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## EQUALITY & DIVERSITY POLICY & ACTION PLAN

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**Title:** Equality & Diversity Policy & Action Plan

**Purpose of Procedure:**

**Section:** Management Committee

**Date:** April 2017

**Review Date:** April 2020

**Charter Standards:** 1 - Equalities

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

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

# **BLAIRTUMMOCK HOUSING ASSOCIATION**

## **EQUALITY & DIVERSITY POLICY**

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#### **Appendix 1 Action Plan**

## **1.0 INTRODUCTION**

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**1.1** Blairtummock Housing Association takes recognition of Scottish Housing Regulator Charters Equalities 1 which states:-

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

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

**1.2** Blairtummock Housing Association recognises that Scotland is a multi-racial society. It is also a society in which women account for nearly half of the working population, and increasingly it is being acknowledged that people with disabilities can make a full contribution to working life. Yet people from these groups and many others frequently suffer discrimination in employment. The Association therefore considers any form of discrimination, i.e. treating a person on less favourable grounds than others, to be unacceptable in terms of good practice, social justice and legal duty.

**1.3** All employees are required to abide by this policy.

**1.4** All documents produced by Blairtummock Housing Association will include our commitment to equality of opportunity for all

**1.5** This policy applies to Blairtummock Housing Association tenants and service users.

## 2.0 LEGAL REGULATORY AND GOOD PRACTICE FRAMEWORK

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This policy on Equality & diversity takes account of legal, regulatory and best practice requirements, including (but not limited to):

- The Equality Act 2010
- Human Rights Act 1998
- The Housing (Scotland) Act 2014
- The Scottish Social Housing Charter
- Section 5.3 of the Regulatory Standards of Governance & Financial Management

### **The Equality Act 2010**

The Equality Act 2010 is the main piece of legislation relating to equalities and aims to replace previous discrimination legislation with one single piece of legislation.

## **3.0 EQUALITY & DIVERSITY STATEMENT**

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**3.1** The following statement will be made available to tenants by displaying in reception area, included in job adverts, publishing in newsletters, tenant's handbook and the Annual Report.

“Blairtummock Housing Association wishes it to be known that it is an equal opportunity Association. This means:

**3.2** In the provision of housing services and employing staff to provide these services, the Association will seek to ensure equality of opportunity for all.

**3.3** No person or group of persons applying for housing, or a job, or for Contracts with the Association, will be treated less favourably than any other person or group of persons because of their:

- Age
- Disability
- Gender
- Economic Status
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy & Maternity
- Race
- Religion or Belief
- Sex and Sexual Orientation

**3.4** To help and fulfil its commitment to equality of opportunity for all, the Association will collect and monitor records of the ethnic/racial origin any disability and gender of all those applying to it for housing and all those seeking employment from the Association.

**3.5** In hiring Contractors/Consultants and other agencies to work for it, the Association will be mindful of its commitments to equality of opportunity.

**3.6** In the composition and operation of its Management Committee, the Association will be mindful of its commitment to equality of opportunity for all.

**3.7** The Association is opposed to discrimination in any form and at all levels, and is committed to take all steps within its power as an employer to counteract it.

**3.8** The Association will seek to ensure that no one receives less favourable treatment or is disadvantaged by conditions or requirements which cannot be shown to be justifiable

**3.9** The Association will seek to ensure that all individuals will be treated fairly and equally and any decision on recruitment and selection will be based on the essential job criteria.

- 3.10** The Association will provide equality and diversity training for all members of staff and committee members and will encourage active participation.
- 3.11** The Association will comply with existing relevant anti-discrimination legislation and codes of practice in employment.
- 3.12** The Association will ensure that this policy will be a condition of service and all members of staff and committee members will abide by it.
- 3.13** The Association's policies and procedures will be monitored regularly to ensure they comply with this policy.
- 3.14** The Association when collecting information will advise stakeholders and representative groups why we collect such information and what we intend to use it for.

## **4.0 EQUALITY ACTION PLAN**

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- 4.1** Blairtummock Housing Association will undertake to produce an Equality Action plan every three years. This plan will –
1. Describe the extent and range of the needs in various Communities.
  2. State the Association's broad equality objectives.
  3. Detail the activities the Association will engage in to meet these objectives over the next three years.
  4. State what intended outcomes of the activities are and how these will be monitored including targets and uptake of services.
  5. Include an explicit recognition of the resources required for the activities.
- 4.2** The action plan is reported to the Housing Management and Maintenance Sub-committee.

## **5.0 DISCRIMINATION – EMPLOYMENT**

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### **5.1 Diversity**

Is about valuing individual differences. Blairtummock Housing Association is committed to valuing and managing people's differences to enable all employees to contribute and realise their full potential. Blairtummock Housing Association recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit Blairtummock Housing Association and it's customers.

### **5.2 Equality**

Is making sure people are treated fairly and given fair chances "Equality is not about treating everyone in the same way, but recognises that their needs are met in different ways". Equality focuses on those arrears covered by law and described as protected characteristics of race, sex, disability, age, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief and sexual orientation.

### **5.3 Protected Characteristics**

The grounds on which discrimination claims can be made:

- Age
- Disability
- Gender
- Economic Status
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy & Maternity
- Race
- Religion of Belief
- Sex and Sexual Orientation

### **5.4 Direct Discrimination**

Treating a person less favourably than others based on a protected characteristics:

- Age
- Disability
- Gender
- Economic Status
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy & Maternity
- Race

- Religion of Belief
- Sex and Sexual Orientation

## **5.5 Indirect Discrimination**

A policy, practice, procedure, provision of criteria that applies to everyone in the same way but might disadvantage a particular protected group, and which cannot be objectively justified in relation to the job.

## **5.6 Harassment**

Conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

## **5.7 Victimisation**

Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

## **5.8 Positive Action**

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. No quotas will be set by Blairtummock Housing Association but equality targets may be set to encourage people from a particular group or groups to apply for a vacancy in Blairtummock Housing Association in comparison to the local community where they are under represented.

## **5.9 Failure to make Reasonable Adjustments**

Where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

## **5.10 Associated Discrimination**

Discrimination against a person because they have an association with someone with a particular protected characteristic. E.g. a non disabled person is discriminated against because of the action they need to take care of disabled dependent.

## **5.11 Perceptive Discrimination**

Discrimination against a person because the discriminator **thinks** the person possesses that characteristic. E.g. a person is not shortlisted for a job on the bases

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.

### **5.12 Employees**

All permanent, temporary fixed term staff, including all managers, Director, and agency workers.

### **5.13 Stakeholders**

Contractors, consultants, tenants, customers, service users, other outside agency workers.

## **6.0 RESPONSIBILITIES OF THE ASSOCIATION AS AN EMPLOYER**

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### **6.1 Responsibility/Accountability**

The Director will have daily responsibility for the implementation of the policy.

The Chairperson will have overall responsibility for the successful implementation of the policy. In addition, the Association will abide by the terms and conditions of this policy to ensure no discrimination occurs in the services it provides.

This policy applies to everyone in Blairtummock Housing Association and all have a responsibility to be alert to discriminatory behaviour and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the Equality and Diversity Policy will be regarded as misconduct and will lead to disciplinary action which may include dismissal.

### **6.2 Recruitment and Selection**

It is Blairtummock Housing Association's policy that all recruitment decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

A fair recruitment process will remove barriers to the employment of people of different backgrounds. This will enable Blairtummock Housing Association to recruit from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving. A more diverse workforce will improve the organisation's service delivery, as it will include staff with more knowledge and experience and aid in meeting the needs and aspirations of service users and potential service users.

To highlight Blairtummock Housing Association's commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy within Blairtummock Housing Association will state that an equality and diversity policy is in place. In addition the advert will also display any signs of equality bodies that Blairtummock Housing Association is affiliated with. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply Blairtummock Housing Association will ensure that all applications will have clear instructions for completion and application forms will be free from personal

questions that are not relevant to the vacancy and that may lead to discrimination.

Blairtummock Housing Association will ensure all staff involved at any stage in the recruitment and selection process will receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

### **6.3 Terms and Conditions of Employment**

As part of the employment relationship being covered under this equality and diversity policy all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's terms and conditions will be standard across all employees regardless of any of the protected characteristics. Employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and the grade it attracts.

### **6.4 Training and Development**

Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image and of equality of opportunity.

### **6.5 Redundancy Selection**

Redundancy selection will be made according to the statutory requirements and in line with Blairtummock Housing Association's Conditions of Service. Criteria will be discussed with the Trade Union and or nominated representatives. The criteria will be set out and will be objectively fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

### **6.6 Publicity**

The Association will seek to ensure that:

- It's publications will not perpetuate discrimination.
- Language used will be non-discriminatory and concise.
- All relevant materials will be accessible to it's target population.

## **6.7 Monitoring, Reviewing and Record Keeping**

The Association will seek to set targets (for measuring performance) and introduce a monitoring system which will collect relevant data on all groups who approach the Association for employment. The data will be assessed on a regular basis to monitor progress and reported to the Management Committee.

## 7.0 COMPLAINTS

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### 7.1 Complaints - Employees

This procedure is complemented by Blairtummock Housing Association's Dignity at Work policy. For further details please refer to the policy.

Where an employee feels they have been discriminated against, victimised or harassed by another employee (including managers), the aim should be to deal with it informally in the first instance.

#### 7.1.1 Informal Stage

An employee should aim to resolve the matter informally as it may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted. This is often the most efficient way with dealing with such circumstances and helps maintain good working relations.

The employee should raise the issue informally with their line manager (if the complaint is against their manager then the manager next in line). The manager will speak to the employee whom the complaint is against. If it is found that the behaviour was in breach of this policy, an appropriate level of sanction will be decided in line with Blairtummock Housing Association's Disciplinary Policy.

In addition, a file note of the incident will be kept on the complaining employee's file, including a statement that the note will only be taken into account if there are any further incidents.

Dealing with the matter informally does not remove the complaining employee's right to have the matter dealt with formally.

#### 7.1.2 Formal Stage

If the employee is dissatisfied with the outcome, or the complaint is very serious, they should raise the matter in writing, detailing the complaint to their line manager. The complaint should then be dealt with under Blairtummock Housing Association's Grievance Policy. In line with this process an investigation into the complaint will be carried out. Employees who feel they are being subjected to harassment should raise the issue in line with Blairtummock Housing Association's Dignity at Work Policy.

If the outcome of the investigation is that a formal disciplinary hearing should take place this will be conducted in line with Blairtummock Housing Association's Disciplinary Procedures. (Please refer to the Disciplinary Policy for full details).

### 7.1.3 Complaints made against Employees

Where a complaint is made against an employee by another employee, committee member or stakeholder, it will be investigated and dealt with under Blairtummock Housing Association's Disciplinary Policy.

## **7.2 Complaints - Committee Members**

Where a committee member feels they have been discriminated against, victimised or harassed, the aim should be to deal with it informally in the first instance.

### 7.2.1 Informal Stage

If a committee member feels they are in receipt of inappropriate behaviour from another committee member, an employee or any stakeholder in connection with Blairtummock Housing Association, they should raise this immediately with the appropriate senior manager. The manager will discuss the issue with whom the complaint is against, explaining the required standards of behaviour and the consequences of failing to comply.

### 7.2.2 Formal Stage

Where formal action is the most appropriate, a thorough investigation will take place into the complaint. The complaint then will be dealt with in accordance with the appropriate procedure (depending whether the complaint is against an employee, a committee member, a contractor, a partner, etc.). In cases of physical violence or serious threats and appropriate manager will notify the Police.

### 7.2.3 Complaints made against a Committee Member

Where a complaint is made against a committee member, Blairtummock Housing Association's complaints procedure will be used as appropriate. The complaint will be investigated by the Chair or another authorised person. If it is found that the inappropriate behaviour occurred, the committee member will be warned and informed of consequences of failure to comply with the expected standards of behaviour, which may include removal from the committee.

## **7.3 Complaints - Stakeholders**

7.3.1 The right to be treated equally with dignity and respect extends to outside contractors, partners, service users, customers and any other agencies that are associated with Blairtummock Housing Association. Therefore, stakeholders also have a right to have any issues addressed under this policy. Any complaints will be investigated by Blairtummock Housing Association and appropriate action will be taken.

If a stakeholder feels that they are being discriminated against in the course of their working day with Blairtummock Housing Association, the following procedure should be followed:

### 7.3.2 Informal Stage

Where possible, incidents should be dealt with informally. The stakeholder should report the matter to their lead contact within Blairtummock Housing Association as soon as possible. It may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted.

The manager will discuss the situation with the individual whom the complaint is against and explain the expected standards of behaviour and the consequences of failing to comply with these. It will be made clear to the individual that continuation of such conduct may result in being refused access to Blairtummock Housing Association's premises, or services.

### 7.3.3 Formal Stage

Where informal action is not appropriate or the matter is of a serious nature the complaint will be dealt with using the formal procedure. Where the formal procedure is instigated a thorough investigation will take place in the first instance. Where it is found that the individual has acted in an inappropriate manner, they will be written to officially by the relevant senior manager informing them that their comments, actions, behaviours are not acceptable and potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in being refused access to Blairtummock Housing Association's premises, or contact with its customers/employees/committee members. In cases of physical violence or serious threats the appropriate manager will notify the Police.

### 7.3.4 Complaints made by Stakeholders

Where stakeholders are in receipt of inappropriate behaviour from an employee of Blairtummock Housing Association, board member or another stakeholder in connection with Blairtummock Housing Association's business, the stakeholder should also raise the issue with their lead contact. The lead contact will then investigate into the complaint and deal with it in accordance with the appropriate procedure (depending whether the complaint is against an employee, a committee member, a contractor, a partner etc.).

## **8.0 SERVICE DELIVERY**

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**8.1** Blairtummock Housing Association acknowledges that certain people can be discriminated against by the housing system and are forced to remain in unsuitable housing. The Association will strive to ensure equal opportunity and treatment for all people.

The Association recognises that discrimination can be direct or indirect and can take place at a personal or at an institutional level.

**8.2** By introducing this policy, the Association aims to ensure the following:

- i) it provides equal opportunities in allocations and service provisions to Blairtummock Housing Association tenants and service users.
- ii) that allocations are made on the basis of housing need, and that minority groups are not disadvantaged in terms of access to its housing services.
- iii) That no one receives less favourable treatment or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

**8.3** To help fulfil its commitment to Equality & Diversity, the Association collects and monitors the ethnic origin, disability and gender of all those applying for housing.

**8.4** In hiring Contractors/Consultants and other services to work on behalf of it, the Association will seek to ensure their commitment to equality and unless they have their own policy on Equality & Diversity they will be expected to adopt the Association's.

### **8.5 Social Inclusion**

The Association will report to Committee on the findings of the Scottish Index of Multiple Deprivation when published.

**8.6** No person or group of persons applying for housing or contracts with the Association will be treated less favourably than other persons or group of persons because of:

- Age
- Disability
- Gender
- Economic Status
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy & Maternity
- Race
- Religion of Belief
- Sex and Sexual Orientation

## **9.0 EQUALITY & DIVERSITY**

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**9.1** The Association is striving to become an equal opportunity organisation and consequently its policies will demonstrate a clear commitment to equal outcomes in respect of:

- Level of Activities
- Association Role
- Contracting Role

In property and managing housing the Association will ensure equality of opportunity in the following area:

- Access to Housing
- Quality of Housing Allocated
- Freedom from Harassment or Fear
- Consultation on the Provision of Housing and Housing Services
- Grievance and Appeals Procedure

**9.2** All policies will be clear, comprehensive and unequivocally non-discriminatory, promoting equal access to all, as the Association is accountable to its members, tenants, service users and the wider community.

**9.3** As recipients of public subsidy the Association will ensure that public funds are not used to promote practices which may be based on discrimination. The Association will seek to redress previous discrimination and take positive action measures to assure equal access for all groups.

## **10.0 MEMBERSHIP**

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- 10.1** Membership of the Association is a voluntary decision, as is the decision to stand for election to its committee. The Association aims to be accountable to the community it serves and will seek to ensure that the composition of its general membership and management committee is as representative as possible of all sections of the community in its area. Furthermore the elected management committee is the employer and as such responsible for eliminating discrimination within the Association.

## **11.0 TRAINING**

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- 11.1** Members of staff and committee members will undertake Equality & Diversity training. The training will concentrate on identifying discrimination and taking action which counters its effects.
- 11.2** Clear records will be kept of all the training which staff and committee attend. The Director will also keep evaluation forms for all the training courses that are attended.
- 11.3** The staff and committee annual training plans will be approved each year by the Management Committee.

## **12.0 CONSULTATION**

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- 12.1** The Association will consult with its tenants and prospective tenants to provide appropriate housing and suitable environment. Blairtummock Housing Association has a Tenant Participation Strategy and Action Plan which is reviewed every 3 years. To encourage participation by all sections of the community, in meaningful consultation, the Association will be sensitive to:
- Religious and cultural requirements e.g. women only meetings, early meeting.
  - The needs of those with young children e.g. provision of transport, crèche, child friendly rooms, appropriate opening and closing hours.
  - The needs of disabled persons e.g. provision of transport, access for disabled people.
  - Language differences e.g. appropriate communication format, assistance with forms and questionnaires, use of interpreters and translators.
- 12.2** The Association will consult relevant agencies working with groups of interest to the Association with a view to seeking, identifying and meeting the needs of these groups.
- 12.3** There will be a regular review of consultation procedures and policies to ensure we continue to be responsive to our tenants' and prospective tenants' needs.

## **13.0 ACCESS**

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- 13.1** The Association will take positive action measures to ensure that all members of the community are aware of the services it provides including availability of stock. The Association will seek to ensure within its means that all people benefit equally from its services.
- 13.2** The Association will have maximum openness about what it is doing, and ensure that all policies and procedures are openly and widely advertised.
- 13.3** The Association will provide tenants with full, clear and accurate information about their particular tenancy in compliance with the law and good practice guidelines. This information will be accessible to all. An oral explanation will be given at the beginning of the tenancy. Tenancy agreements will not contain any unduly restrictive or unnecessary conditions.
- 13.4** The Association will avoid being seen as inaccessible to those in housing need and take any necessary action as reasonably practical to meet these e.g. child friendly rooms, access for disabled people, appropriate opening and closing hours. The Association will ensure that no communication barriers are put in place or maintained.
- 13.5** The Association will on request provide its materials in suitable format e.g. computer disc, tape, Braille, community languages. All application forms and materials published will be in simple jargon free language and where appropriate, help will be given to fill out the relevant forms. The Association will be sensitive to people with difficulties in communicating.
- 13.6** All people will have equal access to housing and will be treated equally when they become tenants.

## **14.0 MANAGEMENT SERVICES**

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- 14.1** Management services provided by another organisation will be compatible with this policy.

## **15.0 LANDLORD ACTIVITIES**

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It is the Association's responsibility as a landlord to adhere to the following:

### **15.1 Design Standards**

The Association will seek to ensure that all developments are built barrier-free and to agreed minimum standards to allow tenants to reduce their dependence on others and maximise choice in their daily life. Consequently, the Association will, wherever possible, involve tenants and potential tenants in the design process.

### **15.2 Maintenance and Repairs**

The Association will seek to ensure that properties are kept in good repair and installations maintained in proper working order to ensure that properties are fit for human habitation and that no defect places any person in potential danger. However, where cause for complaint arises, attention will be paid to tenants' complaints concerning disrepair and service provision, including seeking to ensure that tenants are able to report their complaints in their own languages.

As maintenance is one of the most important services provided to tenants, the Association will seek to ensure that all tenants receive the same quality of service. The Association will, however, be mindful that certain groups, such as older people, may be more vulnerable and consequently will be given priority on certain types of repairs.

Response time to repair requests will be monitored and reported to the Housing Management and Maintenance Sub-committee bi-monthly and in the Association's annual report.

Publicity materials on maintenance and repairs will reflect contractual and legal rights and will be available where possible in suitable format.

### **15.3 Rent Arrears**

All rent arrears will be dealt with sensitively and fairly. The Association will have policies and procedures highlighting the importance of arrears prevention, and action for control and recovery.

### **15.4 Nominations and Referrals**

15.4.1 Referral arrangements will be established with appropriate agencies. When considering an application from such an agency the Association will ensure that the agency's equality and diversity policy is consistent with the Association's. The Association will monitor referral arrangements for

accessibility to all groups and meet regularly with the referral agency to review results and decide appropriate remedial action, where necessary.

15.4.2 This process will be used to assist the Association to meet the housing needs of all groups and also to raise awareness of changes in these needs.

## **15.5 Allocation Policies**

15.5.1 Selection and allocation policies will be clear, comprehensive and unequivocally non-discriminatory, providing equal access for all. All selection and allocation procedures will be designed to deal quickly and fairly with applicants for housing. Proper recording, reporting and monitoring procedures will be carried out. To ensure accountability and fairness more than one person will be involved in each decision.

15.5.2 The Association reports annually to the Management Committee on ethnic origin, disability and sex.

15.5.3 The Association will avoid being seen as inaccessible to those in housing need. As a result the Association will keep its waiting list open and encourage applications to be submitted and assessed throughout the year.

15.5.4 Copies of the policies and procedures on selection and allocation will be available and accessible to all.

## **15.6 Quality of Housing**

15.6.1 The quality of stock will be assessed regularly. The Association will ensure that all groups have equal access to good quality stock.

## **16.0 CONTRACT/CONSULTANTS COMPLIANCE**

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- 16.1** The Association will ensure that all contractors/consultants comply with relevant health and safety, and equality and diversity legislation.
- 16.2** In hiring contractors/consultants to work for the Association, it will encourage contractors to adopt and implement an equality and diversity opportunities policy or abide by the Association's Equality & Diversity policy.
- 16.3** Where contractors/consultants from certain groups appear to be under-represented on the Association's approved list, the Association will where possible take positive steps to seek, support and work with such contractors to encourage them to apply for registration on the approved list and at tender stage.
- 16.4** Any harassment or discrimination by contractors/consultants will lead to investigation. Persistent misdemeanour or breaches of policy will lead to a contractor's removal from the approved list(s).
- 16.5** The Association will continually monitor and review the contractors/consultants performance in relation to equal opportunities.

## **17.0 MONITORING, REVIEW AND RECORD KEEPING**

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- 17.1** The Association will seek to set targets (for measuring performance) and introduce a monitoring system which will collect relevant data on all groups who approach the Association for housing, and on the services the Association provides. The data will be assessed on a regular basis to monitor progress and reported annually to the Housing Management and Maintenance Sub-committee.
- 17.2** Where certain groups appear to be under-represented in housing, the Association will take positive action measures to redress any imbalance.
- 17.3** The Association acknowledges that monitoring, reviewing and record keeping will be on-going process requiring continual examination and annual review of existing procedures and criteria as the society in which we live evolves.
- 17.4** Monitoring will be carried out on all the services the Association provides, but in particular it will look at the following:
- Access
  - Allocations
  - Nominations
  - Advice
  - Repairs and Improvements
  - Complaints
  - Harassment
  - Rent Arrears
  - Membership
- 17.5** It will be the responsibility of the Chairperson and Director to report any progress on successes or failures of implementation of the Equality & Diversity policies to its tenants, service users and members, including producing an annual report on monitoring and highlighting any action taken as a result of the monitoring.

## **18.0 RESOURCES**

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- 18.1** Provision will be made for the additional resources which will be required to ensure effective implementation of this policy.

## **19.0 CONFIDENTIALITY**

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**19.1** Confidential information will be respected and maintained as such.

## **20.0 CONCLUSION**

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- 20.1** Equal outcomes is a natural and integral part of good housing management practice, aimed at developing services to the fullest extent possible for the good of the Association and its users. The Association's ultimate aim is to ensure equal outcomes in its allocations and service delivery.

## **21.0 GENERAL DATA PROTECTION REGULATIONS**

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The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Privacy Policy. Information regarding how your data will be used and the basis for processing your data is provided in Blairtummock Housing Association's employee privacy notice.

## APPENDIX 1

**BLAIRTUMMOCK HOUSING ASSOCIATION LIMITED**

**INTERNAL AUDIT – EQUAL OPPORTUNITIES  
ACTION PLAN 2017 - 2020**

<b>RECOMMENDATION</b>	<b>COMMENT</b>	<b>PERSONS RESPONSIBLE</b>	<b>DATE</b>
Review Policy	Discuss and approve policy	Director	April 2017
Promote Policy/Consult	Put on website, consult at scrutiny day and in newsletters	Director	April 2017 October 2017
Outcome of consultation	To be discussed by Management Committee and any changes approved	Management Committee	October 2017
Representative Management Committee	Consider community profile. Conduct audit of representation and address gaps.	Management Committee	May 2018  October/November
Provide information in appropriate format – translation, interpreters, braille, sign and audio tape	Hearing loop available	Housing Services Manager	Ongoing
Promote availability of these services	Promote services are available if required	Housing Services Manager	Ongoing

<b>RECOMMENDATION</b>	<b>COMMENT</b>	<b>PERSONS RESPONSIBLE</b>	<b>DATE</b>
Ensure there is no barriers to access services and premises	Ensure disabled access when holding meetings, events etc	Housing Services Manager	As and when required Newsletter – ongoing each newsletter Tenant satisfaction survey 2019

Ensuring contractors/consultants comply with policy	Request policy or compliance with BHA policy for contractors/consultants intending to work with BHA	Housing Services Manager Housing Management & Maintenance Sub-committee	As and when contractor are being approved.
Training	Committee and staff to receive training on equal opportunities.	Management Committee Director	Ongoing.
Ensure compliance with policy	Disciplinary action for breaches by staff or committee	Management Committee director	As and when required
Promote equality and prevent discrimination	Consider equal opportunities in all policies, practice and conduct Identify under represented groups and engage with them	Management Committee Staff	Ongoing
Monitoring	Monitor compliance of this policy through report on recruitment, allocations, representation/attendance at meetings/events. Obtain views of service users and the appropriate action	Management Committee Director	Staffing & Administration Sub-committee Reports to Management Committee