



# Equality Policy

Policy Ref: CS10

<b>Prepared By</b>	Chief Executive
<b>Date of Review</b>	June 2021
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<b>Reviewed By</b>	PHA Board

## **1. Introduction - Objectives and Scope**

- 1.1 PHA is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. Throughout PHA there will be a consistent approach in promoting equality and diversity across all areas within the Association.
- 1.2 All employees are required to abide by this Policy. This policy also covers discrimination by and towards members of the public, Board members, contractors and staff from other agencies. PHA opposes all forms of unlawful discrimination in relation to employment.
- 1.3 Tackling inequality is not something new. The introduction of the **Equality Act 2010** from October 2010 saw previous discrimination legislation incorporated into one single piece of legislation. It merges previous equality legislation including laws on age, disability, religion or belief, gender, sexual orientation, race, gender reassignment, pregnancy and maternity, and marriage and civil partnership. These areas of legislation are now known under the Equality Act 2010 as the nine 'protected characteristics'.

## **2. Definitions**

### **2.1 Diversity**

This is about valuing individual differences. PHA is committed to valuing and managing people's differences to enable all employees to contribute and realise their full potential. PHA recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit PHA and its customers.

### **2.2 Equality**

This is about making sure that people are treated fairly and given fair chances. *Equality is not about treating everyone in the same way, but recognises that their needs are met in different ways.* Equality focuses on those areas covered by the law, and described as the Protected Characteristics of race, sex, disability, age, gender reassignment, marriage & civil partnership, pregnancy & maternity, religion or belief and sexual orientation.

### **2.3 Protected Characteristics**

Discrimination claims can be made on the grounds of the following 'protected characteristics':

- Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy & Maternity; Race; Religion or Belief; Sex; and Sexual Orientation.

### **2.4 Indirect Discrimination**

A policy, practice, procedure, provision or criteria that applies to everyone in the same way, but might disadvantage a particular protected group and which cannot be objectively justified in relation to the job.

## **2.5 Harassment**

Conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

## **2.6 Victimisation**

Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

## **2.7 Positive Action**

Addressing imbalances in the workforce, by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets. No quotas will be set by PHA but equality targets may be set to encourage people from a particular group or groups to apply for a vacancy in PHA in comparison to the local community where we are under-represented.

## **2.8 Failure to make Reasonable Adjustments**

Where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

## **2.9 Associated Discrimination**

Discrimination against a person because they have an association with someone with a particular protected characteristic. E.g. a non-disabled person is discriminated against because of the action they need to take care of disabled dependent.

## **2.8 Perceptive Discrimination**

Discrimination against a person because the discriminator thinks the person possesses that characteristic. E.g. a person is not shortlisted for a job on the bases that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name on their application form.

## **2.9 Employees**

All permanent, temporary fixed term staff, including all managers, Directors, Chief Executive, and agency workers

## **2.10 Stakeholders**

Contractors, consultants, tenants, customers, service users, other outside agency workers

### **3. Policy Aims**

3.1 PHA operates within a diverse community and aims to build an environment where people can expand their opportunities, exercise choice and maximise their potential. We are committed to promoting a culture of respect and understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. This policy will ensure that PHA's procedures and practices do not result, either deliberately or indirectly, in any individual or group receiving less favourable treatment or service.

3.2 This policy outlines how we will work with, and be accountable to, our employees, service users, community and other stakeholders to:

- reduce inequality within our workplace and community;
- remove barriers which can limit individuals and groups;
- increase opportunities to access services; and
- increase opportunities for engagement to help shape and improve services.

3.3 As an employer PHA will ensure that all employees are treated with fairness and respect, will not be disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance, and will not be discriminated against on the basis of any of the protected characteristics. PHA subscribes to Employers In Voluntary Housing's terms and conditions of employment, which included reference to the duties and responsibilities of both the employer and employee in respect of equalities. In respect of our staff, PHA will implement fair and just employment practices ensuring that no job applicant or employee receives less favourable treatment on the basis of any protected characteristic and we will ensure that people are recruited, retained and promoted solely on the basis of their own merit, experience, abilities and potential.

### **4. Policy Principles**

4.1 This policy aims to:

- Ensure that an understanding of equalities is integrated into all of PHA's practices, and ensure that employees are treated with fairness and respect from each other and from members of the public, Board members, and contractors.
- Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.
- Sustain a culture of fairness and equality and ensure a better working environment and performance, which in turn will improve staff attraction and retention.
- Promote equality and diversity and social inclusion in the communities we work in
- Deliver equality of opportunity in all areas of our service provision.

## **5. Policy Scope**

- 5.1 This policy will operate to remove discrimination and promote equality of opportunity at every point of contact with our customers, our community and other stakeholders.
- 5.2 In order to achieve the aims of this policy we have developed an Equality Action Plan (EAP) set out in **Annex 1**.

## **6. Informing and Involving Stakeholders**

- 6.1 Stakeholders will be informed of our Equality Policy from our list of policies published on our website and in our newsletters. Stakeholders will be advised that these documents are available on request (in different languages and formats if necessary).
- 6.2 The PHA Board is responsible for the implementation of this policy, with day to day responsibility delegated to the Chief Executive.
- 6.3 Each Director and Manager is responsible for implementing the policy within their team and all employees are expected to abide by the policy.
- 6.4 PHA will ensure that all new employees and Board members receive induction on this policy. The policy will be promoted and integrated into all policies and procedures within PHA.
- 6.5 Appropriate training and guidance will be available to promote equality and diversity among staff and Board.
- 6.6 This policy applies to everyone in PHA and all have a responsibility to be alert to discriminatory behaviours and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the equality and diversity policy will be regarded as misconduct and lead to disciplinary action, which may include dismissal.

## **7. Consultation**

- 7.1 PHA will consult with our customers to seek feedback on services and understand demographic environments.

## **8. Equal Access to Services**

- 8.1 PHA will ensure that all people can benefit equally from our services.
- 8.2 PHA will raise awareness amongst all current and potential customers, including people who are currently under-represented, of the services it provides, including the availability of stock, through our newsletters, website and other measures.
- 8.3 PHA will be sensitive to people with difficulties in communicating and participates in the 'Happy to Translate' scheme, ensuring that our corporate communications, including our website, are fully accessible.

## **9. Contractors' Responsibilities**

- 9.1 By integrating this policy into its procurement practices, PHA will ensure that all consultants/contractors/agents take steps to comply with relevant equality legislation.
- 9.2 Prior to the commencement of any contract or service agreement, any consultant/contractor/agent will have to submit its own Equality Policy statement. Any incidence of harassment or discrimination by consultants/contractors/agents brought to the attention of the Association will be made known to the relevant consultant/contractor/agent who will be expected to conduct an investigation into the complaint and confirm the outcome to the Association.
- 9.3 Consultants/contractors/agents will be made aware in future contracts that any misdemeanour or breaches of policy may lead to prevention of any future contracts/works with the Association.

## **10. Equalities Governance**

- 10.1 All staff and Board members are responsible for complying with this policy, promoting good practice and challenging discrimination within the boundaries set out by the code of conduct for board members. Everyone within the organisation has a responsibility to think about their attitudes to different communities, individual groups and how they challenge others. Challenging the way people think can be difficult but is necessary if we are to tackle inequality. All staff and Board members will receive training so that they have the confidence to promote our values and challenge inappropriate language or behaviour.
- 10.2 In discharging their responsibilities to this policy, Board Members will:
- Set policy;
  - Monitor performance and agree corrective action where necessary and appropriate;
  - Ensure compliance with the policy;
  - Challenge existing practice using parameters set out by Board Code Of Conduct; and
  - Regularly review the policy.

Leadership Team (LT) will:

- Implement the policy;
- Develop clear action plans;
- Ensure reports on policy matters to the Board identify equality and diversity implications; and
- Ensure training, development and relevant information on equality and diversity matters is received by Board members, staff, customers and contractors to sustain competencies and maintain up to date knowledge.

Management Team (MT) will:

- Actively promote equality and diversity; and
- Challenge discrimination within their areas of responsibility.

Staff will:

- Ensure they work in accordance with this policy; and
- Give full commitment to the principles contained herein.

Customers are expected to:

- Adhere to matters of law in relation to equality and diversity according to any agreement in place; and
- Fulfil a 'good neighbour' role respecting the needs and circumstances of all people within their community.

## **11. Monitoring and Review**

11.1 PHA will monitor equalities data in a number of areas including:

- Applicants for housing, employment and membership will be monitored in terms of ethnic origin, gender, age and disability. Within these groups further breakdowns will be made in terms of successful applicants;
- A regular review of consultation procedures and policies; and
- 3-yearly customer survey to capture demographic information.

11.2 We will review the Equality Policy every three years or sooner if required by statutory, regulatory or best practice requirements.

## **12. Alternative Formats**

12.1 On request, the Association will provide translations of our documents, policies and procedures in various languages and other formats such as computer disc, tape, large print, Braille etc, and these can be obtained by contacting the Association's offices.

## **13. Equality Action Plan**

13.1 The range of actions to be delivered as a result of this policy are detailed in the following Equality Action Plan which sets out the performance challenges and targets required to meet the aims of this policy. Progress against the action plan targets will be reported to the LT, PHA Board, customers and staff.

## **14. General Data Protection Regulation (GDPR)**

14.1 The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Privacy Policy. Information regarding how your data will be used and the basis for processing your data is provided in PHA's privacy notice.

**Annex 1**

	<b>Task</b>	<b>Aims &amp; Objectives</b>	<b>How Achieved</b>	<b>Who</b>	<b>Time</b>	<b>Monitoring</b>	<b>Outcomes</b>
1	Designing and Reviewing Services	Deliver policies, strategies and services that meet the needs of different groups within our customer base and communities	Use Equality Analyses (EAs) when reviewing and developing policies, strategies and service delivery				The findings of EAs can help develop positive, help prevent discrimination and promote equality.
2	Quality of Service Delivery	Deliver appropriate services that reflect the diverse range of needs and preferences of our customers and the community we serve	<p>Offer services, facilities and documents to a wide range of people by using accessible formats</p> <p>Maintain database on communication preferences</p> <p>Seek input and feedback from customers and community and use this information to shape and plan services</p> <p>Build links and work in partnership with local groups and other partners, that work with or represent diverse communities or groups, to improve outcomes for specific communities or groups</p>				Buildings, staff and services that are accessible to customers and potential customers

	<b>Task</b>	<b>Aims &amp; Objectives</b>	<b>How Achieved</b>	<b>Who</b>	<b>Time</b>	<b>Monitoring</b>	<b>Outcomes</b>
3	Allocation of Properties	Provide accessible information and advice	<p>Regularly review application and allocation processes</p> <p>Provide clear information and advice to applicants on our policies, procedures and other relevant documents in accessible formats</p> <p>Make the best use of our housing stock, including where aids and adaptations have been provided</p> <p>Regularly review lettings quotas and outcomes</p> <p>Work in partnership with other agencies who can provide support to tenants and optimise tenancy sustainment</p>				Allocation of properties in a way that is fair and transparent
4	Development and Regeneration	Development and acquisition of properties to meet housing needs	<p>Develop and acquire properties that meet a range of housing needs and are accessible for a range of client groups, including those with disabilities and particular needs identified by the strategic housing authority as a priority</p> <p>Where appropriate work in partnership with specialist housing providers to meet particular housing needs</p>				Meet the diverse needs of the communities that we serve

	<b>Task</b>	<b>Aims &amp; Objectives</b>	<b>How Achieved</b>	<b>Who</b>	<b>Time</b>	<b>Monitoring</b>	<b>Outcomes</b>
5	Developing Community Partnerships	Build links with local voluntary and community groups that work with or represent diverse communities or groups	Look for opportunities to work in partnership with other organisations, such as voluntary and community groups, local authority or other housing organisations				Meet the diverse needs of the communities that we serve
6	Responsible Community Management	Ensure that our customers can enjoy their homes without fear of hate crime, harassment or abuse	<p>Regularly review anti-social behaviour policy and procedures, and operate effective monitoring mechanisms</p> <p>Provide clear information and advice to applicants on our policies, procedures and other relevant documents in accessible formats</p> <p>Work in partnership with other agencies who can provide support to customers experiencing anti-social behaviour, including the Police where we will promote information sharing protocols</p> <p>Work with the local authority and participate in local anti-social behaviour initiatives</p> <p>Develop a multi-agency approach to dealing with harassment and anti-social behaviour</p>				Incidents are dealt with effectively

	<b>Task</b>	<b>Aims &amp; Objectives</b>	<b>How Achieved</b>	<b>Who</b>	<b>Time</b>	<b>Monitoring</b>	<b>Outcomes</b>
7	Customer Engagement	Promote ways that people can engage with us	Regularly review our customer engagement strategy and procedures				Tenants and other customers understand and can shape how PHA does business
8	Information and Communication	Regular communication around equalities and diversity issues	Promote our customer engagement strategy and opportunities to participate, providing information in the format customers need or prefer				Communication in appropriate formats to promote equalities and diversity
9	Complaints	Address and remedy situations where our customers are dissatisfied with how we operate	Regularly review customer engagement strategy and procedures  Develop monitoring mechanisms in relation to complaints				Incidents are dealt with effectively and lessons learned
10	Procurement	The policy extends to all those who provide services on behalf of PHA	Promote the principles of equality and diversity when procuring contractors, consultants, suppliers and partners, and monitor their performance  Make it a condition of any engagement that the third parties operate in accordance with our Equality Policy				All business partners share our commitment to equality and diversity
11	Membership	Development of a broad membership base	Treat applications for individual membership equally and consider them in line with our Rules and Membership Policy				We have a broad shareholder membership

	<b>Task</b>	<b>Aims &amp; Objectives</b>	<b>How Achieved</b>	<b>Who</b>	<b>Time</b>	<b>Monitoring</b>	<b>Outcomes</b>
12	Training	Regular equalities awareness training	<p>Deliver general equalities awareness training to staff and Board members</p> <p>Deliver equalities training as an integral part of our induction programme for new staff and Board members</p>				Staff and Board are aware of equalities issues