



EQUAL OPPORTUNITIES POLICY

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The Scottish Housing Regulator Performance Standard GS 2.1

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1. INTRODUCTION

- 1.1 Section 106 of the Housing (Scotland) Act 2001 places a requirement on Registered Social Landlords (RSLs) to act in a manner that encourages equality of opportunity. Cordale Housing Association has had an equal opportunities policy in place since 1992 and, through a process of regular review, has aimed to update and improve its approach on an ongoing basis. The Association therefore welcomes the fact that there is now a legal requirement for RSLs to observe equal opportunities principles.
- 1.2 This document outlines our policy in the area of equal opportunities from June 2004. It seeks to take account of legal, regulatory and best practice requirements, including:
- The Disability Discrimination Act 1995 and the Housing (Scotland) Act 2001
 - Section 9 of Raising Standards in Housing
 - Section GS2.1 of Performance Standards
- 1.3 It is also important to point out that the policy (and supplementary Action Plan) is the result of a community consultation exercise that has taken place from May 2003, with over 50 residents contributing during a series of meetings and individual interviews. In addition, 20 staff and Committee members fed their views into the policy via a tailored training session.
- 1.4 This policy document outlines the strategic elements of our approach in equal opportunities, for example, the policy context and the guiding principles that will be observed. The day-to-day equal opportunities activities are set out in the Action Plan, and it is by measuring progress against this Plan that the success of our work in equal opportunities will be evaluated.
- 1.5 This is one of the Association's most important corporate documents and it is therefore critical that everyone within the community (and, indeed, any interested party) is able to access it. To help achieve this, the Association will continually explain and reinforce the main elements of the Action Plan in newsletters and other literature. For example, publishing the results of equality monitoring of the allocations function in the annual report.

2. POLICY STATEMENT & GENERAL PRINCIPLES

- 2.1 The over-arching principle of the Association's policy on equal opportunities is to seek to ensure that no person, group of persons or organisation dealing with the Association in any way or who requires assistance or advice from the Association is treated less favourably than any other person, group of persons or organisation.
- 2.2 The Association is seeking to promote and achieve equality of treatment and opportunity for all groups in society without discrimination or prejudice on any grounds, including:
- Age (Young as well as old)
 - Tenure
 - Disability
 - Race, colour, nationality or ethnic or national origin
 - Gender
 - Religion
 - Domestic circumstances
 - Illness
 - Mental Health Problem
 - Sexual orientation
 - Marital Status

Since each of the above is equally important, we will take all reasonable steps to ensure that no discrimination, whether deliberate or inadvertent, occurs. Particular efforts may have to be made, however, to target groups that are currently (and historically) under-represented in the Association's membership and on the Management Committee. Such groups include, for example, young people and owners/sharing owners – the consultation exercise found that younger people and older people did not want particularly to be involved in the Management Committee, but there may be other ways of ensuring that their views are better heard in the future.

- 2.3 To help achieve the main principle, as outlined in section 2.1, the Association has developed the following six general guiding principles:
- **Guiding Principle 1**
To ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services

- **Guiding Principle 2**
To ensure that no one is discriminated against on the basis of race, colour, nationality or ethnic or national origin, sex, colour, physical disability, illness, mental health problem, tenure, age, religion, gender, sexual orientation or marital status.
- **Guiding Principle 3**
To actively encourage younger people, older people, homeowners and people who describe themselves as having a disability to get involved/benefit from the Association's services
- **Guiding Principle 4**
To be mindful of its equal opportunities commitments in relation both to the hiring of contractors/consultants and operation of the Management Committee.
- **Guiding Principle 5**
To ensure that all staff are aware of the Associations commitment to, and obligations in relation to, equal opportunities.
- **Guiding Principle 6**
To ensure equality of opportunity and treatment for all people in relation to the employment of staff.

2.4 The achievement of the above underpins the remainder of this policy statement. A schedule summarising the main ways in which each of these will be addressed (the Equality Action Plan) is contained at Appendix 1.

3. COMMUNICATIONS IN ALTERNATIVE FORMATS

3.1 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually impaired resident may not be able to read the allocations policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is all the more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.

3.2 To help combat this, we will provide information to customers in any special formats as required. Special formats may include:

- Large print
- Audio tape
- Translations into relevant languages
- Use of language or sign interpreters
- Braille

Since it is impractical to have all possible formats available immediately, the Association's commitment relates to the ability and willingness to produce documents in the formats required (or an interpreter if requested) within a period of **twenty-eight working days**. All costs in relation to this will be borne by the Association.

3.3 In accordance with recommendations made by the Royal National Institute for the Blind (RNIB), all communications sent out by the Association will be at least 12-point font Arial text.

3.4 To ensure that this strategy is effective, the availability of documents in other formats will be publicised to our residents, members and all those with whom the Association deals. In particular, making material available in large print will be promoted in response to requests received by older people.

4. PUBLICISING THE EQUAL OPPORTUNITIES POLICY

4.1 It is absolutely critical that the policy is publicised if it is to stand any chance of being successfully implemented. The level of interest in the policy will vary from one person to another depending on a whole range of factors. To help respond to this, the Association will publicise the policy to all tenants, members and other residents in plain language that is easy to understand. This will outline the main points and will remind readers that they can request a copy of the policy in full or in summary (in any appropriate format or language).

4.2 All employees, applicants for employment and contractors will be notified of the existence of the policy and will receive individual copies on request (copies will automatically be provided for successful job applicants and contractors being used by the Association). All existing employees will receive training.

- 4.3 Existing and future Committee Members will receive ongoing equal opportunities training relevant to their responsibilities within the organisation. All members will be encouraged to keep up to date with development in the area of good practice in equal opportunities.

5. RACIAL DISCRIMINATION

5.1 In line with accepted good practice, the Association will:

- Comply with the provisions of the Race Relations (Amendment) Act 2000 and all relevant Codes of Practice to help ensure that there is no racial discrimination in the provision of housing, services or employment.
- Recognise and, where necessary, use the specific laws relating to racial harassment in the Crime and Disorder Act 1998
- Adopt policies and procedures which ensure equal treatment and the elimination of racial discrimination and which, where appropriate, encourage positive action on behalf of minority ethnic groups
- Take action to improve the involvement of tenants and other residents from minority ethnic groups in the work of the Association
- Ensure that there is no racial discrimination in relation to the recruitment and selection of employees, general members of the Association and the Management Committee
- Take action against staff members, Committee members or residents found guilty of racial harassment
- Deal with racial, sectarian or otherwise offensive graffiti immediately by having it removed as an emergency repair
- Review and monitor the Association's membership in order to ensure equal representation and, where necessary, take action to redress any imbalance

6. TARGET-SETTING – GENDER, RACE, AGE AND DISABILITY

- 6.1 Whilst embracing the principles of equal opportunities is something that Cordale takes very seriously, it is nonetheless important that there is some system in place to demonstrate that the Association actually achieves its objectives or otherwise. In other words, the Association must ensure that this policy statement is not used merely to pay lip service to equal opportunities.
- 6.2 One of the ways of doing this is to develop a set of targets against which performance can be quantified. (There are some important exceptions to this and these are discussed in section 11). What is crucial, however, is that a range of targets are set that are realistic and achievable for the Association, otherwise the Committee risks a seemingly poor performance in this area.

7. IDENTIFYING PROBLEMS AND TAKING REMEDIAL ACTION

- 7.1 The Director will review progress against the Equality Action Plan on an ongoing basis. This will ensure that any areas where there may be problems will be flagged up so that remedial action can be taken.

8. STAFF AND COMMITTEE RESPONSIBILITIES

- 8.1 Ultimate responsibility for ensuring that the Association conforms to the principles outlined in this policy and strives to achieve the targets set lies with the Management Committee.
- 8.2 Responsibility for ensuring that Committee is kept adequately informed of progress and alerted to any areas of underachievement lies with the Director. It will therefore be the Director's responsibility to ensure the quality and completeness of information and recommendations being presented to the Committee.

9. DISSEMINATION OF KEY TARGETS AND PERFORMANCE

- 9.1 The Committee will consider an annual report on equal opportunities at its April or May meeting. This will be produced by the staff team and will be based on the outturn figures to the end of March. The results will be discussed at Management Committee level with recommendations for change where relevant, and action points with targets agreed for staff. This information will subsequently be summarised and publicised to all residents through a newsletter or annual report.

10. AREAS NOT SUBJECT TO TARGET-SETTING

- 10.1 As noted in the opening section, the Association actively promotes equality of opportunity and treatment for all groups in society. In the main, the Association will be able to gather information to help it assess the degree to which the policies and procedures across all areas of the business inherently contain an equal opportunities approach.
- 10.2 However, the Association believes that certain questions are inappropriate and intrusive and, as such, it is the Associations practice not to ask them. These include questions relating to sexuality, religion, and certain illnesses (unless medical points are being sought as part of a housing application). Consequently, the Association is unable to work towards setting targets and monitoring performance against these.

11. BREACHES OF THE EQUAL OPPORTUNITIES POLICY

- 11.1 The Association has a policy of zero tolerance towards discriminatory practices and breaches of the equal opportunities policy.
- 11.2 Any allegations against a member of staff or Committee will therefore be investigated thoroughly by the Association's Director. If the allegation is made against the Director, the Chairperson and the most senior officer not directly involved will conduct the investigation in conjunction with Employers in Voluntary Housing and/or Positive Action in Housing as appropriate.

- 11.3 If the allegation is against a resident of the Association's property, the Director should ensure that the solicitor is contacted for advice (as there may be tenancy implications under certain circumstances).

12. POLICY REVIEW

- 12.1 As a strategic document, the Association's Equal Opportunities Policy will be reviewed every three years, with the next review due in October 2007. This review will include an analysis of the priority areas of the Association's activities that have been monitored in the previous years. Any weaknesses or failings in the Association's practices will be addressed in the revised policy commitment.