

Equality and Diversity Policy

Date Reviewed: Jan 2021
Next Review: Jan 2024



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1. Introduction and Purpose

1.1 Rosehill is committed to being an Employer, Landlord, Service Provider, Factor and Partner which promotes and supports Equality and Diversity and delivers on associated objectives.

1.2 We also have a legal and regulatory duty to ensure that we promote equality and diversity in all aspects of our work.

1.3 Equality is about treating everyone fairly and ensuring they are given fair chances. It is not about treating everyone in the same way, but recognising the difference in life situations, in experience and ensuring that there is equality of opportunity for all people, taking their needs into account.

1.4 Our main Policy objective is:

To ensure that our governing body, staff, tenants, other customers, contractors and anyone who has dealings with Rosehill are treated equally and fairly.

1.5 To support and deliver this objective we will:

- Ensure that our Management Committee and Senior Staff are accountable for embedding the principles of Equality and Diversity at Rosehill and monitoring our performance;
- Ensure that everyone who works for us or with us abides by this policy;
- Not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation;
- Comply with all legal and regulatory requirements which apply to the protected characteristics of race, religion or belief, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, sexual orientation, disability and age;
- Develop good quality information about our customer base and individual customers, so that our services are accessible and responsive to all.
- Encourage our tenants, other services users and our staff to engage with us to shape Rosehill and its services;
- Ensure that the Equality and Diversity Principles are reflected in our Policies and Procedures.

2. Our Vision, Strategic Objectives and Values

2.1 Our vision is “to provide excellent quality, affordable and efficient homes in neighbourhoods that are well managed and maintained; to contribute to sustaining communities where people feel safe and want to live by providing housing and other services and working with its voluntary and statutory partners.”

2.2 Key to realising our Vision is through the delivery of our seven Strategic Objectives:

- Provide 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
- Provide houses and services that are Value for Money for people who want to live in our communities
- Be innovative in developing services and activities that support our communities
- Build and contribute to effective partnerships to support the delivery of our vision and values
- Use our financial, human and other resources efficiently and effectively to achieve maximum benefit and full potential
- Demonstrate the highest standards of governance, accountability and compliance

2.3 The delivery of our Vision and Strategic Objectives is underpinned by our Core Values:

We will

- Invest and Support

We will be

- Engaged and Responsive
- Accountable and Compliant
- Fair and Approachable

- Efficient and Responsible
- Excellent and Committed

3. Legal and Regulatory Context

- 3.1 This Policy is developed, reviewed and implemented in accordance with the following:

Legislation

The Equality Act 2010

Human Rights Act 1998

The Mental Health (Care & Treatment) (Scotland) Act 2003

The Housing (Scotland) Acts 2001 and 2010

Regulatory Standards

Regulatory Standard 5 “The RSL conducts its affairs with honest and integrity” –

Guidance 5.3: “The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.”

The Scottish Social Housing Charter

Outcome 1 – Equalities:

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

This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation. It includes landlords’ responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.

4. Responsibilities

- 4.1 The Management Committee is responsible for approving the Policy and monitoring its effectiveness by way of an annual report.

- 4.2 The Director has overall responsibility for the implementation of the Policy.
- 4.3 Line Managers are responsible for communicating our values and Equality and Diversity Policy to their teams and new employees at induction training and ensuring the successful implementation of the policy.
- 4.4 Each member of our staff has a personal responsibility for the implementation of this policy and for ensuring they treat others with respect and dignity in both employment and service delivery.
- 4.5 All employees have a responsibility to be alert and to challenge behaviours and practices which result in unfair discrimination when they occur. Where a member of staff believes such behaviour is occurring they must draw the matter to the attention of their Line Manager to ensure the matter is dealt with immediately.
- 4.6 This policy will be published on our website, made available in our reception area and integrated into all of our policies and procedures where appropriate.

5. Committee Membership

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

6. Membership of Rosehill

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

7. Service Provision

- 7.1 We provide services to tenants, housing applicants, members of the local community and factored owners. We are committed to ensuring good practice with regard to equalities across all services we provide.

Access to Services

- 7.2 Being aware of the needs and the diversity of customers will ensure that we are able to provide the right services and meet the right needs. We aim to have services that are accessible to all our customers and to identify and remove any barriers that would prevent this e.g. communication barriers due to disabilities, where English is not the first language and physical barriers by taking steps, as far as practical and reasonable, to make our offices and other venues we use as accessible as possible. All in accordance with our legal duties under Equalities and Mental Health legislation.

Supporting our customers

- 7.3 From the outset of dealing with a customer for any of our services, we will establish if additional support is needed. Examples of some of the support we can provide are:
- arranging interpretation and/or translation services if required;
 - producing information in various formats e.g. large print, audio or braille;
 - helping customers access independent advocacy (the Scottish Independent Advocacy Alliance website has information about local advocacy organisations throughout Scotland).
- 7.4 Anyone who has a “mental disorder” under the Mental Health (Care & Treatment) (Scotland) Act 2003 has the right to access independent advocacy. This must be delivered by independent organisations that only provide advocacy. They help people to know and understand their rights, make informed decisions and have a voice.
- 7.5 In general we will support any vulnerable customer to access our services and will assist them with accessing independent advice, support and advocacy where necessary.
- 7.6 This support covers all of our services including our complaints service and it is important that people have equal access to this service. We recognise the barriers that some customers may face when making a complaint e.g. physical, sensory, communication or language barriers and also their own anxieties and concerns. We understand that some people are not able to speak up for themselves and require support to ensure their voice is heard. We will work with these customers to ensure they receive the necessary support, as set out above, to ensure barriers are removed and they have full access to the complaints service.

Housing Allocations

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

Customer Service Standards

- 7.8 We aim to meet the needs of our customers and stakeholders by:
- creating a work culture which values diversity, inclusiveness and respect, and empowers our employees to reflect those values in their dealings with the people who use our service and all other stakeholders;
 - ensuring that we provide an accessible service to all of our customers;
 - providing clear, meaningful information about what we do and how we do it to our customers, potential customers and other stakeholders, in ways that best suit their individual needs as far as is reasonable and practical;
 - identifying as early as possible any individual requirements that may need to be met in order for a customer to fully access our service; and
 - being responsive to changing needs and requirements.

Communication and Translations

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

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

Customer Engagement

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

Development Programme

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

8. Employment

- 8.1 We demonstrate our commitment to equality and diversity in all aspects of employment, including recruitment, training, performance and development management processes and pay.

- 8.2 We operate a comprehensive Recruitment and Selection Policy to ensure that fair and just employment practices are in place and that people are recruited solely on the basis of their own merit, experience, ability and potential. All vacancies will be advertised in ways that do not discourage traditionally disadvantaged or under-represented groups from applying for posts. Specific qualifications or experience will only be asked for where we decide they are essential to the post. All applicants with disabilities who meet the minimum requirements for a suitable job will be considered for interview. Rosehill is a “disability confident committed” organisation.

8.3 Positive Action

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

8.4 Terms and Conditions of Employment

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

8.5 Disability Arising During Employment

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

8.6 Religious Observance Needs

Some employees and job applicants may have particular religious observance needs. Whenever it is practicable to do so, we will endeavour to meet such needs through unpaid leave. If it is not practicable to grant a request (e.g. because of pressing work commitments) a reasoned explanation will be provided, in writing where requested. We recognise that the list of public and general holidays set out in our Conditions of Service does include some Christian festivals, but not those of other religions. If an employee asks for paid time off to honour other religious festivals, we will normally allow this and the days will be deducted from the employees normal annual leave entitlement.

9. Employment of Contractors and Consultants

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

10. Procurement of Goods and Services

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

11. Equality Impact Assessments

11.1 When developing and reviewing policies and services we will carry out Equality Impact Assessments. The purpose of which is to identify possible negative impacts of our decisions on our Governing Body Members, employees, tenants and other customers with protected characteristics and to take necessary steps to address any issues.

12. Monitoring and Evaluation

12.1 We monitor applicants for jobs and current employees against all protected characteristic information, and will review our practices in accordance with the results shown by the monitoring where possible.

12.2 Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018 and General Data Protection Regulations.

12.3 We ask our tenants and applicants to advise us of their needs and record, where it is provided, the diversity characteristics, communication preferences and any other specific needs to enable us to tailor our services appropriately.

12.4 We assess all our policies against this policy and ensure that all relevant policies have an Equality Impact Assessment attached to them. This fully assesses the positive or negative impact our policies have on all of the protected characteristics and what mitigations will be put in place to ensure equality.

13. Equalities Training

13.1 It is important that our Governing Body Members and employees undertake periodic training in relation to Equalities and Diversity. The training can be delivered in a variety of ways:

- In-house
- External delivery
- Virtual Sessions
- On-line modules

13.2 Training will be tailored to the roles and responsibilities within the organisation. Training can be provided on a group or individual basis. However, as a minimum Governing Body Members and employees will undertake refresher training every 2 years.

13.3 The need for training will also be triggered by any significant changes in legal or regulatory requirements.

13.4 Equalities training forms part of the induction process for both new Committee Members and employees.

14. Breaches of the Policy

14.1 Rosehill does not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation.

14.2 Any claims of such breaches against a staff member will be investigated and if deemed necessary, the disciplinary process will be invoked. Employees should be aware that if the breach is sufficiently serious it will be viewed as gross misconduct and may lead to dismissal.

14.3 Any such complaints made by the Director will be dealt with in accordance with our Procedure for Dealing with Serious Complaints Against the Director.

14.4 Complaints against a member of the Governing Body will be dealt with in accordance with the Committee Code of Conduct and the associated Protocol for Dealing with a Breach of the Code of Conduct.

14.5 Complaints against our tenants will be dealt with following the various Housing Management processes. Depending on the seriousness of the complaint the matter may also be referred to Police Scotland.

14.6 Complaints against our contractors or consultants will be dealt with in accordance with their contract conditions by the appropriate Manager / Director.

15. Tenant Participation

15.1 We are a tenant focussed organisation and as such we are committed to involving tenants in all aspects of our work and ensuring that tenants are included, informed and consulted about decisions that have an impact on the way their homes are managed.

15.2 As part of this commitment we will involve our tenants in the development of our policies and seek feedback where appropriate. We will ensure that any significant changes to this Policy and other Policies which will affect our tenants will be the subject of consultation.

16. Risk Management

16.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our material risks which are regularly monitored by our Management Team and Audit Sub-Committee.

16.2 Key to the mitigation of the risks associated with equalities issues is having a comprehensive policy in place to govern the prevention of any such issues arising. This policy sets out Rosehill's approach to equalities and diversity.

16.3 To ensure we continue to manage the associated risks we will periodically review this Policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.

17. Complaints Procedure

17.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things

can go wrong and that some tenants or other customers may be unhappy with the service provided.

- 17.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. Our Complaints Leaflet for Customers is issued to all new tenants as part of the signing up pack.
- 17.3 We are required to report specifically to both our Management Committee and the Scottish Housing Regulator on any complaints concerning equalities issues.

18. Data Protection

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

18.5 The Privacy Policy sets out what should happen in the event of a Data breach e.g. does the breach require reporting to the Information Commissioner's Office and whether the individual affected should be notified. Timescales are set out for dealing with data breaches.

18.6 A full copy of our Privacy Policy is available on our website www.rosehillhousing.co.uk

19. Policy Review

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

Rosehill Housing Co-operative Equality Impact Assessment

Name of policy to be assessed	Equality and Diversity Policy	Is this a new policy or a review	Review
Person completing the assessment	Linda Chelton	Date of Assessment	20.1.21

1. Briefly describe the aims, objectives and purpose of the policy	The purpose of this Policy is to ensure that our governing body, staff, tenants, other customers, contractors and anyone who has dealings with Rosehill are treated equally and fairly.
2. Who is intended to benefit from the policy? (eg staff, applicants, tenants, staff, contractors)	Tenants, staff, governing body, contractors, prospective staff, applicants and the wider community
3. What outcomes are wanted from this policy? (e.g. benefits to customers)	To be an Employer, Landlord, Service Provider, Factor and Partner which promotes and supports Equality and Diversity and delivers on associated objectives.

4. Which protected characteristics could be affected by the policy (tick all that apply)

Minority Ethnic : x
 Gender: X
 Disability: x
 Sexual Orientation: x
 Marriage/civil partnership: X

Age: x
 Religion/belief: x
 Transgender: x
 Maternity/Pregnancy: X

5. If the policy is not relevant to any of the protected characteristics listed in part 4. State why and end the process here.

N/A

	Positive Impacts	Negative Impacts
<p>6. Describe the likely positive or negative impacts the policy could have on the groups identified in part 4</p>	<p>This policy exists to ensure that equality is achieved in all services provided to a customer, applicant, job applicant, employee, tenant and contractor. Ensuring that this policy is embedded throughout all other policy and process will positively impact on all people in a protected characteristic group.</p>	

<p>7. What actions are required to address the impacts arising from this assessment?</p>	<ol style="list-style-type: none">1. Ensure staff have adequate training about the policy2. Ensure that we have robust processes in place with equality and diversity embedded within them3. Make sure that we have robust information on support available in the area.4. Ensure that adequate information is collected from tenants, applicants (both for housing and employment) and employees around disabilities, vulnerabilities and support.
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Signed: Linda Chelton

Date: 20.1.21

Please attach the completed document as an appendix to the policy report.

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