

New Charter Housing Trust Group

Equality & Diversity Strategy

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# **EQUALITY & DIVERSITY POLICY**

**NEW CHARTER HOUSING TRUST GROUP**

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## I. PURPOSE

- I.1. The purpose of this policy is to ensure that New Charter Housing Trust Group (the Group) provides appropriate and responsive services to tenants, residents, employees, Board Members, customers, applicants, contractors, partner agencies and the wider community fairly and equitably while valuing difference and promoting community cohesion. This policy links directly to the respective Equality Action Plans of each individual subsidiary Company within the Group.
- I.2. Inequality and discrimination is wrong and can have far reaching negative effects on the quality of service delivery with the greatest risks being to relationships, experience, reputation and financial loss through loss of business and possible legal action.
- I.3. Discrimination and disadvantage means that equality cannot be achieved simply by treating everyone the same. The Group will therefore ensure that everyone is treated according to their needs regardless of who they are.
- I.4. The Group will comply with relevant legislation and follow the guidance and codes of practice recommended by current Housing Regulatory Bodies, and the Equality and Human Rights Commission.

## 2. EXTERNAL REFERENCES

- 2.1. The following external references have been considered:
  - Sex Discrimination Act 1975.
  - Race Relations Act 1976 (Amended 2000).
  - Disability Discriminations Act 1995 (Amended 2005.)
  - Protection from Harassment Act 1997.
  - Employment Equality (Religion or belief) Regulations 2003.
  - Employment Equality (Sexual Orientation) Regulations 2003.
  - Employment Equality (Age) Regulations 2006.
  - Equality Act 2006.
  - Equality Act (Sexual Orientation) Regulations 2007.
  - Equal pay act 1979
  - Human Rights Act 1998
  - Gender Recognitions Act 2004
  - Civil Partnerships Act 2004
  - Employment Equality Regulations 2005
  - Equality Act 2006
  - Race and Religious Hatred Act 2006
  - Disability Rights Commission – A Guide to the Disability Equality Duty and the Disability Discrimination Act 2005, for the housing sector.

- Commission for Racial Equality – Code of Practice 2006.
- Housing Corporation Performance Standards and Regulatory Guidelines – Good Practice Note 8, November 2007.
- Equality Act 2010

### 3. RELATED POLICIES AND PROCEDURES

3.1. This policy has links with the following Group Policies and Procedures:

- Anti-Social Behaviour Policy.
- Allocation Policy.
- Customer Care and Performance Standards.
- Customer Care Policy.
- Customer Complaints Policy.
- Code of Conduct: Members and Employees.
- Disciplinary Procedure.
- Grievance Policy.
- Harassment at Work Policy.
- Recruitment and Selection Procedure.
- Responding to Hate Incidents and Crime Policy.
- Training Policy.
- Tenant Participation Consultation Policy.
- Tenant Participation Information Policy.
- Resident Involvement Policy.

### 4. POLICY STATEMENT

- 4.1. The Group is fully committed to achieving fairness and equality for its tenants, residents, customers, staff and members in respect of its service provision and associated activities. The Group recognises, respects and will respond to the different needs of minority groups and will strive to ensure that its services are accessible and inclusive. The Group will strive to secure equality of treatment and opportunity for everyone regardless of their protected characteristic of race, colour, ethnic or national origin, religion or belief, sexual orientation, gender, gender identity, marital or civil partnership status, age, disability or pregnancy and maternity status.
- 4.2. The aim of this policy is to ensure that all individuals and/or groups are treated equally and fairly by having equal access to and use of all services provided by the Group and that while using these services everyone feels valued, supported and respected.
- 4.3. The Group is committed to providing equality of opportunity to all persons in every aspect of its activities. It will, whenever possible, work in partnership with the community and organisations or agencies to

promote equal opportunities, tackle discrimination and work in a proactive manner by taking proportionate action to address disadvantage or under-representation to meet the needs of any disadvantaged and/or minority groups within the community.

This policy therefore includes proposed actions to tackle disadvantage and discrimination in the fields of:

- (i) Service Delivery.
- (ii) Employment Practice.
- (iii) Membership of the Group and composition of the governing body.
- (iv) Tenant and Resident Involvement.
- (v) Tenant and resident satisfaction.

- 4.4. The Group will provide upon request a copy of this Equality and Diversity Policy which will have been formally endorsed by its governing body.
- 4.5. The Group will, where appropriate, set targets and regularly review at governing body level, the recruitment of its governing body members and employees, the provision of housing and services to tenants, residents and applicants.
- 4.6. In order to achieve the aims of this policy the Group will take the following steps:
  - Establish Policies and Procedures that are regularly monitored and reviewed to ensure that the delivery of all its housing services is fair and without discrimination.
  - Regularly review and carry out Equality Impact Assessments (EIA) for all Group Policies and Procedures to ensure they reflect legislation, guidance and best practice and that they do not directly or indirectly discriminate.
  - Provide all employees with awareness training on equality and diversity and the Group's Policies and Procedures that deal with harassment, eg. Anti-social behaviour and Hate Incidents, Domestic Abuse.
  - Statistical information regarding the diversity of all housing applicants, housing allocations and tenants will be recorded. These records will be monitored on a regular basis with the aim of ensuring that services are tailored to ensure that everyone can appropriately access and use them and that those members of disadvantaged groups within the community are achieving equal access to the Group's services.

- Take positive action to encourage under-represented groups within the local community to become involved in the delivery of service.
- This policy will provide the foundations for partnership working as the Group will consult and be a proactive partner with local agencies, such as the local Council, the local Health Services Trusts, the Police and other community groups in identifying and meeting any needs of particular groups within the local community.
- The Group is opposed to all forms of hate behaviour and will positively support victims of hate harassment. The strongest possible action will be taken against perpetrators of harassment whether they are a tenant or not.
- The harassment of staff by a third party such as tenants, customers or partners will not be tolerated and the Group will take all reasonable practical steps to investigate and prevent the harassment. Staff also have an obligation to report any incidents they experience or witness in line with the Group's Harassment at Work Policy.
- Board Members, staff and members of tenant and resident groups will regularly receive guidance and training on Equality and Diversity to ensure that they clearly understand their position in law and the implications of equality and diversity for the Group.
- Recognised tenant groups will be required to comply with and operate this policy and the equality and diversity values of the Group.
- Encourage and support third party service providers to be equitable and fair.
- The Group recognises that if service delivery is to meet the needs of the diverse community it serves, then Group employees and members should reflect the composition of that community by having a diverse range of background, abilities and experience. In order to achieve this the Group will consider taking positive action when advertising for employees and members.

## 5. SERVICE DELIVERY

- 5.1. Service delivery is defined as the provision of housing and associated services that enable the Group to allocate, let, maintain, improve and manage its housing stocks and tenancies either through its employees or the use of third party external contractors and consultants.

## 5.2. **Access to Information.**

The Group believes that inequality can occur whenever a person or group is unaware of or has difficulty gaining access to the services it provides.

5.2.1. The Group will ensure that information is available by means of:

- Letter, e-mail, telephone or face to face contact.
- Regular newsletters.
- Publication of specific leaflets.
- Information translated into local community languages.
- The use of graphics that do not portray stereotypes.
- Internet website.
- Public forums and consultation seminars.

5.2.2. For people with sensory impairment the Group will provide upon request:

- Monochrome editions of all information publications on request.
- Audio recordings of information publications on request.
- Braille versions of publications on request.
- Appropriate training of key staff e.g. signing skills.
- Document magnification facilities on request.
- The provision of an Induction Loop System for the hearing impaired.
- For those with literacy issues, documents will be produced in formats that are user friendly and easier to understand.

5.2.3. Where the language is a barrier the Group will:

- Make provision for appropriate interpretation e.g. the use of Language Line or another form of personal interpretation.
- Include translation strap line in several local languages on all relevant letters, leaflets and publications.
- Liaise with community groups representing minority groups to ensure all information regarding services is fully distributed and understood.
- Provide clear, well publicised suggestion and complaints procedures.
- Consult the local community about their needs.

## 5.3. **Access to Offices and Services.**

5.3.1. The Group believes that inequalities occur when a person or group has difficulty reaching or making use of the services that exist. In order to remedy this the Group will:

- Endeavour to provide a welcoming and informative environment for customers and ensure that all offices and public areas are accessible to physically disabled people.
- Provide reception services for customers waiting with young children, including, where possible, play facilities.
- The Group will also consider whether care facilities can be made available to help those with child/adult caring responsibilities use services and facilities or take part in activities.
- Consider providing specific sessions for certain groups to meet their language or cultural requirements and if more appropriate consider taking services to them.
- Any vulnerable and/or marginalised residents and applicants will be provided with appropriate responsive housing services, including support and care arrangements in partnership with other relevant agencies.
- Using the profiling data it has collected to endeavour to communicate with customers in the most appropriate way.

#### 5.4. **Lettings.**

5.4.1. The Group will ensure through the Allocations Policy that the process of letting properties will be equitable and fair, customer focused and not disadvantage any particular group or facilitate segregation.

5.4.2. The Group will undertake monitoring of the characteristics of people on the housing register compared to the people being housed and population of the area it serves. It will identify ways of addressing any under-representation of any group that the comparison highlights.

#### 5.5. **Special Needs Accommodation.**

5.5.1. The Group will to develop accommodation in a way that is sensitive to the needs of all the community, and develop a comprehensive role in identifying and meeting the need for special needs accommodation by developing community services and improving neighbourhoods.

5.5.2. The Group will make special needs accommodation visually indistinguishable from general needs accommodation and where possible will build it within larger developments.

5.5.3. All new developments will be built to an accessible standard and in accordance with the Housing for Life Standards.

5.5.4. Subject to assessment, property adaptations will be provided for tenants following a comprehensive personal care planning assessment in conjunction with the local Council and Health Service

Trusts.

## 5.6. **Tenant Participation.**

5.6.1. The Group believes it is vital that all service users are involved in the decision making process that affects the services they receive and that inequality can occur when tenant/resident participation in this process only extends to those who are able to attend meetings.

The Group will remedy this with the provision of the following:

- Appropriate transport or travel expenses to meetings for members of the Board and recognised Tenant/Resident groups.
- Recognition of childcare needs for those attending meetings and the provision of services to accommodate these needs.
- The flexible scheduling of events during evenings and weekends not solely office hours to enable more people to attend.
- Adopt practices that will ensure that representation in tenant/resident groups reflects the local community mix, e.g. race, disabled, and other cultures.
- Provisions of interpreters for language or sensory impairment barriers at meetings.
- The development and use of surveys, working groups, forums, meetings, open days, and mystery shopping as an important part of the quality assurance process.

## 6. EXTERNAL CONTRACTORS

- 6.1. External contractors and consultants will be made aware of the Groups equality and diversity values and will be expected to ensure that their business is conducted in a way that does not conflict these principles as well as complying with any relevant legislation.
- 6.2. Any allegations of discrimination or harassment made against contractors and consultants will be taken seriously and investigated thoroughly and if necessary be reported as a crime. Contractors and consultants will be expected to take prompt and appropriate action against any of their staff found to be acting in an unacceptable way.

## 7. HARASSMENT OF RESIDENTS

- 7.1. The Group is opposed to all forms of harassment, domestic abuse and hate behaviour and will give positive support and assistance to victims and witnesses of hate and/or other harassment whilst instigating action

against the perpetrators.

- 7.2. All reported incidents of hate, domestic abuse and harassment will be investigated in accordance with the Responding to Hate Incidents and Hate Crime Policy, the Domestic Abuse Policy or the Anti-Social Behaviour Policy to ensure prompt action is taken against the perpetrators of harassment. The Group will take speedy action in supporting and protecting victims and witnesses.
- 7.3. The Group will take the strongest action against perpetrators of hate or harassment incidents or crime. Harassment will be a breach of the terms of the Group's Landlord Tenancy Agreement.

## 8. EMPLOYMENT

- 8.1. As an equal opportunities employer, the Group will make every reasonable effort to ensure that there is no unjustified discrimination or harassment on the grounds of race, colour, ethnic or national origin, religion or belief, sexual orientation, gender, gender identity, marital or civil partnership status, age, disability or pregnancy and maternity status, in the way that the Group treats its employees, contractors, and job applicants.
- 8.2. The employment section of this strategy has three main objectives:
  - To encourage Group employees to take an active role against all forms of harassment and discrimination.
  - To deter employees from participating in harassment or discriminatory behaviour.
  - To demonstrate to all employees that they can rely upon the Group's support in cases of harassment or discrimination at work.
- 8.3. The Group is committed to creating a working environment that offers equal treatment and equal opportunities for all its employees, so that every employee has the opportunity to develop their skills and abilities enabling each employee to progress to his or her true potential. Staff with particular needs will be supported and where necessary reasonable adjustments made to help retain experience and knowledge and increase trust in the Group as an employer.
- 8.4. This policy applies to all aspects of the Group's employment practices and therefore applies to the recruitment and selection of employees, terms and conditions of employment, training, salary, work allocation, promotion and disciplinary procedures.

- 8.5. All employees are required to follow and implement this policy and to undergo any associated training and development activities to ensure that they are able to carry out their duties and responsibilities in terms of promoting and, implementing the policy in the course of their work. Failure to do so may lead to disciplinary action possibly including dismissal.
- 8.6. The Group's recruitment, selection and promotion procedures and general policies and practices will be regularly reviewed to ensure that this policy is being implemented. The Group will monitor the composition of the workforce and aim for a workforce that is a representative of the Group's customer base and the local community.
- 8.7. To encourage all sections to the community to seek employment with the Group, facilities necessary to offer a welcoming environment and flexible working patterns will be offered, provided that these do not conflict with service delivery. All vacancies will be widely and appropriately advertised.
- 8.8. In the event that any employee feels that he/she has suffered discrimination in any way, the Group's Grievance or Harassment Procedure should be used. If the complaint is against the immediate or other superior manager, the complaint should be sent to the Head of Human Resources for the Group who will refer the complaint to the next tier of management if this appears appropriate. In a case of sexual harassment, the anonymity of the complainant will be protected as far as possible.

## 9. BOARD MEMBERSHIP

- 9.1. Membership of the Group's Board(s) should, as far as possible, reflect the composition of the customer base and the local community in which the Group operates. Where an imbalance exists, positive steps will be taken to encourage people with relevant skills and experience from under-represented groups to stand for election to the Board(s). There will be champions for equality and diversity at Board level for each Company within the Group.

## 10. TENANT AND RESIDENT INVOLVEMENT

- 10.1. The Group will involve, consult, monitor and review its service delivery with all residents of the community in which it operates. This includes tenants, leaseholders, shared owners and freeholders who pay Service Charges, people in temporary and supported housing and other

residents.

- 10.2. The Group also provides the opportunity for those who identify themselves as showing a common characteristic and wish to discuss particular issues, whether they are tenants or not. In order to facilitate this, the set up and continued existence of tenant and resident groups reflecting the composition of the local community will be encouraged and supported, an example of this being the Disability Forum created to discuss issues surrounding those with a disability.

## 11. TARGETS

- 11.1. All targets will be identified within the current Equality for each individual Company within the Group. The implementation of this policy will help facilitate the achievement of these targets.

11.2. **Group Diversity.**

The Group will aim to achieve employee and membership representation equivalent to the diversity characteristic proportions of the community it serves. An example of this being where the majority of its services are provided to a community with a sizable black/ethnic minority (BME) population, the Group will ensure staff providing these services are themselves members of the BME community.

## 12. RESPONSIBILITIES

- 12.1. The Group Chief Executive will have responsibility for the implementation of this strategy in accordance with the Group's Scheme of Delegation. All employees will also be responsible for maintaining and continually improving fairness and equality for customers, staff and partners for all according to their needs regardless of who they are.

## 13. MONITORING / REVIEW

- 13.1. This strategy will be reviewed a minimum of once every three years, unless changes in statute, contract, or regulatory code and guidance require otherwise.