of services and an employer of staff;
- how the Association will ensure periodic training is in place for staff and committee members to ensure they are aware of their obligations with respect to Equality and Human Rights;
- how the Association will use of Equality Impact Assessments (EIAs) to ensure new and revised policies take account of Equality and Human Rights issues;
- how the Association will monitor and review the composition of its tenants, prospective tenants, staff, committee and membership against the nine protected characteristics outlined in the Equality Act (2010).

As part of the ‘new’ framework, the SHR also reviewed and amended the Standards of Governance and Financial Management. NVHA should take account of Standard 5 which highlights the need for RSLs to conduct their affairs with honesty and integrity in all areas of their work. Within this standard, NVHA needs to pay particular attention to Standard 5.3 which requires RSLs to pay “due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.”

# 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 Association also needs to be aware of and avoid Institutionalised Discrimination. This was first defined in the context of racism and exemplified in the Macpherson report on the inquiry into the death of Stephen Lawrence as "the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviours which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people."

## 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

## 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 Scottish Federation of Housing Association's (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.

The Association must also be aware of their responsibility with respect to "Harassment by a Third Party". As an employer, the Association is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant and should act accordingly if this takes place and / or is reported to them.

**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 using its 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 considered. (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.

## **Supreme court ruling on definition of 'sex' under UK Equality Legislation**

*The Association is aware of the UK Supreme Court's ruling that "the terms woman and sex in the Equality Act 2010 refer to biological woman and biological sex". At the point this policy was reviewed, the Equality and Human Rights Commission were in the course of developing a revised Code of Practice which they expect to publish at some point in 2025. NVHA will ensure its policies and procedures take account of their Code of Practice.*

## The Human Rights Act (1998)

The Act's development followed the World War 2 when to avoid the atrocities seen during the war, nations agreed all people should enjoy basic rights i.e. the right to life the right to be free from torture, etc.

The Act contains 16 articles which cover a range of rights with a basic aim is to ensure that everyone should be treated fairly, with dignity and respect. Both the UK government and the Scottish Government are committed to the Human Rights Act and its key principles.

In 2012, the Equality and Human Rights commission produced "Human Rights at Home" guidance for social housing. NVHA recommends that its staff refer to this guidance if they have any questions regarding the Human Rights Act. This can be accessed by clicking on the link below or on demand from NVHA.

### [Human Rights at Home Guidance](#)

This guidance recommends that staff play particular attention to articles 6, 8 and 14 when providing services, developing policies and procedures, etc.

Each of these three articles will be discussed in turn:

#### **Article 6: Right to a fair trial**

Everyone has the right to a fair hearing (trial). This means people should be given the opportunity to participate effectively in any hearing of their case, and present their case in conditions which do not place them at a substantial disadvantage to any other party in the case (**for example**, a person who is subject to a decision-making process in relation to a possible eviction should have access to an interpreter, if necessary). Staff should also ensure that any important decisions (i.e. allocations, evictions, etc.) should be given with reasons.

#### **Article 8: Right to respect for private life, family life and the home**

Everyone has the right to respect for their private and family life, their home and correspondence. It is important to emphasise that the right to respect for a person's home is not a right to be given any extra priority to be housed by an Association, but is a person's right to access, and live in their home without intrusion or interference. For Associations, this has various implications including:

- Personal information about customers should be kept private and confidential.
- The right to respect for family life includes the right for a family to live together
- Associations should take positive steps to prevent others seriously undermining a person's home or private life, for example, through anti-social behaviour.

#### **Article 14: Prohibition of discrimination**

This means that everyone must have equal access to an Association's housing and services, regardless of their race, religion, gender, sexual orientation, disability, or any other personal characteristic. **For example**, a gay couple must be treated in the same way as a heterosexual couple in relation to the right to succeed to a tenancy.

A difference in treatment can only be justified if there is a good reason for the treatment and if it is proportionate in the light of that reason. **For example**, an Association providing sheltered housing to people over a certain age in accordance with its rules and procedures.

*The Association is aware that the Scottish Government is current consulting with various groups to inform the development of a Human Rights Bill to incorporate Human Rights into Scottish Legislation and NVHA will take account of any legislative changes as they occur.*

## **Workers Protection Act (2024)**

This UK wide legislation places a duty on NVHA as an employer to protect its employees from sexual harassment and includes the requirement for NVHA take reasonable steps to pro-actively prevent sexual harassment.

To comply with this duty NVHA has adopted a Dignity at Work Policy based on the EVH model policy. In addition, NVHA has developed a risk assessment action plan to protect its staff from all forms of harassment including sexual harassment and harassment from 3rd parties (i.e. tenants, outside agencies, contractors, etc.)

## **Data Collection**

As outlined earlier in this policy, NVHA is committed to promoting an environment of respect, understanding, where diversity is encouraged, and discrimination avoided as both an employer and a landlord / provider of services. NVHA feels that the collection of equality data as outlined in the 'SHR data collection guidance' "... is integral to a social landlord's equality strategy" and is committed to ensuring it uses "Equality data to deliver quality services to tenants and other customers".

To reflect the importance NVHA attaches to data collection, this was one of the issues discussed by staff and committee members who formed part of the Equalities Working Group during 2022. The Working Group made various recommendations which were discussed and adopted by the Association's Management Committee.

These recommendations led to NVHA developing an Equality Monitoring Form based on the model equalities monitoring form contained within 'SHR data collection guidance' and deciding the equality data should be collected anonymously from all five groups outlined in the guidance (housing applicants, tenants, job applicants, staff and committee members) as opposed to linking information to individuals.

The decision to collect information anonymously was a carefully consider one based on clear evidence, which can be made available on request. This included the committee's opinion that anonymous collection would lead to a higher return rate, the high amount of staff time and resources which would be involved in collecting and using linked information, the data protection implications of collecting linked information, etc.

However, the Management Committee recommended the decision to collect information anonymously be reviewed periodically by the Committee and Senior Staff, ~~including a review one year after this data was collected for the first time.~~ The Committee further recommended that if it is later considered linking information to individuals would be more beneficial to the Association then the approach to data collection would be amended.

NVHA's approach to data collection is outlined in full within their Action Plan which is attached to this policy and embedded in the Association's Business Plan. The Action Plan was reviewed and updated in June 2025 following discussions and feedback from staff and committee during training held in March and April of 2025, and was further informed by a working group of staff and committee members who met during April 2025.

## 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~~ it has access to the widest labour market;
- Secure the best employees for its ~~our~~ needs;
- Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, ~~we~~ it will 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 and 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~~ It will use internal only selection, only in cases where this is unavoidable, for example as a result of reorganisation or redeployment. ~~We~~ It 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~~ NVHA 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. Disability Confident Accreditation through the Department for Work and Pensions).

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 provides information about all 9 protected characteristics identified in the Equality Act 2010
- Use this information to analyse outcomes in recruitment and promotions
- Analyse the overall profile of the workforce in relation to the 9 protected characteristics, to help identify underrepresented groups
- Adhere to its Data Protection and Data Retention policies.

## 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

~~"...always treat others with respect and respect at all times. I will consider and respect the views of others. This includes considering the views of others and being tolerant of differences.~~

~~...will you must~~ adhere to both the letter and the spirit of our Equal Opportunities

and Human Rights 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. 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 Management Committee at least biannually. This will include information about:

- Implementing the actions described in the Equalities Action Plan
- Information about satisfaction with services and complaints
- 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’s staff Code of Conduct aims 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.

This commitment is further emphasised by the development of NVHA's Dignity at Work Policy, and risk assessment action plan developed to protect staff from any form of harassment including sexual harassment and harassment from 3rd parties (i.e. tenants, outside agencies, contractors, etc.). This policy and risk assessment action plan were developed to ensure compliance with the Workers Protection Act 2024 and were both approved by the committee in June 2025.

## **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.

## **Management Committee 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, etc;
- 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 Management Committee at least biannually.

## 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~~ I will consider and respect the views of others ~~and be tolerant of differences."~~

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

~~"You must~~ I will always treat ~~your Governing Body~~ Management Committee colleagues, our staff, our customers and partners ~~and their opinions~~ with respect."

In situations where a Committee or Senior Staff member is alleged to have breached this policy, this would constitute a Notifiable Event as outlined by the Scottish Housing Regulator. The Notifiable Event would be reported to the Regulator by the Chief Executive or Chairperson, depending on the person(s) alleged to have breached the policy.

## Learning and 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 employee and committee training ~~policy~~ policies.

## Specific Equality and Diversity Training

NVHA will periodically deliver ~~run equal opportunities~~ equalities training to mirror ~~Equality~~ Equal Opportunities and Human Rights policy for staff and committee members to enable them to understand their obligations, identify discrimination, and take appropriate action to challenge and address discrimination.

NVHA will also endeavour to provide different types of equalitiesy training to ensure staff and committee members develop a wide range of skills and better understand the needs of its diverse customer base. This training will aim to consider the following:

- law and regulatory requirements;
- NVHA specific policy and procedural training;
- specific training about key equality issues  
(i.e. delivering specific requirements of Equality Act and / or Human Rights Act
- staff consciousness raising  
(i.e. how to address the needs of specific groups, how to tailor services, etc.)

In addition, new employees and committee members will receive induction training, which should include an overview of current legal and regulatory equality obligations and their implications for NVHA, and an overview of NVHA's ~~Equality~~ Equal Opportunities and Human Rights 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~~ its 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 it serves **and** develop appropriate services in response. Furthermore, ~~we~~ it will strive to ensure that ~~our~~ its buildings, staff and services are accessible to all customers, and potential customers.

To achieve these aims, NVHA will seek to:

- Promote its 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 ~~we~~ it serves to help plan ~~their~~ its 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 "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 (for example, 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 (for example USB stick, CD/data-to-voicetape,, Braille, community languages). Any 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, tenant's preferences (for example, interviews with 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 NVHA's responsibility as a landlord to adhere to the following:

## Design Standards

The Association will seek to ensure that all new stock developments meet 'the Glasgow Standard'. This standard sets out the minimum standards Glasgow City Council expects of any social housing developments it funds to be both accessible and flexible enough to respond to future tenant needs. The standard set various expectations including:

**"Meeting changing family needs** ... to build homes that are flexible, with the ability to adapt to the changing needs of existing and future tenants.  
**Wheelchair adaptable** ... housing to be built to good accessibility standards to meet both current needs and any needs that may arise in the future ... All new build developments over 20 units must ensure that 10% of the units are to wheelchair adaptable standard."

**The Glasgow Standard can be viewed in full on request from NVHA or by clicking on the link below:**

[The Glasgow Standard](#)

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 (for example, appropriate location, style, and colours, rooms and layouts for prayers and cooking).

## Maintenance and Repairs

The NVHA will seek to ensure properties are kept in good repair and installations maintained in proper working order to ensure properties are fit for human habitation and 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 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 on request (NVHA will bear any reasonable costs).

## **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. Our Rent Arrears Policy and procedures will also take account of any reasonable adjustments, which have to be made regarding how the process is carried out when dealing with tenants with specific needs (i.e. providing documents in larger fonts, providing access to interpreters / translation services, working through advocates, etc.).

## **Ensuring Equality of Opportunity in Allocation of Properties**

NVHA Allocation 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 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 Allocation 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 effects their policies might have on any protected characteristics. Although not a public body, NVHA will, as a good practice measure, use its Equality Impact Assessment (EIA) tool to help identify any adverse effects any policies might have.

## **Equality Impact Assessments**

As Equality and Human Rights issues are fundamental to how NVHA operates, each policy developed, or reviewed, by the Association will be subject to an Equalities Impact Assessment (EIA). EIAs allow the Association to take proactive steps to identify and remove potential discrimination or, in some cases adapt a policy or practice to better advance equality. It is important to recognise that providing the same service in the same way to everyone can sometimes create a disadvantage and NVHA will always strive to tailor its services and or support offered to specific customer needs.

The Equality and Human Rights Commission (EHRC) in Scotland recommends the use of EIAs when Associations develop or review policies, procedures and practices. This helps ensure Associations proactively consider equality issues, particularly using relevant evidence and consultation, and should lead to better quality policies which better reflect the needs of a diverse range of customers. The EHRC further highlight that EIAs assist in mainstreaming equality into policy and decision-making.

In addition, 'SHR data collection guidance' highlights that the SHR promotes the use of EIAs through the regulatory requirement to:

"Have assurance and evidence that NVHA considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery."

The EIA form is attached to this policy (Appendix 2) along with guidance on how to carry out an assessment. In addition, staff members using the form for the first time will be supported by a fellow member of staff or an external consultant, and periodic training will be provided to ensure the relevant staff are confident about carrying out an EIA.

## 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. The 'SHR data collection guidance' highlighted that NVHA should use equality data to help inform its activities, when it stated:

"Social landlords have a statutory duty to develop a tenant participation strategy, and the collection of equality data is critical to the effective implementation of this strategy. For example, when arranging meetings, equality data gathered in respect of the protected characteristics can be used to address individuals' needs by providing:

- accessible venues for disabled people;
- language interpreters; and
- suitable crèche facilities."

Consideration of accessibility issues informed NVHA's Resident Involvement Strategy, which highlights the need for resident engagement and consultation activities to be regularly reviewed by senior staff and the Management Committee. 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~~ the offices;
- By telephone, letter or email;
- Via their website – [www.nvha.org.uk](http://www.nvha.org.uk);
- Via social media;
- Via regular surveys;
- By coming along to an event e.g. ~~our~~ the 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
- On the NVHA website and social media.

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 these materials, and others it produces, do not perpetuate stereotypes and discrimination, and are produced in concise plain language.

## Provision of Information

NVHA recognises 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, CD/data-to-voice ~~audio tapes or CDs~~, use of language or sign interpreters, Braille, etc.

~~We are~~ NVHA is aware that the minimum recommended font size of the Royal National Institute for the Blind is 12 point. Therefore, this will be used in all letters, policies and information produced by the Association. However, the RNIB highlights that 14 point will reach more people with sight problems and North View is aware there will be occasions where tenants or other customers require information with larger font, and this supported on request.

To ensure this strategy is effective, the availability of documents in other formats will be publicised on ~~our~~ the website, in Reception and on documents where this is reasonably practicable (as this might be more difficult when publicising/sign-posting to documents produced by external organisations). 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 quarterly. In addition, NVHA will ensure that complaints' reports, separate general complaints from those related to equality issues, and as a minimum the committee receive quarterly complaints reports.

The Scottish Public Services Ombudsman (SPSO) revised its model complaints handling procedure in March 2021, and NVHA updated its complaints handling policy in response. The SPSO policy highlighted the importance of ensuring their complaints process is accessible for all, when it stated that complaints systems should:

"... should take into account individual requirements, for example disabled people, people with learning difficulties, people who are deaf or hard of hearing (including British Sign Language users), people with a visual impairment and people whose first language is not English. Where appropriate, suitable arrangements should be made for the specific needs of those who wish to complain, including provision of interpreting services, access to support or advocacy, and information in a variety of formats and languages, at suitable venues, and at suitable times."

The need to ensure complaints procedures are made as accessible as possible was also highlighted in 'SHR data collection guidance'.

## **Dealing with Discrimination or Harassment**

NVHA will take decisive action to deal with cases of harassment, and discrimination on any grounds. NVHA has clear procedures to investigate any allegations against staff, committee, tenants or other customers. These are summarised below:

### **Allegations relating to Staff or Committee Members**

Any allegations against a member of staff will be investigated thoroughly by the Director. If the allegation is made against a member of the Committee, the Director will report the matter to the Management Committee for them to decide how it will be investigated in line with the Protocol for Dealing with an Alleged Breach of the Management Committee Code of Conduct ~~Code of Conduct~~.

If an allegation relates to, or involves, the Director, the Chairperson would present details to the Management Committee. The Management Committee will then normally establish a panel of members to oversee this investigation, and thereafter they will report the findings to the Committee. The Committee may request that the Auditor, Solicitor or another appointed consultant undertake the investigation.

Before any investigation commences, the Association will seek advice from Employers in Voluntary Housing and/or its employment lawyers.

Members of staff/committee should be advised of any allegations made against them and informed what action(s) NVHA is considering with regards to any investigation. The employee(s) or committee member(s) should be advised of their right to be accompanied at any meetings as outlined in the terms and conditions of employment or Code of Conduct.

A deliberate breach of the Equal Opportunities and Human Rights Policy will be regarded as misconduct and may lead to disciplinary action through the terms and conditions of employment for employees and the Code of Conduct for Committee members. In these situations, it could potentially lead to dismissal from the Association.

It is important to note that when a member of the Management Committee or the Director is alleged to have breached this policy, this constitutes a Notifiable Event as outlined by the Scottish Housing Regulator. The Notifiable Event would be reported to the regulator by the Director or Chairperson, depending on the person(s) alleged to have breached the policy.

Any tenant (or other customer) who feels an allegation has not been dealt with satisfactorily will have a right to appeal. The appeal procedure will be clear, fair and accessible to all.

### **Allegations relating to Tenants (other customers)**

NVHA has specific policies and procedures for responding to harassment (racial, sexual or otherwise), discrimination or other behaviours which constitutes a breach of tenancy agreements.

In the event of a NVHA tenant(s) or other customer(s) displaying unacceptable behaviour towards employees, Management Committee members, consultants, other customers, etc. NVHA will consider initiating appropriate action. This may include acting against the tenancy under the terms of the Tenancy Agreement; reporting the matter to Police Scotland; reviewing communication arrangements with the Association in line with ~~our~~ its policies and procedures.

### **Allegations relating to Consultants**

If dealing with alleged breaches of this policy by consultants, contractors or service providers, NVHA will consider the level and severity of the breach and the potential for any recurrence to inform its decision on what action should be taken. The ultimate sanction would be that NVHA seek to terminate any relevant contracts.

## **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 all its tenants can live in their homes without fear of hate crime, harassment or abuse and 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:

- Follow their Anti-Social Behaviour Policy when 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 will monitor the implementation of this policy annually through the analysis of statistical reports regarding the nine protected characteristics identified in the Equality Act (2010), in relation to:

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

In addition, the Committee will receive 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 types of housing allocated (especially if any Equalities need was addressed)
- Access to employment - who has applied, and been appointed, to vacancies within the organisation

Where reports reveal particular issues (for example, under representation), appropriate action will be agreed by the Committee.

## **Equality Action Plan**

~~NVHA developed an Equality Action Plan (Appendix 1) following discussions with the Equalities Working Group.~~

As outlined earlier in this policy the action plan was reviewed and updated in 2025 following discussions and feedback from staff and committee during training, and then further informed by a working group of staff and committee members. 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 the responsibility of NVHA's staff and will be monitored by the Management Committee. The 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.

To ensure this strategy is effective, the availability of documents in other formats will be publicised on ~~our~~ the website, in Reception and displayed within interview rooms.

## **Policy Review**

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