

COR09	ADOPTED: 29.05.96	REVIEWED: 20.02.98; 28.02.01; 26.02.03; 22.02.06; 29.04.09; 26.01.11; 29.01.14; 29.03.17; 29.06.22
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## EQUALITY AND DIVERSITY POLICY

### 1.0 INTRODUCTION AND PURPOSE

- 1.1 Prospect Community Housing is committed to encouraging equality, diversity, and inclusion. We promote an environment of respect and understanding, by encouraging and celebrating diversity and eliminating discrimination by providing equality of opportunity for all.
- 1.2 The aim of this policy is to outline how we implement and promote equality and diversity across the organisation and our services. This impacts on our staff, customers, Committee members, members of the Association, contractors, and suppliers.
- 1.3 We aim to ensure that everyone we deal with is treated with fairness and respect and is not discriminated against because of the Equality Act 2010 protected characteristics of:
- age
  - disability
  - gender reassignment
  - marriage or civil partnership
  - pregnancy and maternity
  - race (including colour, nationality, and ethnic or national origin)
  - religion or belief
  - sex
  - sexual orientation
- 1.4 By implementing clear policies and procedures we will seek to ensure that we do not discriminate against any groups or individuals on any of the grounds listed in para. 1.3 above.
- 1.5 Prospect also works to reduce the inequalities of outcome which result from socio-economic disadvantage.

### 2.0 THE SCOTTISH SOCIAL HOUSING CHARTER

The relevant standards and outcomes for the Equality & Diversity Policy are:

### *Outcome 1: Equalities*

Social landlords perform all aspects of their housing services so that:

- Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

## **3.0 POLICY FRAMEWORK**

### **Equality Culture**

3.1 To promote a culture of equality and celebrate diversity when delivering out housing and maintenance services to tenants and other customers we:

- Promote equality of opportunity by taking individual needs into account. This allows all service users to have equal access to our services. We do this in a variety of ways including offering translation services, communication preferences including large print, face to face meetings rather than letters, accessible office spaces, offering transport to meetings, encouraging children to attend meetings to avoid childcare issues, working with specialist support agencies such as SCOREScotland, Women's Aid, Occupational Therapists etc. By implementing these measures, we aim to ensure equality of opportunity to access the services we deliver.
- Engage in regular consultation with our tenants and other users of our services to ensure that their views and priorities are incorporated into our decisions and future planning.
- Ensure that all our new housing is designed to current housing for varying needs standards. This is outlined in our Design Brief. In addition, subject to the physical constraints of each site and the identification of need following appropriate assessments and consultation with partners, each new development incorporates the provision of housing for those with additional physical or learning needs, including accessible homes.
- Ensure that any upgrading of existing housing, through planned maintenance or improvement projects, includes bringing the properties up to housing for varying needs standards.
- Seek funding annually from the Scottish Government, through the City of Edinburgh Council, for the provision of specialist aids or adaptations to existing properties so that those with specific requirements may continue to live in their home with independence, privacy, and dignity.
- Ensure that where management services are provided to us or on our behalf by another organisation, the provider of such services either has an acceptable Equality & Diversity policy or agrees to adopt this policy.
- Ensure that when we are procuring services, any consultants, contractors, or suppliers that we appoint either have an acceptable Equality & Diversity policy of their own or are willing to adopt this policy.

- Ensure that membership of the Association and participation in our activities is open and accessible to everyone. We ensure that all Association members have equal opportunity to be nominated for and elected to the Management Committee and to participate fully in Committee and Working Group meetings. We work to ensure that the Management Committee is representative of the community whom they serve.

### **Best Practice approach**

- 3.2 To inform our practice with regards to equality and diversity we ensure we are learning from others and reflect on service delivery to ensure continuous improvement by:
- Membership of organisations such as Scottish Federation of Housing Associations, Chartered Institute of Housing, Housemark, etc.
  - Adherence to Scottish Housing Regulator guidance on equalities and compliance with the Annual Assurance Statement.
  - Carrying out Equality Impact Assessments of our Policies, the Business Plan, and our annual budget.
  - Considering our Equalities Strategy which outlines the ways in which we deliver on our commitment to ensuring equality and diversity across the services.
  - Meeting the objectives of our Equality Action Plan which is reviewed by our Equalities Working Group. This Plan is based on the structure of the CIH Equality and Diversity Charter.

### **Training**

- 3.3 We hold regular training for staff and committee on equality and diversity issues. We use this to increase awareness as well as inform improvements to service delivery.

### **Employer Responsibilities**

- 3.4 Prospect recognises that tackling discrimination helps to attract, motivate, and retain staff. It helps employers make the best use of skills and can lead to a more diverse workforce, new ideas, access to wider markets and a better image. As an employer we will:
- ensure that there is no discrimination when deciding who to employ so that the best people are appointed to deliver our services.
  - only consider applicants for jobs on the basis of their relevant experience, qualifications, skills, and abilities.
  - consider applicants with a disability positively. We will take all measures possible to make reasonable adjustments where appropriate in order to provide employment to applicants with a disability who meet the requirements for the post and prove to be the best candidate for the post.
  - ensure that all employees receive fair and equal treatment in relation to their employment.
  - encourage and help all our employees to reach their full potential.
  - treat our employees fairly in relation to procedures.
  - ensure that the workplace is free from discrimination and harassment and will act promptly on any complaints of discrimination or harassment.
  - wherever possible, make reasonable adjustments and retain, in suitable employment, employees who become disabled.

- ensure that all employees are aware of their personal responsibility to follow and support this policy.

### **Committee and Staff Responsibilities**

- 3.5 We recognise that the existence of a policy does not in itself guarantee or provide equality in access, opportunity, or outcome, and that the success of this policy depends on the commitment in practice of all Management Committee Members and staff.

The Chairperson of the Management Committee has the overall responsibility for ensuring that this policy is implemented in every area of our activities.

The Director is responsible for the day-to-day implementation of this policy, for ensuring that Managers implement the policy with and through their staff, and for ensuring that our policies, procedures, terms and conditions of employment, publications, information material, advertisements and application forms etc. promote equality, diversity, and inclusion.

All Prospect staff and committee members are expected to be familiar with this policy and to conduct themselves in accordance with its requirements.

It is acknowledged that discrimination may occur unintentionally however it is essential that a culture in which positive challenge to inappropriate or discriminatory behaviour is part of normal practice.

Any deliberate act of discrimination against other employees, committee members or service users will be treated as a disciplinary offence. Following a full investigation, appropriate action will be taken.

Any committee member, staff member (or any applicant for a vacancy) who has a proposal or grievance in relation to the operation of the policy may refer it initially to their Manager, the Director or Chairperson, as appropriate.

## **4.0 MONITORING**

- 4.1 We monitor our progress towards meeting the aims of this policy in a number of ways:

- We seek regular feedback on the quality and provision of our services through ad hoc individual surveys or questionnaires, and major tenant satisfaction surveys. We collect Equality and Diversity information through the tenant survey. We analyse the survey questions against equalities information to identify any gaps in service provision or areas of concern. The Equalities Working Group leads on this analysis.
- We carry out an annual equalities survey of staff and committee members.
- We monitor equalities data for recruitment and for those terminating their employment to establish whether we need to take any action as a result of any trends etc. emerging. We will consider the institution of positive action programmes if there is evidence that members of particular groups are under-represented in the staff complement.
- We report to committee annually on our Equalities Action Plan

- We encourage tenant involvement in our activities and by listening to tenant feedback through the Tenants' Forum, the Prospect Scrutiny Group, through encouraging membership of the Association and election to the Management Committee we can better understand if our service delivery meets the aims of this policy.

## **5.0 REVIEW**

- 5.1 The Director will ensure that this policy is reviewed at least every three years by the Management Committee.

Reviewed by the Management Committee on 29 June 2022

Next review due by: June 2025

## PROSPECT EQUALITY IMPACT ASSESSMENT RECORD

<b>Title of policy/ practice/ strategy</b>	Equality & Diversity Policy and Strategy	
<b>Department</b>	Corporate	
<b>Who is involved in the EQIA?</b>	Catherine Louch	
<b>Type of policy/ practice/ strategy</b>	New <input type="checkbox"/>	Existing <input checked="" type="checkbox"/>
<b>Date completed</b>	21/06/2022	

### Stage 1: Screening Record

#### **What is the main purpose of the policy?**

We have reviewed our Equality and Diversity Policy to describe how we will seek to celebrate and promote equality and diversity across the association, and combat discrimination. We have developed an Equality and Diversity Strategy to summarise how we promote access of access and opportunity. This assessment considers the impact of both the policy and strategy.

#### **Who will the policy benefit and how?**

The policy and strategy will affect all tenants, service users, employees, committee, stakeholders, and the wider community by promoting an environment of respect, understanding, encouraging diversity, and eliminating discrimination by providing equality of opportunity for all. Equality and Diversity will be part of our business practice in all of our activities.

#### **For each equality group, does or could the policy have a negative impact?**

Protected characteristic	Negative	Positive/no impact	Don't know
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief (including no belief)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered negative or don't know to the above question you should consider doing a full EQIA.

#### **Are there any potential barriers to implementing the policy?**

E.g., capacity, or financial issues. Are there any factors that might prevent the desired outcomes being achieved?

None identified.

	Yes	No
<b>Is a full EQIA required?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### **If you answered no to the above question explain why a full EQIA is not required:**

No impact on equalities identified:	<input type="checkbox"/>
Other:	

## Stage 2: Data and evidence gathering, involvement and consultation

Include here the results of your evidence gathering, including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

Source	Qualitative evidence provided	Quantitative evidence provided	Which protected characteristics are covered?	Gaps identified/ action taken
Management information data		Annual staff and committee equalities data	Age, disability, gender, ethnicity. In some cases other protected characteristics	Membership data not collected. Implementation of Cx may assist with data collection.
Tenant satisfaction survey		Survey carried out in 2019, next survey will be completed 2022	Age, disability, gender, ethnicity. In some cases other protected characteristics	Data becoming out of date. Implementation of Cx may assist with data collection.
Committee, Equalities Working Group and Tenants Forum minutes	Equality related issues identified and discussed		Various	
Review of complaints received	Tenant/service user experience	Statistical data on types of complaint	All protected characteristics	Implementation of Cx may assist with data collection and analysis of protected characteristics
Observations/conversations (anecdotal)	Staff/committee/tenant/service user levels of understanding, inclusive practice		All protected characteristics	
Edinburgh Census 2011		Statistical data	Age disability, gender, ethnicity, marital status, religion or belief.	Data becoming out of date.
EdIndex data		Statistical data provided for individuals on the housing waiting list	Age, disability, gender, ethnicity. In some cases other protected characteristics.	Data becoming out of date.

## Community Profile

The following profile summarises key data for Prospect stock, the Wester Hailes Community and Edinburgh.

Indicator	Prospect	Wester Hailes	Edinburgh	Source	Comment
The number of households in receipt of Universal Credit.	42%	4,605-40%	34,317-9%	Prospect – Cx 22.11.21 Wester Hailes – as at 14.10.21 <a href="#">Universal Credit: Official Statistics (arcgis.com)</a>	Prospect received housing costs directly for 42% of tenants.
The proportion of households in owner occupation, private rented accommodation, and social housing	100%	OO-25.7% PR-9% SH-64.5%	OO-58.9 PR-22.4% SH- 17%	WH-2011 Census Edinburgh- 2011 Census	
The number of people from minority ethnic communities;	23%	20.3%	11%	Prospect – Tenant Survey 2019 WH- 2011 Census CEC- 2011 Census	
The number of people over 60;	13.27% over 65	10.5% Over 65	15% Over 65	Prospect – Cx 22.11.21 WH- 2011 Census CEC- 2011 Census	
The number of lone parent families;	12%	14%	5.8%	Prospect – Tenant Survey 2019 WH-2011 Census CEC-2011 Census	
The number of people with long-term limiting illnesses;	42%	30%	26.7%	Prospect – Tenant Survey 2019 WH-2011 Census CEC- 2011 Census	
The number of homeless persons;	n/a	Not available	1,912	2020/21 <a href="#">Homelessness Statistics 2020-21 - gov.scot (www.gov.scot)</a>	
The number of single households;	34%	37.6%	39.1%	Prospect – Tenant Survey 2019 WH-2011 Census CEC-2011 Census	



### Stage 3: Assessing the impacts

**How might the policy impact on people who share protected characteristics?** Include both positive and negative impacts.

Protected Characteristic	Description of Impact
Age	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Disability	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We are conscious that a significant number of Prospect tenants have a member of the household who has a long term limiting illness and therefore we make adjustments to service delivery accordingly. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Gender reassignment	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We do not currently gather statistical data for this characteristic. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Marriage & civil partnership	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We are conscious that a higher than the Edinburgh average number of Prospect tenants are lone parents and therefore we make adjustments to service delivery accordingly. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Pregnancy & maternity	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We do not currently gather statistical data for this characteristic. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Race	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We are conscious that a higher than the Edinburgh average number of Prospect tenants are from a BAME background and therefore we make adjustments to service delivery accordingly. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Religion or belief (including no belief)	The policy promotes good practice and safeguards against discrimination in service provision and employment practices. We do not currently gather statistical data for this characteristic. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.

Sex	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.
Sexual orientation	The policy and strategy promote good practice and safeguards against discrimination in service provision and employment practices. We monitor statistics in this area as part of the Tenant Satisfaction Survey analysis. We will collect individual data as part of the annual process to confirm household details. This will assist us to support tenants with any specific needs.

***How does the policy promote equality of opportunity?***

The policy and strategy have been designed to positively impact not just on people who share protected characteristics in terms of the Equality Act 2010 but should also positively impact all groups. It sets out Prospect’s commitment to the advancement of equality and the prevention of discrimination.

***How does the policy promote good relations?***

Through the policy and strategy Prospect aims to promote good relations by balancing consistency with practices which strive to offer an equal outcome for everyone regardless of their protected characteristics. Prospect also brings together groups to consult on a variety of topics affecting service delivery.

**Stage 4: Decision making and monitoring**

***Identifying and establishing any required mitigating action***

If, following the impact analysis, you think you have identified any unlawful discrimination – direct or indirect - you must consider and set out what action will be undertaken to mitigate the negative impact.

Does the assessment show a potential for differential impact on any group(s)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is there potential for unlawful direct or indirect discrimination?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

***What arrangements could be implemented to reduce or mitigate any potential adverse or negative impacts identified?***

We monitor our complaints to identify any potential equalities related concerns or issues. With the assistance of tenant feedback we are able to assess the impact of our service delivery on a range of groups. This will help us to make changes to our services if required.

***Describing how Equality Impact analysis has shaped the policy making process***

No changes have been made as a result of the equality impact assessment.

***Monitoring and Review***

Equalities data for staff and Management Committee is monitored on an annual basis and data is gathered via the tenants survey every three years. The Equalities Working Group meets regularly and monitors progress of the Equalities Action Plan. Equalities data and the Equalities action plan are reported to the Management Committee annually. The Equality & Diversity policy is reviewed every three years.

## Stage 5 - Authorisation of EQIA

Please confirm that:

- ◆ This Equality Impact Assessment has informed the development of this policy:

Yes  No

- ◆ Opportunities to promote equality in respect of age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, marriage or civil partnership, race and religion or belief have been considered, i.e.:
  - Eliminating unlawful discrimination, harassment, victimisation.
  - Removing or minimising any barriers and/or disadvantages.
  - Taking steps which assist with promoting equality and meeting people's different needs.
  - Encouraging participation (e.g., in public life)
  - Fostering good relations, tackling prejudice, and promoting understanding.

Yes  No

### Declaration

**I am satisfied with the equality impact assessment that has been undertaken for **Equality & Diversity Policy**.**

**Name: Catherine Louch**

**Position: Housing Manager**

**Authorisation date: 07/02/17**