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EQUALITY & DIVERSITY POLICY

LS/April.2022/REF.P20



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Registration No. HCB 161 SC Registered: Financial Conduct Authority - 1818 R(S).
Registered under the Co-operative and Community Benefit Societies Act 2014.



1) POLICY STATEMENT

The Equality & Diversity Policy is intended to cover all areas of operations within Milnbank Housing Association (MHA). The principles upon which it is based are applicable to the activities of all Staff, Committee members and the Association as a whole. In recognition of MHA's commitment to equal opportunities, an Equality Action Plan is compiled and reviewed annually.

The Management Committee, as employers, is jointly responsible for any acts of discrimination by Committee members, Staff or agents and as such aims to prevent and eliminate discrimination. The day-to-day responsibility of ensuring equality and diversity opportunities is maintained is delegated to the Management Team; with the Director retaining the overall equalities remit.

2) EQUAL OPPORTUNITIES AIMS

The Association aims to ensure that it provides equal opportunities:

- a) In the services it provides to residents, applicants and other customers.
- b) In access to membership of the Association, the Management Committee and the engagement of members and other volunteers in its activities.
- c) In its recruitment and employment of staff

MHA seeks to ensure that no person is treated less favourably than any other person or group of persons applying for housing, employment, or work under contract to the Association on the grounds of the nine protected characteristics.

3) EQUALITY & DIVERSITY LEGISLATION

MHA is committed to the implementation of good practice throughout the organisation and to the provisions of the various Equality & Diversity legislation, Codes of Practice and Guidance Notes. The main legislation MHA complies with is The Equality Act 2010. Details of the key points for this and other relevant legislation, and how they impact on MHA, in terms of equality & diversity is as follows:

- a) The Equality Act 2010 - Under this Act it's unlawful to discriminate against an employee or job applicant because of:
 - (1) age,
 - (2) disability,
 - (3) gender reassignment,
 - (4) race,
 - (5) religion or belief,
 - (6) sex,
 - (7) sexual orientation,
 - (8) marriage and civil partnership and
 - (9) pregnancy and maternity.

It also covers direct and indirect discrimination, discrimination by association, perception discrimination, harassment, third party harassment and victimisation.

- a) Human Rights Act 1998 - Act covers the right to peaceful enjoyment of possessions and protection of property, freedom of thought, conscience

and religion and prohibition of discrimination in the enjoyment of convention rights.

- c) Housing (Scotland) Acts 2001, 2010 & 2014 - This places a statutory duty on housing associations to encourage equal opportunities. This stipulates such areas as tenant participation and consultation, allocations, homelessness strategies, grounds for recovery of possession and rights under the Scottish Secure Tenancy must meet the requirements of this Act.
- d) Good Practice Guidance – Produced specifically for housing associations, Collecting Equality Information: National Guidance for Scottish Social Landlords (April 2022) provides guidance on collecting quality information to ensure legal and regulatory requirements for equality data collection are met.

4) ORGANISATION ARRANGEMENTS

To help fulfil its commitment to Equality & Diversity, MHA collects and monitors appropriate information in relation to the 9 protected characteristics included in the Equality Act 2010. This includes:

Housing - including housing applicants, applicants accepted, applicants rehoused, development programmes, homeless strategy.

Employment - including advertising, requests and interviews.

Current Racial Profile -including tenants, employees, shareholders, Committee members.

Tenant Participation/Consultation - including membership details of the Association, publicity of equal opportunities issues.

Economic status and household details – for MHA tenants and housing applicants.

The Committee are periodically presented with statistical information on the above.

5) RESPONSIBILITY OF MHA AS A SERVICE PROVIDER

- a. Residents - MHA will seek to provide sufficient and appropriate information to residents and other customers by a method that ensures information is available regardless of disability or impairment.
- b. Housing Applicants - MHA will seek to ensure that information about allocation procedures is easily available, and that decisions about access to the housing list and the allocation of property is made solely on the basis of housing need. (Full details are in the Allocations Policy)
- c. Agreements with other Housing providers - MHA will seek to ensure that outside parties involved in housing agreements comply with the Association's own standard, as a minimum, regarding equal opportunities.

- d. Contractors/Consultants Equality Compliance - As recipients of public subsidy, MHA will seek to ensure that public funds are not used to promote practices that may be based on discrimination. Consequently, the Association will seek to award to those Contractors and Consultants who develop and implement an Equality & Diversity Policy or agree to abide by the MHAs Policy.
- e. The Community - MHA actively promotes its involvement in networking and supporting local community groups and encourages the promotion of equal opportunities in all forms.
- f. Harassment and Grievance - MHA has a Dealing with Unacceptable Behaviour Policy and Complaints Handling Procedure to respond to complaints of harassment or grievance in order that such cases are dealt with fairly and impartially.
- g. Confidentiality - MHA will seek to ensure that the staff and management committee members observe the Code of Conduct in terms of confidentiality and in relation to personal information regarding tenants, clients, staff, Committee Members and others, regardless of their circumstances, status or any other factors.
- h. Health and Safety - MHA has implemented a Health and Safety Policy to ensure that everyone is equally informed and aware that their health and safety needs are given fair and equal consideration.
- i. Training & Development - MHA will facilitate training for staff and committee members in order to recognise the importance of equal opportunities and, where necessary, provide additional training for staff that recruit, select and train employees.

6) EMPLOYMENT

The Association will seek to ensure that all individuals will be treated fairly and equally and any decisions on staff development, recruitment and selection will be based on the essential job evaluation and criteria. MHA is a recognised 'Disability Confident Employer' user which demonstrates our commitment to good policies and practices in the employment with people with disabilities. MHA's pay system is transparent, free from bias and based on objective criteria.

MHA's recruitment process is detailed in the Recruitment & Selection Policy which guards against unfair discrimination and covers job evaluation, job description, job specification, advertising, short listing, interviewing and offers of employment.

7) DISSEMINATION OF POLICY

To maximise awareness, this policy is distributed to all employees, Contractors and Consultants, it forms part of the Committee Members Handbook and is displayed in the Associations office. It will be available on request, free of charge, to any member of the public. This policy can be made available, on request, in Braille, type talk and large print. The Association shall also arrange

the use of an Interpreter or Advocate if possible. The Association operates a Mini loop system and is an accredited Happy to Translate member.

8) MONITORING & REVIEW

The monitoring of equal opportunities is delegated senior managers and findings presented to committee. This policy is reviewed and adopted annually or as otherwise deemed necessary by the Management Committee.

9) COLLECTING INFORMATION

The SHR Regulatory Framework requires housing associations to collect equality information in respect of the 9 protected characteristics under the Equality Act. As advised by the Equalities and Human Rights Commission (EHRC) and the Information Commissioner’s Office (ICO), MHA will not link data to individuals. MHA will collate data using a spreadsheet for each of the undernoted groups.

	Existing tenants	New tenants	People on waiting lists	MC Members	Staff
Age					
Disability					
Gender reassignment					
Marriage & civil partnership					
Pregnancy & maternity					
Race/ethnicity					
Religion or belief					
Sex					
Sexual orientation					

By collecting this information anonymously, it is not personal data therefore data protection requirements do not apply.

10) DATA PROTECTION

MHA controls the personal information that we collect, this means that we are legally responsible for how we collect, hold and use personal information, including sensitive personal information as is included within this Policy. It also means that we are required to comply with the General Data Protection Regulations (GDPR) when collecting, holding and using personal information.

EQUALITY ACTION PLAN

AIM OF THE PLAN

The aim of this Equality Action Plan is to actively promote MHA's continuous commitment to equality and diversity in all areas of operation. This plan supports the Equality & Diversity Policy and consolidates equality issues from other organisational policies and procedures.

APPRAISAL OF THE CURRENT POSITION

As part of the Equal Opportunities Policy review, committee members are provided with statistics for monitoring purposes. These figures cover issues relating to: Residents Profile, Association Membership, Ethnic Monitoring, Employment Monitoring etc. These figures are studied and any necessary action is implemented.

COMMUNITY PROFILE

As part of the Association's work on equality and diversity, the community profile report will be updated to provide a range of information on the MHA's population and to assist with setting MHA's future objectives and priorities. The approach of undertaking this work is based on the Chartered Institute of Housing (Feb. 2013) paper entitled "How to undertake an equality analysis" which is based around The Equality Act 2010. The current Community Profile is presently being updated.

SHR REGULATORY FRAMEWORK

The equality and human rights part of the above framework focuses on the SHR promoting equalities and human rights and for landlords to ensure compliance with their responsibilities under the Equalities Act 2010. As stated in our 2021 Annual Assurance Statement, MHA is aware of the requirement to collect data on all nine protected characteristics from April 2022 onwards and will comply with the updated guidance on data collection and other equalities issues. (National guidance for Scottish Social Landlords - April 2022)

TARGETS AND ACTION

It can be difficult setting realistic targets that reflect the needs of everyone. In terms of equality MHA strives to set various targets, in addition to those specified in the Equality and Diversity Policy, these include:

TARGET AREA	ACTION DATE 2022/23
<u>Governance</u> MHA has several policies relating to equality & diversity:	November 2022

<p>•Complaints Handling Procedure provides access to all residents and other customers who wish to lodge a complaint against MHA practice. This policy is reviewed annually.</p> <p>•Unacceptable Behaviour Policy where MHA makes a commitment to act against perpetrators where harassment exists. This policy is reviewed every 3 years.</p> <p>In recognition of the number of residents with poor mobility, the Association offers a home visiting service. This information is on our website and periodically included in newsletters.</p> <p>MHA also operates a tailored service to provide a support service to vulnerable residents. The Tenancy Support Strategy is reviewed annually. This includes the services of our Income Maximisation staff.</p> <p>MHA has a number of flats that have been specially adapted to facilitate tenants who impaired hearing.</p>	<p>2024 review</p> <p>Spring 2022 newsletter</p> <p>February 2022</p>
<p><u>Management Committee</u> Working within the Association’s Rules, MHA endeavours to have a Management Committee to reflect the profile of the area. There is a mixed range of skills, knowledge, and expertise within the committee. Regular Committee Skills Audits are undertaken & updated as part of the annual review of the Organisational Training & Development Plan.</p> <p>Committee members, Board Members and representatives from other groups (e.g. Focus Groups) within the area are actively encouraged to participate in a range of training.</p>	<p>September 2022</p>
<p><u>Contractors</u> It is a pre-requisite for any contractor on MHA’s Reactive & Planned Maintenance Framework to agree to abide by our Equality & Diversity Policy. A comprehensive review of the Reactive & Planned Maintenance Framework is undertaken & reviewed every 4 years.</p>	<p>June 2022</p>

<p><u>Staff</u> With the exception of appointments of Support staff (female employees only), all vacancies within MHA are open to everyone to apply. MHA operates an open recruitment policy.</p> <p>MHA's Equality & Diversity Policy forms part of employees Induction. Staff are issued with an updated version of this policy upon each annual review.</p> <p>Staff undertake a job review each year where their personal development plans are updated. Job reviews are scheduled for each October/January with workplace support sessions held on an on-going basis.</p>	<p>Commence October 2022</p>
<p><u>Tenant Participation/Consultation</u> To support MHA's commitment to Tenant Participation, a strategy is in place which is regularly monitored. Participation and consultation is via Focus & Community Groups and MHA offers childcare provision to ensure equal access. In addition, the location of residents meetings is varied to take account of mobility issues and transport is arranged where required.</p> <p>MHA consults on an annual basis on the Scottish Social Housing Charter and community services meetings to seek their preferred method of communication.</p>	<p>November 2022</p> <p>May 2022</p>
<p><u>Development</u> MHA endeavours to reflect the needs of the community when developing new builds and renovating properties, this includes discussions with other agencies and promoting independence by designing, where possible, homes to allow disabled people to gain access.</p> <p>MHA applies for funding to provide adaptations every financial year, where there is a funding shortfall; MHA meets this sum whenever possible.</p>	
<p><u>Maintenance/Asset Management</u> MHA's target to remove graffiti is within 24 hours and immediately if it is of an offensive nature.</p>	

<p>MHA has an in-house repair team who can offer a quick response to requests to assist residents with disabilities e.g. grab rail for the common close.</p> <p>Through support staff, residents are offered support during major repair works within their properties. E.g., community engagement team assisting with decants.</p> <p>The Adaptations Policy promotes opportunities for tenants to remain in their home for as long as possible.</p>	<p>September 2022</p>
<p><u>Allocations</u></p> <p>The Association strives to provide equality of opportunities for all housing applicants by basing our Allocations Policy on relevant guidelines, standards etc. The Allocations Policy is reviewed every 2 years.</p> <p>Allocations involving staff or committee members are subject to MHA's Control of Payments & Benefits Policy. All allocations are scrutinised by 2 members of staff.</p> <p>MHA monitors ethnic origin from all applicants, this is part of the housing application form. From details supplied, records are kept on gender etc and are used purely for monitoring purposes.</p> <p>The Allocations Policy allows for applicants who require carers to be considered for larger accommodation and in terms of areas, an allocation would not be made where there is potential of racial or any other form of harassment. The Dealing with Domestic Abuse Policy forms part of the Allocations Policy.</p>	<p>September 2022</p> <p>June 2022</p> <p>February 2022</p>
<p><u>Rents</u></p> <p>The Association is aware of tenant's income and affordability, this information is considered during the rent review process. The Rent Policy is reviewed on an annual basis.</p>	<p>February 2022</p>

