



## **Equality and Diversity Policy and Strategy**

**October 2008**

# **Equality and Diversity Policy and Strategy**

## **Contents**

- 1. Introduction**
- 2. Values and Commitment**
- 3. Collective and Personal Responsibility**
- 4. Overall Policy Aims**
- 5. Key Objectives**
  - 5.1 Corporate Commitment and Continuous Improvement**
  - 5.2 Appointment of Board Members**
  - 5.3 Employment**
  - 5.4 Awarding Contracts**
  - 5.5 Access to Services**
  - 5.6 Access to Homes**
  - 5.7 Customer Satisfaction**
  - 5.8 Resident Involvement**
  - 5.9 Anti Social Behaviour and Harassment**
- 6. Setting Targets, Monitoring and Analysing**
- 7. Policy Review**

## **I Introduction**

Westward Housing Group promotes equality of opportunity and fairness in its role as a major landlord, service provider and employer. In so doing, we recognise the contribution made by diverse communities to our local areas' economic, social and cultural well being. We strongly oppose all forms of unfair discrimination because this prevents individuals and communities from developing to their full potential and playing an active role in their neighbourhoods and communities

We operate with professionalism, integrity and openness and believe that everyone should be treated with dignity, respect and fairness. We appreciate that some groups or individuals may experience discrimination and disadvantage because of their age, disability, ethnic or national origin, nationality, race or colour, gender, HIV status, marital status, religion or belief, political beliefs, sexual orientation or any other irrelevant factors. It is therefore our intention to seek to redress this through positive action measures where possible.

We recognise that different people and communities may have different needs and this may sometimes mean providing a range of different services to meet these varying needs.

This policy sets out our commitment to promoting and practising equality and diversity, and dealing with any form of discrimination or harassment. It also sets out our plans for implementing, monitoring and co-ordinating progress towards the achievements of our objectives.

This policy is underpinned by relevant laws, Statutory Codes of Practice, the Housing Corporation's Regulatory Code, guidance from the statutory agencies such as the Commission for Equality and Human Rights and the Audit Commission, and others such as the National Housing Federation and the Chartered Institute of Housing.

## **2 Values and Commitment**

We value diversity and treat everyone fairly and with respect, and do not tolerate any form of unfair discrimination, bullying or harassment against our residents, service users, customers, staff, contractors and board members.

Our Business Strategy is based on our values and commitment to 'work to equal opportunities principles'. The Business Plan for 2008/09 includes our vision 'to provide stronger, happy neighbourhoods by:

- Putting communities and their needs at the forefront
- Encouraging employment and training opportunities particularly for Westward residents
- Ensuring equality and diversity are fully reflected in all activities

## **3 Collective and Personal Responsibility**

All Board members and staff at Westward Housing Group have a responsibility to implement this policy and to ensure that their actions do not lead to unlawful discrimination.

### **3.1 Board Members**

Board members are responsible for:

- Setting strategy, policy and targets.
- Making resources available for implementation.
- Monitoring and analysing performance and agreeing corrective action where necessary.
- Regularly reviewing the Equality and Diversity policy, strategy and action plans.

### **3.2 Overall Implementation**

The Group Chief Executive and the Senior Management Team are responsible for:

- Implementing this strategy through annual and long-term action plans.
- Making sure that this policy is consistently applied in all areas of work.
- Reporting annually to the Board on progress of the Equality and Diversity action plan.

The Group Chief Executive and the Senior Management Team are supported by the Equality and Diversity Group which is responsible for overseeing the co-ordination of the relevant action plans and provides a forum for discussion on progress and introduction of new initiatives.

### **3.3 Day to Day Implementation**

Each Director and Manager will:

- Ensure that their staff understand this policy and are helped to put it into practice.
- Take immediate steps to correct the behaviour and conduct of any employee whose actions do not conform to this policy.
- Review existing and any new policies and procedures to ensure that they comply with this policy.

All staff are responsible for practising and promoting equality and diversity in their day-to-day activities. They are responsible for ensuring that their behaviour and actions comply with and support this policy.

Westward Housing Group engages with a wide variety of organisations and individuals, such as contractors, consultants and suppliers, their commitment, support and co-operation to adhere to this policy is essential.

### **3.4 Sanctions**

Deliberate acts of unlawful discrimination, including victimisation, harassment, bullying or pressure to discriminate, will result in serious disciplinary action, possibly including dismissal of Board members or staff, and termination of contracts with service providers.

## **4 Overall Policy Aims**

Our commitment to Equality and Diversity is central to our corporate vision and values. We will do as much as possible to make sure that we:

- Offer equal access to Board membership, employment, contracts, homes and services.
- Deliver a high standard of service to our customers and respond to individual needs.
- Design and develop our services to meet the diverse needs of all our customers.
- Encourage all communities to take part in decision-making and developing services through residents' groups and partnerships.
- Develop a culture that values people from all sections of society and the individual contribution that they make.
- Protect residents, service users, customers, Board members, staff and service providers from bullying, harassment, victimisation and unfair treatment.

## **5 Key Objectives**

Equality and Diversity is central to our corporate commitments and values. The main objective of this policy is to ensure that we become and remain an inclusive organisation, by promoting fairness and implementing best practice in all of our strategies, policies, practices and operational plans.

This policy applies to all Westward Housing Group's activities and functions and, in particular the following:

### **5.1 Corporate Commitment and Continuous Improvement**

We will demonstrate corporate commitment and continuous improvement through:

- Formally designate a board member to champion Equality and Diversity.
- Providing appropriate training and guidance to all staff, Board Members, active residents and main contractors to ensure that they clearly understand their position in law and their personal responsibilities.
- Publishing a summary of this policy and making it available to Board members, staff, contractors and customers.
- Encouraging recognised residents' groups to adopt our ethos and work in the spirit of our values.
- Taking account of equality and diversity impact on Service Improvement Plans and Best Value Reviews.
- Regularly analysing and reporting performance against targets to the Board and residents.
- Routinely update under new and developing legislation.

### **5.2 Appointment of Board Members**

Board Members are chosen on the basis of their knowledge, skills and abilities to manage and take responsibility for Westward Housing Group. The selection process

for membership is fair and transparent. Applicants are monitored by age, disability, ethnicity, and gender. Appointments are based on merit.

The Board recognises that in order to be effective and accountable it should aim to reflect all sections of the community. We will use data from the 2001 Census to check that the Board reflects the same mix of people as the local community. If it does not, we will agree targets based on this data, and encourage people from particular groups to apply for vacancies to get the mix right.

We will:

- Regularly review the make-up of the Board by age, disability, ethnicity, gender, religion and sexuality and set targets.
- Ensure that policy and procedures for appointment of Board Members remains fair and transparent.
- Regularly provide relevant training to Board Members.
- Encourage under-represented groups to apply when vacancies occur.

### **5.3 Employment**

Our desire to meet diverse needs is achieved by having a workforce that reflects diversity, and has the skills and understanding to achieve our strategic and operational objectives. Staff are chosen for their ability to carry out their job roles and responsibilities.

We aim to:

- Have a workforce that reflects the local population and the communities in which we work.
- Ensure that our Recruitment and Selection Policies and Procedures are non-discriminatory.
- Include a positive statement about equality of opportunity in job advertisements.
- Only ask for relevant criteria in person specifications.
- Make reasonable adjustments for applicants, candidates and employees in respect of disability, and where possible, other personal needs.
- Test potential employees' understanding and commitment to the principles of equality and diversity.
- Provide appropriate training to those responsible for conducting job interviews.
- Take positive action measures that are permitted under the relevant legislation, in order to encourage under-represented groups to apply for jobs at Westward Housing Group.
- Develop an organisational culture which values people from all sections of society and supports the contribution each individual can make.
- Ensure that unlawful discrimination does not occur in terms and conditions of employment, learning and development opportunities, promotion and other benefits, achieving a work-life balance, etc.
- Ensure that harassment, bullying or victimisation of Board members, staff, service providers, customers or residents is not tolerated in any circumstances. We will take appropriate action against anyone who behaves in any such manner. Claims will be speedily and fully investigated and appropriate action will be taken.
- Ensure that any temporary or agency staff are aware of this policy and relevant procedures so that they can comply with them.
- Ensure that staff representation is diverse on all working groups.

## **5.4 Awarding Contracts**

We are fair when we give contracts to individuals and organisations to work with us. Our decisions will be made on the service providers' ability to carry out work to our required standards, timetables and budgets, together with their commitment to practicing and promoting equality and diversity.

We will:

- Promote the principles of equality and diversity through engagement of contractors, consultants, suppliers and partners.
- Require external agents to conduct themselves in a manner that reflects our values and ethos and monitor this as part of the Contractors Annual Review.
- Offer equality training to contractors on a regular basis.
- Give assistance to small businesses so that they can meet our standards for example, by asking them to adopt our Equality and Diversity stance.

## **5.5 Access to Services**

We will make sure that all people have equal access to our services, and in particular take into account the needs of disabled, vulnerable and particularly disadvantaged groups. Actions that we take will include provision of:

- Accessible customer contact points that meet the requirements of the Disability Discrimination Act, for example facilities for disabled customers such as wheelchair access, hearing loops and disabled parking.
- Information in large print, other formats and minority languages where it is needed.
- Verbal explanations of any document, perhaps where customers have literacy problems.
- An emergency "out of hours" service that is capable of providing a sensitive and appropriate service.
- Home visits for housebound or vulnerable residents.
- Staff who are well-trained to deal with vulnerable or disabled customers.

## **5.6 Access to Homes**

As a social landlord it is important that our homes are accessible to those in greatest need. We will:

- Understand the composition and needs of the communities we serve
- Set targets and measure performance on lettings to diverse groups.
- Provide clear, accurate and accessible information about our allocations processes, including interpretation and translation services to remove communications barriers.
- Provide services in a sensitive way, and take into account the diverse needs of our customers, and in particular groups that are vulnerable and traditionally hard to reach.
- Work in partnership with our local authorities and community, voluntary and faith-based agencies to meet the housing needs of all sections of the communities in which we work.

- Select clients for housing services based only on their need for the service, (within the limits of the agreed selection criteria)
- Identify the needs of our existing customers through customer profiling methods, and assessing their transfer needs.
- Review our Asset Management Strategy to ensure that investment decisions take into account new and emerging housing needs.
- Review our Development Strategy to improve access for BME, disabled and disadvantaged people to new housing, community development and regeneration opportunities and take account of needs in respect of location, design, facilities, services and the mix of development projects.

## **5.7 Customer Satisfaction**

Our aim is to ensure that all customers are equally satisfied with our services.

We will:

- Regularly monitor the quality of our homes and services by reference to particularly disadvantaged groups and identify unfair and discriminatory practices and outcomes.
- Undertake regular satisfaction surveys. Results will be analysed to identify differences in responses from different groups.
- Encourage survey responses from all groups, and in particular identify ways in which to gather views of disadvantaged or hard to reach groups.

## **5.8 Resident Involvement**

We believe that customer involvement and consultation are at the centre of delivering decent homes and services around the needs of customers. It is essential to ensure that flexible consultation and participation methods are available.

We will:

- Encourage the involvement of all communities in decision-making and developing services through resident participation structures.
- Encourage all customers to join resident participation groups, and expect membership of those groups to reflect their local communities.
- Review our Resident Involvement Policy to ensure that it allows all customers and residents to have equal access and involvement in how services are designed and delivered.
- Explore ways in which disadvantaged and hard to reach groups can participate.
- Provide training to recognised residents groups.
- Consult and involve residents, service users and staff who need specialist help or are from minority groups when planning service and developing policy.

## **5.9 Anti Social Behaviour**

We believe that no one in society should live in fear of harassment or victimisation because of their age, disability, ethnic or national origin, nationality, race or colour, gender, HIV status, marital status, religion or belief, political beliefs, sexual orientation or any other irrelevant factors. We are fully committed to ensuring that effective action is taken against perpetrators of anti-social behaviour so that

residents and leaseholders are able to live in a safe and secure environment. Our Tenancy Agreement requires customers and members of their households and visitors, not to harass, intimidate or create any nuisance. We encourage customers to inform us of any such breaches so that we can investigate them.

Whilst our overarching Anti Social Behaviour Strategy and procedures deal with such crimes we have specific policies and procedures that help us to deal with racial harassment, homophobic and hate crimes and domestic violence.

We will ensure that:

- The Group's commitment to tackling harassment is publicised.
- Action is taken to eliminate harassment and anti-social behaviour.
- Victim-centred approach is taken when investigating cases.
- Steps are taken to encourage particularly vulnerable groups to report possible incidents.
- Resources are available to support victims of racial harassment and domestic violence.
- Appropriate mechanisms are in place for reporting and recording incidents of racial harassment and domestic violence.
- Action is taken against perpetrators.
- Relevant training is provided to staff to deal with racist incidents, domestic violence and hate crimes.
- Monitoring data on harassment cases is reported to the Board with recommendations for appropriate action.

## **6 Setting Targets, Monitoring and Evaluating**

To assess the success of the equality and diversity strategy and policy, monitoring systems are essential. We will identify key performance indicators, set targets and analyse performance.

Board Members will regularly monitor the effectiveness of practice against policy. An annual report will be presented to the Board, which will include data on disability, gender, ethnicity, age, religion and sexuality in the following areas:

### **Membership of Board and Formal Committees**

- Diversity of members

### **Employment of Staff**

- Number of applicants, shortlists and appointments by Directorate
- Opportunities for flexible working and work-life balance
- Grievance and disciplinary action
- Harassment, bullying and victimisation
- Turnover rates
- Exit interview trends
- Action taken to make reasonable adjustments for people with disabilities

### **Contracts Awarded for Services**

- Contracts awarded to companies that meet our equality and diversity standards.
- Contracts awarded to minority communities.

### **Allocations and Lettings**

- Proportion on waiting and transfer lists
- Proportion of lettings
- Refusals and reasons for refusal on allocations

### **Aids and Adaptations**

- Number of residents supported through re housing into adapted properties
- Spend on aids and adaptations
- Waiting times for completion of adaptations work
- Satisfaction with aids and adaptations

### **Complaints Handling**

- Number of complaints received and handled within target timescales
- Number of complaints resolved satisfactorily
- Satisfaction with the complaints procedure

### **Communication Needs**

- Spend on translation and interpreting facilities
- Customer satisfaction with website and other relevant publications

### **Repairs and Maintenance**

- Customer satisfaction with overall service

### **Income Management**

- Rent arrears actions

- **Anti Social Behaviour**

Victims supported through Racial Harassment, Domestic Violence, Hate & Homophobic Crimes and anti social behaviour policies

Removal of offensive graffiti

Assistance to vulnerable people

- **Resident Participation and Customer Satisfaction**

Numbers of those involved formally and informally

## **7. Policy Review**

The Chief Executive has the responsibility for ensuring that this policy is reviewed and presented to Board at least every three years.

## **8. Linked Policies and Strategies**

This policy should be read in conjunction with various other documents and in particular the following:

- Business Plan and Corporate Plan
- Staff and Board Members Recruitment and Selection Policy and Procedure
- Terms and Conditions of Employment
- Bullying and Harassment at Work Policy
- Procurement and Tendering Policy

- Lettings and Allocations Criteria, Policy and Procedures
- Resident Involvement Policy
- Anti Social Behaviour Policy and Procedure
  - Racial Harassment Policy
  - Domestic Abuse Policy
  - Protection of Vulnerable Adults from Abuse
- Residents' Handbook, Tenancy Agreement and other documents provided to residents
- Allocations Policy and Procedures
- Mutual Exchange Policy and Procedure
- Disabled Adaptations Policy and Procedures
- Communications Strategy