



EASTHALL PARK

EASTHALL PARK HOUSING CO-OPERATIVE LTD

EQUAL OPPORTUNITIES POLICY

APPROVED

March 2015

REVIEWED

March 2018

NEXT REVIEW

March 2021

or before on issue of Scottish Housing Regulator Guidance or changes in legislation, best practice or Co-operative policy.

If you have difficulty with sight or hearing, or if you require a translated copy of this policy, we would be pleased to provide the information in a form that suits your needs.

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1. Commitment

Easthall Park Housing Co-operative is committed to tackling discrimination on the grounds of age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.

Easthall Park Housing Co-operative will endeavour to focus on ending discriminatory practices for all and in particular towards protected characteristic groups as defined in the Equality Act 2010.

We will also take action to prevent any unlawful behaviour or discrimination whether direct, indirect, by association, or by perception and will deal with harassment, third party harassment or victimisation in carrying out our policy.

We will endeavour to address the needs of those intended to benefit from our activities as:

- organisational managers (governance)
- landlord
- service providers
- employers
- procurers of services

Furthermore, the Co-operative will ensure that, as an organisation, we will seek to actively promote equal opportunities within our community and beyond.

Mary Davidson

Chair person

John McMorrow

Director

2. Introduction

2.1 This policy, and the accompanying Equalities Action Plan, describe how Easthall Park Housing Co-operative will provide equality of opportunity and fair treatment for all in all aspects of our activities including:

- Everyone who uses, or wishes to use, the Co-operative's services
- Everyone who wishes to be involved in the governance and overall management of the Co-operative
- Everyone who works for Easthall Park Housing Co-operative or who applies to work for us

The Co-operative has set an number of organisational values and one of these is to treat everyone with equality and fairness.

3. Equal Opportunities Context in Easthall

3.1 Easthall Park Housing Co-operative is a registered social landlord, operating in the Easthall and Kildermorie areas of Greater Easterhouse.

3.2 Many Easthall residents' lives continue to be affected by poverty and poor health, which we believe diminishes their life chances.

3.3 Our Equal Opportunities Policy and Action Plan have been informed by several sources of information about the people who live in Easthall. These include:

- Statistical information derived from Easthall Park records
- Tenant Satisfaction Surveys

- Statistical Information derived from Census based on the G33/G34 postcode sector

3.4 Statistical information is not available on some equality groups.

Our aim is to be responsive to all sections of the community, including the less visible minorities such as lesbian bisexual, gay and transsexuals and people with mental health issues.

3.5 We believe the Co-operative has an excellent track record of responding to diversity and supporting disadvantaged groups within Easthall.

- Providing housing which is suitable for varying and supported needs through previous development programme(s) and an ongoing commitment through our major repairs and adaptations work
- Creating additional opportunities for varying and special needs
- Fostering close working relationships with all sections of the community and joint working with agencies and services.
- Affiliated to “Happy to Translate”
- Adopting progressive employment practices

4. Regulatory and Good Practice Requirements

4.1 *‘RSL’s must have and operate policies and procedures which clearly promote equal opportunities and seek to eliminate unfair discrimination in all areas of their operation’.*

All RSLs should have a comprehensive equal opportunity policy, which takes an inclusive approach to the needs of those intended to benefit from its activities. It should be clearly linked to other policies the RSL has. The policy should address all aspects of the RSL’s business as:

- *organisational structure (governance)*
- *landlord*
- *service provider*
- *employer*
- *procurer of services*

Such a policy should focus on the make up of the relevant local populations and ensure that measures are taken to ensure that no one is excluded from access either through direct or indirect discrimination.

Raising Standards **SFHA**

4.2 Regulatory Standards and Guidance

The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

The RSL conducts its affairs with honesty and integrity.

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

- 4.3 The pursuit of equality and the recognition of diversity are a legal, regulatory, moral, employment and business imperative. Social landlords need to act with determination within their organisations, with their tenants and other service users, and with their staff and members of governing bodies or elected members, to remove unfair discrimination, seek equality and value diversity.

In other words, equality of opportunity goes to the core of what type of organisation an association/co-operative is. It plays a vital role in helping organisations deliver better and more responsive services, engage more effectively with their customers, ensure that they are accessible to everyone who wants to use their services, and to ensure their staff, tenants, board/committee profiles are as reflective of their communities as possible. Above all, equality and diversity is about associations and co-operatives striving to treat their staff, governing body members and customers fairly and

ensuring that no groups or individuals are treated any better, or worse, than anyone else.

*Equalities Guidance Getting the Balance Right
November 2011 SFHA*

- 4.4 Easthall Park Housing Co-operative will take full cognisance of these requirements and any future requirements.

5. Legal Framework

- 5.1 The Co-operative has taken account of the Equality Act 2010, Housing Scotland Act 2010 and the Human Rights Act 1998 in preparation of this policy.
- 5.2 Overall the Co-operative will ensure that it complies with all relevant statutory and contractual obligations relating to equal opportunities.

6. Aims and Objectives

Aims

- 6.1 Equality is a key value for the Co-operative and as such this is guides the development of our strategic plan.
- 6.2 Bearing in mind the local context, legal requirements and best practice the Co-operative is committed to tackling discrimination, harassment and victimisation. We will promote equality and celebrate diversity.
- 6.3 Our ethos will be to strive to achieve equality of opportunity and treatment for all, irrespective of age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
- 6.4 We will promote a multi cultural community.
- 6.5 These policy aims will be based achieved through the following objectives.

Objectives

- 6.6 We will adopt policies and procedures, which are responsive to the needs of people living or wishing to live in Easthall and Kildermorie.
- 6.7 We will ensure that our Management Committee, Staff and Contractors:
- Translate our objectives into effective action and reality.
 - Reflect the needs of the local population.
 - Attempt wherever possible to attract under represented groups to live in Easthall and Kildermorie.
- 6.8 Equal Opportunities will be a central theme throughout all the Co-operative's activities. As previously stated in relation to:
- Governance
 - Our role as a landlord
 - Our role as an employer
 - Our relationship and expectations of third parties that we employ
- 6.9 We will meet our legal obligations and where resources allow we will strive to achieve best practices with respect to Equal Opportunities.
- 6.10 We will consult with the entire community when reviewing our policies, procedures and future plans.
- 6.11 We will monitor our performance against targets set down in our Equality Action Plan.
- 6.12 We will be pragmatic about the level of improvements we can make based on local context and resources.

7. Governance

Objective

- 7.1 To be representative and accountable to the entire community.

Membership

- 7.2 The Co-operative's rules (fully mutual) means that membership is automatically required for any tenant residing in the Co-operative's properties. Members are eligible to stand for election or vote for their representatives to sit on the Management Committee at an Annual General Meeting.
- 7.3 Members of the Management Committee will be expected to meet the highest standards of probity, be prepared to attend network meetings and training courses.

Representation

- 7.4 The Co-operative will strive to ensure that the composition of the Management Committee represents all sections of the community.
- 7.5 We will monitor trends in the composition of the Management Committee based on protected characteristics.
- 7.6 We will analyse the underlying reasons for any under-representation of particular groups, by consulting all sections of our community.
- 7.7 We will identify what positive actions that can be taken to address under-representation.
- 7.8 We will regularly inform the community about the activities of the Co-operative, how decisions are taken and how individuals can influence the decision making process. This will include initiatives aimed at under-represented sections of the community.
- 7.9 We will provide opportunities to participate at different levels. If individuals or groups are interested in specific subjects, they will be invited to contribute on a one off basis.
- 7.10 This may include supporting individuals or groups, to assist developing skills and confidence that will assist greater participation.
- 7.11 We will provide new members with induction training and support, this will include if necessary an ongoing 'buddy' system to ensure

continued involvement.

- 7.12 When members leave the Management Committee we will attempt to ascertain the reasons for leaving, if there are factors, which the Co-operative can influence, we will endeavour to ensure that the same situation does not occur.
- 7.13 We will consider using co-options as a way of including under-represented groups on the Management Committee.
- 7.14 It is essential that we provide training for all Management Committee members on all aspects of equal opportunities and diversity. All members must show a positive commitment to addressing equal opportunities, as it will be a **core value** for the organisation.

8. Equal Opportunities in Easthall Park Housing Co-operative Services

- 8.1 The following articulates how we aim to achieve equality of opportunity, whilst providing housing and associated services.
- To provide fair and equal access to our housing services for all.
 - To ensure that nobody suffers disadvantages because of their age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
 - To set clear service standards through written policies and procedures
 - To consult in an inclusive way with service users about what service standards should be adopted.
 - To identify distinct needs and produce services that address individual needs.
 - We will measure outcomes of our policy and procedures, taking cognisance of the Equality Action Plan.

- 8.2 Promoting equal opportunities means more than simply offering the same service to everyone. We will assess how our service policies and practices impact on groups and individuals via equality impact assessments, to ensure we do not inadvertently disadvantage any section of the community. We will adjust our approach where necessary to achieve fair access to services, and fair service outcomes.
- 8.3 Many of our policies already state our commitment to equal opportunities. We will give explicit consideration to equality issues as part of all policy and service reviews.
- 8.4 Appendix 1 provides a summary of our key equalities standards for different service areas.
- 8.5 Our individual policies provide more information; copies of all policies are available from the Co-operative's offices.

9. Equal Opportunities in Employment

- 9.1 Easthall Park Housing Co-operative recognises that discrimination, harassment and victimisation, can occur against disadvantaged groups of people in the field of employment. We will aim to be an equal opportunity employer and will:
- Ensure that it has access to the widest labour market
 - Secure the best employees for its needs
 - Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, we assist applicants to compete for jobs on a genuine basis of equality and give our staff the help they need to attain their full potential
 - Ensure the workforce reflects the diversity within our community
- 9.2 The Equality Action Plan will set targets for groups that are recognised as being under-represented in the workforce.

- 9.3 We ensure that the procedures we follow in all aspects of employment (e.g. vacancy advertising, selection and recruitment, training, conditions of service and reasons for termination of employment) are fully consistent with the Equalities Act 2010.
- 9.4 The Co-operative will monitor changes in employment legislation to ensure that practices remain up to date.
- 9.5 Easthall Park Housing Co-operative will make the following commitments:
- Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability and potential.
 - To ensure there is a mechanism in place to discuss, at any time, but at least once a year, with employee's specific needs or ways in which we can develop their careers
 - To make every effort when employees become disabled that they stay in employment
 - To take action to ensure that all employees are aware of disability issues
 - To review each year our commitments and what has been achieved
- 9.7 The Co-operative operates employment procedures based on the models published by Employers in Voluntary Housing. The following section provides a summary of the overall policy on which our procedures are based.
- 9.8 Wherever possible, we will advertise vacancies simultaneously, internally and externally. We will aim to ensure that underrepresented groups are made aware of vacancies. All vacancy advertisements will include an appropriate short statement on equal opportunity.
- 9.9 We will use selection criteria based on job descriptions and employee specifications. These will focus on essential skills for the effective performance of the job.

- 9.10 We will keep job descriptions and person specifications under regular review in order that they remain consistent with our objective of equal opportunity.
- 9.11 All participants in the recruitment process, including the selection interviews will have to undergo equal opportunities training. At all times more than one person will be involved in the recruitment process including the interview stage. All selections will be based on the job description and person specification for the post. We will also record reasons for selection and rejection of candidates.
- 9.12 The Co-operative will encourage under-represented groups to apply for training and employment opportunities with Easthall Park.
- 9.13 Wherever possible, we will remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the needs of disadvantaged and/or under-represented groups.
- 9.14 The Co-operative will collect monitoring information in respect of profile of employees and job applicants, this will assist us to assess if the staff profile reflects the profile of the community.
- 9.15 We will follow procedures, which reflect the law on data protection and access to personal information. The procedure will involve:
- Maintaining records of selection processes for six months after an appointment has been made.
 - Recording the composition of the selection panel.
 - Request all job applicants to complete a monitoring form, which provides information about their age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds. (Note it is not compulsory that candidates complete)
 - At the end of each recruitment process we will analyse the process to ensure that all applicants enjoyed a 'level playing field' and no discrimination, harassment or victimisation has occurred.

10. Equal Opportunities in Contracts with Third Parties

- 10.1 Easthall Park Housing Co-operative strives to ensure equality across all our activities. This applies whether the Co-operative delivers services directly or if we contract elements of our work to contractors including sub-contractors, consultants or voluntary organisations.
- 10.2 We will make contractors and consultants fully aware of Easthall Park's overall policy and ethos in respect of equal opportunities, we will detail any specific behaviour or requirements, which are required during the service which is being procured. We will specify particular requirements relating to the conduct of employees, customer satisfaction and overall standards of customer care.
- 10.3 We will aim to employ contractors and consultants that are willing to meet our requirements. At tender stage we expect all organisations to have their own equal opportunities policy. For fixed term contracts contractors must abide to a code of conduct obligation on equal opportunities.

All other contractors must demonstrate evidence of their approach to equal opportunities.

This approach could include:

- Information on the ethnic origin and gender of directors and employees.
- Whether the organisation has premises that are accessible for people with disabilities.
- Targets to redress any under-representation amongst the organisation's workforce on the grounds age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
- Details of any action the organisation have taken to promote equality of opportunity in the recent past.

- How acts of discrimination or harassment by employees are dealt with by the organisation's employment policies.
 - Compliance with the Equality Act 2010.
- 10.4 Contract documentation will detail requirements for contractors and consultants to comply with our policies in relation to equal opportunities, discrimination and harassment, in relation to other employees, tenants and members of the public. Organisations that are unable to meet these expectations or where there are serious or persistent breaches of the policy, this will result in these organisations being removed from our approved lists.

11. Implementation

- 11.1 The Management Committee is responsible for approving the Equal Opportunities Policy, and for reviewing the outcomes, which are achieved.
- 11.2 On a day-to-day basis the Director and senior staff will have the responsibility to ensure that the policy is implemented effectively.
- 11.3 Every member of the Management Committee and staff have an individual responsibility to ensure that the ethos of equal opportunity taking cognisance of diversity and needs is applied throughout all the work of the Co-operative.
- 11.4 The Co-operative will provide a copy of this policy statement to all employees, and will clearly communicate requirements to new employees as part of an induction process.
- 11.5 Our Code of Conducts for Committee Members and Staff articulate standards of personal conduct, which are expected. Behaviour or actions, which are inconsistent with the Equal Opportunities Policy, will be treated as serious disciplinary matters.

Equality Action Plan

- 11.6 The Equal Opportunities Policy articulates our commitment to providing equal opportunity for all, in all aspects of service delivery.

11.7 It is widely recognised that equalities issues can be difficult to manage. Best practice states that an Equality Action plan provides a number of immediate benefits:

- Brings together in one place a statement of the key components of our equality activities.
- The plan presents our activities in a systematic, concise and coherent manner, clarifying the thinking behind how the plan is expected to work.
- Provides a useful, concise communication tool in the equalities area.
- Can help manage pressure that could result in over ambitious or unrealistic objectives being set where the necessary resources are not available.
- Makes it easier to clarify and manage the division between the responsibilities of the Management Committee and senior staff to meet objectives.
- The plan can also provide a defence against litigation.

11.8 The Co-operative will produce an Equalities Action Plan, covering a three-year period. The plan will:

- Describe the local context, describing the extent and range of the need within Easthall and Kildermorie
- State our broad equality objectives, relating to the functions of the Co-operative and themes relevant to the community (they will include targets and performance indicators).
- Detail the activities we will engage in to meet these objectives over the lifetime of the plan.
- We will recognise and articulate the level of resources required to achieve these targets.

12. Monitoring, Review and Continuous Improvement

12.1 We will collect and analyse information about the effectiveness of our Equal Opportunities Policy. The main objectives of monitoring:

- Highlight possible inequalities.
- Which weaknesses or omissions within policies, procedure or practices are responsible.
- How can these policies or procedures be improved to address inequality.

12.2 The areas of activity that will be monitored:

- Applications
- Points system
- Nominations
- Offers and acceptance
- Allocations
- Membership
- Management Committee Membership
- Workforce
- Employment Applications
- Housing Services
- Contractors policies and activities
- Scottish Public Services Ombudsman Complaints

12.3 To ensure a consistent approach to monitoring and reporting, reports will provide statistical data but also detailed objectives for each activity, this will allow the Management Committee to measure the success of the policy and plan.

12.4 An Annual Report will be presented to the Management Committee it will include information on:

- Housing Applications and Allocations
- The profile of Organisation
Tenants, Management Committee and Staff
- Satisfaction with services

- Reports of racist incidents and outcomes
- Reports of harassment on other grounds and outcomes
- Complaints in respect of equality

12.5 The Annual Report will be accompanied by commentary which:

- Articulates our aims and objectives
- Describes the findings, emphasising trends
- Indicate any qualifying factors or limitations of information
- Set out implications for policies and procedures
- Summary of key points
- Draw clear conclusions

12.5 We will also report our performance in respect of equality to tenants and other service users through the Co-operative's Annual report, newsletters and at any other events.

12.6 The Co-operative is committed to achieving continuous improvement in all our activities including equal opportunities.

12.7 We will review the Equal Opportunities Policy every three years or more frequently if required.

12.8 The Equalities Action Plan will be reviewed annually.

12.9 We may alter targets, procedures and working methods outside the review cycle, where monitoring highlights weaknesses or deficiencies.

12.10 Policy review will involve consultation with service users, local groups and be subject to an appropriate and proportionate Equality Impact Assessment . The Co-operative will also be open to advice from organisation that specialise in Equal Opportunity Issues.

Appendix 1

Summary of Easthall Park Housing Co-operative's Equalities Service Standards

Service Area	Summary of Easthall Park's Service Standards
Access and Allocations	<ul style="list-style-type: none"><li data-bbox="539 495 1359 618">• We will comply with all anti-discrimination , harassment and victimisation measures contained in legislation<li data-bbox="539 663 1359 786">• We will provide information freely about the availability of housing, and how to apply for housing.<li data-bbox="539 831 1359 954">• Information about access and allocations will be made available in other languages and formats upon request from customers.<li data-bbox="539 999 1359 1122">• We will operate an allocations policy, which is clear, comprehensive and which provides equal access for all to our housing list.<li data-bbox="539 1167 1359 1491">• Our allocations policy will give priority to meeting extreme forms of housing need which some applicants may be experiencing – for example, victims of racial harassment and domestic abuse (including same sex relationships) and disabled people with urgent rehousing needs.<li data-bbox="539 1536 1359 1659">• We will maintain records of housing which is suitable for disabled people, to facilitate the matching of people and accommodation.<li data-bbox="539 1704 1359 1827">• Bearing in mind the local context we will examine the options to create targets for minority Ethnic groups.<li data-bbox="539 1872 1359 2007">• We will monitor the outcomes of the allocation process to ensure that we are addressing needs across groups within society.

- All allocations decisions will be scrutinised by a second member of staff, to minimise the risk of inadvertent discrimination.
- We will give priority to tenants occupying properties that can be adapted to suit people with specific needs thus increasing opportunities.

Tenancy Agreements and Procedures

- Tenancy Agreements will upon request be available in alternative formats, to meet customers' needs.
- We will conduct tenancy sign-up meetings in the customer's first language, where required.
- In tenancy management matters, we will consider the support needs of disabled tenants with learning difficulties or mental health problems.

Repairs and Maintenance

- We will ensure that all tenants receive a high quality service as described in our Maintenance Policy.
- We will assess periodically (through comprehensive tenants satisfaction surveys and ad hoc monitoring exercises), the quality of service provided to equalities groups. This will focus on repair response times and satisfaction levels for minority groups.

Rent Management and Tenancy Terminations

- We will maximise the range of methods available for making rent and factoring payments.
- We will establish personal contact with tenants in arrears. In doing so, we will accommodate any language or other communication needs the tenants has.

- We will monitor the frequency with which legal action including evictions is taken against protected characteristic tenants, relative to the tenant population as a whole.

Harassment

- The Co-operative will endeavour to ensure that all our tenants are protected from harassment and nuisance.
- We will operate a robust policy to deal with racial harassment. As part of our policy, we will:
 - Monitor the number of racist incidents and the Co-operative's response
 - Ensure that all allegations of racial incidents are investigated and acted upon
 - Ensure that victims are supported and kept informed
 - Co-operate with the police and other agencies on the collection, recording and exchange of information
 - Work with community groups to help provide support to victims
 - Work in partnership with local groups to develop anti-racist and crime prevention strategies

Development Programme and Existing Stock

- Development opportunities are limited due to a number of factors and it is anticipated that no new Development Programme will be forthcoming within the timeframe of this policy. Should this change however the Co-operative will carry out equality assessments accordingly and this will involve assessment of local housing needs to inform the types and sizes of houses provided through our development programme, giving consideration to the housing needs of all sections of the community.
- Our assessment of housing needs will be informed by consultation with equalities

groups, by the City Council's Local Housing Strategy, and by the results of community care locality planning.

- We will adopt design standards, which allow tenants to minimise their dependence on others and maximise choice in their daily life.
 - We will seek to respond to people's changing needs over time rather than moving them from their existing home.
 - Houses modernised or built by the Co-operative will be based on the achievement of barrier free and Housing for Varying Needs standards, to maximise the accessibility of our housing stock.
 - We will carry out an ongoing programme of adaptations (subject to availability of funds) to existing properties, to meet the needs of tenants with disabilities.
- Consultation and Communication**
- We will actively seek to involve all sections of the community in the way in which the Co-operative sets out and reviews policy, procedures and service standards. Through the Tenant Participation Strategy and initiatives aimed at particular groups.
 - The Co-operative will make particular efforts to involve younger and disabled people.
 - Information about our service and activities will be available in a range of formats and languages upon request from potential service users. We will also endeavour to meet best practice criteria in respect of Standard Print Formats, Spoken Communication and ensure that the only written communication we require from tenants is a signature.

- Where information or a particular support service is required to meet a specific need, we will ensure that this is achieved as soon as practically possible.
- We will actively publicise our complaints policy and procedures to all service users.
- We will actively publicise projects or initiatives that promote equal opportunities and diversity.
- Our staff will treat all customers with respect and courtesy. We will provide staff with regular training to promote awareness of disability, different cultures, languages, social conventions and lifestyles and the needs of disadvantaged groups.
- We will ensure that our office premises and services are accessible to all service users.
- Contractors or consultants employed by the Co-operative will be required to observe standards set by the Co-operative in relation to general conduct of employees in respect of equal opportunities and to ensure no act of discrimination or harassment occurs towards tenants or members of the public.
- We will undertake Equality Impact Assessments to ensure that new policies and decisions promote equal opportunity for all and do not adversely affect any protected characteristics.