

Equalities Strategy

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[Rosehill Equalities Strategy](#)

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1. Introduction and Purpose

The population of Pollok and Rosehill's area of operation is predominantly white Scottish at the moment however that dynamic has been changing over the past decade with other ethnic groups starting to move to the area.

Equality is not always about treating everyone the same – it is about recognising our differences and treating people accordingly so that the outcome for each person is the same.

We recognise that there are specific groups and individuals in society who experience discrimination, harassment and exclusion as a result of different aspects of their identity. This can have a profound impact on their lives and adversely affect the opportunities open to them. Rosehill Housing Association Limited (RHA) is committed to proactively tackling this discrimination and disadvantage.

We know good housing is a basic human need. It provides the foundation for good health and opportunities for individuals and contributes to sustainable places and quality of life for communities. So, RHA plays a vital part in ensuring the welfare, protection and access to opportunities for everyone in its area of operation.

At Rosehill Housing Association (RHA):

Our Vision

"We will provide excellent quality affordable and efficient homes in neighbourhoods that are well managed and maintained; we will contribute to sustaining communities where people feel safe and want to live by providing housing and other services and working with our voluntary and statutory partners."

Our Core Values are:

We will

- Invest and Support

We will be

- Engaged and Responsive
- Accountable and Compliant
- Fair and Approachable
- Efficient and Responsible
- Excellent and Committed

We will deliver these values by:

- Providing high quality and affordable homes through the maintenance and improvement of and investment in our housing and, the building of new houses that are well designed and efficient and meet identified needs.
- Engage effectively with tenants and service users so that our service delivery meets their requirements.
- Providing houses and services that are Value for Money for people who want to live in our communities.
- Being innovative in developing services and activities that support our communities.

- Building and contributing to effective partnerships to support the delivery of our vision and values.
- Using our financial, human and other resources efficiently and effectively to achieve maximum benefit and full potential.
- Demonstrating the highest standards of governance, accountability and compliance.
- Rosehill's Equalities Strategy sets out the steps that RHA will take to ensure that:
- All customers, employees and wider stakeholders feel part of the local community, have full access to RHA services and have the opportunities to realise their potential.

This strategy demonstrates our approach to meeting Outcome 1: Equalities in the Scottish Housing Charter:

‘Every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services’

This strategy begins with a summary of what we know about the diversity of our customers and our staff team. It then summarises an assessment of our current approach to equality and diversity across different parts of our operation:

- Knowing our customers
- Leadership, partnership and organisational commitment
- Involving our customers
- Responses, services, access and customer care
- A skilled and committed workforce

It uses this assessment to identify key objectives and sets out an action plan for 2024 - 2027 in achieving these objectives.

2. Our Equalities Duty

As Registered Social landlords we have a duty to service users to encourage better and positive equalities outcomes for our tenants, service recipients, staff, committee members and members of the wider community. We are committed to performing our duties and performing our functions in a way which achieves this aim. We will continue to work closely with all of our customers and staff to better understand how we can achieve our aims.

Duties under the Housing (Scotland) Act 2010

These require us to perform our functions in a way which encourages equal opportunities and in particular the observance of the requirements of the law relating to equal opportunities.

Duties under the Equality Act 2010

These duties require us in the exercise of our functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and

- foster good relations between people who share a protected characteristic and those who do not.

Regulatory Requirement

The Scottish Housing Regulator states:

Social landlords must work to understand the individual needs of their tenants and other service users, and to deliver services that recognise and meet these needs. As part of this we require landlords to ask for equalities' information from their tenants and other service users, and to use it to inform their decision making. Social landlords must take equalities impacts into account when taking decisions that affect their tenants and other service users.

We further expect landlords to facilitate joint working with tenants and other service users to help ensure customer-focused decision making which recognises that people with different protected characteristics may have different needs.

Through our regulatory role we further promote equality across social landlords by, for example:

- *conducting thematic inquiries on equalities where appropriate;*
- *highlighting and sharing positive practice where we find it; and*
- *providing accessible and comparable information about each landlord's performance to empower tenants and other service users and give them a voice.*

We have set Regulatory Standards of Governance and Financial Management for social landlords. One Standard is that social landlords conduct their affairs with honesty and integrity. This requires landlords to pay due regard to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics. The standards also require registered social landlords (RSLs) to have effective plans in place to ensure that suitable people are readily available to take on leadership roles on their governing bodies when others leave or need to be replaced. This planning should take into account how they will achieve the appropriate and effective composition and profile of governing body members. The achievement of the RSL's business purpose is helped by having a diverse governing body that can better understand its tenants, other service users, staff and the wider environment within which it operates.

Each year we require landlords to confirm through their Annual Assurance Statement that they comply with our requirements, or what they are doing to improve their compliance.

We will ensure that we meet all regulatory requirements relating to equalities by ensuring that we follow all regulatory guidance in all our work. We will also ensure that by the use of Equality Impact Assessments, due regard is given to the effect any policy will have on any person in one of the protected characteristics categories.

3. Links to Key Documents

Equalities strategy and Data Protection policy

The collection and usage of equality data must comply with the requirements of data protection law and equality data must be processed in line with data protection legal requirements. Rosehill will ensure that any data collected as part of this strategy is handled according to the Data Protection Policy and its related retention periods. All data will also be collected in line with the organisations privacy Notice.

Equalities Strategy and Tenant Participation Strategy

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.

Rosehill will ensure that relevant data is collected from all the Committee and involved tenants to ensure that relevant support is put in place to make sure that participation is inclusive.

Equalities Strategy and Customer Charter

The Scottish Social Housing Charter, Standard 1 sets out a clear link between customer care and the equality strategy:

"...every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services."

Having good information about individuals' needs, including equality information, is essential to enable social landlords to ensure those needs can be addressed.

4. Equalities and Diversity: What do we know

We have worked on gathering all the information to allow us to produce the current strategy, however we now need to work towards a meaningful way of using the data collected to shape our visions for our area as well as any policies that we currently operate from. RHA has developed an Equality Impact Assessment tool, which it uses whenever a new policy is developed or an existing policy is reviewed to proactively identify and remove potential discrimination (or barriers faced by particular groups) or, in some cases adapt a policy or practice to better advance equality of opportunity for all.

5. Equality Framework Assessment

The Equality Framework for Local Government looks at four themes for Equality and Diversity. These are:

- Understanding and Working with your Communities
- Leadership and Organisational Commitment
- Responsive Services and Customer Care
- Diverse and Engaged Workforce

This framework (app 1) allows organisations to self-assess their performance with regard to Equalities. An initial assessment against this framework will be used to assess Rosehill's performance to this end. From this assessment a list of improvement objectives and an action plan will be formulated.

The framework has four levels for self-assessment which are:

1. Developing - The developing level criteria contain the basic building blocks for each priority.

An organisation at the Developing level has made an organisational commitment to improving equality. It is putting in place processes to deliver on equality issues and is working towards meeting and exceeding the statutory requirements.

2. Achieving - An organisation at the Achieving level has policies, processes and procedures in place and delivers some good equality outcomes. It is not only meeting but can demonstrate exceeding statutory requirements.
3. Excellent - An organisation at an excellent level has mainstreamed equality throughout the organisation and can demonstrate that it is delivering significant outcomes across its services that are making a difference in their communities. The organisation not only exceeds statutory requirements, and it is an exemplary council for equality and diversity in the local government and wider public sector.
4. Not meeting any of the criteria would mean that no assessment can be made

Service Area: Understanding and Working with 2024 Self - Assessment Community	
Collecting and Sharing Information <i>The Organisation has gathered and published information and data on the profile of its communities and the extent of inequality and disadvantage. Plans are in place to collect, share and use equality information.</i> Rosehill is clear about what sources of information (both local and national) are relevant and useful. Rosehill is compliant with GDPR legislation in its collection, analysis storage and use of data and information and has all security measures needed in place. Rosehill has a dedicated DPO resource in place to ensure legislative and regulatory compliance.	Achieving

<p>Analysing and using data and information</p> <p><i>Systems are being developed to analyse soft and hard data/intelligence about our tenants, their needs and aspirations.</i></p> <p>Equalities information is collected and taken account of.</p> <p>Rosehill is compliant with UKGDPR legislation, analysis and use of data and information.</p>	<p>Achieving</p>
<p>Effective Community Engagement</p> <p><i>Engagement mechanisms and structures are in place to involve equality stakeholders and scrutinise service delivery, decision-making and progress. The Organisation engages with all its communities when making decisions, including those with protected characteristics.</i></p>	<p>Achieving</p>

<p>A range of engagement methodologies are used.</p> <p>Priorities have been changed as a result of engagement with a clear and demonstrable evidence basis.</p> <p>Engagement with the community effectively informs decisions.</p> <p>Feedback is given and people in the community are able to challenge and have their views taken account of.</p>	
<p>Fostering good community relations</p> <p><i>The organisation and its partners have a strong understanding of the quality of relations between different communities and collectively monitor relations and tensions.</i></p> <p><i>The organisation and its partners are actively engaged in planning and delivering activities that foster good relations.</i></p> <p>We are members of Community Safety Glasgow and actively take part in local community planning activities such as G53 Together and the Thriving Places groups which includes a community safety plan.</p> <p>Rosehill take part as and when</p>	<p>Achieving</p>
<p>Participation in public life</p> <p><i>Local people are encouraged to participate in public life or in other activities where they are under-represented.</i></p> <p>Rosehill uses a range of different methods, and it, is able to innovate and find new ways to extend participation.</p> <p>Rosehill's Management Committee is made up solely from its tenant base. Work is done to ensure that the membership of the Committee is representative of its tenant make up.</p>	<p>Achieving</p>

clearly laid out in its participation and scrutiny strategies and within its model rules.

Service Area: Leadership and Organisational Assessment Commitment	2024 Self -
<p>Leadership</p> <p><i>The Senior Leadership can demonstrate their commitment to equality in decision making and how this informs the way the organisation responds to challenges.</i></p> <p>Senior Managers and the Management Committee demonstrate knowledge and commitment to equality issues. Regular training on Equalities is undertaken. There is evidence that equality considerations inform their decision making in that an Equality Impact Assessment is undertaken for all service areas and their respective Policy.</p> <p>Senior Managers and the Management Committee understand the value and impact good communications can have and ensure that publications, websites and other communications channels are as diverse as possible.</p> <p>Rosehill promotes a positive narrative around equality and good relations across the whole community</p>	<p>Achieving</p>
<p>Priorities and Partnership Working</p> <p><i>Corporate and partnership documents capture the commitment of the organisation and partners to equality.</i></p> <p>Equality objectives are reflected in local strategic planning.</p>	<p>Developing</p>
<p>Assessing Equality Impact in Policy and Decision Making</p> <p><i>Equality impact assessment is integrated systematically into planning and decision making across the organisation.</i></p>	<p>Achieving</p>

<p>There is senior level commitment to using and understanding equality impact assessment to inform planning and decision making.</p> <p>Rosehill's assessments are accessible, robust and meaningful.</p> <p>Rosehill takes account of the information and actions within its EIA's. The findings, recommendations and conclusions are shared effectively to inform decisions and planning. Mitigating actions are identified where appropriate</p>	
<p>Equality Objectives and Annual Reporting</p> <p><i>Equality objectives for the organisation have been set and published in accordance with the requirements to support the public sector Equality Duty.</i></p> <p>The specific duty to publish equality objectives has been met</p> <p>Objectives are underpinned by robust equality analysis.</p> <p>Objectives are SMART(Specific, Measurable Realistic, Achievable and Timely)</p>	Achieving
<p>Performance Monitoring and Scrutiny</p> <p><i>Appropriate structures are in place to ensure delivery and review of equality objectives.</i></p> <p>The Management Team and Management Committee have responsibility for the equality agenda.</p> <p>There are resources available for supporting equality work and the staff, Committee and involved tenants have regular equalities training.</p>	Achieving
Service Area: Responsive Services and Customer Care	2024 Self - Assessment
Commissioning and Procuring Services	Achieving

Mechanisms are in place to ensure that equality standards are embedded throughout the procurement cycle.

Procurement is undertaken through public contracts Scotland and Equalities are considered in line with the EIA for procurement.

Rosehill considers and publishes annually how the rent payer's pound is spent in regards to procurement.

Specifications take account of the different needs of users, for example through equality impact assessments. This is especially important when working in people's homes and individual requirements are taken into account.

Rosehill has an established Social Value Framework. The Social value of contracts is measured.

The performance of sub- contracting arrangements is measured.

Integration of equality objectives into service planning

Structures are in place to ensure equality outcomes are integrated into business objectives. This is done through the business plan, strategic plans and operational plans into service delivery through EIA's

Service plans are monitored regularly to ensure that equality objectives are being met.

Equality analysis is fed into planning and assessment of service plans. All service policies highlight the needs of protected groups.

Service Delivery

The organisation has systems to collect, analyse and measure how satisfied all sections of the community are with services.

Service users are consulted about service development and delivery. The outcome of the

Developing

Achieving

consultations are published on the Company website.

The organisation is able to analyse and measure whether all sections of the community are able to access services.

It is clear who the service users are. Services carry out mapping exercises to identify and review current participation and to highlight gaps.

Rosehill collects data about customer satisfaction with its services. The mapping and satisfaction data collected is disaggregated by different equality groups.

Complaints are disaggregated by protected groups. There are mechanisms in place to enable staff to introduce business improvements.

All customers are treated with dignity and respect.

Service Area: Diverse and Engaged Workforce		2024 Self - Assessment
Workforce Diversity		Developing
<i>The organisation understands its local labour market, and has mechanisms in place to monitor its workforce against protected characteristics.</i>		
Rosehill are members of EVH who have robust equalities monitoring in place for recruitment and gather equalities information throughout the recruitment process		
Rosehill has begun to identify the steps it needs to take to achieve a diverse workforce. These are reflected in recruitment policies and procedures.		
Recruitment and selection is monitored at all stages of the process by protected characteristics		
Inclusive Strategies and Policies		Achieving

The equality objectives contained within workforce strategies are implemented and monitored.

Rosehill has a basic set of policies and practices to enhance workforce equality and diversity including reasonable adjustments, equal pay, flexible working and family friendly policies.

When necessary, changes have been made as a result of equality analysis findings.

Managers apply policies and practices across the organisation in a consistent manner for all staff.

Staff are engaged positively in employment and service transformation and in developing new roles and ways of working.

Training and development offer supports a wider equalities agenda for the organisation.

Training courses are meeting the needs of all staff.

Collecting, Analysing and Publishing Workforce Data

The organisation regularly monitors, analyses and publishes employment data in accordance with its statutory duties.

Data on applicants, people shortlisted and the composition of the workforce is systematically collected. This can be disaggregated by the protected characteristics.

The gender and race pay gap is addressed by means of being part of the EVH pay structure.

Workforce information is published to cover basic legal requirements and includes analysis of pay evaluation outcomes.

Learning and Development

The organisation provides a range of accessible learning and development opportunities to

Achieving

Achieving

support staff, Management Committee and engaged tenants in achieving equality objectives and outcomes.

Equality and diversity forms part of the training and development for key decision makers, including the Management Team and Management Committee.

Equality issues are mainstreamed into all training (e.g. training on customer care)

Employees are confident that they can deliver services to diverse customers. They are made aware of equality objectives or any changes or improvements.

Health and Wellbeing

The organisation promotes the health and well-being of staff in its workforce and other policies.

There are coherent Health and Wellbeing policies that addresses a range of related issues.

Improvements have been made to the working environment.

Staff are engaged positively in employment and service delivery.

Reasonable Adjustments are provided in a timely fashion consistently across the organisation when identified (ramp access etc)

Access to Occupational Health Services are available (well-being sessions, employee counselling etc.)

Managers have received training on mental health awareness and say they are equipped to address staff issues.

Reports of harassment and/or bullying incidents are monitored and appropriate action is taken to address any issues that have been identified.

Achieving

6. 2024-27 Action Plan

The Equality Action Plan for 2024 – 2027 can be found at appendix.2

7. Data Collection

In August 2021 the Scottish Housing Regulator published its guidance on data collection along with its recommended data collection form (app 3).

The Guide provides social landlords with comprehensive practical advice on equality data collection to support effective implementation of regulatory requirements.

The guide looks at what Social Landlords need to consider in their Equalities Strategies with regard to the collection of data. Primarily RSL's need to consider:

- why data is to be collected;
- what data is to be collected;
- what barriers to data collection exist; and
- how data is to be used.

The SHR has published regulatory requirements that every social landlord must:

"Have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights..."

The regulatory framework specifies that this requires social landlords to collect equality information in respect of the protected characteristics. Each social landlord must:

"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."

and

"... collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. ..."

The SHR also makes clear that:

"Landlords should adhere to our statutory guidance. In certain cases, where exceptional circumstances exist, it may be appropriate for a landlord to depart from our statutory guidance. Where a landlord is considering departing from statutory guidance, it should discuss with us why a departure from the guidance is necessary before acting. The landlord should keep a record of the reasons for the departure."

The implications of these requirements for Rosehill are that:

- the collection of data is a specific requirement, applying to all protected characteristics;
- Our equality data collection forms must cover all the protected characteristics for the groups specified by the SHR;
- This requirement does not refer to job applicants, however Rosehill must also gather personal data about job applicants, including data about an applicant's protected characteristics, and must process this in line with data protection law;
- Rosehill must adhere to the statutory guidance unless exceptional circumstances exist.

GWSF have received clarification from the EHRC and ICO that data should NOT be linked to an

individual and should be completely anonymous. To that end we will use a separate collection form for each purpose which will ask only about the protected characteristics relating to that particular group. We will ensure that the information collected will be monitored but anonymously. To ensure this the form will be kept separately from any other identifying information we gather. So this means that an applicant's equalities data will be kept completely separate from their application form and a tenant's information will be gathered but no identifiers will be on the forms. To this end Rosehill as part of the data collection requirement look at all areas where we must collect data and decide with the assistance of our Data Protection Officer what information it is required to collect and how and where the data will be stored.

When collecting Equalities data RHA takes account of The Scottish Housing Regulator's: "Collecting Equality Information: National Guidance for Scottish Social Landlords" (revised April 2022). In response to this guidance, the RHA Management Committee recommended Equality data should be collected anonymously. It was agreed it be reviewed periodically by the Committee and Senior Staff. 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.

8. Human Rights

In January 2022 the Chartered Institute of Housing published their guidance on housing as a human right. This document sets out the seven dimensions of adequate housing and forms the basis of housing as a human right. RHA has policies, strategies and processes in place to ensure we meet the requirement for housing as a basic human right but will continuously monitor these to ensure they are compliant and help to meet the ethos of housing as a human right in line with guidance.

The seven dimensions of adequate housing:

1. *Security of tenure: legal protection from forced eviction, harassment by landlords and other threats to having a settled home.*

RHA only uses eviction as an absolute last resort all other remedies to avoid eviction are followed. Anyone who is being evicted is supported and given enough information to avoid the eviction in the first instance and to get emergency housing after that.

RHA have well-trained and supportive staff and internal processes ensure that tenants aren't harassed by staff.

RHA has clear policies and procedures to prevent harassment and to deal with any cases in the swiftest possible way.

2. *Habitability: A dwelling in a decent state of repair that provides a dry, warm home and adequate living space.*

All RHA properties meet the SHQS and EESSH standards. RHA has an excellent repairs service and a comprehensive asset management strategy.

3. *Availability of services: A dwelling has facilities that makes it habitable, such as sanitation and waste disposal facilities, washing facilities, cooking facilities, storage, heating and lighting.*

RHA properties all meet SHQS and EESSH and are maintained to a high standard with all basic amenities in place and well maintained. RHA also works closely with GCC to ensure that

adequate waste disposal services are in place.

4. *Affordability: Housing costs are not so high that people struggle to pay for food, fuel and other basics.*

All RHA rents are classed as affordable using recognized affordability measures. RHA have an Income Maximisation Team which includes welfare rights and money management support. Tenants are consulted on rent levels and rent setting.

5. *Accessibility: Suitable housing is available to those who require it, including housing that maximizes the capacity of individuals with a disability or limiting illness to live independently.*

RHA have adapted properties within the stock profile and work with GCC and health professional to ensure required adaptations are undertaken in a timely manner. RHA has an Adaptations Policy in place which is regularly reviewed.

6. *Location: Housing is situated in areas that allow access to services (e.g., education, health, shops), paid work and participation in civic society. Housing should not be in an environment that is hazardous to health.*

The Scottish Governments housing to 2040 promotes 20-minute communities. RHA stock is within 20 minutes of all required amenities such as shops, health centres, schools, places of employment or places of worship.

7. *Cultural adequacy: Housing and its allocation should allow people to live in ways that express their cultural identity and does not disrupt their cultural affiliations.*

RHA have policies in place to ensure that diversity is recognised and embraced. Both staff and Committee Members receive regular training on both equalities and diversity. RHA have policies in place to deal with any form of harassment which includes harassment due to cultural or religious beliefs.

Rosehill is aware that the Scottish Government is currently consulting (since 2023) with various groups to inform the development of a Human Rights Bill to incorporate Human Rights into Scottish Legislation. Rosehill will take account of any legislative changes as they occur. The importance of ensuring the protection of people's human rights was emphasised by Rosehill when the 2024 Equality Policy review changed the policy title to "Equality and Human Rights Policy".



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Equality Framework for Local Government (EFLG) 2020 Version



Introduction

The Equality Framework has been updated to reflect the latest legislation affecting equality such as Gender Pay Gap reporting, GDPR, the changing context of the local government sector and equality in Britain and in response to other significant issues that might affect equality including the UK's decision to leave the European Union.

The equality framework is intended to help Councils:

- deliver accessible and responsive services to customers and residents in their communities including those from protected characteristics
- employ a workforce that reflects the diversity of the area they are serving
- provide equality of opportunity for all staff
- Meet the requirements of the Public Sector Equality Duty

It seeks to do this by:

- Identifying the areas of activity that Councils need to be address to deliver good equality outcomes
- Helping Councils to understand how they can build equality into processes and practices
- supporting organisations to become inclusive employers
- Enabling Councils to informally self-assess their progress on the equality improvement journey and determine where and how they need to improve.
- Providing the framework for an LGA Equality peer challenge

Underlying Principles

- The EFLG is part of the LGA's sector led improvement offer to the local government sector and as such engagement with the Framework is voluntary.
- The Framework can help with compliance with the Public Sector Equality Duty which is a legal obligation of the Equality Act 2010.
- The Framework references the nine legally protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also encourages Councils to consider other issues that might be affecting their staff such as caring responsibilities as well issues affecting communities such as socio-economic inequality and isolation including rural isolation
- The EFLG is supportive of the EHRC's six selected domains of equality measurement which it has identified as the areas of life that are important to people and that enable them to flourish. They are: Education, Work, Living standards, Health, Justice and personal security, and Participation
- The modular design of the Framework reflects the fact that Councils come in all shapes and sizes with different resources, communities and priorities. It recognises that action on all equality issues at once is not always possible.
- The Framework supports the LGA's Equality Peer Challenge

The Framework sets out four modules for improvement underpinned by a range of criteria and practical guidance that can help a Council plan, implement and deliver real equality outcomes for employees and the community. The four modules are:

- **Understanding and working with your communities**
- **Leadership and Organisational Commitment**
- **Responsive Services and Customer Care**
- **Diverse and Engaged Workforce**

For each module there are three Levels. Developing; Achieving and Excellent. The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities. Councils can be at different levels of the framework for different modules.

Developing - The developing level criteria contain the basic building blocks for each priority. An organisation at the Developing level has made an organisational commitment to improving equality. It is putting in place processes to deliver on equality issues and is working towards meeting and exceeding the statutory requirements.

Achieving - An organisation at the Achieving level has policies, processes and procedures in place and is delivering some good equality outcomes. It is not only meeting, but can demonstrate exceeding statutory requirements.

Excellent - An organisation at the Excellent level has mainstreamed equality throughout the organisation and can demonstrate that it is delivering significant outcomes across its services that are making a difference in its communities. The organisation not only exceeds statutory requirements and it is an exemplar council for equality and diversity in the local government and wider public sector.

The modules contain a number of themes, each with short descriptor at each level of the framework. This is followed by a set of indicators or criteria that can be used to self-assess.

Understanding and Working with your Communities	Leadership and Organisational Commitment
Collecting and sharing information	Leadership
Analysing and using data and information	Priorities and working in partnership
Effective community engagement	Assessing equality impact in policy and decision taking
Fostering good community relations	Equality objectives and annual reporting
Participation in public life	Performance monitoring and scrutiny
Responsive Services and Customer Care	Diverse and Engaged Workforce
Commissioning and procuring services	Workforce diversity
Integration of equality objectives into service planning	Inclusive strategies and policies
Service delivery	Collecting, analysing and publishing workforce data
	Learning and development
	Health and wellbeing

Understanding and Working with your Communities		
Developing	Achieving	Excellent
Collecting and Sharing Information		
<p>1.1 The organisation has gathered and published information and data on the profile of its communities and the extent of inequality and disadvantage. Plans are in place to collect, share and use equality information with partners.</p>	<p>1.2 Relevant, proportionate and appropriate information about the local communities and their protected characteristics is being gathered. Information is shared across the organisation and with partners</p>	<p>1.3 A comprehensive set of information about local communities/protected characteristics needs and outcomes is regularly updated and published and used to identify priorities for the local area</p>
Criteria		
<p>The organisation is clear about what sources of information (both local and national) are relevant and useful.</p> <p>The organisation knows what information is already being collected – internally and by its partners, including voluntary and community sector stakeholders?</p> <p>Some information and data has been gathered and published.</p> <p>The organisation is working with its partners to ensure information is shared effectively.</p> <p>Partners ensure efficient collection of data that avoids duplication.</p> <p>The authority is compliant with GDPR legislation in its collection, analysis storage and use of data and information</p>	<p>Information is disaggregated and analysed on the basis of different communities, including those sharing protected characteristics.</p> <p>Quantitative and qualitative research methods are used to gather data and information</p> <p>National and regional data is used and analysed.</p> <p>Information from ward councillors is gathered in a systematic way.</p> <p>Data is easily accessed, shared and used by departments across the organisation.</p> <p>The organisation is working with partners to address identified gaps in information. Data is disaggregated using the same or similar categories.</p> <p>Information is being shared to identify and measure equality gaps and to inform outcomes for the area.</p> <p>There are robust and effective protocols in place for sharing information between partners and to ensure data protection</p>	<p>The Council is working with partners to continuously develop new and innovative data sharing platforms.</p> <p>The organisation has a sophisticated understanding of the difference between the equality profile of their local area and how that translates to inequalities for different groups.</p> <p>Changing needs are identified and prioritised across a wide range of services and outcomes by, for example, referring to the Equality and Human Rights Commission's Equality Measurement Framework</p> <p>Data is regularly updated and used to set priorities across the organisation and in different services, by geographical area and by protected characteristic.</p> <p>There is evidence of a continuous improvement of the quality of the data.</p> <p>The organisation is working with partners to ensure that changing needs are identified and met.</p> <p>Voluntary and community sector partners/health colleagues and stakeholders access and use the information.</p>

	Information is being captured about health inequality.	
Analysing and using data and information		
2.1 Systems are being developed to analyse soft and hard data/intelligence about communities, their needs and aspirations.	2.2 Information and data is disaggregated and analysed to support the assessment of local need, impacts of changes to services and priorities.	2.3 Up to date and comprehensive equality data is used regularly to plan and assess impacts of decisions.
Criteria		
<p>The organisation is developing and improving systems for collating and analysing the different sets of data being collected.</p> <p>Information is collected by front-line staff or key decision makers and taken account of.</p> <p>The authority is compliant with GDPR legislation, analysis and use of data and information</p>	<p>Data is used to inform the setting of relevant equality objectives, and these are regularly monitored.</p> <p>Data is used in service planning, commissioning and decision making.</p> <p>Data is continuously gathered and analysed.</p> <p>Information is disaggregated in a meaningful way, by relevant protected characteristic and other factors (such as deprivation or rurality) and analysed on a regular basis. Information is used to identify and prioritise on the basis of need.</p> <p>Information and data is used effectively as part of impact assessment/ risk assessment and giving due regard to the public sector equality duty.</p>	<p>The organisation and its partners are using data in the most innovative ways such as predictive analytics to target service interventions</p> <p>Data is being used to predict and measure demand for services</p> <p>Achievement of outcomes are measured and there is evidence of gaps being narrowed.</p> <p>Performance is monitored against equality objectives and outcomes including procured and commissioned services, and with key partners and other stakeholders.</p> <p>Equality outcomes for commissioned and procured services are monitored and reported on.</p>

Effective Community Engagement		
Developing	Achieving	Excellent
<p>3.1 Inclusive community engagement structures are being developed throughout the organisation. There are opportunities for communities to be involved in decision making.</p>	<p>3.2 Engagement mechanisms and structures are in place to involve equality stakeholders and scrutinise service delivery, decision-making and progress. The organisation engages with all its communities when making decisions, including those with protected characteristics</p>	<p>3.3 Formal and informal interactions takes place between the organisation and its diverse communities. Communities from across the protected groups are actively participating in and influencing decision making.</p>
Criteria		
<p>The organisation has an engagement strategy. It is clear about different levels of engagement (i.e. informing, consulting, participating, co-producing) and when these are appropriate.</p> <p>Engagement structures are in place</p> <p>There are opportunities for protected groups to be engaged with decision making.'</p> <p>The organisation can evidence examples of these opportunities.</p> <p>Shared engagement structures/mechanisms are in development with partners.</p> <p>There are some shared engagement activities with partners.</p>	<p>People from protected groups are encouraged and enabled to participate in decision making.</p> <p>A range of engagement methodologies are used.</p> <p>Priorities have been changed as a result of engagement with a clear and demonstrable evidence basis.</p> <p>The organisation and partners engage collectively/share information and results of engagement activities to ensure that particular groups are not being over consulted with.</p> <p>There is an increase in the involvement of underrepresented groups.</p> <p>Engagement with the community and voluntary sector and the wider community effectively inform decisions.</p> <p>There are processes and plans throughout the organisation and with partners to</p>	<p>There are a range of innovative approaches to involving communities and arrangements are made to meet specific or individual needs.</p> <p>Vulnerable people/ communities are participating including the hardest to reach in the community.</p> <p>There is evidence that mainstream engagement mechanisms are increasingly involving previously under-represented groups.</p> <p>Communities are encouraged or supported to influence or make decisions.</p> <p>Staff and stakeholders are able to describe levels of influence within the community and changes made as a result.</p> <p>Key decision makers are involved in the engagement process.</p> <p>There is evidence of partnership arrangements leading to improved outcomes in participation.</p>

	<p>increase stakeholder and voluntary and community sector involvement in informing priorities.</p> <p>Feedback is given and people in the community are able to challenge and have their views taken account of.</p>	<p>Partners are open to challenge and constructive criticism.</p> <p>Where there is very limited or no actual representation within a local demographic, the ability to cater for difference is in evidence.</p>
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Fostering good community relations		
<p>4.1 Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions.</p>	<p>4.2 The organisation and its partners have a strong understanding of the quality of relations between different communities and collectively monitor relations and tensions. The organisation and its partners are actively engaged in planning and delivering activities that foster good relations.</p>	<p>4.3 The organisation takes a sophisticated approach to fostering good relations which has resulted in measurable improvements in relationships between diverse communities</p>
Criteria		
<p>There are joint partnerships responsible for monitoring community tensions.</p> <p>The Community Safety Strategy addresses the issue of community cohesiveness</p> <p>Council leaflets/ posters/ communications/ events promote positive relations.</p>	<p>Harassment and hate crimes are monitored and analysed regularly</p> <p>Appropriate action is taken to address the issues that have been identified.</p> <p>Members play a role in monitoring community relations and reporting intelligence</p> <p>Data is available, and is it disaggregated to cover the protected characteristics.</p> <p>Data is regularly analysed and acted upon.</p> <p>Stakeholders and communities are involved in the monitoring.</p>	<p>Information is available to show there has been an improvement in community relations.</p> <p>The organisation works with others to improve performance on good relations between diverse communities.</p> <p>The Council's leaders maintain a high profile on community relations. The Council makes use of Members' links with different communities depending on circumstances.</p> <p>The Council plays a leading role in bringing the partners and the community together if there are serious incidents of hate crime.</p> <p>There is obvious and demonstrable cross over between equality, diversity and community cohesion</p>

Participation in public life		
<p>6.1</p> <p>The organisation has a clear understanding of the level of participation in public life by different communities/protected characteristics. This can include involvement in local democracy and representation e.g. school governors, councillors, board members of voluntary/statutory sector organisations.</p>	<p>6.2</p> <p>Local people are encouraged to participate in public life or in other activities where they are under-represented. The Council uses a range of different methods and it is able to innovate and find new ways to extend participation in certain communities.</p>	<p>6.3</p> <p>There is an improvement in the participation rates of under-represented groups in public life. The organisation can demonstrate that people across a range of protected characteristics are able to influence decisions</p>
Criteria		
<p>Information/data is gathered about the extent of involvement in public life</p>	<p>The organisation actively informs and involves local people, including under-represented groups, in opportunities for public participation.</p> <p>Outreach work or public campaigning has been undertaken to increase levels of participation by protected groups.</p>	<p>There is evidence that improvements have been achieved.</p> <p>More people from under-represented groups are participating across a wider range of activities.</p> <p>Decision makers are from a wider range of backgrounds.</p>

Leadership and Organisational Commitment		
Developing	Achieving	Excellent
Leadership		
<p>7.1 The political and executive leadership have publically committed to reducing inequality, fostering good relations and challenging discrimination.</p>	<p>7.2 Political and executive leaders demonstrate personal knowledge and understanding of local communities and continue to show commitment to reducing inequality.</p>	<p>7.3 Leaders have gained a reputation within the community and with all of its partners for championing equality, balancing competing interests and fostering good relations.</p>
<p>Criteria</p> <p>Senior leaders in the organisation have stated their commitment to a diverse workforce and have made clear what is expected from staff when delivering services to the community</p> <p>Leadership on equality is demonstrated in a way that is recognised and understood by the organisation and local communities.</p> <p>Leaders have publicly committed to improving equality in their area.</p> <p>The organisation has established and publicised a strong business case for its equality work.</p> <p>The organisation regularly communicates its commitment to promoting equality to staff and the community</p> <p>There is evidence that publications reflect the organisation's commitment to equality and fostering good relations.</p>	<p>Senior leaders can demonstrate their commitment to equality in decision making and how this informs the way the organisation responds to challenges</p> <p>Senior leaders demonstrate knowledge and commitment to equality issues. They 'walk the talk'</p> <p>There is evidence that equality considerations inform their decision making.</p> <p>Senior leaders understand the value and impact good communications can have and ensure that publications, websites and other communications channels are as diverse as possible</p> <p>The organisation promotes a positive narrative around equality and good relations across the whole community</p> <p>There are examples of where the organisation and its partners have had to take unpopular decisions but still managed to keep local communities on board.</p> <p>The organisation has taken steps to counter negative stereotypes or dispel myths.</p>	<p>The organisation is able to show that even when making difficult decisions it continues to demonstrate a clearly articulated and meaningful commitment to equality.</p> <p>Senior leaders have and own clear knowledge of local equality priorities and how and why they are being addressed.</p> <p>Senior leaders act as ambassadors for the equality agenda.</p> <p>Senior leaders personally challenge inequalities and drive an improvement agenda.</p> <p>Staff, the community or the voluntary and community sector can offer good examples of how effective communication and engagement with the Council has enabled the organisation to prevent or manage tensions between different equality groups.</p> <p>The organisation plays a role in ensuring that all stakeholders collectively manage the conflicting needs of their communities.</p>

<p style="text-align: center;">Priorities and Partnership Working</p>		
<p>8.1 Partnership working arrangements are being reviewed with the voluntary and community sector and the wider community to ensure that local equality priorities are addressed</p>	<p>8.2 There is a coherent, shared vision of equality for the local area, with clear priorities which have been agreed and understood by all key stakeholders, including the voluntary and community sector.</p>	<p>8.3 The organisation can demonstrate success in working with partners in the public, private, community and voluntary sectors to address equality priorities, which are reviewed on a regular basis.</p>
<p>Criteria</p>		
<p>Corporate and partnership documents capture the commitment of the organisation and partners to equality.</p> <p>Equality objectives are reflected in local strategic planning.</p>	<p>There are shared equality priorities, objectives and outcomes for the local area which are understood and acted on at all levels within the organisation.</p> <p>There is a clear shared vision for the area.</p> <p>The organisation and its partners monitor, review and evaluate performance against equality priorities, including inequality and health inequality</p> <p>The results of these activities contribute directly to the development of the organisation's objectives.</p>	<p>Staff, the community or the voluntary and community sector give good examples of improved outcomes/ reduced inequality/ improvements in health inequality</p> <p>Review mechanisms are in place.</p> <p>There is evidence that cross-organisational learning is taking place.</p> <p>The community and voluntary sector say that they are treated as equal partners by the Council.</p>

Assessing Equality Impact in Policy and Decision Making		
9.1 Due regard is taken to the aims of the general equality duty when making decisions and when setting policies	9.2 Equality analysis/ impact assessment is integrated systematically into planning and decision making across the organisation.	9.3 The organisation can demonstrate that improvements in equality outcomes are being delivered as a result of effective equality analysis/ impact assessment, and that negative impacts have been mitigated.
Criteria		
<p>The organisation has an agreed approach to conducting equality analysis/ impact assessment of policy and service decisions.</p> <p>Training and support on equality analysis/ impact assessment is available</p> <p>Impact assessments take account of the views of those affected by the policy or decision.</p> <p>There is a process for ensuring that equality impact assessments are sufficiently robust.</p>	<p>There is senior level commitment to using and understanding equality analysis/ impact assessment to inform planning and decision making.</p> <p>The organisation's assessments are accessible, robust and meaningful.</p> <p>There is evidence that Members routinely take account of equality analysis/ impact assessment when making decisions.</p> <p>Decisions around budget cuts and savings have taken account of cumulative impact.</p> <p>The findings, recommendations and conclusions are shared effectively to inform decisions and planning.</p> <p>Mitigating actions are identified where appropriate</p>	<p>The organisation can demonstrate how equality analysis/ impact assessment has been used to identify needs and improve outcomes/ reduce inequality.</p> <p>The organisation can provide evidence of how or where equality analysis/ impact assessment has informed decision-making and led to different, tailored services that have improved outcomes.</p> <p>The organisation captures information about what budget/service cuts mean to people's lives.</p>

Equality Objectives and Annual Reporting		
<p>10.1 Equality objectives for the organisation have been set and published in accordance with the requirements to support the public sector Equality Duty.</p>	<p>10.2 Specific and measurable equality objectives have been integrated into organisational strategies and plans and action is being taken to achieve them. Outcomes are measured and monitored regularly by senior leaders.</p>	<p>10.3 The organisation can demonstrate a clear link between meeting their equality objectives and positive outcomes for its communities</p>
Criteria		
<p>The specific duty to publish equality objectives has been met</p> <p>Objectives are underpinned by robust equality analysis.</p> <p>Objectives are SMART(Specific, Measurable Realistic, Achievable and Timely)</p>	<p>Equality objectives are integrated into organisational strategies and plans.</p> <p>There is evidence of a link between equality objectives, business planning and performance management.</p> <p>Progress is regularly monitored and reviewed.</p> <p>Members are kept informed of progress against equality objectives</p>	<p>There is evidence that equality objectives have led to improved outcomes for people with protected characteristics</p> <p>Actions to achieve priority outcomes are reviewed and regularly updated.</p> <p>Steps are taken if deficiencies are identified.</p> <p>Stakeholders and staff are involved in the monitoring of objectives.</p> <p>An Annual Equality report is published and shared</p>

Performance Monitoring and Scrutiny		
<p>11.1 Appropriate structures are in place to ensure delivery and review of equality objectives.</p>	<p>11.2 The setting and monitoring of equality objectives is subject to challenge, including through any organisational bodies or groups and the political Overview and Scrutiny process.</p>	<p>11.3 The organisation uses the scrutiny process as a driver for change. The organisation benchmarks its achievements against comparable others and shares its experience in developing good practice.</p>
Criteria		
<p>There is an appropriate and accountable leadership group/ board/ forum who have responsibility for the equality agenda.</p> <p>There are resources for supporting equality work.</p>	<p>The Overview and Scrutiny function is used to scrutinise and challenge equality analysis/ impact assessment objective setting and monitoring?</p> <p>The public are enabled to monitor progress</p> <p>Progress and responses are reported regularly to the leadership of the organisation</p>	<p>The organisation assesses its performance and outcomes against comparable organisations.</p> <p>Review mechanisms are in place.</p> <p>Some outcomes and priorities have changed as a result of Scrutiny review.</p> <p>The organisation is approached on a regular basis to provide examples of, or showcase good practice.</p>

Responsive Services and Customer Care		
Commissioning and Procuring Services		
Developing	Achieving	Excellent
<p>12.1 The organisation ensures that procurement and commissioning processes and practice take account of the diverse needs of clients, and that providers understand the requirements of the public sector Equality Duty.</p>	<p>12.2 Mechanisms are in place to ensure that equality standards are embedded throughout the procurement cycle.</p>	<p>12.3 The organisation can demonstrate that commissioned/ procured services are helping it achieve its equality priorities.</p>
Criteria		
<p>Guidance is available for suppliers on the equality requirements for the procurement and commissioning process.</p> <p>There are standard equality clauses for contracts.</p>	<p>The organisation considers how the public pound is spent in regards to local procurement and influence on the local economy.</p> <p>Specifications take account of the different needs of users, for example through equality analysis/ impact assessments.</p> <p>Monitoring requirements are built into contracts to ensure equality issues are addressed.</p> <p>The organisation has an established Social Value Framework. The Social value of contracts is measured.</p> <p>The performance of sub- contracting arrangements is measured.</p>	<p>There is evidence that contracts are being monitored using quantitative and qualitative analysis. The results are considered by both the supplier and client.</p> <p>There is evidence of providers meeting the organisations equality objectives.</p> <p>Providers understand and can articulate a commitment to equality.</p> <p>The organisation achieves considerable social value from its contracts</p> <p>Local procurement is positively influencing the local economy</p>

Integration of equality objectives into service planning		
<p>13.1 Structures are in place to ensure equality outcomes are integrated into business objectives.</p>	<p>13.2 Equality objectives are integrated into service plans across the organisation, with progress towards them performance managed by key decision makers.</p>	<p>13.3 The organisation can demonstrate that improvements and equality outcomes are being delivered across the business.</p>
Criteria		
<p>Service plans are monitored regularly to ensure that equality objectives are being met.</p> <p>Equality analysis is fed into planning and assessment of service plans.</p> <p>Customer care policies highlight the needs of protected groups.</p>	<p>Objectives address inequality and equality gaps.</p> <p>The needs of protected groups are taken account of.</p> <p>Service users have opportunities to comment on how services are planned.</p> <p>Objectives have specific timescales.</p> <p>Resource implications have been properly assessed.</p> <p>Key decision makers demonstrate that they continuously monitor, review and evaluate performance for equality objectives.</p> <p>Equality integrated into the performance management.</p>	<p>Service Plans are designed and written with equality objectives in mind.</p> <p>Business plans review past performance, demonstrate how past objectives have been achieved, review performance and set new objectives.</p> <p>Gaps have been identified in terms of who may not be using the service and why. Action has been taken to change services in response.</p> <p>There is evidence of improved or improving outcomes, disaggregated where appropriate to demonstrate the effects on different communities/ protected groups.</p> <p>There is evidence that Services are being co-produced with service users.</p>

Service Delivery		
<p>14.1</p> <p>The organisation has systems to collect, analyse and measure how satisfied all sections of the community are with services.</p>	<p>14.2</p> <p>There is evidence that services are meeting the needs of a diverse community, and that take up of services is representative of the wider community.</p>	<p>14.3</p> <p>The organisation has systems in place to use monitoring data and citizen feedback to redesign or adapt services to ensure equity of access, and can demonstrate where this has been done.</p>
Criteria		
<p>There are mechanisms in place for service users to be consulted about service development and delivery</p> <p>Social Value and Collaborative Principles are reflected in the organisations practical service delivery.</p> <p>The organisation is able to analyse and measure whether all sections of the community are able to access services.</p> <p>It is clear who Service users are. Services carry out mapping exercises to identify and review current participation and to highlight gaps.</p> <p>The organisation collects data about user satisfaction with its services. The mapping and satisfaction data collected is disaggregated by different equality groups or vulnerable communities.</p> <p>Complaints are disaggregated by protected groups. There are mechanisms in place to enable staff to introduce business improvements.</p> <p>Appropriate mechanisms are in place to ensure that Human Rights considerations are identified when planning services and that customers and citizens are treated with dignity and respect.</p>	<p>Service users are consulted effectively before services are developed.</p> <p>Issues such as Social Prescription and Social Value are used to measure outcomes which are not delivered by the organisation.</p> <p>Access to and appropriateness of services is monitored regularly by senior leaders and decision makers.</p> <p>Senior leaders and decision makers demonstrate that they continuously review and evaluate access to services.</p> <p>Data about access to services and user satisfaction is used in equality analyses/ equality impacts assessment</p> <p>A scrutiny/ evaluation process of services is in place.</p> <p>Human Rights issues are understood and considered when delivering services to customers and clients.</p> <p>Human Rights guidance is available for staff and decision makers have up to date knowledge.</p>	<p>Services are co-produced with service users wherever possible and service users are able to influence changes</p> <p>Initiatives such as Community Asset Transfers and Community Right to Challenge are in evidence as delivered by local communities instead of the local authority.</p> <p>There is evidence of how levels of customer satisfaction with services have improved over time.</p> <p>Take up of services is representative of the community in proportions that would be expected.</p> <p>There are examples of how different customers' experiences are analysed and acted upon.</p> <p>The organisation has taken steps to safeguard the human rights of individuals where these have been threatened.</p>

Diverse and Engaged Workforce		
Workforce Diversity		
Developing	Achieving	Excellent
<p>15.1</p> <p>The organisation understands its local labour market, and has mechanisms in place to monitor its workforce against protected characteristics.</p>	<p>15.2</p> <p>The organisation can demonstrate movement towards greater diversity in its workforce profile compared with previous years, including increasing the levels of previously under- represented groups at all levels of the organisation.</p>	<p>15.3</p> <p>The organisation actively ensures that the profile of its workforce (including the profile of major providers of commissioned services) broadly reflects the community it serves/local labour market</p>
Criteria		
<p>The organisation is clear about its local labour market.</p> <p>It has begun to identify the steps it needs to take to achieve a diverse workforce. These are reflected in recruitment policies and procedures.</p> <p>The progress of protected groups through the organisational hierarchy is monitored.</p> <p>Equality mapping data is used as part of the analysis</p> <p>Recruitment and selection is monitored at all stages of the process by protected characteristics</p>	<p>Where there is evidence of disproportionality, action is being taken to reverse the trends.</p> <p>Succession plans and recruitment processes address under-representation.</p> <p>Specific and measureable employment targets been set to improve workforce diversity.</p> <p>Selection panels are trained in Unconscious Bias. This includes senior recruitment panels where Members are involved.</p>	<p>There are appropriate examples of positive action to improve diversity.</p> <p>There is evidence that the workforce profile at all levels broadly matches the local labour market/community profile. This is continually monitored.</p> <p>There are reasonable explanations for gaps (e.g. the community profile is constantly changing or largely retired population) and what the organisation is doing about it.</p> <p>Good use is made of flexible working arrangements and career pathway initiatives to address potential barriers and under representation.</p>

Inclusive Strategies and Policies		
16.1 The organisation's workforce strategies and policies include equality considerations and objectives.	16.2 The equality objectives contained within workforce strategies are implemented and monitored.	16.3 Prioritised equality outcomes for the whole workforce are being achieved.
Criteria		
<p>All employment policies and procedures comply with equality legislation and employment codes of practice The organisation's workforce strategy identifies equality issues. Targets and objectives are based on internal monitoring, staff consultation and the assessment of the local labour market and barriers to employment. New/changing employment policies and procedures are assessed for their impact on people with protected characteristics.</p> <p>All employment and training related policies are regularly reviewed.</p> <p>The council is using its workforce data to develop training and development strategies that can support a wider equalities agenda for employees.</p> <p>A range of inclusive structures are in place to engage and involve staff</p>	<p>The organisation has a basic set of policies and practices to enhance workforce equality and diversity including reasonable adjustments, equal pay, flexible working and family friendly policies</p> <p>The equality aspects of the organisation's workforce strategy are being implemented and tracked.</p> <p>When necessary, changes have been made as a result of equality analysis findings.</p> <p>Managers apply policies and practices across the authority in a consistent manner for all staff.</p> <p>Staff are engaged positively in employment and service transformation and in developing new roles and ways of working. Trade unions and partners are involved.</p> <p>The training and development offer supports a wider equalities agenda for the organisation.</p> <p>Training courses and development interventions are meeting the needs of</p>	<p>The organisation has an excellent set of policies and procedures in place which are actively promoted to staff from all protected groups and used by managers to promote equality. Strategic, innovative and holistic approaches have been considered to improve outcomes.</p> <p>Staff are involved in developing and monitoring these policies.</p> <p>Positive and tangible outcomes have been delivered as a result of the implementation of a wide range of policies and practices. The organisation compares well with others.</p> <p>Outcomes are communicated to staff with protected characteristics.</p> <p>The organisation has high satisfaction levels across all staff groups in respect of staff engagement.</p> <p>Training and development strategies are proven to be making a significant difference to the wider equality agenda for employees and for workforce diversity.</p>

	different groups, and are making a difference in getting underrepresented groups of staff up the leadership ladder.	
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Collecting, Analysing and Publishing Workforce Data		
17.1 Systems are in place to collect and analyse employment data across a range of practices (recruitment, training, leavers, grievance and disciplinaries etc).	17.2 The organisation regularly monitors, analyses and publishes employment data in accordance with its statutory duties.	17.3 The authority has a robust and comprehensive set of employment data and uses this to inform its workforce strategy and management practice.
Criteria		
<p>The organisation reports annually on its Gender Pay Gap.</p> <p>People are encouraged to provide data and there are initiatives in place to increase the disclosure of equality information by staff.</p> <p>Diversity monitoring information is separated from recruitment decisions and held securely.</p> <p>GDPR processes are in place and regulations are being met.</p>	<p>Data on applicants, people shortlisted and the composition of the workforce is systematically collected. This can be disaggregated by the protected characteristics.</p> <p>The organisation's Gender Pay Gap is reducing and it is addressing any race pay gap.</p> <p>There is evidence that workforce data is analysed and reported to senior leaders regularly.</p> <p>Workforce information is published to cover basic legal requirements and includes analysis of pay/job evaluation outcomes.</p> <p>There is evidence that the organisation is actively working on reducing its Gender Pay Gap.</p> <p>Action has been taken as a result of monitoring, trends are being identified and used to help establish objectives.</p>	<p>Workforce data includes a wide range of information and protected characteristic profiles including pay levels, training opportunities, appraisal ratings.</p> <p>The organisation considers pay gaps across other areas of inequality such as religion and belief/ race- ethnicity/ age, disability etc.</p> <p>The organisation understand the effects of employment policy and practice on its workforce.</p> <p>The organisation has sufficient information about staff to inform robust equality analysis.</p> <p>The workforce profile is updated regularly.</p> <p>Data is looked at organisationally and service by service.</p> <p>It is possible to analyse data by all the protected characteristics.</p>

Learning and Development		
<p>18.1 The organisation carries out regular assessments of the training and learning and development needs required to ensure its councillors and officers are equipped to understand their equality duties and take action to deliver equality outcomes.</p>	<p>18.2 The organisation provides a range of accessible learning and development opportunities to support councillors and officers in achieving equality objectives and outcomes.</p>	<p>18.3 Decision makers understand the importance of equality when making decisions and in how they use resources. Services are provided by knowledgeable and well-trained staff who are equipped to meet the diverse needs of local communities.</p>
Criteria		
<p>An assessment has been made as to what equality-related training, learning or development is required</p> <p>Appropriate behavioural competencies have been identified for the workforce.</p> <p>The learning and development plan/strategy take account of equality issues.</p> <p>Induction training for new Members includes equality and all Members are offered Equality training.</p> <p>Appraisal processes ensure staff and managers are aware of their equality-related responsibilities and accountabilities</p>	<p>Equality and diversity forms part of the training and development for key decision makers.</p> <p>There is evidence that equality issues are mainstreamed into all training (e.g. training on customer care</p> <p>Employees are confident that they can deliver services to diverse customers. They are made aware of equality objectives or any changes or improvements.</p> <p>Different methods are used to promote learning to a wide audience (e.g. standard courses, coaching, mentoring)?</p> <p>Management and individual appraisals include specific equality objectives for the service area</p>	<p>Managers and staff are accountable for ensuring equality outcomes. They can give examples of improved equality outcomes they have contributed to.</p> <p>Good performance is recognised in the appraisal process and more generally.</p> <p>Issues relating to protected characteristics and equality practice are challenged confidently and effectively by managers.</p> <p>Staff feel their skills have improved and that they are able to relate effectively with a range of clients.</p> <p>Staff can answer questions about the council's equality priorities.</p> <p>Feedback from service users in protected groups is positive about the skills of staff in dealing with their issues.</p>

Health and Wellbeing		
18.1 The organisation has begun to consider how it can address the key employee health and wellbeing issues	18.2 The organisation promotes the health and well-being of staff in its workforce and other policies	18.3 There is a positive health and wellbeing culture throughout all levels and areas of the service
Criteria		
<p>The organisation uses workforce data and other information from staff to determine what its health and wellbeing priorities are</p> <p>The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met</p> <p>A range of inclusive mechanisms are in place to engage and involve staff</p> <p>Policies and systems are in place to identify, prevent and deal effectively with harassment and bullying at work.</p> <p>The organisation has a policy for Reasonable Adjustments for staff and Members and managers are trained to implement it.</p> <p>Occupational health services are provided</p> <p>The organisation has started to address mental health issues in the workplace</p>	<p>There is a coherent Health and Wellbeing Strategy that addresses a range of related issues.</p> <p>Improvements have been made to the working environment.</p> <p>Staff are engaged positively in employment and service transformation and in developing new roles and ways of working.</p> <p>Reasonable Adjustments are provided in a timely fashion consistently across the organisation</p> <p>Occupational health works closely with HR to identify and address absence trends.</p> <p>Managers have received training on mental health awareness and say they are equipped to address staff issues</p> <p>Harassment and bullying incidents are monitored and analysed regularly. Appropriate action is taken to address the issues that have been identified.</p>	<p>Approaches to health and wellbeing are innovative.</p> <p>The organisation has adopted the Social model of disability</p> <p>There have been significant outcomes in the health and wellbeing of all staff including those with protected characteristics.</p> <p>There are high satisfaction levels with the working environment across all staff groups particularly those with protected characteristics.</p> <p>The organisation has high satisfaction levels across all staff groups in respect of staff engagement.</p> <p>Harassment and bullying at work is dealt with effectively and staff say that they are treated with dignity and respect.</p>

Equality action plan – 2024 – 2027

The Housing Services Manager will provide Committee with a report on the progress of the Action Plan on a quarterly basis, commencing August 2024. The RAG system will be adopted when providing updates. The following text will be entered into the Progress column:

If the deadline or timescale has passed the text should be **Achieved**, **Partially Achieved**, **Not Achieved** and narrative added to the Completed/Comments column

If is showing as an “ongoing” task the text should **Being Achieved**, **Not Being Achieved** and narrative added to the Completed/Comments column.

If it is a task with a future deadline/timescale the text should be **On track**, **Not on Track** and narrative added to the Completed/Comments column.

Item	Activity	Timescale	Lead officer	Progress
) To ensure no one is discriminated against on the basis of any of the nine protected characteristics or any other key groups Rosehill identifies	i. To ensure Rosehill Housing Co-operative's (Rosehill) commitment to Equalities and Human Rights is clearly displayed in the office reception, on its website, and other publicity materials and information.	Sept 2024	HSM / CS & HRM	Achieved not on track
	The information should underline Rosehill's zero tolerance to discrimination (and any other forms of unacceptable behaviour) and ensure anyone experiencing discrimination, harassment, etc. is aware they can contact Rosehill who will investigate their issue.	Sept 2024	HSM / CS & HRM	Achieved not on track Achieved not on track
	The information produced should reflect Rosehill's commitment (see Rosehill's Equality Strategy) to pay due regard to the General Equality Duty set out in the Equality Act 2010. This requires organisations to:	Sept 2024	HSM / CS & HRM	Achieved
	<ul style="list-style-type: none"> eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 advance equality of opportunity between people who share a protected characteristic and those who do not foster good relations between people who share a protected characteristic and those who do not 			
	Rosehill's expectations relating to Equality and Human Rights will be emphasised in staff and committee codes of conduct*. In addition, Rosehill's equalities expectations should be included in the tenant's handbook and the sign-up process for new tenants.	Mar 2025	HSM / CS & HRM	Achieved
	ii. To update Rosehill's policy and action plan to reflect changes to relevant legislation or regulation as, and when, required.	Jan 24 (Policy) June 24 (Action Plan)	HSM	Achieved

	<p>iii.To periodically report to the committee on the delivery of - the action plans aims. This should include discussion of any slippage in meeting timescales and / or any additional resources needed to deliver any aims / activities.</p> <p>iv.To publicise that Rosehill</p> <ul style="list-style-type: none"> • will make its documents available in alternative formats on request (i.e. large font, in Braille, etc. on request. • will provide a signer or translation support when requested to do so, within a reasonable timescale. • will make handouts available in large print at public meetings on request. • will ensure signage highlighting Rosehill's commitment to Equality and Human Rights is developed and displayed at the reception and other locations within Rosehill's office. In addition, rolling information will be displayed on the TV located in Rosehill's reception • will ensure articles highlighting Rosehill's commitment to Equality and Human Rights will be published periodically in Rosehill's newsletter <p>* The support outlined above will be updated to reflect any future legislative / regulatory changes i.e. updates to the code of conduct</p>	<p>August 2024 onwards</p> <p>March 2024 and on-going</p>	<p>HSM</p> <p>HSM</p>	<p>Achie</p> <p>Achie</p>
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im	Activity	Timescale	Lead officer	Pro s (RA
<p>To periodically collect, collate and analyse equalities data, and use it to enhance Rosehill's services, and assess how reflective Rosehill is of its community</p>	<p>i.Data collection – in accordance with Scottish Housing Regulator's (SHR) guidance Rosehill shall collect a range of equalities data from tenants and housing applicants, committee and staff relating to the protected characteristics identified in the Equality Act 2010.</p> <p>As agreed by the committee data will be collected anonymously and compared against a range of data including the census, the Scottish Index of Multiple Deprivation (SMID), data held by Rosehill. etc.</p> <p>Tenant and housing applicant information was gathered initially (between March – August 2023), and staff and committee information will be gathered by March 2024.</p> <p>Rosehill will ensure data is collected, stored and used in accordance with data protection legislation, and its policies and procedures. Rosehill will seek to ensure collection methods ensure nobody is identifiable (i.e. separating monitoring forms from applications forms).</p> <p>The data collected shall be used to monitor:</p>	<p>March 2024 and on-going</p> <p>On-going</p> <p>March 2024</p> <p>On-going</p> <p>On-going</p>	<p>HSM (assisted by SMT)</p> <p>HSM (assisted by SMT)</p> <p>HSM (assisted by SMT)</p> <p>HSM (assisted by SMT)</p> <p>HSM</p>	<p>Act ed</p> <p>Act ed</p> <p>Act ed</p> <p>Act ed</p> <p>Act</p>

	<p>1- Staff composition</p> <p>2- Committee composition</p> <p>3- Tenant composition</p> <p>4- Housing applicant composition</p> <p>5- Composition of applicants wishing to join the Co-op's staff or committee</p>		(assisted by SMT)	ed
	ii. Rosehill will seek to ensure any imbalances in committee and / or staff composition are identified and inform succession / recruitment plans.	On-going	HSM (assisted by SMT)	Ac ed
	iii. Rosehill will use data from tenants and housing applicants to inform future services and communication.	March 2024 and on-going	HSM	Ac ed
	iv. Rosehill will continue to identify tenants, households, etc., who would benefit from tailored communications and / or services (i.e. providing documents in alternative formats (braille, large font)), making adaptations to properties, providing access to translation services, etc.	March 2024 and on-going	HSM (assisted by SMT)	Ac ed
	<p>v. To review the process used to inform future data collection methods. The review should discuss:</p> <ul style="list-style-type: none"> • future data collection methods and identify potential improvements (i.e. linking data collection to tenant satisfaction surveys.) • any additional equalities data which might be valuable to collect in the future (i.e. literacy, poverty, household needs, caring responsibilities, etc.) • how to ensure tenants are aware of why the data is collected, what Rosehill will do with it and how Rosehill will protect this information • how to encourage tenants to provide specific information which can help Rosehill tailor services to their specific and those of their families (i.e. info. regarding progressive illnesses, needs of household members, preferred gender pro-nouns, etc.) • how to reassure tenants that Rosehill will not share any personal information unnecessarily, and it will be stored according to Rosehill's procedures and data protection legislation and regulations 	March 2024 and annually thereafter	HSM (assisted by SMT)	Ac ed

im	Activity	Timescale	Lead officer	Pro s (RA
Review Rosehill's Equality Impact Assessment (EIA) tool*.	i. To review, and revise, Rosehill's EIA tool to reflect good practice, and ensure the tool is as straight-forward to use as possible.	September 2024	HSM	Ac ed not tim
			HSM	Ac ed

<i>This tool ensures when policies are developed / reviewed they promote equality of opportunity and avoid disadvantaging anyone from protected characteristics</i>	ii. To discuss if the EIA tool should reflect on how policies ensure Human Rights informs the services Rosehill provides. iii. To train all staff in policy development and review in the use of the revised EIA.	September 2024 September 2024	HSM	not timed Achieved not timed
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aim	Activity	Timescale	Lead officer	Progress (RAG)
) Ensure equality of opportunity and treatment for all people in relation to the employment	i. To use EVH guidelines consistent with those of the Equality and Human Rights Commission) when recruiting staff. This includes using objective scoring criteria when selecting for interview and identifying preferred candidates.	On-going	CS & HRM	Achieved
	ii. To compile an equality monitoring report for all filled vacancies providing a breakdown of applicants, interviewees and the successful candidate. Ensure that all job adverts highlight that Co-op is an equal opportunities employer.	On-going	CS & HRM	Achieved
	iii. Rosehill will seek to guarantee an interview to all those who have a disability if they meet the minimum criteria for a position.	On-going	CS & HRM	Achieved

aim	Activity	Timescale	Lead officer	Progress (RAG)
) Ensure all staff and committee members are aware of Rosehill's commitment to, and obligations in relation to, equality and human rights	i. To ensure all staff and committee receive specific equalities training.	September 2024	HSM	Achieved
	ii. To raise awareness of Rosehill's equality and human rights commitments in the staff and committee induction processes	On-going	CS, HRM & Director	Achieved
	iii. To ensure teams / individual staff are aware of relevant equality aims / activities, and discuss them during training / team meetings, etc.	On-going	HSM (assisted by SMT)	Achieved
			HSM	Achieved

	iv. To ensure the committee receive quarterly reports on the delivery of the Equality Action Plan's aims and activities	On-going quarterly from August 24		
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im	Activity	Timescale	Lead officer	Progress (RAG)
To ensure Rosehill communicates effectively with tenants, including those who are traditionally excluded	i. To develop strategies to address digital exclusion within its community through providing relevant support, signposting to IT resources (i.e. local libraries/colleges).	Ongoing	HSM (assisted by CEO)	Achieved
	ii. To develop links with groups / support organisations who work with under-represented or traditionally excluded groups to identify how best to engage these groups and / or improve its services / support.	Ongoing	HSM (assisted by CEO)	Achieved
	iii. To use the equality data Rosehill collects and other data to identify the most commonly used community languages within the community and use translation services and IT technologies (i.e. AI) to engage effectively in those languages.	Ongoing	HSM (assisted by CEO)	Achieved
	iv. To develop Rosehill's digital presence to ensure it communicates / engages with tenants in their preferred medium. This should include developing plans to better use social media platforms (i.e. facebook, youtube, WhatsApp, X (formerly twitter), etc.).	Ongoing	HSM (assisted by CEO)	Achieved
	v. To investigate how Artificial Intelligence (AI) can be used to tailor letters, publicity, newsletters articles, etc. to best engage with different groups / demographics. This should aim to increase engagement levels and ensure effective communications.	Ongoing	HSM (assisted by CEO)	Achieved

im	Activity	Timescale	Lead officer	Progress (RAG)
Be mindful of Rosehill's equality and human rights commitments during the procurement	i. To ensure contractor application forms include specific questions regarding equality and human rights compliance.	September 2024	TSM	Achieved

of contractors / consultants and when working with partner organisations	ii. To refuse to use any contractor or consultant who is unable to satisfy Rosehill of their commitment to equal opportunities.	As and when required	TSM	Achieved
	iii. To investigate and if necessary, take appropriate action if a consultant or contractor breaches Rosehill's Equality and Human Rights' policy.	As and when required	TSM	Achieved
	iv. To ensure all organisations who work with, or for, Rosehill observe the commitments outlined in Rosehill's Equality and Human Rights policy, strategy and action plan.	July 2024	TSM & SMT	Achieved
	v. To ensure tenants, and others, are aware contractors, consultants, etc. are required to observe Rosehill's equality commitments.	October 2024	TSM	Achieved

Model equality monitoring form

August 2021

Produced by:

Scottish Federation of Housing Associations

Glasgow and West of Scotland Forum of Housing Associations

Association of Local Authority Chief Housing Officers

Scottish Housing Regulator



Glasgow and West of Scotland
Forum of Housing Associations



ASSOCIATION OF LOCAL AUTHORITY CHIEF HOUSING OFFICERS

Scottish Housing
Regulator

sfha
Scottish Federation of
Housing Associations

We are housing Scotland

Model equality monitoring form

Name of social landlord:	[insert name]
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Information for those completing the form

Why are we asking for equality information?

We collect equality information to help us to plan and deliver effective services and to meet our legal and regulatory obligations.

What do we do with equality information?

We use equality information for a range of purposes, including to help us to:

- protect and promote your rights and interests;
- promote equality objectives across our services;
- identify and address our customers' needs, and improve our services; and
- identify and eliminate any form of discrimination.

Do you need to answer every question?

By answering as many questions as possible you will help us meet your needs better, but we provide options throughout this form to allow you to provide only the information you want to give us. You can complete some questions and not others or you can complete parts of questions. The form has space for you to tell us more about your needs if you want.

We may ask for some information in other forms where this is required by law. For example, where we need to know your age if you are applying for a home as only those over 16 years old can be registered on our housing list.

How do we process your equality information?

We process equality information strictly in line with data protection law, including by:

- processing your equality data confidentially;
- restricting access only to relevant staff members;
- retaining equality information only as long as necessary;
- sharing data only as lawfully permitted; and
- destroying data securely.

Who do we gather equality information about?

We gather equality information from:

- people who apply for a home;
- tenants;
- people who apply for a job with us;
- our employees;
- board and committee members; and
- elected members (in case of local authorities)

Other formats: We can provide this document in *[insert the relevant alternative format you can provide]*, and more information to help you to complete the form is available *[insert where this is available]*.

Name

Name:	
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Age

Note: We may request a specific date of birth in certain forms when this is required in law. For example, we need to know the age of housing applicants as a person can only be registered on our housing list/register if the person is 16 years of age.

What is your date of birth? (DD/MM/YYYY)	
Prefer not to say	

Alternative format:

Please tick the band for your age:	16–24		25–34	
	35–44		45–54	
	55–65		65+	
Prefer not to say				

Belief or religion

Please tick the box which best describes your belief or religion from the list below?

Buddhism:					
Christianity					
Catholic:		Protestant:		Other:	
Hinduism:					
Islam:					
Judaism:					
Sikhism:					
Other religion (please state what this is):					
No specific belief in religion (for example, atheism or agnosticism):					
Other belief (for example, humanism):					
Prefer not to say					

Please use the space below to tell us about any particular requirements relating to your beliefs or religion:

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Please tick here if you want to discuss this matter in confidence:	
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Disability

Are you a disabled person?	Yes		No	
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If yes, please tick the box which category you would use from the following list:

Autoimmune: (for example, multiple sclerosis, HIV, Crohn's/ulcerative colitis)	
Learning difficulties: (for example, Down's Syndrome)	
Mental health issue: (for example, depression, bi-polar)	
Neuro-divergent condition: (for example, autistic spectrum, Dyslexia, dyspraxia)	
Physical impairment: (for example, wheelchair-user, cerebral palsy)	
Sensory impairment – hearing impairment	
Sensory impairment – visual impairment	
Other: If none of the categories above apply to you, please specify the nature of your impairment.	
Prefer not to say	

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:	
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Ethnicity

Please tick the box that best describes your particular ethnic group:

African

African, African Scottish or African British:	<input type="checkbox"/>
Other African background (please specify):	<input type="checkbox"/>

Asian, Scottish Asian or British

Bangladeshi, Bangladeshi Scottish or Bangladeshi British:	<input type="checkbox"/>
Indian, Indian Scottish or Indian British:	<input type="checkbox"/>
Pakistani, Pakistani Scottish or Pakistani British:	<input type="checkbox"/>
Chinese, Chinese Scottish or Chinese British:	<input type="checkbox"/>
Other Asian background (please specify):	<input type="checkbox"/>

Black or Caribbean

Caribbean, Caribbean Scottish or Caribbean British	<input type="checkbox"/>
Black, Black Scottish or Black British	<input type="checkbox"/>
Other Caribbean or Black background (please specify)	<input type="checkbox"/>

Mixed groups

Mixed or multiple ethnic group (please specify)	<input type="checkbox"/>
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White

English	<input type="checkbox"/>
Gypsy Traveller	<input type="checkbox"/>
Irish	<input type="checkbox"/>
Polish	<input type="checkbox"/>
Roma	<input type="checkbox"/>
Scottish	<input type="checkbox"/>
Welsh	<input type="checkbox"/>
Other British	<input type="checkbox"/>
Other group (please specify your ethnic group)	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

<div></div>

Please tick here if you want to discuss this matter in confidence:	<input type="checkbox"/>
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Marriage and civil partnership

Are you presently in a civil partnership?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Are you presently married?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say				<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence: ☐

Pregnancy and maternity

Are you pregnant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you taken maternity or paternity leave in the past year?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say				<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence: ☐

Sex

What is your sex?	Female	<input type="checkbox"/>	Male	<input type="checkbox"/>	Intersex	<input type="checkbox"/>
Prefer not to say						<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence: ☐

Gender re-assignment (trans/transgender)

Do you consider yourself to be a trans person?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>			

Please use the space below to advise us if you have any particular requirements:

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Please tick here if you want to discuss this matter in confidence:	<input type="checkbox"/>
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Sexual orientation

What is your sexual orientation?

Bisexual	<input type="checkbox"/>
Gay man	<input type="checkbox"/>
Heterosexual/straight	<input type="checkbox"/>
Lesbian/ gay woman	<input type="checkbox"/>
Other	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

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Please tick here if you want to discuss this matter in confidence:	<input type="checkbox"/>
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General

Please mark this box if there are any issues that you want to discuss with us in confidence	<input type="checkbox"/>
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Consent

[If explicit consent is used as the basis for processing special category data, then each social landlord should insert their own explicit consent statement at this point.]

Signature:	
Date:	



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A registered society under the Co-operative and Community Benefit Societies Act 2014 No. 2220R(S) and with The Scottish
Housing Regulator (Number HAC174).