



## Equality and Diversity Policy

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## **Overall Objective**

- To ensure equality and diversity issues are integral to all that we do as a service provider and employer.
- To ensure that no person or group of people applying for accommodation, services, employment, or a contract is treated less fairly than any other person or group of people.
- To fully investigate all complaints of unfair treatment and refer them to the Quality Panel for consideration.

## **Equality and Diversity Statement**

In the interests of fairness we have dispensed with the necessity to relate unfair treatment with gender, age, disability etc. Instead we have adopted the following definition of unfair treatment:

'Being treated in a way that is outside our policy environment undermines a person's civil rights or where the treatment has no foundation in evidence. Unfairness may involve conferring an undeserved advantage or disadvantage in relation to the pursuit of service from EPIC.'

We will ensure that any complaints of unfairness are fully investigated by a person not involved in dealing with the case and reported fully to the Quality Panel who may instigate further actions.

## **Policy Statement**

- We are committed to ensuring equality of opportunity and access to all our services.
- We recognise that differences between people must be respected and that everyone has the right to their distinctive and diverse identities.
- We value diversity within the community and organisation and recognise that it can enrich people's experiences and lives.
- We realise that equality of opportunity and management of diversity are vital to the promotion of an inclusive society and the reduction of disadvantage.
- We want to continue to develop good relationships based on integrity and equality.
- We will work towards the elimination of discrimination, and want to ensure that no one receives less favourable treatment, prejudice, discrimination, or suffers any other disadvantage on the grounds of:
  - Race, colour, ethnic origin or nationality.
  - Gender.
  - Disability, whether mental or physical.
  - Religion and other beliefs.
  - Marital or family status.
  - Sexuality or sexual preference.
  - Age, physical appearance or other characteristics.
  - Illness such as HIV and AIDS.
- We will make our services accessible and responsive to the needs of the communities with whom we work and individuals using our services as customers, employees, contractors or consultants.
- We will ensure that equality and diversity issues are mainstreamed into all areas of work and built into the overall drive for continuous improvement. This will improve our ability to deliver good quality services.
- We will set out our commitment to equality and diversity within our Local Standards.

## **Objectives**

### **Statutory Requirements**

- We will ensure that as a housing and services provider and as an employer, we abide by statutory requirements, set out by the Equality Act 2010 and the following other acts and codes of practice:

- Relevant Codes of Practice including that of the Race and Housing Inquiry.
- The Asylum and Immigration Act 1999.
- Harassment Act 1997.
- Crime and Disorder Act 1998.
- Employment Equality (Age) Regulations 2006.

### **Housing and Housing Services**

- The selection of clients for housing services will be based on their need for the service in question, within the limits of our other policies and criteria.
- To seek to identify the needs of disadvantaged groups in terms of housing and services.
- To record and monitor minority representation within our homes to ensure that policy and procedures are effective.
- To keep records with regards to present housing need and allocations in a format which can be monitored, to ensure fairness in the allocation of our homes.
- To provide services which are responsive to the diverse needs of different individuals and communities.
- To ensure services are accessible in terms of:
  - Premises being accessible to wheelchair users and those with impaired mobility.
  - Offering communication via text, letter (including Braille and large print), telephone, email, fax and home visits.
  - Use of interpretation services where required. Use of a Hearing Loop in Reception for the hard of hearing.

### **Recruitment, Employment and Training**

- We value the contributions that people from all sections of society can make, and value diversity within the workplace. We will seek to have a workforce that reflects the local population.
- All selection, appointment, and advancement of staff will be merit based on justifiable job requirements and equality of opportunity for all applicants and staff.
- We will provide equality and diversity training to all staff.
- We aim to provide a supportive, open environment where all employees have the opportunity to reach their full potential.

### **Contractors and Consultants**

- We will promote equality amongst those suppliers of goods and services to the Company and to our customers, and in hiring contractors and other agencies, we will be mindful of their commitment to equality and diversity.
- We will try to ensure that contractors, consultants, and suppliers of goods and services comply with our policy and do not discriminate in the execution of our contracts, and are committed to equal opportunities in the provision of their services to both customers and those working for their company.

### **Board of Management**

- We will seek to include representation from a full cross-section of the community on our Board of Management and Committees.
- In the operations of the Board of Management and Committees, the association will be mindful of its commitment to equality of opportunity.

### **Tenant Participation**

We will:

- Take equality and diversity issues into account in the way they seek to involve customers in the planning, development and management of services, and ensure that vulnerable and marginalised groups have the chance to participate.
- Endeavour to ensure that meetings are held in accessible places at suitable times, translation services should be available if required and material should be produced in a wide variety of formats.

- Consult with tenants about performance in implementing equality and diversity commitments.

#### **Other**

- We will support local initiatives that aim to promote the employment of companies that are owned by people belonging to communities and groups that experience discrimination.
- We will communicate our commitment to equality and diversity as widely as possible to staff, residents, contractors and consultants and Board members. This will be done through the provision of a summary leaflet in Reception, a full copy of the policy to all staff and within all tender information and contracts for work, and making reference to it in all job descriptions.
- We will take positive action against discriminatory behaviour from tenants, other customers, visitors, staff or business partners.
- EPIC will ensure that equality and diversity issues are addressed in its policies, reports and reviews.

#### **Action Plan**

We will implement and publish an Equality Action Plan in line with the general duties under the Equality Act 2010, which specify that we should publish our equality and diversity objectives and sufficient information to demonstrate how we have delivered our duties. This Action Plan can be found at Appendix 1.

#### **Monitoring**

We will endeavour to gather information on ethnic origin, sex, and disability from all existing employees and all applicants applying for accommodation and employment. We will create information systems on which to record data relating to all the targets created for equality and diversity, and ensure that monitoring occurs on a regular basis.

#### **Review**

This Policy and the action plan will be reviewed every three years or upon the introduction of new legislation that may affect it.

## **Appendix 1: Equality Action Plan**

### **Background**

As recommended by the Social Housing Regulator (previously the Tenant Services Authority), EPIC has put together an Equality Action Plan for development and implementation within the organisation. This action plan complies with the requirements of the Equality Act 2010. Although the Equality Act 2010 refers to public bodies, the Social Housing Regulator required all Registered Providers to comply with the regulation by January 2010.

Within this action plan there are four areas EPIC review and audit in order to define the required actions, as suggested by The North West Equality and Diversity Network for Housing Practitioners and Habinteg; these have been used as Habinteg is a respected housing authority. The areas to be considered are as follows:

- Customer service
- Asset Management
- Employment
- Governance

An initial audit was completed in January 2009, making recommendations as to how we could comply with the requirements. Following this audit a full report on the findings was compiled and presented to the Operations Committee in January 2010. The Action Plan remains a live document that is reviewed in line with the policy.

## **Equality Objectives:**

### Customer Service and Asset Management (as set out in the Local Standards):

- We will treat all tenants with fairness and respect.
- We will offer an induction loop for our hard of hearing customers and try to do as much as we reasonably can to assist our customers with a disability.
- We will consider requests for adaptations to properties and will co-operate with relevant organisations to provide an adaptations service that meets the needs of our tenants.
- We will have an Allocations Policy that is fair and clear which will be published on our website.
- We understand the different needs of tenants, including equality issues and additional support needs and work closely with other agencies to offer appropriate referrals.

### Employment and Governance:

- We will ensure all appointments are made based on fair selection criteria.
- We will provide regular Equality and Diversity training to staff and Board.
- We will treat all staff and board members with fairness and respect.

<b>ID</b>	<b>Action</b>	<b>Resp.</b>	<b>Deadline / Timetable</b>
<b>1. Customer Service</b>			
	The Offices will be easily accessible to all groups (including, access for disabled customers, a hearing loop and a lower desk area for wheelchair users).	Asset Manager	n/a
	In 2012, EPIC completed a project of visiting all over 75's to ensure that their needs are continually assessed and met. This will be repeated in 2015.	Executive Assistant	December 2015
	EPIC maintain a list of customer needs and requirements on our "Risk Register" to ensure that we can tailor our services to particular customer circumstances. This information is collated at application and asked each time the Customer Satisfaction (Star) Survey is carried out.	Housing Officers	n/a
	The Allocations Policy was comprehensively reviewed in 2012 and has been subject to an Equality Impact Assessment.	Director of Housing	n/a
<b>2. Asset Management</b>			
	EPIC will maintain an Adaptations register for its dwellings so that properties with special equipment and adaptations can be identified and allocated to appropriate applicants.	Asset Manager	End 2012
	EPIC ensures all contractors it works with have an approach to equality and diversity that fits with good practice guidance by exploring this as part of the pre-qualification questionnaire.	Asset Manager	Ongoing.
<b>3. Employment</b>			
	EPIC will complete the Display Screen Equipment and Workstation Assessment for all employees on a regular basis and ensure that any adjustments required are made.	Executive Assistant	Ongoing
	EPIC will have a Recruitment and Selection Policy to ensure all appointments are fair. This is reviewed on an annual basis as part of the Staff Handbook review.	Executive Assistant	annually, July each year.
	All Staff will receive equality and diversity training on a 3 yearly basis. This was last carried out in June 2014.	Executive Assistant	June 2017
	EPIC will ensure that an equality and diversity monitoring form is completed by all job applicants and staff and that this information is recorded for monitoring purposes.	Executive Assistant	Ongoing
<b>ID</b>	<b>Action</b>	<b>Resp.</b>	<b>Deadline / Timetable</b>
<b>4. Governance</b>			

	EPIC will have a Board Director Recruitment and Selection Policy to ensure all appointments are fair.	Executive Assistant	July 2015
	All Board members will receive equality and diversity training on a 3 yearly basis. This was last carried out in June 2014.	Executive Assistant	June 2017
	EPIC will ensure that an equality and diversity monitoring form is completed by all board members and that this information is recorded for monitoring purposes.	Executive Assistant	Ongoing
<b>5. All Areas</b>			
	We will ensure that any complaints or grievances relating to unfair or unequal treatment are reported to the Quality Panel.	Chief Executive	n/a
	We will ensure that all policies, procedures and reports consider equality and diversity implications.	Chief Executive	Ongoing.
	The Executive Assistant will take specific responsibility for Equality and Diversity within the organisation – to ensure that there is a 'named' officer.	Executive Assistant	n/a
	An Annual Equality and Diversity monitoring report is prepared and circulated to the Board for information.	Executive Assistant	May 2015