

## **CLYDESDALE HOUSING ASSOCIATION LIMITED**

<b>Policy:</b>	<b>Equal Opportunities Policy</b>
<b>Date:</b>	<b>19 February 2020</b>
<b>Lead Officer:</b>	<b>Chief Executive Officer</b>
<b>Review Date:</b>	<b>February 2023</b>
<b>Regulatory Standards:</b>	<b>Standard 1</b> The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

### ***Guidance***

- 1.1 The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users.
- 1.2 The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL.
- 1.3 The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below.
- 1.4 All governing body members accept collective responsibility for their decisions.
- 1.5 All governing body members and senior officers understand their respective roles, and working relationships are constructive, professional and effective.
- 1.6 Each governing body member always acts in the best interests of the RSL and its tenants and service users and does not place any personal or other interest ahead of their primary duty to the RSL.
- 1.7 The RSL maintains its independence by conducting its affairs without control, undue reference to or influence by any other body (unless it is constituted as the subsidiary of another body).

### **The Scottish Social Housing Charter**

#### **1: Equalities**

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

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

**Clydesdale Housing Association will provide this policy on request at no cost, in large print, in Braille, in audio or other non-written format, and in a variety of languages.**

## Contents

1. Introduction .....	3
2. The Local Context for Equal Opportunities in Clydesdale .....	3
3. Aims and Objectives.....	5
4. Regulatory and Good Practice Requirements .....	6
5. Legal Requirements .....	6
6. Discrimination.....	7
7. Governance and Representation .....	8
8. Equal Opportunities in Clydesdale Housing Association’s Services.....	9
9. Equal Opportunities in Employment .....	10
10. Equal Opportunities in Contracts with Third Parties .....	12
11. Implementing the Equal Opportunities Policy .....	13
12. General Data Protection Regulators.....	15
13. Continuous Improvement.....	15
14. Policy Review .....	16
Appendix I: Geographical Stock Breakdown.....	17
Appendix II – Equalities Standards for Housing and Other Services .....	18

## **1. Introduction**

1.1 This Policy, and the accompanying Equalities Action Plan, describes how Clydesdale Housing Association (CHA) will provide equality of opportunity and fair treatment for all. This includes:

- everyone who uses, or wishes to use, CHA's services including tenants and factored owners;
- everyone who wishes to be involved in the governance and overall management of CHA;
- everyone who works for us, or who applies to work for us.

1.2 The Policy is informed by legislation, regulation and best practice along with CHA's Business Plan, policies, Performance Management and Measurement framework.

## **2. The Local Context for Equal Opportunities in Clydesdale**

2.1 CHA is a Registered Social Landlord (RSL) based in the Clyde and Douglas Valley areas and operates within a 21 mile radius of the market town of Lanark.

2.2 CHA:

- owns and manages 738 tenanted properties and 10 shared ownership properties;
- provides factoring services to 202 owners;
- is a participating partner in South Lanarkshire Council's Common Housing Register (CHR)
- has 15 staff;
- is managed by a voluntary Management Committee of up to 15 people;
- supports a Registered Tenant's Organisation (RTO) – The Clydesdale Tenants' and Residents' Group and a Tenant Engagement Panel.

2.3 Around 51% of CHA's tenanted housing stock is in Carluke and Lanark whilst the remaining properties are dispersed among another 16 distinct areas. A breakdown appears as Appendix I.

2.4 The majority of our tenants, factored owners and other service users live in primarily rural communities with transport issues and a lack of local facilities in the most isolated areas.

2.5 The area's population does not appear to be particularly diverse with few people from a Black and Minority Ethnic profile living there, although, we are aware of an increasing number of people suffering from mental health issues.

2.6 Rigside has a higher proportion of people who suffer with a long-term health condition i.e. 37.2% compared to Clydesdale at 30.7%. Rigside also has a higher proportion who suffer from a mental health condition, i.e. 6.7% compared to 4% for Clydesdale. This information was derived from the 2011 Scottish Census and is not based on the opinion of Clydesdale Housing Association.

2.7 Our Equal Opportunities Policy and Action Plan have been informed by several sources of information about the people who live in the area. These include:

- Statistical data derived from the 2011 Census, based on the Clydesdale Scottish Parliamentary Constituency;
- Tenant Satisfaction Survey carried out in October 2019;
- Statistical information provided to the Scottish Housing Regulator regarding our tenant base, housing list and tenancy allocations;
- Statistical information gathered as part of our recruitment processes.

2.8 A few brief statistics set the context for our equal opportunities policy:

- The Clydesdale area has a population of 72,866 according to the 2011 Census.
- 98.6% of the population is white. 1.4% are from ethnic minorities.
- The Tenant Satisfaction Survey completed in October 2019, involving 60% of CHA's tenants, revealed that 98.2% of respondents described themselves as Scottish or Other British. Nobody surveyed felt that racial or other harassment was a major or minor problem in their area.
- The vast majority of the Clydesdale population describe their nationality as British and/or Scottish. Only 1.6% of the population have a national identity other than this.
- 99.2% of the Clydesdale population speaks English well or very well and only 0.1% say they cannot speak English at all. 1.6% use a language other than English at home.
- 30.7% of people living in the area describe themselves as having a long-term limiting illness according to the 2011 Census.
- 5.7% of local people describe themselves as having bad or very bad health.
- 17.7% of the population are under 16 years old, 64.7% are aged between 16 and 64, and, 17.6% are 65 years old and over. 7.6% are 75 years and over.
- 51.4% of the population are female and 48.6% male.
- Only 2 people who took part in the Tenant Satisfaction Survey of 2016 revealed that they had a sexual orientation other than heterosexual /straight.
- 13 of CHA's 15 staff are female and all staff describe their ethnic origin as white/Scottish. Of the four Management Team members, 3 are female and 1 male.
- CHA's 15 strong Management Committee has 11 females/4 males. It has a female Chair, Secretary and Treasurer.

2.9 Statistical data is not available on some equalities groups, however, we will develop our Equalities Monitoring Framework and gather more detailed statistical data to become better informed about the people who use our services and live in the areas we work in. Our Action Plan sets out the steps we intend taking to record and monitor equalities data.

2.10 The Association has a track record of responding to the diversity which exists, our achievements have included:

- providing housing which is suitable for older and disabled people through the development programme;
- communicating effectively with non-English speaking customers through schemes such as Happy to Translate;
- engaging with all sections of the community through joint working with local organisations and community projects such as South Lanarkshire Leader, Healthy Valleys, South Lanarkshire Credit Union and South Lanarkshire Rural Partnership;
- Adopting progressive practices in employment matters.

### **3. Aims and Objectives**

3.1 In developing and implementing policies covering all aspects of our work, CHA will ensure that our strong principles and commitment to equality of opportunity are evident.

3.2 CHA is strongly committed to tackling discrimination, whether direct or indirect. As an organisation which seeks to promote equality, we recognise and encourage diversity.

3.3 We will strive to achieve equality of opportunity and treatment for all in all that we do. We will do this irrespective of any protected characteristic a person might have or be perceived to have.

3.4 We will consider the needs of hard to reach groups and will make reasonable adjustment, if possible, to assist people to access our services.

3.5 We will combat discrimination and adapt the ways that we work to reflect the needs of all sections of our community.

3.6 Our Policy on equal opportunities is based on the following overarching objectives. Later sections of the Equal Opportunities Policy describe our objectives for specific activities.

#### **Overall Equalities Objectives:**

- We will adopt policies, procedures and working practices which are responsive to the needs of all people living, or wishing to live, in our properties.
- We will seek to ensure that our Management Committee and staff translate our equalities objectives into effective action.
- We will make equal opportunities a mainstream part of all of CHA's work, e.g. in relation to:
  - CHA's governance
  - Its role as a landlord and service provider
  - Its employment role
  - The way we work with third parties such as consultants and contractors.
- We will meet our legal obligations, and go beyond these to achieve good

practice in equalities issues.

- We will listen to the views and needs of all sections of the community when reviewing our policies, plans and service standards.
- We will monitor our performance closely to ensure that all groups have equal access and experience fair outcomes.
- We will be open and realistic in identifying where we can make improvements.
- We will communicate our improvement plans to tenants and other stakeholders and will ensure this is reflected in a Communication Strategy.

#### **4. Regulatory and Good Practice Requirements**

4.1 *Regulatory Standards of Governance and Financial Management for Social Landlords* (reviewed by the Scottish Housing Regulator, and published in 2019) require social landlords to act to embrace diversity, promote equal opportunities for all and eliminate unlawful discrimination in all areas of their work. This includes:

- Planning and delivering housing and other services;
- Governance and decision-making;
- Employment practices;
- Contracting with third parties for the provision of goods and services.

4.2 CHA will fully comply with the Regulatory Standards in all aspects of our work.

#### **5. Legal Requirements**

5.1 In line with the Housing (Scotland) Act 2001 CHA operates in a manner which encourages equal opportunities and observes the equal opportunity requirements described in Section 106 of the Act.

5.2 The Association also takes account of all applicable legislation, including the Equality Act 2010 and relevant Codes of Practice issued by the Equality and Human Rights Commission.

5.3 Our Policy recognises the protected characteristics as defined by the Equalities Act:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

5.4 This policy also reflects contractual obligations, for example those contained in our tenancy agreement.

- 5.5 Detailed information about CHA's statutory duties has been made available to our Committee and members of staff.
- 5.6 The main obligations which inform our policy and working practices appear in our Summary of Equalities Service Standards which appear as **Appendix II** of this Policy.

Overall, CHA will ensure that it complies with all relevant statutory and contractual obligations relating to equal opportunities, and to comply with good practice wherever possible. This Policy and our Equalities Action Plan set out specific procedures and actions for achieving this aim.

## 6. Discrimination

- 6.1 We will ensure all of our policies and procedures comply with legislative requirements.
- 6.2 We will ensure that no direct or indirect discrimination results from the implementation of policies and procedures and we will take all reasonable steps to adapt our service delivery where any form of discrimination might occur.

**Direct Discrimination** happens when a person is treated less favourably than another person because of a protected characteristic in the same or similar circumstances. The Equality Act 2010 extends Direct Discrimination to disability but not to pregnancy/maternity and marital status/civil partnerships.

**Indirect Discrimination** happens when a policy, provision, practice or criterion is applied equally to everyone, but:

- it can only be met by a considerably smaller proportion of people from particular equality groups;
- is to their detriment and results in disadvantage and/or exclusion;
- and, cannot be objectively justified.

**Dual discrimination** makes it possible for an individual to claim that they have been directly discriminated against because of a combination and maximum of two protected characteristics, this does not, however, apply to indirect discrimination.

**Discrimination by Association/Perception** - Direct discrimination can also occur when a person is treated less favourably because of a protected characteristic even though that person does not have the characteristic. This includes a person being treated less favourably because they are linked or associated with someone who has a protected characteristic.

## 7. Governance and Representation

- 7.1 Policy Objectives As a community controlled housing association, we wish to be representative of, and accountable to, all sections of the communities we serve and welcome opportunities to include people with Protected Characteristics in our organisation.
- 7.2 Membership of the Association and the Management Committee CHA's area of operation is described in our Rules. Members are eligible to stand for election to the Management Committee, as described in the Rules. The Management Committee annually assesses the skills, knowledge, diversity and objectivity that it needs for its decision-making, what is contributed by continuing governing body members, and what gaps there are that need to be filled. The Management Committee will seek to recruit people who will best fill these gaps.
- 7.3 Membership of the Management Committee also depends on an individual's willingness to attend meetings on a voluntary basis, and to participate in regular learning and development activities.
- 7.4 Being representative in decision-making CHA's approach to ensuring that all sections of the community are represented in its decision-making structures is described below.

### **Community Representation and Accountability:**

- We will monitor trends in the composition of the Management Committee in a non-intrusive way, based on members' age, gender, race and disability.
- We will identify what positive action we can take to promote changes in the composition of the Management Committee.
- We will disseminate information regularly about CHA, its work, how it makes decisions and how people can become involved.
- We will provide opportunities for participation at different levels. For example, if people wish to contribute on particular issues without being members of the Management Committee, we will explore how this can be achieved. This may include supporting individuals or groups, to help develop the skills or confidence people may need before they feel ready to participate in the Management Committee.
- Where we identify barriers to participation, we will set specific objectives and targets, to increase participation by under-represented sections of the community.
- We will provide new members of the Management Committee with induction training and support. We will provide members with ongoing support, where this is needed to ensure their continued involvement.
- When members leave the Management Committee, we will analyse the reasons why.
- We will consider using co-options as a way of including under-represented groups on the Management Committee.
- We will provide all members of our Management Committee with training on equal opportunities and diversity. Members must show a positive commitment to upholding equal opportunities.

## 8. Equal Opportunities in Clydesdale Housing Association's Services

8.1 The following table summarises CHA's equalities aims in providing housing and other services.

### Key Aims – Housing and Other Services:

- To provide fair and equal access to our housing services for all.
- To ensure that nobody suffers disadvantage because of any protected characteristic they might have or be perceived to have. Protected characteristics are:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- To set clear service standards through written policies and procedures.
- To consult in an inclusive way with service users about what service standards should be adopted.
- To communicate effectively with non-English speaking customers through schemes such as Happy to Translate.
- To "equality proof" our service policies and procedures as a matter of routine, so that we identify and act upon any distinctive needs which equalities groups may have
- To measure the outcomes we achieve in practice, for example, this will cover access to services for different sections of the community, the quality of the services they receive, and satisfaction levels with our services.

### Achieving Fair Service Outcomes

8.2 Promoting equal opportunities means more than simply offering the same service to everyone. We will assess how our service policies and practices impact on groups and individuals, to ensure we do not inadvertently disadvantage any section of the community. We will adjust our approach where necessary to achieve fair access to services, and fair service outcomes.

### Policies and Procedures for Housing Services

8.3 Many of CHA's service policies and procedures already state our commitment to equal opportunities. They also describe how we will make adjustments to service delivery methods for people with the protected characteristics described in the Equality Act 2010.

8.4 We will give explicit consideration to equalities issues as part of all policy and service reviews, so that they are a mainstream part of our approach.

### Summary of Our Service Standards

- 8.5 Appendix II provides a summary of our key equalities standards for different service areas. Our policies for the individual service areas provide more information.
- 8.6 Copies of service policies are available from CHA's website. Our service policies can be made available in a range of languages and formats.

## **9. Equal Opportunities in Employment**

### Policy Objectives

- 9.1 CHA recognises that discrimination, both direct and indirect, can occur against disadvantaged groups of people in the field of employment.
- 9.2 We aim to be an equal opportunity employer and adopt fair and compliant processes. This means that we will:
- Ensure we have access to the widest possible labour market;
  - Secure the best employees for CHA's needs;
  - Ensure that no applicant or employee receives less favourable treatment and that, wherever possible, we assist applicants to compete for jobs on a genuine basis of equality and give our staff the help they need to attain their full potential;
  - Achieve an ability-based workforce which welcomes diversity.

### Legal Obligations and Good Practice

- 9.3 CHA will comply with the Equality Act 2010 and the Equality and Human Rights Commission's Guidance for Employers launched in July 2010 which provides practical advice on recruitment.
- 9.4 We will ensure that the procedures we follow in all aspects of employment are fully consistent with the Guidance, specifically:
- Vacancy advertising;
  - Selection and recruitment, including health screening;
  - Training;
  - Conditions of service;
  - Reasons for termination of employment.
- 9.5 CHA aims to participate in the "Positive about Disabled People" scheme will make the following commitments:
- Interview all applicants with a disability who meet the minimum criteria for a job vacancy and consider them on their abilities;
  - Ensure there is a mechanism in place to discuss, at any time, but at least once a year, with disabled employees what we and they can do to make sure they can develop and use their abilities;
  - Make every effort when employees become disabled that they stay in employment;
  - Take action to ensure that all employees develop disability awareness;

- Review our commitments on a planned basis, as detailed in our Equalities Action Plan to:
  - consider what has been achieved;
  - plan ways to improve;
  - let employees and the Employment Service know about progress and future plans.

9.6 We will make any reasonable adjustments which might allow someone with a physical disability to work at CHA.

#### Employment Procedures

9.7 We operate employment procedures based on the “industry standard” models published by Employers in Voluntary Housing. The following section provides a summary of the overall policy on which our procedures in key aspects of employment are based.

#### Vacancy advertising

9.8 Wherever possible, we will advertise vacancies simultaneously, internally and externally. We will aim to ensure that underrepresented groups are made aware of vacancies. All vacancy advertisements will include an appropriate short statement on equal opportunity.

#### Selection and recruitment

9.9 We will use selection criteria based on job descriptions and employee specifications. These will focus on essential skills for the effective performance of the job.

9.10 We will keep job descriptions and person specifications under regular review to ensure they continue to be consistent with our non-discriminatory objectives.

9.11 All participants in selection interviews and the recruitment process will have received training in equal opportunities. Wherever possible, more than one person will be involved in the selection interview and recruitment process. We will make selection and recruitment decisions with reference to the job descriptions and person specifications for the post. We will also record reasons for selection and rejection of candidates for vacancies.

9.12 We will only ask health related questions to allow us to assist candidates during the recruitment process and to ensure reasonable adjustment can be made to accommodate the person and to ensure the person is able to carry out essential aspects of the role.

9.13 CHA’s recruitment procedures provide further guidance for those involved in selection and recruitment.

### Positive action - Training, Promotion and Conditions of Service

- 9.14 We will encourage underrepresented groups to apply for training and employment opportunities with CHA. Where appropriate, we may provide training for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. Recruitment to all jobs will be strictly on merit.
- 9.15 Wherever possible, we will remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the needs of disadvantaged and/or underrepresented groups.
- 9.16 CHA has adopted flexible working arrangements. We will respond as positively as our resources allow to the diverse needs of our workforce, to help them achieve an appropriate balance between work and home life.

### Personnel and monitoring records

- 9.17 We will collect monitoring information about the profile of employees and job applicants, to help assess whether its policy aims are being achieved.
- 9.18 We will analyse this information on a regular basis to identify any required action to eliminate discrimination and promote equality of opportunity. We will follow procedures which reflect the law on data protection and access to personal information. The procedures will involve:
- Recording the composition of selection panels;
  - Asking all job applicants to complete a monitoring form which provides information about their ethnic origin, and disability;
  - Analysing the overall profile of the workforce in relation to ethnic origin, gender, age and disability, to help identify under-represented groups;
  - Analysing outcomes in recruitment and promotions;
  - Maintaining records of selection processes for at least twelve months after an appointment has been made;
  - Destroy individual job applications for unsuccessful candidates after 6 months.

### Harassment

- 9.19 CHA's Code of Conduct for Staff aims to ensure that no employee is subjected to any form of harassment. In accordance with this Policy and the Code of Conduct CHA will take positive action to counter harassment should it occur.

## **10. Equal Opportunities in Contracts with Third Parties**

### Policy Objectives

- 10.1 CHA wishes to promote equality across all of its activities. This applies whether we deliver services direct or if we contract elements of our work to contractors, sub-contractors, voluntary organisations or consultants.

### Summary of our policy actions

- 10.2 We will make contractors and consultants aware of our overall policy on equal opportunities and of any specific requirements which are relevant to the works or services which are being procured.
- 10.3 We will specify particular requirements relating to the conduct of employees, customer satisfaction, and overall standards of customer care.
- 10.4 We will aim to employ contractors and consultants who meet our requirements. This will always involve asking potential contractors and consultants to provide details of their equal opportunities policies. For small organisations employing less than 10 people, it will be acceptable for the organisation to confirm its willingness to operate in accordance with our policy and any additional requirements which are specific to the nature of the contract.
- 10.5 Where a potential contractor or consultant has 10 or more employees, we will expect the company to demonstrate its performance in equalities issues. This includes:
- Information on the ethnic origin and gender of directors and employees;
  - Whether the organisation's premises are accessible to disabled people;
  - Details of any action the organisation has taken to promote equality of opportunity in the recent past;
  - How acts of discrimination or harassment by employees are dealt with in the organisation's employment policies;
  - Compliance with the Equality Act 2010;
  - What steps the organisation has taken to prohibit discrimination, harassment and victimisation due to a protected characteristic as defined by the Equality Act 2010.
- 10.6 We will use equalities clauses in contract documentation. These will require contractors and consultants to comply with CHA's policies in relation to equal opportunities, discrimination and harassment, in relation to other employees, tenants and members of the public and CHA's employees.
- 10.7 CHA will remove organisations from its contracts if there are serious or persistent breaches.

## **11. Implementing the Equal Opportunities Policy**

### Management Committee and Staff Responsibilities

- 11.1 CHA's Management Committee is responsible for approving the Equal Opportunities Policy, and for reviewing the results which are achieved.
- 11.2 On a day to day basis, CHA's Chief Executive and Management Team have lead responsibility for ensuring that the policy is implemented effectively.
- 11.3 Every member of staff and of the Management Committee is responsible for ensuring that CHA's Policy is applied in practice.

- 11.4 We will provide training to all members of staff and Committee about equal opportunities including our policy and Action Plan and Equalities Service Standards, this will include Diversity Awareness training.
- 11.5 Staff and Committee members involved in recruitment will receive specific training relating to employment and staff with policy responsibilities will attend training on Equality Impact Assessments and Equality Proofing.
- 11.6 We will provide a copy of this Policy statement to all employees, and will clearly communicate requirements to new employees as part of induction procedures. All employees and Committee members will be required to provide a signed statement confirming that they have read and understood the policy and will comply with it.
- 11.7 We will regard behaviour or actions which are inconsistent with this Policy, or the values on which it is based, as serious matters. CHA's Codes of Conduct for Committee members and staff members provide further information about the standards of personal conduct which are required, and the possible consequences of failing to uphold equal opportunities.

#### Equalities Action Plan

- 11.8 Our Equalities Action Plan covers a 3-year period and sets out the specific equalities objectives across all aspects of CHA's work. The Action Plan:
- Details the actions we will take to meet these objectives and achieve continuous improvement in performance;
  - Includes targets and performance indicators which describe the outcomes we are aiming to achieve.
- 11.9 We will conduct a half-yearly review of the Action Plan during the first year (2016/17) and annual reviews thereafter to assess the progress we are making.

#### Equalities Monitoring

- 11.10 We will collect and analyse data about the characteristics of the people using our services, or who are involved in the management of CHA.
- 11.11 We will use monitoring information to:
- highlight possible inequalities;
  - allow the underlying causes to be investigated;
  - remove any unfairness or disadvantage.
- 11.12 We will monitor CHA's performance in the following areas:
- access to, and satisfaction with, services based on ethnicity and disability;
  - whether our membership, governing body and employees are representative of the communities we serve based on ethnicity, disability, gender and age.
- 11.13 We will gather information in a non-intrusive way and will not collect sensitive information such as people's sexual orientation, religion or political beliefs. Such information is of limited value in measuring CHA's performance. CHA will not,

however, tolerate discrimination against service users, governing body members or employees on these or any other grounds covered by this Policy.

#### Measuring and reporting our performance

11.14 We will monitor its performance in implementing its Equal Opportunities Policy and Equalities Action Plan at a number of levels:

- Equalities outcomes will be recorded and considered following recruitment exercises for individual posts;
- Performance in service delivery will be monitored on an ongoing basis by the Management Team. This will generally involve monitoring practice and outcomes in individual service areas for a finite period.
- An annual report will be presented to the Management Committee, summarising performance in achieving the objectives and targets in the Equalities Action Plan. This will include information about:
  - The profile of CHA's staff and governing body;
  - Housing applications and allocations;
  - Satisfaction with services;
  - Evictions;
  - Reports of racist incidents and outcomes;
  - Reports of harassment on other grounds and outcomes;
  - Complaints by service users.

11.15 We will report on our performance to tenants and other service users, through the CHA's Annual Report and newsletters, and at relevant public events.

## **12. General Data Protection Regulators**

12.1 The Association will treat personal data in line with our obligations under the current data protection regulations and our own Equal Opportunities Policy. Information regarding how your data will be used and the basis for processing your data is provided in Clydesdale Housing Association's Privacy Policy.

## **13. Continuous Improvement**

13.1 CHA is committed to achieving continuous improvement in its equal opportunities performance.

13.2 The Equalities Action Plan will be reviewed annually, as described above and will be monitored on a 6-monthly basis in line with our Performance Management Framework.

13.3 We may alter targets, procedures and working methods outside the policy review cycle, where monitoring of policy outcomes indicates that this is needed.

13.4 In revising this Policy, we will take account of any views or representations from local people, groups and organisations and we will also seek feedback from tenants about the operation of the policy through regular satisfaction surveys and any other appropriate methods.

## **14. Policy Review**

- 13.1 This Policy will be reviewed every 3 years or sooner if there are any legislative changes.

## Appendix I: Geographical Stock Breakdown

Town	Number of tenants
Abington	18
Biggar	59
Blackwood	14
Braidwood	24
Carluke	255
Carnwath	32
Carstairs Village	28
Coalburn	18
Kirkfieldbank	30
Lanark	124
Leadhills	8
Lesmahagow	44
Rigside	34
Symington	22
Tarbrax	5
Thankerton	22
Woolfords	2
<b>Total</b>	<b>739</b>

## Appendix II – Equalities Standards for Housing and Other Services

### Key Aims – Housing and Other Services:

#### General

- We will provide fair and equal access to our housing services for all.
- We will ensure that nobody suffers disadvantage because of any protected characteristic they might have or be perceived to have. Protected characteristics are:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- We will comply with all anti-discrimination measures contained in the Equality Act 2010 and the Equalities and Human Rights Commission's Guidance.

## Access and Allocations

- We will provide information freely about the availability of housing, and how to apply for housing.
- Information about access and allocations will be made available in other languages and formats, in accordance with customers' needs.
- We will operate an allocations policy which is clear, comprehensive and which provides equal access for all to our housing list.
- Our allocations policy will give priority to meeting extreme forms of housing need which some applicants may be experiencing, for example, victims of racial harassment and domestic abuse (including same sex relationships), and disabled people with urgent rehousing needs.
- We will maintain records of housing which is suitable for disabled people, to facilitate the matching of people and accommodation.
- We will monitor the number of lets made to Black and Minority Ethnic and disabled applicants, average waiting times, and the demand attributes of the houses allocated to these groups.
- All allocations decisions will be scrutinised by a second member of staff, to minimise the risk of inadvertent discrimination.

## Tenancy Agreements and Procedures

- Tenancy agreements will be made available in alternative languages and formats, to meet customers' needs.
- We will conduct tenancy sign-up meetings in the customer's first language, where required.
- In tenancy management matters, we will consider the support needs of disabled tenants with learning difficulties or mental health problems.

## Repairs and Maintenance

- We will ensure that all tenants receive a high quality service, as described in our Repairs and Maintenance Policy.
- We will assess periodically (through comprehensive tenant satisfaction surveys, and ad hoc monitoring exercises) the quality of service provided to equalities groups. This will focus on repairs response times and satisfaction levels for Black and Minority Ethnic and disabled tenants
- We will maximise the range of methods available for making rent and factoring payments.

## Arrears management and tenancy terminations

- We will establish personal contact with tenants in arrears. In doing so, we will accommodate any language or other communication needs the tenant has.
- We will monitor the frequency with which legal action, including evictions, is taken against disabled or Black and Minority Ethnic tenants, relative to the tenant population as a whole.

## Harassment

- The Association will ensure through its policy on anti-social behaviour that all tenants are protected from harassment and nuisance.
- We will operate a robust policy to deal with harassment. As part of our policy we will:
  - monitor the number of incidents and the Association's response.
  - ensure that all allegations are investigated and acted upon.
  - ensure that victims are supported and kept informed and up to date.
  - co-operate with the police and other agencies on the collection, recording and exchange of information.
  - work with community groups to help provide support to victims.
  - work in partnership with local agencies to develop anti-racist and crime prevention strategies.
- We will deal firmly with any cases which involve a tenant being subject to harassment due to a protected characteristic, for example, where a disabled person is subject to harassment or where lesbian and gay people are harassed because of their sexuality.

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## **Development Programme and Clydesdale Housing Association's housing stock**

- We will carry out regular assessments of local housing needs to inform the types and sizes of houses provided through our development programme, giving consideration to the housing needs of all sections of the community.
- Our assessment of housing needs will be informed by consultation with equalities groups, by the Council's Local Housing Strategy, and by the results of community care locality planning.
- We will adopt design standards which allow tenants to minimise their dependence on others and maximise choice in their daily life.
- We will seek to respond to people's changing needs over time rather than moving them from their existing home.
- Houses modernised or built by the Association will be based on the achievement of barrier free standards, to maximise the accessibility of our housing stock
- We will carry out an ongoing programme of adaptations to existing properties, to meet the needs of tenants with disabilities.

## Consultation, Communication and Customer Care

- We will actively seek to involve all sections of the community in the way in which the Association sets and reviews service standards, e.g. through the Tenant Participation Strategy, or through specific initiatives aimed at particular groups of service users.
- The Association will investigate and welcome opportunities to involve people with Protected Characteristics and will be open and proactive in seeking to involve people from all sections of the community.
- Information about our services will be made available in formats and languages which are appropriate to the communication needs of all current and potential service users.
- We will communicate effectively with non-English speaking customers through schemes such as Happy to Translate.
- Where information is prepared specifically to meet an individual's particular needs, we will ensure that this is done as quickly as possible.
- We will actively publicise our complaints policy and procedures to all service users. We will monitor periodically the extent to which the policy is being used by different sections of the community, and whether the policy is being applied fairly.
- Our staff will treat all customers with respect and courtesy. We will provide staff with regular training to promote awareness of disability, different cultures, languages, social conventions and lifestyles and the needs of disadvantaged groups.

- Contractors or consultants employed by the Association will be required to observe the Association's standards in relation to the general conduct of their employees, to prevent acts of discrimination or harassment towards our tenants or members of the public.