

	CORPORATE POLICY & STRATEGY	Equality & Diversity Policy (Equal Opportunities)
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Equality & Diversity Policy (Equal Opportunities)

1.0 EQUALITY & DIVERSITY STATEMENT OF INTENT

Providence Row Housing Association (PRHA) is determined to challenge direct & indirect discrimination, discrimination by perception or association, harassment or victimisation against anyone on the grounds of race (including colour, nationality, ethnic or national origins), gender including gender reassignment, physical or mental health, disability, social class, age, political or religious belief or non-belief, offending history, marital or civil partnership status, sexual orientation, pregnancy or caring responsibilities.

This commitment is enshrined in our core values which include: Justice & Inclusion.

PRHA will strive to ensure that we eliminate all forms of discrimination & reflect our commitment to equal opportunities and anti-discriminatory practice in all aspects of our work. In particular in:

- Access to housing, support & services,
- Recruitment , employment, remuneration, training & development of staff,
- Recruitment & training of Management Board members
- Work with contractors & suppliers.

To achieve our aims, PRHA will:

- Promote and celebrate the diversity of our client groups, staff teams, Management Board and the local community.
- Design our services to meet the needs of all our communities
- Constantly monitor and review our systems & procedures to ensure that we are meeting our equality & diversity objectives
- Work in partnership with commissioners & other agencies to develop good practice on equality & diversity ,social exclusion & community cohesion issues
- Provide training and guidance to all employees to ensure our commitment to equality and diversity is known, understood and adhered to
- Value our employees, providing them with the skills and training to do their job well and with opportunities to progress and develop.
- Give active support to our client groups to enable their involvement in service development and decision making
- Work with service users, staff, Management Board & stakeholders to review this policy

2.0 PURPOSE OF POLICY

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The aim of policy is to ensure that the statement of intent is realised through the implementation of policies & procedures, promotion of its policy & through monitoring & review. In particular it focuses on:

- 3.0 Legal , regulatory & best practice frameworks
- 4.0 Responsibilities for the policy
- 5.0 Fair treatment , fair access & fair exit for all Residents
- 6.0 Fair employment practices
- 7.0 Human Rights Act 1998
- 8.0 Social exclusion
- 9.0 Monitoring & review processes
- 10.0 Promotion of the policy

3.0 LEGAL, REGULATORY & BEST PRACTICE FRAMEWORKS

3.1 Legal framework

PRHA acts in accordance with all relevant duties under UK & European equalities legislation and regulation, including:

- Equality Act 2010
- Equality Act 2006
- Racial and Religious Hatred Act 2006
- Employment Equality (Age) Regulations 2006, Schedules 6 and 8
- Employment Equality (Sex Discrimination) Regulations 2005
- Civil Partnerships Act 2004
- Race Relations Amendment Act 2000
- Human Rights Act 1998
- Equal Pay Act 1970

Equality Act 2010

The Equality Act 2010 replaces the majority of the existing UK anti-discrimination laws with a single act. It covers the same groups that were protected by existing equality legislation & extends protection to some new groups. These are now called 'Protected Characteristics'.

PRHA will ensure that all groups of people with characteristics protected under the equality act benefit equally whilst recognising that some groups may need more help and encouragement than others.

PRHA will take positive action as appropriate where employees or job applicants who share a particular protected characteristic suffer a disadvantage connected to that characteristic, or if their participation in an activity is disproportionately low.

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PRHA accepts its responsibilities for the promotion of equality of opportunity under the Equality Act and subsequent regulations. Individual employees also have a responsibility and role in ensuring that this policy is adhered to.

3.2 Regulatory & commissioning frameworks

PRHA is a private Registered Provider regulated by the Regulator of Social Housing (RSH). The RSH's regulatory requirement is that PRHA is accountable on an ongoing basis both to the RSH & to its tenants to demonstrate how we have taken into account the needs of tenants across all of the protected characteristics. This is published in annual performance information produced in partnership with representative tenant groups.

PRHA also contracts for a significant number of services funded through Local Authorities. These services are expected to meet current standards for fair access, diversity & inclusion.

3.3 Best practice

PRHA aims to monitor & respond to best practice in relation to its Equality & Diversity policy. It maintains a policy & procedure framework which operates to ensure equality of opportunity in particular areas including:

- Allocations and Lettings Policies
- Anti-Social Behaviour policy
- Code of conduct
- Core values
- Customer Care charter
- Disciplinary Procedure
- Equality & Diversity policy
- Grievance Procedure
- Harassment Policy & procedures
- Managers Charter
- Remuneration policy
- Staff Recruitment policy & procedures
- Supervision policy
- Recruitment of Ex-offenders
- Redundancy Procedure
- Training and Development Policy
- Translation policy

In addition to upholding the law, we support the provisions of the Equality and Human Rights Commission Codes of Practice in the provision of housing, services and employment.

PRHA is committed to building on existing good practice, and to ensuring that staff members, volunteers, Residents and outside agencies are fully aware of our achievements and improvements.

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4.0 RESPONSIBILITIES FOR THE POLICY

The implementation and monitoring of this policy rests with PRHA's Chief Executive who is accountable to the Board. Overall responsibility at Management Board level rests with the Chair.

PRHA aims to embed a culture of commitment to fair access, diversity & inclusion across the organisation. This is reflected in our promotional materials, recruitment literature & process & training events. Whilst the Chief Executive and Board will be responsible for the operational effectiveness of this Policy, it is the duty of each manager and individual staff member to actively promote equality of opportunity within their own sphere of responsibility. Individual staff members also have a responsibility and role in ensuring that this policy is put into practice, promoted, monitored and reviewed. This responsibility is outlined throughout the recruitment process & in the job descriptions and person specifications for all posts.

It is essential that all staff members & volunteers accept that they have a duty to understand and familiarise themselves with the policy.

Residents also are encouraged & supported to abide by the Anti Social Behaviour policy & unacceptable behaviour is made clear from point of entry to the service.

PRHA's agents and contractors are made aware of this policy and all invitations to tender require bidders to make a statement that they agree to abide by it.

PRHA will take seriously any instances of non-adherence to the Equality and Diversity Policy by staff, volunteers, service users, visitors, agents or contractors. Any instances of non-adherence will be investigated and where appropriate will be considered under the relevant disciplinary policy or as a breach of licence/tenancy.

5.0 FAIR TREATMENT, FAIR ACCESS & FAIR EXIT FOR ALL RESIDENTS

PRHA is committed to providing Residents with respect, equality of access & exit, fair treatment, rights of privacy, and the right to have their faith, opinions and experiences valued.

PRHA is determined to ensure that all service contractors and professional or official visitors adhere to this policy.

5.1 Fair access

PRHA is committed to providing fair access to its services. Many of these lawfully target specific groups of people (e.g. young people or people with mental health issues). PRHA is also restricted in law to providing services for people with recourse to public funds.

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PRHA aims to work with local commissioners & other stakeholders to identify the needs of disadvantaged groups in our local communities and to ensure that they have access to our housing and support services by:

- Ensuring that we are active within the local community & that our services are widely known & accessible.
- Planning to meet the specific needs of particular groups where appropriate.
- Ensuring fair access to under-represented groups as identified by the annual equality audit & action Plan.
- Ensuring regular independent audit of fair access

PRHA ensures that anyone applying for housing or support services is dealt with fairly & without discrimination. In particular by ensuring that:

- Assessment & allocations processes are reviewed at least every three years & taking into account data available from the annual equalities review in terms of potential underrepresentation.
- Service improvements made as a result of policy review will be monitored. Also the impact of client and stakeholder involvement will be evidenced.
- Accurate & up to date information on services & their eligibility criteria is accessible & widely promoted
- Residents with communication support needs are assisted to understand information & processes
- Unsuccessful applicants are informed of the reasons for refusal and signposted to more appropriate services or back to the referral agency.
- There is a right of appeal against decisions arising from assessment

5.2 Fair treatment

PRHA aims to ensure that the housing, services and support that people receive are relevant to their individual needs and aspirations in a culturally sensitive and anti-discriminatory manner. Where residents require assistance with communication, extra support, advocacy, translation or interpreting services will be made available.

In particular when residents are signing occupancy agreements or other legal agreements PRHA staff will ensure that they understand their rights & responsibilities. Equally staff will ensure that relevant policies & procedures are explained in an appropriate way to service users.

Providence Row Housing Association undertakes to make household and culinary provision which reflects the diversity of the client group where these services are provided.

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5.3 Fair Exit

For PRHA & its' staff a fair & positive exit is a key objective. PRHA aims to work with local commissioners & other stakeholders to improve fair exit & move-on outcomes.

PRHA regularly reviews the ways in which residents leave our services to establish whether there is any under or over representation of specific groups. Action plans are put in place where necessary to address any identified issues.

PRHA aims to ensure that there is no discrimination in the ways in which residents exit our services by:

- Seeking to achieve planned moves for residents in short term accommodation wherever possible through the move-on strategy
- Discussing move-on & resettlement with Residents from the beginning of service delivery
- Having clear policies & procedures in relation to evictions, abandonments, move-on & service withdrawal or closure which comply with the law & good practice.
- Reviewing the move-on policy & application process at least every three years & ensuring that it includes clear information especially the application criteria & how applications are prioritised.
- Service improvements made as a result of policy review will be monitored. Also the impact of client and stakeholder involvement will be evidenced.
- Providing information on the move-on application process in plain English and other formats as appropriate.
- Ensuring that residents have clear information on possible grounds for termination of the service, including eviction and withdrawal of floating support including information or signposting for independent advice if needed.
- Ensuring regular independent audit of fair exit

5.4 Satisfaction levels, Complaints & Incidents

To safeguard individual rights under this Policy, PRHA will ensure that adequate complaints procedures are in place for service users. These procedures will be reviewed regularly.

Satisfaction levels, complaints & incidents are all potential indicators that PRHA is failing to meet our service users' specific needs. They are therefore reviewed for possible learning & monitored quarterly as part of the performance management systems & the annual Equalities review (see below). Specific outcomes will advise the equalities action plan.

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5.5 Harassment & bullying

PRHA is committed to taking swift & effective action against any reported harassment & bullying. PRHA's anti-social behaviour policies are well publicised & enforced where necessary. They detail : support to victims, action towards alleged perpetrators ,multi –agency approaches (e.g working with community safety teams)

We are also committed to the safeguarding of vulnerable adults & young people including from bullying, harassment, victimisation and any form of coercion or exploitation. We comply with local statutory requirements including those regarding reporting of incidents.

All services review equality data annually to verify that they are compliant with the policy & meeting targets. Also the reviews identify gaps & areas for service improvement.

6.0 FAIR EMPLOYMENT PRACTICES

PRHA is committed to ensuring fair employment practices. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against on the basis of any protected characteristic. Decisions about recruitment and selection, promotion, training or any other benefit will be made objectively and without unlawful discrimination. In addition, no one will be discriminated against other than on the basis of 'Genuine Occupational Qualification' or residential requirements.

Providence Row Housing Association will continue actively to promote equality of opportunity through the application of policies that will ensure that individuals receive treatment which is fair and consistent with their relevant aptitudes, potential, skills and abilities.

Providence Row Housing Association will ensure that individuals are treated fairly, having regard to experience, potential, skills and abilities. In particular, no applicant or staff member will be placed at a disadvantage by requirements or conditions which are unnecessary or which constitute indirect or unfair discrimination.

Conditions of service will be reviewed as necessary, to ensure that they do not discriminate against any particular group.

6.1 Recruitment & selection

PRHA aims to ensure equal access to employment opportunities by:

- Implementing recruitment & selection policy & procedures
- Providing guidance & regular training to interview panels in equalities issues.

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- Promotion is only offered through our recruitment and selection procedures & competitive interview.

6.2 Training

PRHA aims to provide suitable and relevant training to staff and volunteers in line with this Policy, and, where resources permit, to consider positive action programmes to promote training for discriminated-against groups to assist them to enter areas of employment where they are under-represented.

Regular training will be provided to all staff in equality & diversity issues including this policy.

6.3 Reasonable adjustments

PRHA's policies & procedures incorporate support for staff with disabilities through reasonable adjustments procedures, through occupational health support and counselling services. PRHA has audited the accessibility of all of its workplaces & ensured that they are "Disability Discrimination Act compliant".

6.4 Equal pay & conditions

PRHA's remuneration policy aims to ensure that equal pay, terms & conditions are applied. The policy includes an outline of PRHA's job evaluation & review mechanisms.

6.5 Raising grievances or concerns

To safeguard individual rights under this Policy, PRHA will ensure that adequate grievance & confidential reporting (Whistleblowing) procedures are in place. These procedures will be reviewed regularly, and grievances and complaints monitored.

6.6 Harassment and bullying

PRHA's Code of Conduct outlines PRHA expectations of its staff in relation to discrimination and harassment. Disciplinary procedures for staff & anti-social behaviour policies for residents clarify that action will be taken against anyone discriminating against, harassing or abusing any staff members. This is emphasised by posters displayed in all workplaces. PRHA has robust procedures for reporting & responding to any incidents of Harassment and Bullying.

6.7 Criminal history

PRHA has procedures in place which support people with offending histories to access employment wherever possible. PRHA has worked closely with the Tower Hamlets Safeguarding teams to clarify whether issues relating to safeguarding and Disclosure and Barring Service disclosures can be resolved satisfactorily.

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7.0 HUMAN RIGHTS ACT 1998

PRHA is not defined as a public body. There is however ongoing legal debate about whether all or any of the Human Rights Act duties would apply to an organisation like PRHA in some of its functions. Where the law applies, PRHA will meet its obligations. We also aim to reflect the general principles as follows:

Right to respect for private & family life: PRHA supports its tenants to re-establish & maintain family links wherever possible. This presents specific challenges in shared accommodation & where there are safeguarding issues. Nevertheless PRHA will work with residents & aim to find satisfactory solutions.

Staff and residents are also made aware of the information that PRHA holds on them and can view this.

Freedom of conscience, thought and religion: PRHA publicises its commitment to supporting staff & residents to pursue their religious beliefs, cultural practices & other personal views. Religious & cultural diversity is promoted throughout the organisation on a regular basis. Information is provided to new residents on religious & cultural activities within the borough. Staff members & residents are supported to observe religious practices & holidays wherever possible.

Freedom of assembly & association: PRHA has a recognised union & staff representative system. Similarly residents have a range of options for participation & representation available to them.

Protection of property: PRHA has policies relating to the protection of tenants possessions. It also has clear policies on the grounds for termination of tenancies.

8.0 SOCIAL EXCLUSION

PRHA recognises issues of social exclusion particularly those experienced by its residents in relation to socio-economic status, low literacy levels & educational attainment, offending histories & mental health issues. PRHA is committed to working with statutory bodies to eliminating discrimination relation to socio-economic status and issues of social exclusion.

9.0 MONITORING & REVIEW PROCESSES

9.1 Annual Equalities Audit & action plan

In order to measure the effectiveness of this policy PRHA carries out an annual Equalities Review of key service & employment activities for all protected characteristics. Gaps & areas for improvement are identified & these are developed into targets within an action plan for the year ahead following consultation with staff & service users.

In relation to service delivery, we also set targets to ensure that we are matching demand for the services from all potential client groups. These are set through

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analysis of local demographic information & of the characteristics of the specific client groups that are served (e.g. Rough sleepers). Where groups are under-represented positive action targets are set.

All support services are required to carry out an annual review of the monitoring data for that service. They are then expected to liaise with residents & staff to create an action plan for the year ahead. This should address any gaps & take forward service improvements.

9.2 Staff Monitoring

PRHA aims to meet its' organisational objectives and values by ensuring that the workforce reflects the diversity and cultural profile of both our residents and the local communities in which we operate. PRHA has in place monitoring systems for all staff, volunteers and trainees. This information covers all protected characteristics of all new and current members of staff. The Annual Equalities Review includes staffing statistics & reviews the following to ensure that any apparent inequalities are addressed:

- Staff recruitment and selection
- Promotion and progression
- Management composition
- Staff training and development opportunities
- Grievance & disciplinary proceedings & Whistleblowing
- Leavers
- Progress against positive action targets

These statistics are reviewed against the overall staff profile to establish whether there is any apparent overrepresentation of groups with protected characteristics. Any necessary action is highlighted within the action plan.

9.3 Resident Monitoring

PRHA constantly monitors how our services are utilised, identifying the relevant protected characteristics of individuals accessing our services. Key areas such as lettings/new service users/refusals /harassment cases are reported to senior leadership team and the Board on a quarterly basis. Any action required from these reviews is fed back through departmental workplans.

In the annual Equalities Audit we review statistics that include:

- Access to housing: refusals and new lettings
- Service satisfaction & complaints
- Service outcomes (including positive moves & evictions)

9.4 Other data

During the year Equalities Impact assessments are undertaken for changes to policy or practice. Tenant satisfaction surveys are also undertaken & analysed according to protected characteristics. Reviews of complaints, harassment cases & incidents are also undertaken. If any of these identify the need for further action the organisational action plan & departmental workplans are revised. Similarly any

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changes to legislation or specific outcomes from complaints or service reviews can be added.

9.5 Review

The Review action plan is reported annually to the Management Board, & the service users' advisory panel. All actions are also incorporated into departmental workplans and monitored regularly by the senior leadership team.

10.0 PROMOTING THE EQUALITY & DIVERSITY POLICY

PRHA is committed to promoting this policy & ensuring that the Equality & Diversity policy is central to the work of all staff. It will make resources available to support this & other equality & diversity activity.

The Equality and Diversity Policy is communicated to staff in a number of different ways:

- In the induction process
- A compulsory policy discussed between managers & staff during the probation period.
- Through training & by being featured at staff conferences. Aspects of the policy are also included within the PRHA Manager's Charter and Customer Services Charter, both of which are regularly discussed with staff through training events & are displayed in all workplaces & services.
- The equalities statement is signed by the Chief Executive & is displayed at all of our workplaces & services.

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