

Equality and Diversity Policy

Reviewed: Sep 18
Next Review: 2021



ROSEHILL HOUSING CO-OPERATIVE LIMITED
250 Peat Road, Glasgow, G53 6SA

1. Summary Policy Statement

- 1.1 As an employer, landlord, purchaser of goods and services, provider of services and in our dealings with other organisations, Rosehill Housing Co-operative has a legal and regulatory duty to ensure that we promote equality and diversity in all aspects of our work. Therefore, we are intent on ensuring equal opportunity so that no person is treated less favourably than any other person on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. These are the protected characteristics detailed in the Equality Act 2010 which give people legal protection against being treated unfairly. We are committed to ensuring that all of our tenants and other customers are treated equally and fairly in line with statutory requirements.
- 1.2 We will not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation.
- 1.3 Everyone who works for us or with us will be required to abide by this policy.
- 1.4. We will make our publications available in alternative formats where requested and will translate them in to other languages.
- 1.5. Our publications will be jargon free as far as is possible.

2. Definitions of Equality and Diversity

- 2.1 Equality is about treating everyone fairly and ensuring they are given fair chances. It is not about treating everyone in the same way, but recognising the difference in life situations, in experience and ensuring that there is equality of opportunity for all people, taking their needs into account.
- 2.2 Diversity is the term used to describe the fact that everyone is a unique individual with a significant variety of differences in life experiences, skills and perspectives. Even though people have things in common with each other they are also different in all sorts of ways. Differences include visible and non visible factors, for example, personal characteristics such as background, culture, personality, and work style, size, accent and language.

3. Responsibilities

- 3.1 The Director has overall responsibility for the implementation of this Equality and Diversity Policy.
- 3.2 The Management Committee will monitor the effectiveness of the Policy by way of an annual report.
- 3.3 Line Managers are responsible for communicating our values and Equality and Diversity Policy to new employees at induction training and ensuring the successful implementation of the policy.
- 3.4 Each member of our staff has a personal responsibility for the implementation of this policy and for ensuring they treat others with respect and dignity in both employment and service delivery.

All employees have a responsibility to be alert and to challenge behaviours and practices which result in unfair discrimination when they occur. Where a member of staff believes such behaviour is occurring they must draw the matter to the attention of their Line Manager to ensure the matter is dealt with immediately.

- 3.5 This policy will be published on our website, made available in our reception area and integrated into all of our policies and procedures where appropriate.

4. Committee Membership

- 4.1 This policy applies to the recruitment and development of Committee Members. All Committee Members are required to be aware of our commitment to equality and diversity and must comply with this policy in carrying out their duties.
- 4.2 Within our Management Committee and Management Team we will ensure that we have a diverse range of skills and expertise to lead the organisation.

5. Membership of Rosehill

All applications for membership will be treated equally and considered in line with our Rules, Allocations Policy and Membership Policy.

6. Service Provision

We provide services to applicants for housing, tenants, sharing owners and factored owners. We are committed to ensuring good practice with regard to equalities across all services we provide. The Scottish Social Housing Charter came into effect on 1st April 2012 and its aim is to help to improve the quality and value of services that social landlords provide to tenants and other customers. Social landlords are required to perform all aspects of their housing services so that: every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services. This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

6.1 Housing Allocations

We will ensure that anyone applying for housing is dealt with fairly and without discrimination. We will adhere to our Allocations policy and monitor it and continue to review and improve the service we give to our tenants and applicants.

6.2 Access to Services

Being aware of the needs and the diversity of customers will ensure that we are able to provide the right services and meet the right needs. We will, as far as practical and reasonable, make sure that access to our premises and other venues we use complies with the provisions of the Disability Discrimination Act.

6.3 Customer Service Standards

We aim to meet the needs of our customers and stakeholders by:

- creating a work culture which values diversity, inclusiveness and respect, and empowers our employees to reflect those values in their dealings with the people who use our service and all other stakeholders;
- ensuring that we provide an accessible service to all of our customers;

- providing clear, meaningful information about what we do and how we do it to our customers, potential customers and other stakeholders, in ways that best suit their individual needs as far as is reasonable and practical;
- identifying as early as possible any individual requirements that may need to be met in order for a customer to fully access our service; and
- being responsive to changing needs and requirements.

6.4 Communication and Translations

6.4.1 We will ensure that all written material is clear, simple and jargon free where possible. The content will be open and inclusive and will not discriminate against any group or individual. Our website will be easily accessible to all our service users and stakeholders.

6.4.2 Information can be provided in various formats: Braille, CD, Large Font and different languages. We will communicate regularly to current service users, tenants, and stakeholders through newsletters, our annual performance report, our web-site and ad-hoc publications.

6.5 Customer Engagement

We recognise the value of customer engagement in shaping and delivering the services we provide, and will seek to actively involve tenants in the management of their homes and our services at a variety of levels.

6.6 Development Programme

We are committed to building homes which are accessible, relevant and of use to the individuals and communities where we work.

7. **Employment of Contractors and Consultants**

Where services are provided by external contractors and consultants, they are expected to adhere to and work in accordance with this policy or similar whilst providing services on our behalf.

8. Equality Impact Assessments

When reviewing policies we will consider the impacts in relation to equalities issues.

9. Procurement of Goods and Services

We will ensure that there is no discrimination in terms of allocation of work to contractors and consultants or in purchasing from suppliers. We will ensure that our contractors are aware of this policy and will encourage them to have similar objectives.

10. Monitoring and Evaluation

- 10.1 We monitor the ethnic, age and gender composition of the existing workforce and of applicants for jobs, and the number of disabled people within these groups, and will review our practices in accordance with the results shown by the monitoring where possible.
- 10.2 Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.
- 10.3 We ask our tenants to advise of their needs and record, where it is provided, the diversity characteristics, communication preferences and any other specific needs to enable us to tailor our services appropriately.

11. Employment

- 11.1 We demonstrate our commitment to equality and diversity in all aspects of employment, including recruitment, training, performance and development management processes and pay.
- 11.2 We operate a comprehensive Recruitment and Selection Policy to ensure that fair and just employment practices are in place and that people are recruited solely on the basis of their own merit, experience, ability and potential. All vacancies will be advertised in ways that do not discourage traditionally disadvantaged or under represented groups from applying for posts. Specific qualifications or experience will only be asked for where we decide they are essential to the post. All applicants with disabilities who meet the minimum requirements for a suitable job will be considered for interview. The Association recognises the five commitments associated with the JobCentrePlus Positive About Disability Symbol and uses the symbol where appropriate.

11.3 Positive Action

The composition of job applicants and the workforce will be monitored. Should inequalities become apparent and where appropriate and permissible under legislation, positive action will be taken to redress the imbalance by encouraging under-represented groups to apply for the post.

11.4 Terms and Conditions of Employment

All contracts of employment will be issued in accordance with the job roles and not the job holder. Terms and conditions will be standard across all employees and employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and grade it attracts. We have comprehensive conditions of service which are accessible to all employees.

11.5 Disability Arising During Employment

We are committed to ensuring equality of opportunity for those members of staff who are disabled or become disabled for the purposes of the Equality Act 2010 during their employment with us. If you are disabled or become disabled, we encourage you to tell us so that we may support you as appropriate.

11.6 Religious Observance Needs

Some employees and job applicants may have particular religious observance needs (e.g. the opportunity, on an unpaid basis, to observe prayer time or religious festivals or ceremonies). Whenever it is practicable to do so, we will endeavour to meet such needs. If it is not practicable to grant a request (e.g. because of pressing work commitments) a reasoned explanation will be provided, in writing where requested.

12. Managing Breaches of the Policy

Breach of this policy will be considered a serious disciplinary offence and, after investigation, may be regarded as gross misconduct.

13. Performance Management

- 13.1 Staff will monitor the outcomes of any specific strategies in place. The results will be reported to the Management Committee on an annual basis and published in our newsletters.

14. Tenant Participation

- 14.1 We are a tenant focussed organisation and as such we are committed to involving tenants in all aspects of our work and ensuring that tenants are included, informed and consulted about decisions that have an impact on the way their homes are managed.
- 14.2 As part of this commitment we will involve our tenants in the development of our policies and seek feedback where appropriate. We will ensure that any significant changes to this Policy and other Policies which will affect our tenants will be the subject of consultation.

15. Risk Management

- 15.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our material risks which are regularly monitored by our Management Team and Audit Sub-Committee.
- 15.2 Key to the mitigation of the risks associated with equalities issues is having a comprehensive policy in place to govern the prevention of any such issues arising. This policy sets out Rosehill's approach to equalities and diversity
- 15.3 To ensure we continue to manage the associated risks we will periodically review this Policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.

16. Complaints Procedure

- 16.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things can go wrong and that some tenants or other customers may be unhappy with the service provided.

- 16.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. In addition, we initially issued all of our tenants with a copy of the new Procedure introduced in October 2012. This information leaflet is also issued to all new tenants as part of the signing up pack.
- 16.3 We are required to report specifically to both our Management Committee and the Scottish Housing Regulator on any complaints concerning equalities issues.

17. DATA PROTECTION

- 17.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the General Data Protection Regulation (GDPR).
- 17.2 We hold a variety of Personal Data relating to individuals including tenants, waiting list applicants, factored owners, other service users, employees and Committee Members. Our Privacy Policy sets out the basis on which we can process and share such data with third parties, it also sets out how we will securely store individuals' data, whether electronically or in paper format. It also provides information on individuals' rights under GDPR including: to view personal data held about them by us; to request a restriction of processing of their data; the right to be forgotten and a right to object to us processing their data. In terms of the rights to be forgotten and to restrict or object to processing of Personal Data, any such requests will require to be considered on their own merits and legal advice will need to be obtained in some circumstances. We have the responsibility for accepting or refusing such requests and will do so in *writing*.
- 17.3 Under GDPR we are required to provide individuals whose Personal Data we hold with a Fair Processing Notice (also known as a Privacy Notice). The Notice sets out the Personal Data we process and the basis for doing so.
- 17.4 We will only keep and process Personal Data for the original purpose we gathered it for and we will not keep it for any longer than necessary. Attached to our Privacy Policy is a table of Retention Periods for Personal Data held and processed by us. We recognise that not all

Personal Data can be processed and kept for the same period of time, and this will vary depending on the individual circumstances of each person whose Personal Data we hold.

- 17.5 The Privacy Policy sets out what should happen in the event of a Data breach e.g. does the breach require reporting to the Information Commissioner's Office and whether the individual affected should be notified. Timescales are set out for dealing with data breaches.
- 17.6 A full copy of our Privacy Policy is available to employees through the Central Library, GDPR\Final Documents or from our website www.rosehillhousing.co.uk

18. Policy Review

- 18.1 This Policy will be reviewed at least every three years or sooner to ensure it continues to reflect current thinking and practice and to comply with legislative requirements and regulatory guidance.

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