

WARRINGTON HOUSING ASSOCIATION EQUALITY AND DIVERSITY POLICY



1. INTRODUCTION / AIM

Warrington Housing Association (WHA) is committed to promoting equality of opportunity, tackling discrimination and valuing diversity.

Our aim is to make sure that our residents, other service users and the communities we serve are treated fairly and equitably, without discrimination or prejudice. Through our Equality and Diversity Policy, we aim to prevent discrimination in any aspect of our work, to advance equality of opportunity, promote good relations and to comply with legal and regulatory requirements.

Improving performance in relation to equality and diversity allows us to understand our customers and their needs better meaning that we can continuously improve the delivery of our services to them. Services will remain relevant to customers and their changing aspirations.

Fair and transparent recruitment processes help us to recruit and retain the best staff.

Board and executive understanding of equality and diversity issues and how they impact on our business and customers help us to deliver sound business leadership.

2. SCOPE

We expect all Board and Committee members, residents who belong to any of our formal resident involvement groups, staff and volunteers to comply with the Policy. We also expect organisations that work with us, such as contractors and consultants to have their own equality and diversity policies and to be able to demonstrate how they put them in practice. We make this a condition of tenders through our contract and performance management processes on all major contracts.

3. LEGAL FRAMEWORK

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 1 of 13

In line with the Equality Act 2010, this policy aims to be compliant with the current legislation and promote a culture of dignity and respect for all.

4 DEFINITIONS

Protected Characteristics

There are 9 protected characteristics. These are the grounds on which discrimination is prohibited by law under the Equality Act 2010. The grounds on which discrimination claims can be made are:

- Age
- Disability
- Gender re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or belief
- Sex
- Sexual Orientation

Equality

Is making sure people are treated fairly and given fair chances. It is not about treating everyone the same way, but recognising that different needs may have to be met in different ways.

Diversity

Is about recognising and valuing individual differences.

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 2 of 13

Direct Discrimination

Means treating someone less favourably than others based on a protected characteristic as set out in the Equality Act 2010.

Indirect Discrimination

Can occur where a Policy, practice or procedure, provision or criteria is applied to everyone in the same way but has a disproportionate impact on people with a protected characteristic.

Associated Discrimination

Means discriminating against a person because they have an association with someone with a particular protected characteristic.

Perceptive Discrimination

Means a discrimination against a person because the discriminator thinks the person possess that characteristic.

Harassment

Amounts to conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

Victimisation

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 3 of 13

Means treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

Positive Discrimination

Treating someone more favourably than others based on a protected characteristic as set out in Equality Act 2010.

Positive Action

Taking steps to help or encourage certain groups of people with different needs, or who are disadvantaged in some way, to access work or training.

Failure to make reasonable adjustments

This is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

4. OUR COMMITMENT

Ensure integration of equality and diversity practices into all that WHA does, and ensure that employees are treated with fairness and respect from each other and from members of the public, Board, formal resident involvement groups, volunteers, contractors and consultants.

Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each other's differences and promotes dignity and diversity.

5. SPECIFIC AREAS

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 4 of 13

We have an Equality and Diversity Action Plan which focuses on the key actions that we want to take to continue developing the way in which WHA deliver services equitably to residents / tenants, other customers and our staff.

5.1 Access to Services

We may take positive action measures to ensure that all members of the community are aware of the service it provides including availability of stock. The Association will seek to ensure within its means that all people benefit from its services.

We will have maximum openness about what it is doing, and ensure that all policies and procedures are openly and widely advertised.

We will provide tenants with full, clear and accurate information about their particular tenancy in compliance with the law and good practice guidelines.

We will avoid being seen as inaccessible to those in housing need and take any necessary action as reasonably practicable.

We will provide materials in a suitable format. The Association will use professional, qualified interpreters if required. All application forms and materials published will be in simple jargon free language and where appropriate, help will be given to fill out the relevant forms. The Association will be sensitive to people with difficulties in communicating and offer home visits where appropriate.

We will promote fair access to housing by monitoring the allocation of our homes, including the quality of accommodation.

5.2 Provision of Services

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 5 of 13

In providing and managing housing and delivering services to customers, we will ensure equality of opportunity in relation to the quality of housing, access to housing, policies relating to harassment and nuisance, provision of services and complaints.

We will endeavour to ensure that all written material is clear, simple and jargon-free. In preparing written material we will ensure that the content is open and inclusive and does not discriminate against any group or individual.

To understand better who our customers are so that we are able to provide appropriate services which are accessible to all people within the communities we serve.

To be mindful that people are different and take account of these differences when helping and advising our customers.

We will engage in regular consultation with service users, and encourage tenants to be involved in our activities to ensure that services which are provided are responsive and reflect the diversity of need.

5.3 Referral Arrangements

We will establish referral arrangements with appropriate agencies in accordance with the Association's policies and statutory obligations.

The Association will monitor referral arrangements for accessibility to all groups and meet regularly with the referral agency to review results and decide appropriate remedial action, where necessary.

This process will be used to assist the Association to meet the housing needs of all groups and also to raise awareness of changes in these needs.

5.4 Contracting Role

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 6 of 13

We will seek to ensure that all contractors comply with relevant Health and Safety, employment and Equalities and Diversity legislation.

Potential contractors, consultants and tenderers will be asked to provide a copy of their Equality and Diversity Policy or to confirm that they will abide by our own Policy.

When we receive an application to our list of contractors or consultants and when we advertise tenders we will ask the application to provide a copy of their Equality and Diversity Policy or confirm that they will abide by our own Policy.

We will ensure that where practicable, a wide range of contractors and consultants provide services to us.

We will include equality clauses relating to the behaviour of the contractor and their employees when we award a contract.

5.5 Governance

We will aim to ensure that membership and participation in our affairs is open to everyone. We will ensure that we have the range of skills and experience required to lead the organisation, and that we regularly review the range of skills and expertise needed and will base our succession and recruitment strategies on this assessment.

We will provide regular training to our Board members on equalities and diversity awareness and practice.

We will seek to ensure that the composition of its membership is as representative as possible of all sections of the community.

5.6 Recruitment and Selection

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 7 of 13

All recruitment decision will be based on the merits and abilities of candidate alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

A fair recruitment process will remove barriers where possible to the employment of people from different backgrounds.

All vacancies will be aimed at as wide a group as possible.

We will ensure that all staff involved at any stage in the recruitment and selection process are fully aware of our equality and diversity policy, and will provide regular training to all staff on equality and diversity awareness in practice.

We recognise some employment practices may create barriers which prevent individuals obtaining employment. The Association may adopt positive action measures which will help redress any imbalances.

5.7 Terms and Conditions of Employment

All Contracts will be issued in accordance with the job role and job holder. Employee's terms and conditions will be standard for all employees regardless of any of the protected characteristics.

5.8 Training and Development

Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role and in agreement with their line manager.

5.9 Redundancy and Selection

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 8 of 13

Redundancy selection will be made according to the statutory requirements. Employees selected for redundancy will be selected in accordance to chosen selection criteria and not in any discriminatory way either directly or indirectly.

5.10. Harassment and Victimisation

WHA will deal with complaints of discrimination and harassment with particular care, sensitively and effectively. We will protect any employee from victimisation if they raise such a grievance.

Any employee who considers that they are being subject to unequal treatment on any equalities grounds will be encouraged to report this. Such a complaint will be dealt with through our grievance procedure.

Issues of harassment of tenants will be dealt with through out Internal Harassment Policy.

5.11 Discrimination involving members of the public, management, contractors and staff from others

The right to be treated equally with dignity and respect extends to outside contractors, committee members, volunteers and other agencies whilst at work. A complaint can be made which will be investigated by WHA and appropriate action will be taken.

Employees also have a right to complain if they feel they are being discriminated against by those not directly employed by WHA.

If a staff member or colleague feels that they are being discriminated in the course of their working day from any of the above they are encourage to report it.

5.12 SMT and Employees

Whilst we aim to maintain high standards in Equalities and Diversity, we recognise that the existence of a policy in itself does not guarantee or provide equality in access, opportunity

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 9 of 13

or outcome and that the success of the policy depends on the degree of commitment in practice of all SMT and staff.

The SMT has overall responsibility for ensuring that this policy is implemented across all areas of our activities.

WHA expect all SMT and staff to:

- Apply this policy in their activities and work for the Association;
- Challenge any discriminating behaviour they become aware of;
- Report to a line manager any instances of actual discrimination.

6. RESPONSIBILITIES AND ACCOUNTABILITY

The Chief Executive:

- Has a duty to ensure that the policies, procedures and practices of WHA, WHiA and LifeTime reflect the Equality and Diversity Policy. The Chief Executive is accountable to the Board in this regard.
- Delegates to each Director, specific responsibilities for making sure that the Equality and Diversity Policy is implemented effectively in their functional areas. They are accountable through the Chief Executive to the Board for ensuring that service standards, planning and service delivery take account of equality and diversity issues, that, where relevant, impact assessments are carried out and that outcomes are monitored effectively.

All SMT are responsible for making sure:

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 10 of 13

- Their staff, involved residents, and volunteers receive appropriate training and understand their responsibilities;
- They take equality and diversity issues into account in decision-making and service planning by carrying out, where appropriate, impact assessments.
- They analyse access to and satisfaction with the services under their control.

Every individual: staff, involved residents and volunteers has a duty to uphold the Equality and Diversity Policy by:

- Acting and behaving at all times in a way that supports the aims of the Policy;
- Treating all customers, colleagues and members of the public with respect and courtesy;
- Taking equality and diversity issues into account in service delivery and planning’
- Complying with policies and procedures relating to equality and diversity; and
- Challenging discrimination or bringing suspected breaches to their line manager’s attention.
- The duty to uphold Equality and Diversity Policy is included within staff Job Descriptions. Breaches of the Policy are taken seriously and can result in disciplinary action up to and including dismissal for staff or barring from resident involvement activities for residents.

7. MONITOR AND REVIEW

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 11 of 13

We will collect relevant data on all groups who approach the Association for housing, and on the services the Association provides. The data will be assessed on a regular basis to monitor progress.

Where certain groups appear to be under-represented in housing, the Association may take positive action measures to redress any imbalance.

We acknowledge that monitoring, reviewing and record keeping will be an ongoing process requiring continual examination and annual review of existing procedures and criteria as the society in which we live evolves.

Monitoring will be carried out on the services the Association provides but in particular will look at the following:

- All Applicants
- Allocations
- Money Advice
- Anti Social Behaviour
- Repairs and improvements
- Customer Feedback
- Contractor Performance
- Complaints
- Recruitment and Employment
- LifeTime Memberships
- People accessing the WHiA Service

The responsibility for monitoring the application of this Policy will rest with the Chief Executive and the Housing Services Director will be the designated deputy.

This Policy will be reviewed every three years or sooner if necessary because of changes in legislation.

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 12 of 13

8. COMPLAINTS

Any member of the public, resident / tenant, homeowner, service user or member of staff can complain if they believe the Equality and Diversity Policy has not been applied properly by completing a Complaints Form. Members of staff can use the grievance procedure.

Document Ref:	Version:	Approved Date:	Approved by:	Expire Date:	Number of Pages:
WHA 0090	1	15.06.2016	Board	01.06.2019	Page 13 of 13