



EQUALITIES & DIVERSITY POLICY

To be reviewed by the Resident Participation & Equal Opportunities Working Group: 10 December 2008

To be reviewed: November 2011 or earlier depending on the date of enactment of the Equality Bill which will consolidate and develop existing equalities legislation

1. Policy statement

Equal Opportunities is about removing bias, prejudice and stereotyping, so that difference does not hold back an individual from any undertaking or other opportunity.

Diversity is about recognising that everyone is different and that our differences lead to varied experiences, values, attitudes, ways of thinking, behaving, communicating and working.

Embracing diversity gives value to the differences between people, allowing us to work creatively with these differences to stimulate fresh ideas, broaden and enrich perceptions and empower every person to contribute to our businesses and the neighbourhoods we work in, so that we achieve the best possible results.

Our commitment to equal opportunities and diversity means that we will:

- Positively bring equality and diversity into all our work - in the community, as a landlord, employer and local business.
- Be sensitive, creative and reasonable when responding to the diverse needs and aspirations of residents.
- Create a working culture where diversity is welcomed and everyone feels valued and respected.

Solon believes in and promotes equality and diversity within our organisation and in the communities we serve. We have always worked in areas with diverse communities and appreciate how all the different perspectives, experiences and talents enrich our work.

We know that people continue to suffer discrimination for many reasons, including their race, colour, ethnic or national origin, sex, marital status, disability, sexual orientation, age or religious belief. By using our organisational strength, influence and resources we will work actively to challenge and eliminate inequality and disadvantage, and to create communities where people live well together because diversity is valued and respected. We will establish and maintain a fair, accessible and safe environment for our residents, staff and everyone who works with us.

We support and uphold all current equality legislation, but we want to do more than just comply with the law. We want to be a positive model of good practice.

The purpose of this policy statement is to set out Solon's commitment to eliminating direct or indirect discrimination, whether intentional or unintentional, as a landlord, employer and purchaser. It reflects the leadership and full commitment of our Board and senior management team. We require all our committee members, employees and those who supply us with goods and services to comply with this policy and procedures relating to it. Detailed

guidance and procedures to be followed to achieve the policy objectives are set out in the separate Code of Practice, which is available on request.

2. Scope of the policy

Our Equalities and Diversity Policy applies to the following areas:

- Provision of housing and related services.
- Staff recruitment, employment and training.
- Housing development and maintenance, including the selection and employment of contractors and consultants.
- General procurement of goods and services.
- Governance, including shareholders and the Board of Management.

3. Policy objectives

The objective of the policy is to eliminate unfair discrimination and, where appropriate, take positive action to redress the effects of discrimination in relation to:

- Access to Solon's homes, quality of accommodation offered to people in need and provision of management, maintenance and other related services to all residents and licensees. This includes the protection of residents' rights in relation to racial and other forms of harassment.
- Recruitment and selection procedures, and ensuring equality of opportunity for all job applicants and prospective applicants and positive action to ensure that there are recruitment opportunities for all.
- Staff management and support, and provision of training and development opportunities on an equitable basis so all employees are treated fairly on the basis of their relevant merits and abilities. This includes the protection of the rights of staff in relation to all forms of discrimination and harassment.
- The design, development and maintenance of Solon's housing, and the selection, employment and practices of its development and maintenance contractors and consultants.
- The selection, employment and practices of Solon's other general suppliers, contractors and consultants.
- Opportunities for individuals to become shareholders and Board Members.
- Opportunities for local communities to inform and influence Solon's work.

Solon recognises that the achievement of the above objectives may require continuous changes to current practice and is committed to providing the necessary training and support to enable the Board of Management and the staff team to understand and meet their responsibilities under the policy.

The relevant statutory requirements are contained in:

- The Race Relations Act 1976, Amendment Act 2000 and amendments/regulations 2006.
- The Sex Discrimination Act 1975.
- The Equalities Act 2006.
- The Disability Discrimination Act 2005.
- The Protection From Harassment Act 1997.
- The Human Rights Act 1998.
- The Employment Equality (Religion or Belief) Regulations 2003.
- The Employment Equality (Sexual Orientation) Regulations 2003.
- The Gender Equality Duty 2007.
- The Disability Duty 2006.
- The Sex Discrimination (Gender Reassignment) Regulations 1999.
- The Employment Equality (Age) Regulations Act 2006.
- The Equal Pay Act of 1970.
- The Racial and religious Hatred Act 2006.

Solon will abide by these Acts and Regulations.

Solon will also comply with the requirements of:

- The Housing Corporation's Regulatory Code and Guidance relating to race equality and equal opportunities.
- Any code subsequently introduced by the Tenant Services Authority (the new housing association regulator).
- The Race Equality Code of Practice for Housing Associations.
- The Commission for Equality & Human Rights Codes of Practice in Rented Housing and Employment.
- The Commission for Equality & Human Rights Code of Practice for Employment.

4. Target groups

The following groups are more likely to experience discrimination and disadvantage than others and therefore the policy objectives focus on them to varying degrees:

- Black and minority ethnic groups, including religious or faith groups.
- Women.
- People with disabilities, including mental illness.

- Lesbians and gay men and people of transgender.
- Older people.

5. Diversity targets and regulatory requirements

Specifically in relation to black and minority ethnic people, and in line with the current HC Regulatory Code and Guidance, the Code of Practice incorporates targets in the following areas:

- Lettings.
- Resident satisfaction.
- Dealing effectively with racial harassment.
- Governing body membership.
- Staffing.
- Representation in the Residents' Forum (residents' association).
- Employment performance of suppliers, contractors and consultants.

The Code of Practice also incorporates specific targets in relation to:

- The Disability Equality Duty as required by HC Circular 10/07.
- The Gender Equality Duty as required by HC Circular 10/07.

6. Responsibility for implementation

Solon's Board, having formally adopted the Equalities and Diversity Policy, accepts responsibility for its implementation and for monitoring its effectiveness, and has established the Resident Participation & Equal Opportunities Working Group to ensure this is achieved.

Day-to-day responsibility for implementation lies with the Chief Executive and the other members of the Senior Management Team. There is also a designated equal opportunities officer (the Personnel & Administration Coordinator) and other officers, (Housing Officers) designated to deal with harassment. All these staff have a responsibility to undertake stated duties and report to the Board. Besides the statutory duty not to discriminate, all staff have a responsibility to ensure the positive application of this policy.

The success of any policy, however, depends not only on the degree of commitment of all employees, but also on the extent to which the Chief Executive and other Directors and Managers turn commitment into action. Together with the Chief Executive, the Senior Management Team has a particular duty to ensure that the requirements of this policy for all the areas of work under its control, in respect of the target groups prioritised above, are planned and met.

The policy will be implemented by:

- Operating the procedures and practices outlined in the separate Solon Code of Practice.
- Regular review of current practices and identification of weaknesses in procedures, or where practicable ongoing review and improvement.
- Devising and implementing new procedures for monitoring equal opportunities in various functions, usually as part of regular review, but earlier if practicable and sensible.
- Establishing equality targets and regular performance reviews.
- Subject to internal discussion and agreement, and compliance with relevant legislation, devising and implementing positive action programmes where appropriate.
- Monitoring progress and reporting to the Board via the Resident Participation and Equal Opportunities Working Group (RP&EOWG) at regular intervals, and periodically reviewing the policy itself.

Breaches of this, as of all other Solon policies, may be the subject of disciplinary procedures.

7. Monitoring the Equalities and Diversity Policy and implementation programme

The Board has responsibility for monitoring progress in meeting the requirements of the Policy via the RP&EOWG. Regular reviews will be undertaken to monitor:

- Performance against targets.
- Effectiveness of procedures.
- Feedback on how the policy is operating; and
- Progress of implementation programmes (including positive action) with respect to agreed timetables.

The RP&EOWG will report regularly and make recommendations to the Board as necessary. Minutes etc. will be published and circulated with Board reports and also circulated to staff via Managers.

The Board has delegated authority to the RP&EOWG for the review and approval of the Equalities and Diversity Policy and Code of Practice, and other strategies, and action plans, advising the Board of any material changes and budgetary implications.

Monitoring is important to test whether the policy and procedures are working, and to enable Solon to take remedial action if they are not. Monitoring methods and reasons for specific monitoring are explained in more detail in the Code of Practice.

8. Impact assessments

Equality impact assessments provide a means of ensuring that individuals and teams think carefully about the likely impact policies or procedures, strategies, functions and services have on equalities. They also help to identify unmet needs, and provide a basis for action to improve services where appropriate.

Equality impact assessments systematically assess and record the actual, potential or likely impact of services, policies or projects – or significant changes in services, policies or projects - on different groups of people. The consequences of policies and projects on particular groups are analysed and anticipated so that, as far as possible, any negative consequences can be eliminated or minimised and opportunities for ensuring equality can be maximised.

Solon will endeavour to carry out an equality impact assessment on new policies and procedures and revisions, on new projects and where proposals are made to change or develop existing systems.

The implementation of this requirement will be monitored by the Personnel & Administration Coordinator.

9. Resources

Solon will allocate appropriate resources, to ensure full and effective implementation of this policy.

The Personnel & Administration Coordinator will co-ordinate the collection of monitoring information. Housing Officers have also been designated to deal with harassment. Directors (heads of department), managers and other staff, have other responsibilities set out under the policy. These officers will undertake key roles in implementing the policy. The importance of their roles and the priority Solon places on this work will be recognised and they will be given any necessary support, ongoing training, guidance and powers necessary to enable them to do their jobs. Difficulties and obstacles encountered in doing their jobs should be drawn to the attention of the respective Director or the Chief Executive to ensure they are resolved.

10. Future action/the next step

The Chief Executive will continue to implement action plan targets to:

- Co-ordinate, run and service the Resident Participation and Equal Opportunities Working Group.

- Set out and review the responsibilities of Directors and Managers for implementing the policy.
- Set out and review the responsibilities of the Personnel & Administration Coordinator.
- Oversee and manage the work of the Directors and the Personnel & Administration Coordinator in implementing the policy.
- Plan annual and other reviews identified as necessary during the year.

11. Board approval

This policy was agreed by Solon's Resident Participation and Equal Opportunities Working Group at its meeting on 10 December 2008 and will be reviewed in November 2011.

FILE: EqI Opps Policy (updated Nov 2008) Draft 1