



EQUALITIES & DIVERSITY POLICY

“Continually striving towards fairness for all”

Policy Details	
Date Completed	29/11/11
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Overall Responsibility	Chief Exec
Author	HR Co-ordinator
Approved By	CSIC
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Checklist	
Consultation	Yes
Best practice	Yes
Equality Impact Assessment	Yes
Plain English	Yes
Arial 14	Yes
Notify HRC of policy training needs	yes

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 and do all we can to advance equality - in the community, as a landlord, employer and local business.
- Be sensitive, creative and reasonable when responding to the diverse needs and aspirations of staff and 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/civil partnership status, disability, gender reassignment status, sexual orientation, age, pregnancy / maternity 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 all areas of the work we do, specifically the following areas:

- Provision of housing and related services (including support and advice).
- Staff recruitment, employment, training and promotion.
- 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 main objective of the policy is to:

“Eliminate unfair discrimination and, where appropriate, take positive action to redress the effects of discrimination and advance equality”.

This policy objective can be achieved through the delivery of our E&D strategy objectives:

1. Ensure anyone can access our services and that our services are non-discriminatory (including direct, indirect, harassment or victimisation)
2. Ensure that all services and future services are shaped by our residents (across all protected characteristics) and delivered to address their needs
3. Ensure that service uptake is representative of people in housing need, our residents and the communities which we serve, in the following areas:
 - i. housing management
 - ii. maintenance
 - iii. support
 - iv. involvement
 - v. new homes
4. Ensure that the new homes we develop are designed to address the needs of people in housing need, our residents and the communities which we serve and existing homes and offices are accessible as possible (aids, adaptations and other reasonable adjustments)
5. Improve the way we collect and use tenancy audit data, including evidencing better outcomes for residents
6. Proactively adapt the way we provide services to encompass new legislation (such as the Equalities Act 2010)
7. Ensure we procure contractors and suppliers who embrace our equalities commitments
8. Ensure our staff and Board members are representative of our resident base and community and proactively ensure the same with our contractors.
9. Ensure we assess the 'equality impact' of all service areas and act on the findings
10. Ensure equal opportunity for all job applicants and prospective applicants and take positive action to ensure that there are recruitment opportunities for all

11. Ensure that staff management, support, and provision of training and development opportunities are provided on an equitable and non-discriminatory basis
12. Ensure our allocation of resources is prioritised in a way to achieve our commitment to equality

4. Training

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. Current training includes:

- Compulsory Equality Training for staff, managers and Board Members
- Optional training for Involved residents and contractors
- Contractor funded cultural awareness training (agreed with Solon)
- Compulsory training for Equality in Recruitment for all staff and Board involved in interview panels
- Mental Health Awareness Training for staff who deal with our most vulnerable residents

Our training programme is always under review so may be subject to change. For up to date information on equalities training please speak to Central Services.

5. Statutory and Regulatory Compliance

We support and uphold all current equality legislation. The relevant statutory requirements are contained in:

- The Equality Act 2010 - which has consolidated and replaced much of the below:
 - The Race Relations Act 1976, Amendment Act 2000 and amendments/regulations 2006.
 - The Sex Discrimination Act 1975 (SDA).
 - The Equalities Act 2006.
 - The Disability Discrimination Act 2005 (DDA).

- 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 Employment Equality (Age) Regulations Act 2006.
- The Equal Pay Act of 1970.
- The Racial and religious Hatred Act 2006.
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- The Sex Discrimination (Gender Reassignment) Regulations 1999.
- The Equality Duty 2010 (replacing the previous race, disability and gender duties)

Solon will also comply with the requirements of:

- The Housing Corporation's Regulatory Code and Guidance relating to race equality and equal opportunities.
- 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.
- The Government Equalities Office - Equality act 2010: Public Sector Equality Duty

We have started to respond to and aim to fully comply with recommendations from the following: Challenge Report, Cattle's Community Cohesion Report and the Stephen Lawrence Enquiry ('99).

The Equality Duty

The Equality Duty is a duty on public bodies and others carrying out public functions. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, in delivering services, and in relation to their own employees. The duty covers all protected characteristics (**see appendix 2**)

The Equality Duty has three aims; to have due regard to the need to:

1. eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
2. advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
3. foster good relations between people who share a protected characteristic and people who do not share it.

Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making.

We comply with this duty by ensuring the following:

Knowledge – those who exercise the Solon’s functions are aware of the requirements of the Equality Duty.

Timeliness – the Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision.

Real consideration – consideration of the three aims of the Equality Duty must form an integral part of the decision-making process.

Sufficient information – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.

No delegation – Solon is responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice.

Review – public bodies must have regard to the aims of the Equality Duty not only when a policy is developed and decided upon, but also when it is implemented and reviewed.

We will communicate how we meet the Equality Duty by doing the following:

- Publish information to demonstrate our compliance with the duty annually (this will be done through the annual report)
- Set equality objectives every three years (this will be done through our equality and diversity strategy)

6. Diversity targets, monitoring and regulatory requirements

Targets have been developed by SMT in 2011 to ensure that all areas of the service have been considered and accessibility can be measured. These targets have been taken from our code of practice.

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.

To enable us to identify whether we meet these targets we carry out equal opportunity monitoring for all the above areas. We carry out a tenancy audit to collect data on our residents, equality monitoring for staff, Board, candidates for recruitment and suppliers, contractors and consultants. We use this information to ensure we have fair representation across all our services and staffing etc and use appropriate positive action where possible to advance equality.

6. Responsibility for implementation

Chief Executive: has day-to-day responsibility for implementation of this policy however there are some other individuals / groups that have additional responsibilities:

Solon's Board: Setting strategic direction (approving E&D strategy and related documents), reviewing performance and ensure good governance.

Customer Service Improvement Committee (CSIC): to ensure the Board's responsibility is achieved, through monitoring regular equalities reports and progress.

Senior Management Team: Support the Chief Executive in overseeing the design, delivery, quality and effectiveness of the organisation's functions.

Equal Opportunities Officer (the HR Coordinator): Responsible for chairing the EC group, co-ordinating the EIA process, dealing with staff-related harassment cases and assisting in reviewing equality policies, procedures and documents.

Equality Champions: designated equalities group which discusses progress, improvement and identifying barriers to accessing services. This group is made up of 1 Board member and 1 person from each department, raises awareness and supports other staff in equality issues.

Housing Officers: to deal with resident-related harassment (see procedure for further details)

Central Service Staff (HR): to ensure they build equality considerations in employment policies and procedures.

All Policy makers (could be any member of staff): to ensure they build equality considerations in all stages of the policy making process including review and evaluation (our policy template and guidance [*Creating and Reviewing Policies and Strategies Policy*] ensures that this happens systematically)

All staff: to ensure equality information is available and accessible.

Front line staff: to ensure equality considerations are made in the

delivery of services to the public.

Staff involved in procurement – to ensure they build equality considerations in the organisation's relationships with suppliers.

All these staff have a responsibility to undertake stated duties and report to the Board when required. 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.

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 Customer Service Improvement Committee at regular intervals, and periodically reviewing the policy itself.
- Monitoring Progress at monthly Equality Champion meetings.

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 Customer Service

Improvement Committee and the Equality Champions Group. 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 CSIC will report regularly and make recommendations to the Board as necessary. Minutes will be published and circulated with Board reports and also circulated to staff via Managers and Equality Champions.

The Board has delegated authority to the CSIC 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 HR Co-ordinator. A timetable has been developed for Impact Assessments to be completed by July 2014 on all major service areas of the business, as identified by SMT in February 2011.

9. Resources

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

The HR Co-ordinator 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 the GAP actions in relation to equality (these are equality related actions that have been identified through strategies and working groups). These actions are monitored 6 monthly through the Equality Champion group and CSIC.

Ongoing actions include the following:

- Co-ordinate the running of the Customer Service Improvement Committee.
- Set out and review the responsibilities of Directors and Managers for implementing the policy.
- Set out and review the responsibilities of the HR Coordinator and Equality Champions.
- Oversee and manage the work of the Directors and the HR Co-

ordinator in implementing the policy.

- Plan annual and other reviews identified as necessary during the year.

11. Link to other documents / policies

The following documents relate to this policy

- Equality Impact Assessment Form
- Equality Impact Assessment Toolkit
- Equality and Diversity Strategy
- Equality Code of Practice
- Equality Champions Terms of Reference
- Diversity KLOE

Appendices

Appendix 1

Equalities targets 2011

Targets agreed by SMT Feb

11

Presented to CSIC April 11

red = new targets 2011

Department	Existing target (from 2008 code of practice)	Agreed 2011 target	Reporting to	In what format	Frequency of report	Where is data stored	Comments / Action
Central Services							
Staff recruitment (candidates that apply, get shortlisted and are successful)	16.5% BME only	16.5% for BME (to reflect the higher % of residents than presented in the local statistics) and all other protected characteristics against the local community	CSIC	Staff / Board / contractors / recruitment report	6 monthly	recruitment EO monitoring (CS)	To be reviewed in 2012 when the Census data is released (this will be more accurate)
Staff Profile	16.5% BME only	average between residents and local community for all protected characteristics	CSIC	Staff / Board / contractors / recruitment report	6 monthly	Staff spreadsheet (CS)	
SMT Profile (incl. Middle Managers)	16.5% BME only	average between residents and local community for all protected characteristics	CSIC	Staff / Board / contractors / recruitment report	6 monthly	Staff spreadsheet (CS)	
Positive action placement (i.e. CEED / future jobs)	1 per year (subject to resources)	no change	CSIC	Staff / Board / contractors / recruitment report	6 monthly		
Board Profile	reflect the community and residents	average between residents and local community for all protected characteristics	CSIC	Staff / Board / contractors / recruitment report	6 monthly	register of interests spreadsheet (CS)	
BME Board Members	20% (3)	average between residents and local	CSIC	Staff / Board / contractors /	6 monthly	register of interests spreadsheet (CS)	

		community for all protected characteristics		recruitment report			
Female Board Members	50%	average between residents and local community for all protected characteristics	CSIC	Staff / Board / contractors / recruitment report	6 monthly	register of interests spreadsheet (CS)	
Shareholders	no target	no target (as new shareholders will be Board members)	Is reported through Board member reporting				
Complaints	none	representative of resident profile	CSIC	Feedback report	6 monthly	complaints log (CS)	
Staff equalities training	100% - 6 months from joining then every other year	no change	Board / SMT	HR report / Training plan review	annually	staff training matrix (CS)	
Board equality training	100% - 6 months from joining then regularly throughout the term of membership	6 months from joining then every other year	Board	HR report	annually	board training matrix (CS)	Needs to be included in the HR report
Mental Health Training	100% of housing services staff	no change	SMT	training plan review	annually	staff training matrix (CS)	
Vulnerability Training	100% of housing services staff	no change	SMT	training plan review	annually	staff training matrix (CS)	
Equality in Recruitment	100% of staff who would interview	no change	SMT	training plan review	annually	staff training matrix (CS)	
Interview panel	1 woman / 1 BME	no target	n/a	n/a	n/a	n/a	Include this as part of the recruitment policy as something we will aim to do
Grievance / disciplinary / capability		representative of staff profile	Board	HR report	annually	Staff spreadsheet (CS)	
Staff Survey		Upwards trend in equality questions	SMT	staff survey report	annually	staff survey (CS)	
Equality Impact Assessments		100% of planned EIAs	Board	KPI report	6 monthly	EIA timetable (CS)	
Development (including Suppliers, Contractors and Consultants)							
Wheelchair accessible homes	Need to set percentage	No Target	n/a	n/a	n/a	n/a	Will try and include wheelchair accessible homes where funding will allow but will aim to have all homes up to lifetime standard
Contractor Profile	16.5% BME	average between residents and local community for all	CSIC	Staff / Board / contractors / recruitment report	6 monthly	contractor & consultant diversity spreadsheet	

		protected characteristics				(finance)	
Consultant Profile	16.5% BME	average between residents and local community for all protected characteristics	CSIC	Staff / Board / contractors / recruitment report	6 monthly	contractor & consultant diversity spreadsheet (finance)	
Contractor, consultants and suppliers agreeing to HC requirements (now Solon's equality targets)	seek to	100% of regular contractor, consultants and suppliers	CSIC	Staff / Board / contractors / recruitment report	6 monthly	Approved contractor and consultant spreadsheet (finance)	Contractors etc need to come back and say where they cannot meet our targets, why not and what they plan on doing to improve.
Contractor, consultants and suppliers signing up to Solon's EO Policy	seek to	100% of regular contractor, consultants and suppliers	CSIC	Staff / Board / contractors / recruitment report	6 monthly	Approved contractor and consultant spreadsheet (finance)	
Contractor, consultants and suppliers having own EO Policy	seek to	100% of regular contractor, consultants and suppliers	CSIC	Staff / Board / contractors / recruitment report	6 monthly	Approved contractor and consultant spreadsheet (finance)	
Awarding contracts to organisations run by BME and women	seek to	no target	n/a	n/a	n/a	n/a	Improve tendering processes to ensure opportunities are maximised for all (guidelines for staff on how to access under-represented organisations)
Use of the tender process	representative of residents	no target	n/a	n/a	n/a	n/a	As above
Resident Involvement							
Forum attendance	12% BME / representative of strands	representative of resident profile	CSIC	Involved residents profile report	6 monthly	UH2 / Resident Involvement	
Overall involved (surveys etc)		representative of resident profile	CSIC	Involved residents profile report	6 monthly	UH2 / Resident Involvement	
Status / Star survey		representative of resident profile	CSIC	Status survey report	3 yearly	Star survey document	
Housing Management							
Racial Harassment		Targets for dealing with this is in the ASB service standard	CSIC	service standard monitoring report	6 months	SABRE	SABRE will be able to produce information on this (SABRE launched Autumn 2011)
Lettings	16.5% and 25% BME	16.5% for Bristol South Gloucestershire needs to be decided	CSIC	housing management report	6 months	TBC	

		based on up to date figures					
Nominations, transfers, referrals & CBL	to be agreed by RP&EOWG following consultation	Nominations - superseded by CBL Transfers - representative of residents (see below) Referrals - ?CBL - covered by lettings above	CSIC	housing management report	6 months	TBC	
Refusal for housing	to be agreed by RP&EOWG following consultation	no target	superceded by CBL - reporting on lettings will highlight any issues				
Waiting time for housing	to be agreed by RP&EOWG following consultation	no target					
ASB		Targets for dealing with this is in the ASB service standard	CSIC	service standard monitoring report	6 months	SABRE	
Rent arrears		representative of resident profile	CSIC	housing management report	6 months	UH2	
Mutual Exchanges / transfers		representative of resident profile	CSIC	housing management report	6 months	UH2	
Transfers		representative of resident profile	CSIC	housing management report	6 months	UH2	
Extended starter tenancies		representative of resident profile	CSIC	housing management report	6 months	UH2	
Asset Management							
Repairs	ethnicity of residents where response targets are not met	representative of resident profile	CSIC	Repairs report	6 months	UH2	Currently report to CSIC 6 monthly
removal of harassment related graffiti	immediately	Targets for dealing with this is in the ASB service standard	CSIC	service standard monitoring report	6 months	TBC	
Aids and adaptations		ethnicity of the resident profile	CSIC	Local offer report	6 months	TBC	
Cyclical	ethnicity of residents where stock re-investment and improvement has been made	no target	N/A	TBC	N/A	TBC	standard 5 year programme
Decent Homes		representative of	CSIC	TBC	5 yearly	TBC	To be done when planning the 5 year

		resident profile					programme (inc. boiler replacement as gas is not targeted)
Supported Housing							
Rackfield		no target	CSIC	TBC	annually	TBC	annual supported housing report (include BANES profile information for reference)
managing agents		no target	CSIC	TBC	TBC	TBC	classed as suppliers
TSO uptake		no target	CSIC	TBC	annually	TBC	annual supported housing report
Satisfaction							
Satisfaction (initially focussing on response repairs through UH2)	equal for all strands (majors on BME)	No change	CSIC	with feedback report	6 monthly	UH2 (report needs to be written for this?)	Priorities will be: ASB, Maintenance and Complaints. JH standardising the satisfaction / EO monitoring

NB

All targets that are influenced by the local community will need to be revised in 2012 when the results of the next census have been published.

All targets will need to be reviewed annually based on community and resident profiling data

Appendix 2

Protected characteristics: definitions

Age

Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment

The process of transitioning from one gender to another.

Marriage and civil partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the

way you live for it to be included in the definition.

Sex

A man or a woman.

Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

This information has been taken from:

<http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>