



**Policy Title:** Equality and Diversity Policy

**Policy Manual Section:** Governance

**Policy Number:** GO7

**Date Approved by Management Committee:** 27 March 2013

**Next Review Date:** March 2017

# GOVAN HOUSING ASSOCIATION LIMITED

## EQUALITY & DIVERSITY POLICY

### 1.0 INTRODUCTION

- 1.1 This document outlines the Association's Equality and Diversity policy. It updates the previous Equality and Diversity Policy which was approved by the Management Committee in November 2009. An Equality Impact Assessment is given in Appendix 1 for information.
- 1.2 The policy is supported by an action plan which sets out what the Association will do on a day-to-day basis to help ensure that the policy's objectives are achieved and that the Association can be proactive in its work in equality and diversity. Appendix 2
- 1.3 To help us ensure that those wishing to use our services, which includes the general public, tenants and contractors as well as our employees, are clear about our commitment to equality of opportunity, the Association will:
- a) Place a notice in the office reception and interview room publicising the policy's existence and that it is available in a variety of formats
  - b) Feature the new policy in the one of the newsletter before September 2013 and explain the main elements of the action plan in a newsletter before the end of July 2013 and on our website, [www.Govanha.co.uk](http://www.Govanha.co.uk)
  - c) Continue to ensure that staff and committee receive appropriate training in the area of equality and diversity

### 2.0 LEGAL, REGULATORY AND GOOD PRACTICE FRAMEWORK

- 2.1 This Policy on Equality and Diversity takes account of legal, regulatory and best practice requirements, including (but not limited to):
- a) Equality Act 2010
  - b) Human Rights Act 1998
  - c) The Housing (Scotland) Act 2010
  - d) Section 9 of Raising Standards in Housing
  - e) The Scottish Social Housing Charter Outcome Number 1
  - f) Section 5.3 of the Regulatory Standards of Governance and Financial Management
  - g) **"Getting the Balance Right"**<sup>1</sup>

The Equality Act 2010 consolidates much of the previous equalities-related legislation into one single Act. It therefore replaces for example, the Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995.

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<sup>1</sup> Published by the Scottish Federation of Housing Associations in November 2011

- 2.2 The Scottish Government published the Scottish Social Housing Charter in March 2012 and it came into effect on 2 April 2012. The Government's commitment to ensuring that RSLs behave in a way that promotes equality and diversity and seeks to eliminate discrimination is characterised by the fact that Outcome Number 1 addresses Equalities.
- 2.3 At the same time as the Charter, the Scottish Housing Regulator introduced the Regulatory Standards for Governance and Financial Management. Section 5 requires RSLs to conduct their affairs with honesty and integrity and, within this, RS5.3 requires RSLs to pay "*due regard to the need to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements*".
- 2.4 The Charter and Regulatory Standards essentially combine to replace Performance Standards for RSLs.
- 2.5 The Management Committee wishes to be clear, however, that its work in equalities is motivated by a belief and commitment to ensuring equal opportunities for all, and to do all that is reasonably can in this regards – we are doing it because we want to and not because we have to. Whilst we will make reference to legal, regulatory and best practice requirements to ensure that we are not placing the Association at risk of a legal or regulatory breach, our main motivation in reviewing the policy is because we want to continue to improve our approach in this area.

### **The Equality Act 2010**

- 2.6 The Equality Act 2010 is the main piece of legislation relating to equalities. It was passed by Westminster Government and therefore applies throughout the UK. It has two main aims: the first is to harmonise previous pieces of anti-discrimination legislation and the second is to strengthen and extend the law in a number of respects.
- 2.7 There has been some debate as to how the Act applies to registered social landlords as it is not clear whether RSLs are public authorities for the purposes of the Act – Schedule 19 Part 3 of the Act defines a Scottish Public Authority and RSLs are not expressly included in this. However, Govan's view is that we should seek to comply with the principles outlined in the Act and that our work in the area of equalities should always reflect the spirit of the Act. The Housing (Scotland) Act 2010 requires RSLs to observe prevailing equalities legislation in any case.
- 2.8 The National Housing Federation highlights the undernoted areas as the main ones in the Act to be relevant to RSLs as:
- Protected characteristics (see section 3.2)
  - The definitions of unlawful discrimination
  - The disability related aspects
  - The provision of goods, facilities and services
  - Positive action and the genuine occupational requirements
  - Employment related matters and pay reviews
  - The duties to advance equality
  - Tackling socio-economic inequalities
  - Procurement

### 3.0 POLICY STATEMENT, GENERAL PRINCIPLES AND PROTECTED CHARACTERISTICS

3.1 The policy has two main aims:

- To ensure that no person, group of persons or organisation who deals with the Association in any way or who requires a service, assistance or advice from the Association, or who is employed by (or serves) in any capacity by the **Association**<sup>2</sup>, is treated less favourably than any other person, group of persons or organisation – put more simply, anyone who has any sort of contact with Govan Housing Association.
- To promote the policy so that anyone dealing with the Association in any capacity is made aware that the Association has a policy and that there is a zero tolerance of any act which contravenes the policy/policy principles in any way.

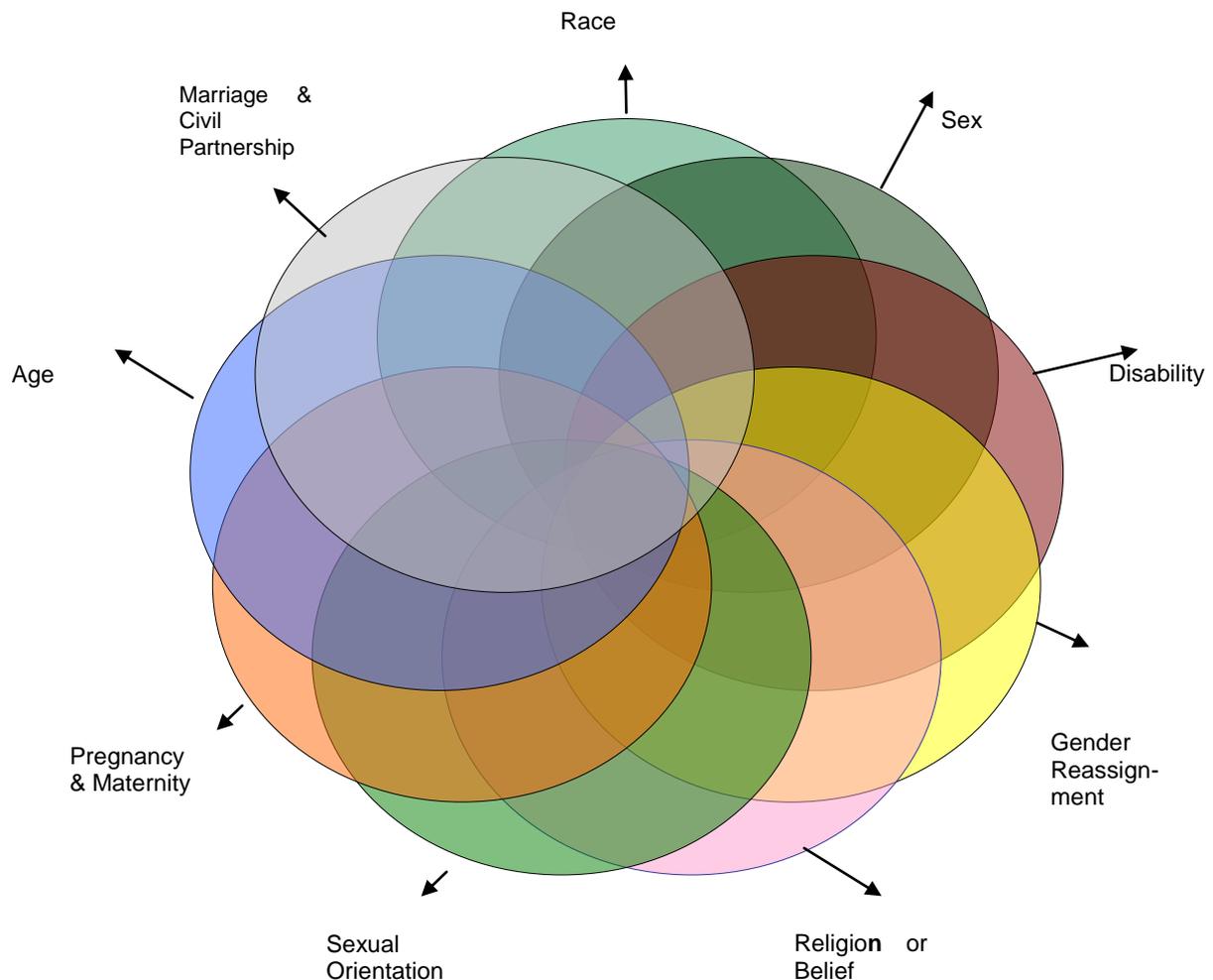
3.2 We will seek to promote and to achieve equality of treatment and opportunity for all groups in society without discrimination or prejudice on any grounds. The Equality Act introduces the term “protected characteristics” to describe groups against whom any sort of discrimination is unlawful. Section 4 of the Act specifies nine protected characteristics:

- Age
- Disability
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Gender (referred to as “sex” in the Act)
- Gender Reassignment
- Sexual Orientation

In addition, the Act recognises that unlawful discrimination can occur because of a combination of protected characteristics and so people will be able to make a claim because they are both female and disabled or black and gay. The diagram on the following page was used by Employers in Voluntary (EVH) in their October 2011 model Equality and Diversity policy and shows how protected characteristics can overlap.

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<sup>2</sup> This includes committee members, contractors, consultants, agents and anyone attending in a voluntary capacity for work experience.



3.3 The Association is keen to emphasise, however, that it will not tolerate any sort of unfair treatment or discrimination on any grounds. In addition to the above, therefore, our zero tolerance will be broadened (but not confined) to the following:

- National Origin
- Cultural Background
- Ethnic Origin
- Tenure
- Issues related to literacy or numeracy
- Employment status
- Domestic circumstances

Each of the above is equally important, and we will take all reasonable steps to ensure that no discrimination, whether deliberate or inadvertent occurs.

3.4 To help achieve the main aims as outlined in section 3.1, the Association has devised the following six statements, which will form the basis of the separate action plan.

- a) Ensure that no one is discriminated against on the basis of any of the nine protected or seven other characteristics noted above

- b) Ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services.
- c) Actively assist disadvantage minority groups within the local community to benefit from its housing services
- d) Ensure equality of opportunity and treatment for all people in relation to the employment of staff
- e) Ensure that all staff are aware of the Association's commitment to, and obligations in relation to equality and diversity
- f) Be mindful of its equalities commitments in relation both to the procurement of contractors/consultants and to the composition and operation of the Management Committee

## **4.0 TYPES OF DISCRIMINATION**

4.1 The 2010 Act contains seven types of discrimination, and these are discussed in sections 4.2a to g. We have also added an eighth category, institutionalised discrimination, for the purposes of this policy and this is outlined in section 4.2h.

### **4.2 Discrimination**

#### **a) Direct Discrimination**

This is less favourable treatment of an individual or group less favourably than others, and this treatment is because of a protected characteristic. An example of this would be to refuse to employ somebody because they had an impairment, which had no relevance to their ability to carry out the job they had applied for.

#### **b) Associated Discrimination**

This is direct discrimination against someone because they are associated with another person who possesses a protected characteristic. For example, a non-disabled person is discriminated against because they need to take care of disabled dependent.

#### **c) Discrimination by Perception**

This is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name on their application form.

**d) Indirect Discrimination**

This is when an apparently neutral requirement or condition impacts adversely or has a disproportionate effect on a particular equality group. An example of this could be holding meetings at times which are inconvenient for people with child care responsibilities and not providing crèche facilities.

**e) Harassment**

This occurs when a person engages in unwanted conduct which is related to a protected characteristic, and which has the purpose or the effect of (i) violating the dignity of another person or (ii) creating for that person an intimidating, hostile, degrading, humiliating or offensive environment. An example might be displaying a topless calendar on a wall where this makes the workplace an offensive place to work for any employee.

**f) Harassment by a Third Party**

As an employer, the Association is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant.

**g) Victimisation**

This occurs when someone faces discrimination because she or he has made an allegation of unlawful discrimination or because of assisting or supporting a complainant. An example might be refusing to consider someone for a promotion because they gave evidence on behalf of a colleague who made a complaint of unlawful race discrimination.

**h) Institutionalised Discrimination**

This was first defined in the context of racism and exemplified in the Macpherson report on the inquiry into the death of Stephen Lawrence as “the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviours which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.”

The Association extends the above to cover all actions where these are related to a protected characteristic.

**5.0 POSITIVE ACTION**

5.1 The Act outlines two types of positive action which, in certain circumstances, are permissible:

- General
- Recruitment and Promotion

- 5.2 If the Association believes that persons who share a protected characteristic suffer a disadvantage or have different needs because of that characteristic, then action may be taken to help overcome the disadvantage or address the needs. The Act points out that any action should be proportionate.
- 5.3 An example could be addressing imbalances in the workforce by encouraging members of under represented groups to apply for jobs. Positive action may be applicable in setting equality targets aimed at encouraging people from a particular group or groups to apply for a vacancy in but no quotas will be set.

## **6.0 EQUALITY IMPACT ASSESSMENT**

### **Context**

- 6.1 Because equality and diversity issues are fundamental to how Govan Housing Association works and thinks, the Management Committee has decided to carry out a programme of Equality Impact Assessments (EqIA) on its policy documents. It would be impractical to do all of these at once and so our approach will be to carry out the impact assessments as policies are being reviewed. The EqIAs allow the Association to take proactive steps to identify and remove potential discrimination or, in some cases, the relevant action will be to adapt a policy or practice to better advance equality. It is important to recognise that providing the same service in the same way to everyone can sometimes create a disadvantage.
- 6.2 The Equality and Human Rights Commission in Scotland states that a policy or practice which proactively considers equality, particularly using relevant evidence and consultation or involvement, is likely to be a better quality policy in terms of it being more responsible to the needs of those affected. It further recognises that EqIA helps mainstream equality consideration into policy and decision-making, and this is something that the Association has previously promoted in its equality policies.

### **Policies Subject to Equality Impact Assessment**

- 6.3 The Association will apply a screening process to determine which policies should be subject to impact assessment. This is not an exact science and some judgement therefore needs to be used, but the approach is to ask the undernoted questions to every policy. Where the answer to any one question is “yes”, then an impact assessment will normally be carried out.
- a) Does the policy affect service users, employees or the wider community, and therefore potentially have a significant effect in terms of equality? The relevance of a policy will depend not only on the number of those affected, but also the significance of the effect on them.
  - b) Is it a major policy, significantly affecting how functions are delivered in terms of equality?
  - c) Does it relate to policy areas or issues that previous consultation or involvement activities have identified as being important to particular protected groups?

- d) Does it relate to an area where the Association has identified a need to improve equality outcomes?
- e) Does it relate to an area where there are known inequalities?
- f) Does it relate to a policy where there is significant potential for reducing inequalities or improving outcomes?

6.4 It is expected that EqIAs will be applied to all of our service delivery policies as a minimum.

### **Format of the Impact Assessment**

6.5 All policies subject to an impact assessment will have an individual assessment. (See Appendix 1).

### **Aims of the policy**

6.6 The following questions will be asked and the responses noted in a table:

- What is the purpose of the policy?
- Target audience(s) – who is affected by the policy or who is intended to benefit from the policy, and how?
- Who is responsible for delivering the policy?
- How does the policy fit into our wider or related policy objectives?
- Is there a financial cost to the Association to implement either the EqIA or the policy.

### **Target Audience(s)**

6.7 What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience? The outcomes in the policy are to be available to all tenants and other customers regardless of factors such as (but not limited to ) their age, disability, gender, marital status, sexual orientation, race, religion or belief, marriage or civil partnership, or pregnancy/maternity. Each target audience should be **identified**<sup>3</sup> and the following should be addressed:

- Comment on what the information we have tells us about how the policy in question might impact positively or negatively on the different groups within the target audience(s).
- Identify whether the policy provides an opportunity to promote equality and diversity or good relations by altering the policy or working with others.
- State whether a further impact assessment is required to be carried out and state the timeframe for this.
- Highlight any follow up action not already programmed and state the timeframe for this.

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<sup>3</sup> The target audiences will often, but not necessarily, be all of the protected characteristics groups.

## **Follow-up Action**

- 6.8 Where there is a need for follow-up action, the tasks and timeframe for achieving them need to be noted in this section. Tasks therefore need to be incorporated into the Equality and Diversity Action Plan to ensure that they are addressed.

## **Impact Assessment on Equality and Diversity Policy**

- 6.9 The impact assessment for this policy is contained at Appendix 1.

## **7.0 RISK MANAGEMENT**

- 7.1 The Association recognises the potential risks should we fail to adhere to the Equality and Diversity Policy and/or the accompanying Action Plan. It is not only the Association's credibility that would be compromised, but that of the Management Committee should there be a major deviation from policy, and possibly even the sector as a whole. In order to combat this, Section 14 of this policy outlines the method of investigation that would be adopted should any allegation of a breach be made.

## **8.0 COMMUNICATIONS IN ALTERNATIVE FORMATS**

- 8.1 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually-impaired resident may not be able to read a policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is all the more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.

- 8.2 To help combat this, the Association will provide information to customers in any special formats a required. Special formats may include:

- Large print
- Audio tape or CD
- Translations into community languages
- Use of language or sign interpreters
- Braille

Please note that it is impractical to have all possible formats available immediately. Our commitment therefore relates to the ability and willingness to produce documents in the formats required (or an interpreter if requested) within a period of three days. All costs in relation to this will be borne by the Association.

- 8.3 During the development of this policy, we consulted with the Royal National Institute for the Blind (RNIB) on font size. The RNIB confirmed that the Association's current approach of all letters, policies and information being produced in 12 point Arial as standard with larger font available on request complies with their Clear Print Guidelines. This will therefore remain our policy but, as part of the Equality and Diversity Action Plan, we will discuss how we can identify more customers who would benefit from receiving all communications from us in large font.

- 8.4 To ensure that this strategy is effective, the availability of documents in other formats will be publicised on our website and on the notice board within the interview rooms.

## **9.0 PUBLICISING THE EQUALITY AND DIVERSITY POLICY**

- 9.1 It is absolutely critical that the policy is publicised if it is to stand any chance of being successfully implemented. The level of interest in the policy will vary from one person to another depending on a whole range of factors. To help respond to this, we will publicise the policy widely, including placing an article in Govan's Newsletter.
- 9.2 All employees, applicants for employment and contractors will be notified of the existence of the policy and will be asked to familiarise themselves with it within a week of it being approved, or within five days of returning to work for anyone who is absent when the policy is reviewed (the Chief Executive will send an email attaching the policy to all staff informing them that it has been approved). Staff training will take place within three months of the policy being approved and staff will be encouraged to raise any queries they have relating to the policy to their line manager in the first instance.
- 9.3 Copies of the policy will automatically be provided for successful job applicants within their Induction and Staff Handbook and contractors being used by the Association within the Application Pack.
- 9.4 Committee Members will continue to receive on-going equality and diversity training and will be involved in approving the final document. All members will be encouraged to keep up to date with development in the area of good practice in equality and diversity.
- 9.5 Anyone wishing to inspect the Equality and Human Rights Commission (EHRC) Code of Practice on Racial Equality in Housing can view this in the Association's office or download a copy from the Association's website, [www.Govanha.co.uk](http://www.Govanha.co.uk) or directly from the EHRC

## **10.0 TARGET SETTING – GENDER, RACE, AGE AND DISABILITY**

- 10.1 Whilst embracing the principles of equality and diversity is something that the Association takes very seriously, it is nonetheless important that there is some system in place to demonstrate that we actually achieve our objectives (or perhaps more importantly, to highlight areas where we do not). In other words, we must ensure that this policy statement is not used merely to pay lip service to equality and diversity.
- 10.2 One of the ways of doing this is to develop a set of targets against which our performance can be quantified. Crucially, however, we will seek to set a range of targets that are realistic and achievable for the Association, otherwise the Committee risks a seemingly poor performance in this area.
- 10.3 It is proposed that we incorporate targets in the following areas within the Internal Management Plan and evaluate the position every twelve months, with figures being compared with the APSR.

- a) Gender imbalance
- b) Age-maintain good age representation on the Management Committee
- c) Proportion of different groups on waiting list versus tenants
- d) Disabled people on Management Committee

## **11.0 IDENTIFYING PROBLEMS AND TAKING REMEDIAL ACTION**

- 11.1 Because the Association is reviewing progress against the Equality and Diversity Action Plan on an annual basis, areas where there may be problems will be flagged up so that remedial action can be taken.
- 11.2 It is not possible to be prescriptive about how the Association should identify problems and take appropriate action in this policy statement as there are too many potential outcomes, all different from each other. The general process to be followed by staff is:-
- a) Advise Committee of the underachievement
  - b) Outline action already taken to achieve the objective
  - c) Make suggestions for further action, in consultation with other RSLs who may have solved similar problems
  - d) Agree refinements to the Equality and Diversity Action Plan and implement these
- 11.3 Realistically, it may emerge that some tasks are difficult to achieve and this is something that the Association recognises. This does not mean, however, that we will cease trying to achieve these. The Association will do all that is possible and reasonable to ensure that equality and diversity targets are met.

## **12.0 STAFF AND COMMITTEE RESPONSIBILITIES**

- 12.1 Ultimate responsibility for ensuring that the Association conforms to the principles outlined in this policy and strives to achieve the targets set lies with the Management Committee.
- 12.2 Responsibility for ensuring that Committee is kept adequately informed of progress and alerted to any areas of underachievement lies with the Association's Chief Executive. It will therefore be the Chief Executive's responsibility to ensure the quality and completeness of information and recommendations being presented to the committee.

## **13.0 DISSEMINATION OF KEY TARGETS AND PERFORMANCE**

- 13.1 The Committee will consider an annual report on equality and diversity at its April or May meeting. This will be produced by the Chief Executive and will be based on the outturn figures to the end of March.
- 13.2 In July, this performance will be summarised in the "Annual Statement on Equality and Diversity". This will be distributed to all tenants and members by way of a newsletter and posted on the website.

13.3 The Association will report clearly on its performance, and this will include highlighting areas where targets have not been met.

#### **14.0 BREACHES OF THE EQUALITY AND DIVERSITY POLICY**

14.1 The Association has a policy of zero tolerance as far as discriminatory practices and breaches of equal opportunities are concerned.

14.2 Any allegations against a member of staff or committee will therefore be investigated thoroughly by the Association's Chief Executive. If the allegation is made against the Chief Executive, the investigation will be conducted by the Chairperson and the most senior officer not directly involved or by an independent investigator.

14.3 Before the investigation begins, the Association will seek advice from the Association's solicitor.

14.4 The member(s) of staff/committee member(s) should be advised of the allegations and informed of what action the Association is planning to take by way of investigation. They should also be advised to contact an independent representative, such as a solicitor or trade union representative.

14.5 The Association's disciplinary procedures should then be followed as appropriate.

14.6 If the allegation is against a resident of the Association's property, the Chief Executive should ensure that the solicitor is contacted for advice (as there may be tenancy implications under certain circumstances).

#### **15.0 BUDGETS & AFFILIATIONS**

15.1 The Association will have an annual budget to cover training on any revised issue dealing with Equalities and Diversity. In order to keep up to date with good practice in equalities.

#### **16.0 POLICY REVIEW**

16.1 As a strategic document, the Association's Equality and Diversity Policy will be reviewed every three years. The next review will therefore take place in March 2016.

16.2 As an operational document, the Equality and Diversity Action Plan will be reviewed by the Management Committee annually.

## EQUALITY IMPACT ASSESSMENT

### 1.0 Aims of the policy

1.1 The aims of the policy and other key details are noted below:

<b>TITLE OF POLICY</b>	<b>Equality and Diversity Policy</b>
<b>Strategic Outcome</b>	1. To maximise participation, consultation and social inclusion in the delivery of our services.
<b>What is the purpose of the proposed policy?</b>	<ul style="list-style-type: none"> <li>• To clearly outline and promote to staff, customers, partners and stakeholders the Association’s commitment to equality and diversity in all it’s services and how this will be delivered and measured to ensure compliance.</li> <li>•</li> </ul>
<b>Protected Characteristic Groups Affected By the Policy</b>	<p><b>Age</b> To help ensure that age is not directly or indirectly a consideration when delivering our services, we will remove referral to age from our job applications to mitigate risk from age discrimination, we will positively promote equality of opportunity to all staff, we have removed reference to retirement at a specific age and instead promote this to be a personal choice. We robustly require our partners and contractors, as well as staff and Committee, to adhere to similar equality friendly polices and procedures.</p> <p><b>Disability</b> The Association’s staff are trained in relation to equality and diversity good practice. Similar to age, however, the Association recognises that there could be a risk that discrimination in relation to disability could be a factor when delivering our services or in relation to recruitment. In consequence, steps have been included within this Policy to mitigate these risks.</p> <p>These steps include: Being a member and demonstrating a commitment to the job centre plus’ “Positive About Disabled People” scheme; Ensuring the office is barrier free and we are proactive about this; Holding refresher awareness training on a regular basis to ensure staff are aware of good practice.</p> <p><b>Marriage and Civil Partnership</b> As noted above, the Association recognises that</p>

discrimination, directly or indirectly, in relation to marriage and civil partnership could feature during the Association's activities. Details of marital status of any applicant for a new post with the Association will not be requested at any stage of the process and all equality information will be removed prior to short -listing to mitigate the risk of discrimination of any kind.

### **Pregnancy and Maternity**

It is recognised that discrimination relating to pregnancy and maternity may occur in delivery of our services either directly from staff or via one of our partners or sub-contractors, despite our promotion of championing equality. To reduce the risk of any such discrimination, we will ensure that all contractors hold and administer robustly an equality and diversity policy to ensure fairness for all and mitigate risk of unfair treatment occurring. We also aim to ensure that our message is clear on our expectations in relation to compliance with the Tenant's Charter and the Scottish Housing Regulator's Regulatory Framework. To support this, staff will be given practical equality training on a regular basis.

### **Race**

Similar to above, the Association is aware that discrimination in relation to race, whether indirectly or directly, could be a feature when providing services. To mitigate the risk of any such discrimination, we will ensure that all contractors hold and administer robustly an equality and diversity policy and all is clear on our staff expectations in relation to compliance with the Tenant's Charter and the Scottish Housing Regulator's Regulatory Framework. Staff will also be given practical equality training on a regular basis.

### **Religion or Belief**

To mitigate against the risk of discrimination relating to religion or belief, the risk of any such discrimination, we will ensure that all contractors hold and administer robustly an equality and diversity policy and all is clear on our staff expectations in relation to compliance with the Tenant's Charter and the Scottish Housing Regulator's Regulatory Framework. Staff will also be given practical equality training on a regular basis.

	<p><b>Gender and Gender Reassignment</b></p> <p>It is recognised that discrimination relating to gender and gender reassignment may occur in delivery of our services either directly from staff or via one of our partners or sub-contractors, despite our promotion of championing equality. To reduce the risk of any such discrimination, we will ensure that all contractors hold and administer robustly an equality and diversity policy and all is clear on our staff expectations in relation to compliance with the Tenant’s Charter and the Scottish Housing Regulator’s Regulatory Framework. Staff will also be given practical equality training on a regular basis.</p> <p><b>Sexual Orientation</b></p> <p>The Association has made a clear commitment to not tolerate discrimination of any kind and to proactively work towards the elimination of discrimination. This policy has attempted to outline steps that will be proactively taken to treat everyone fairly and consistently to a high standard. We also aim to measure our performance to mitigate the risk of any such discrimination occurring.</p> <p>Where selection interviews are undertaken, the criteria for selection will be objective and clearly linked to only price and quality of the service the company can provide. Clear record keeping will be a procedural requirement to evidence and demonstrate why the successful applicant has been awarded the contract and that the reasons comply fully with the selection criteria.</p>
<p><b>Who is the Target Audience of this policy or who is intended to benefit from the proposed policy and how?</b></p> <p><b>(ie. employees, service users, Management Committee etc.)</b></p>	<p>GHA employees, Management Committee Members, tenants and other service users including contractors and other partners and stakeholders.</p>
<p><b>Please list any existing documents, evidence, research which have been used to inform the EqIA. (This must include relevant data used in this assessment)</b></p>	<ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• Guidance from EVH</li> <li>• Statement of Terms and Conditions of Employment</li> </ul>

<p><b>Has any consultation, involvement been undertaken with the protected characteristic groups to inform this assessment? (please provide details who and how consulted)</b></p>	<p>Staff feedback at training sessions has been used to support comments within this EIA.</p>
<p><b>What is the actual likely impact ?</b></p>	<p>The likely impact of this policy will be affected groups will be better informed of the Association’s proactive approach to ensuring equality and embracing diversity. Our emphasis on treating all protected characteristic groups fairly and consistently while ensuring that no one group is discriminated against will also be clearly understood. This will in turn outline expectations of the Association and will assist in the prevention of any wider direct or indirect discrimination that may occur.</p>
<p><b>How have you, or will you, put the policy into practice, and who is or will be responsible for delivering it?</b></p>	<p>The policy will be approved by the Association’s Management Committee. Departmental managers will be responsible for the implementation of the policy in relation to day to day delivery of the policy. Corporate Services will collate statistics to help measure and gauge performance and compliance with our Action Plan and service delivery commitments.</p>
<p><b>How does the policy fit into our wider or related policy initiatives?</b></p>	<p>This Policy ties in with the following Govan HA policy areas:</p> <ul style="list-style-type: none"> <li>• Codes of Conduct for Committee and Staff</li> <li>• The SHR Regulatory Framework</li> <li>• The Tenant’s Charter</li> <li>• Our Internal Management Plan</li> <li>• Our Performance Management Framework</li> </ul>
<p><b>Do you have a set budget for this work?</b></p>	<p>The costs of implementing our proactive approach to equality may incur some costs such as offering free translation and interpreting services and will be incorporated within departmental budgets which are planned and approved prior to the respective financial year.</p>

*The table above is taken from the Step One of the Government’s Self-Assessment Tool – “Defining the aims of the policy”.*

- 1.2 The Association should be able to measure the degree to which the policy objectives are achieved via a range of internal monitoring systems, including Committee reporting.

**EQUALITY ACTION PLAN (Draft)**  
**April 2012 to March 2013**

Aim (from s3.4 of policy)		Activity	Timescale	Lead Officer	
a)	<i>Ensure that no one is discriminated against on the basis of any of the nine protected or seven other characteristics noted above</i>	(i)	Ensure that our commitment to equalities and diversity is clearly displayed in the office reception and on the website to help ensure that anyone experiencing discrimination knows that they can approach the Association and will be taken seriously.	By end May 2013 and ongoing	Arlene
		(ii)	Publicise the policy in the summer 2013 edition of Govan's Newsletter.	July 2013	Arlene
		(iii)	Carry out Committee and Staff training on the new policy.	July 2013	Fiona McT/Arlene
		(iv)	Continue to gather information on our current customers – this will include asking equalities monitoring questions in the next tenant satisfaction survey.	Next TSS and ongoing	Fiona McT/HMT and Arlene
b)	<i>Ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services</i>	(i)	Carry out equality impact assessments when reviewing policies (where the screening process has indicated that an assessment is required).	From May 2013	Arlene
		(ii)	Publicise again that the Association's public documents can be made available in translation, large print, on tape/CD and in Braille on request. There will also be handouts available in large print at public meetings if required.	June 2013	Arlene

Aim (from s3.4 of policy)		Activity		Timescale	Lead Officer
		(iii)	The Association will provide a sign or language interpreter when requested to do so.	Ongoing	Arlene
		(iv)	Work towards a representative general and Management Committee membership so that all groups in our community have a real opportunity to be consulted and, via Committee membership, to influence the direction of the Association. Use the results of the Census to agree a set of appropriate targets.	May 2013	Fiona McT/Arlene
c)	<i>Actively assist disadvantaged minority groups within the local community to benefit from its housing services</i>	(i)	Try to forge links with groups that may be under-represented or marginalised with a view to identifying what the Association can do to improve its services – use the Census to inform this process.	May 2013	Arlene
		(ii)	Provide, where possible, housing that is suitable for groups with special needs.	Ongoing	HMT/Development
		(iii)	Ensure that any future development briefs comply with any relevant best practice guidelines in place at the time.	Ongoing	Development
		(iv)	Carry out adaptations to allow people to remain in their current Association home, subject to the availability of funding.	Ongoing	HM and Maintenance

Aim (from s3.4 of policy)		Activity		Timescale	Lead Officer
d)	<i>Ensure equality of opportunity and treatment for all people in relation to the employment of staff</i>	(i)	Use EVH guidelines, which are consistent with those of the Commission for Racial Equality, when recruiting staff. This includes using objective scoring criteria when selecting for interview and identifying a preferred candidate.	All vacant posts	Violet
		(ii)	Monitor applications for employment and, where applicable, report on this to the Committee once an appointment has been made.	All vacant posts	Violet
		(iii)	Guaranteed an interview to all those who have a disability if they meet the minimum criteria for a job being advertised ("positive about disabled people" scheme).	All vacant posts	SMT/Violet
		(iv)	Compile an equalities monitoring report for all filled vacancies providing a breakdown of applicants, interviewees and the successful candidate.	All vacant posts	Violet
e)	<i>Ensure that all staff are aware of the Association's commitment to, and obligations in relation to, equality and diversity</i>	(i)	Ensure that all staff receive specific equal opportunities training.	September 2013	Fiona McT
		(ii)	Raise awareness of the Association's commitment to equal opportunities as part of the induction process for new staff.	Ongoing	Violet/SMT
f)	<i>Be mindful of its equalities commitments in relation both to</i>	(i)	Ensure jobbing contractor application forms to include specific questions on	March 2013	Maintenance/Development

	<i>the procurement of contractors/consultants and to the composition and operation of the Management Committee</i>		equal opportunities compliance.		
	<b>Aim (from s3.4 of policy)</b>		<b>Activity</b>	<b>Timescale</b>	<b>Lead Officer</b>
		(ii)	Refuse to use any contractor/consultant who is unable, for any reason whatsoever, to satisfy us of their commitment to equal opportunities. Confirm to the Management Committee annually that this has been observed.	As required	Maintenance/Development
		(iii)	Terminate immediately any contract with a consultant or contractor who breaches this policy.	As required	Maintenance/Development