



# Equality and Diversity

## Equality and Diversity Policy

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## E&D Policy

This policy applies to all subsidiary companies within Vicinity.

### 1. Policy Aims

- To enable equality of opportunity in the provision of housing, services, employment and training.
- To ensure Vicinity is fully accessible to everyone who receives a service from Vicinity (parent and subsidiaries) and to everyone who works for it. This policy aims to meet the diverse needs of all customers, staff, and stakeholders regardless of race (including Gypsies and Travellers), religion, gender, marital status, sexual orientation, disability or age and to promote social inclusion.
- To eradicate inequality and discrimination against people, communities and organisations with which we work.
- To ensure we work closely with the diverse range of people within our neighbourhoods, empowering residents to influence services provided.

### 2. Detail of Policy

Vicinity recognises that Equality and Diversity is key to achieving the highest standard of performance, providing quality services across the Group. Continually improving our performance in relation to Equality and Diversity is important to Vicinity and its subsidiaries because:

- We aim to work towards a just and tolerant society
- It makes good business sense
- We recognise the legal and regulatory framework in which we work

Vicinity is committed to achieving the best possible performance on Equality and Diversity to enable us to:

- understand our customers - understanding the diversity of our customers and their needs is central to delivering continuous improvement and high quality services.
- secure new business - excellent performance on Equality and Diversity is a key criterion in the selection process for all types of partnerships, including the transfer of Local Authority housing and working with private developers to provide affordable housing.
- ensure that services and products are relevant to the needs of our customers and sustain long-term demand.
- recruit and retain the best staff. By having a fair and transparent recruitment process, we aim to employ a diverse range of staff. Vicinity is committed to supporting and encouraging all staff to reach their full potential.
- deliver sound business leadership. Vicinity recognises that governing bodies and senior management teams need to understand the needs of their customers. We

will achieve this by ensuring these bodies reflect the diversity of the communities in which we work.

Vicinity will ensure policies and procedures do not cause discrimination, or allow discrimination or disadvantage to be an obstacle to accessing services, or to the recruitment, training and promotion of staff.

Vicinity is committed to achieving equality in regards to:

**Age:** We recognise the Employment Equality (age) Regulations and will not discriminate against anyone seeking employment or employed by Vicinity on the grounds of age. We will strive for age equality in service provision to residents.

**Disability:** Vicinity will strive for disability equality in service provision and employment. Vicinity will publish its Disability Equality Scheme in December 2007.

Vicinity will strive to provide services which are relevant to the individual needs of people. Vicinity will work with other agencies to provide support services where appropriate.

Vicinity will ensure employment practices do not unfairly discriminate anyone with a disability.

**Faith:** Vicinity will not tolerate discrimination against anyone due to their religious beliefs (Faith) or lack of religious beliefs (Faith), both within the communities in which we work and within the workforce.

**Gender:** We recognise our duties under the Sex Discrimination Act, Equal Pay Act, Gender Recognition Act, Equality Act and codes of practice and strive for gender equality in service provision and employment for men, women and transgender people.

**Marital status:** Vicinity will not discriminate against anyone because of their marital status.

**Racial (including Gypsies and Travellers):** Vicinity is committed to achieving racial equality; both in the workplace and in the communities we serve.

**Sexuality:** We want to create an environment where Lesbian women, and Gay men are free from unfair treatment and harassment and feel safe to be open about their sexuality, if they choose to do so. Vicinity aims to ensure that our employment policies and service delivery are not based on the assumption that everyone is heterosexual.

**People with additional support needs:** Vicinity will aim to ensure its services are accessible to all and will seek to provide additional advice and support to those who need it.

**Other diverse groups:** Vicinity recognises that people may fit into more than one social grouping. Vicinity will strive to promote social cohesion within communities.

Vicinity Group will ensure its services are accessible to everyone, valuing the diversity of our customers, staff, contractors and partners in the following ways:

**Service Delivery:** Vicinity will aim to ensure all services are accessible regardless of race, religion, gender, marital status, sexual orientation, disability or age. Vicinity will strive to ensure that all staff deliver fair and equal services to all and that governing body members are aware of their obligations.

**Lettings:** Vicinity will monitor lettings to seek to ensure they reflect the make-up of the communities in which we work. We will provide full support and assistance to ensure equal access to Vicinity properties in all areas of our ownership.

**Access to Information and advice** – Vicinity will ensure that information is available in a range of formats and will provide information about our services in audiotape, Braille and in other languages in accordance with its agreed policies and procedures. Vicinity will also offer face to face advice and support to tenants if a need is identified to do this.

**Tenant participation** – We actively encourage all members of the community to become involved within the work of Vicinity and its subsidiary companies. We aim to ensure our resident involvement structures reflect the ethnic mix of our diverse communities and neighbourhoods. We will also encourage people with additional support needs and marginalised groups to get involved and take part in consultation. We will provide support and training to involved residents and tailor involvement mechanisms to meet the needs of diverse communities.

**Accountability** - Vicinity has a duty of accountability to its Boards, customers, staff and agencies it works with.

**Tenant satisfaction** – We want all our customers to be satisfied with the services we provide. We will monitor satisfaction levels to ensure they are equally high within all the communities we work in. We will build on our understanding of our diverse communities, to be able to meet their expectations and increase their satisfaction with our services.

**Dealing with incidents** – Vicinity will monitor harassment on the grounds of Hate Crime (including Racial Harassment) and Domestic Violence in accordance with its agreed policies and procedures. Vicinity will work in partnership to promote community cohesion and good relations between people of different social groups.

**Procurement** – We expect our contractors, consultants and suppliers to take Vicinity's proactive approach to achieving equality and diversity. We will take their performance in this area as a criterion, taking this into account when awarding new contracts.

**Governance** – We aim to ensure that our Governing Body Membership represents the communities we serve by reflecting the diversity of our customer base. We will ensure that Vicinity and its subsidiary Boards monitor and review both policy and performance in the area of Equality and Diversity. Subsidiary associations have Equality and Diversity action plans in place to ensure:

- Policy is put into practice
- Equality of opportunity is implemented in all areas of activity and at all levels.

### **Staffing and employment- Recruitment**

Vicinity is an equal opportunities employer and has achieved the Investors in People Award. Vicinity job adverts carry the two ticks 'positive about disability' symbol reflecting our commitment to equality of opportunity for people with a disability. As part of this we operate the guaranteed interview scheme for applicants who consider themselves to have a disability, providing they meet the minimum selection criteria. Job vacancies are promoted and advertised through a network of local BME agencies, organisations for disabled people and community groups. Job adverts are placed onto the Disabled Go website.

### **Employment Policies & Procedures**

Vicinity has employment policies in place which enable staff to raise issues formally should they feel they have been treated unfairly i.e. the Grievance Procedure and the Harassment Policy. Vicinity's HR Policies will be reviewed annually to ensure that they meet legal requirements.

### **Staff Training**

All new staff will receive 1 days training on Equality and Diversity and existing staff will receive refresher training every 2 years. A training programme for Board members will also be developed.

### **3. Performance Monitoring**

Vicinity subsidiaries monitor the services it provides to ensure it does not discriminate. Vicinity subsidiaries will monitor existing workforce and job applicants, in terms of race, disability, age, and gender via workforce data and equal opportunities monitoring data.

Vicinity subsidiaries monitor tenant and resident satisfaction levels as detailed above.

Each subsidiary association within Vicinity will report performance in relation to equality and diversity to Board as required by the Housing Corporation.

This will include monitoring information in regards to:

- Lettings
- Tenant satisfaction
- Dealing with harassment
- Staffing
- Governing body membership
- Tenant and resident association membership
- Employment of contractors, consultants and suppliers

Additional performance will be communicated to staff, residents and stakeholders through appropriate communication channels such as the website and newsletters.

### **4. Links to other policies**

This policy links to all policies and procedures within Vicinity. The following policies provide additional guidance:

LHT Alternative Communications Policy

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LHT Hate Crime (including Racial Harassment) Policy  
LHT Domestic Violence Policy  
LHT Allocations Policy  
LHT Antisocial Behaviour Policy  
LHT Suspensions Policy  
LHT Transfer Policy  
LHT Vulnerable Adults Policy  
Vicinity Recruitment Policy  
Vicinity Sickness & Absence Policy  
Vicinity Staff Training Policy  
Vicinity Harassment Policy  
Vicinity Grievance Procedure  
Cobalt Domestic Violence Policy  
Cobalt Allocations Policy  
Cobalt Relationships Breakdown Policy  
Cobalt Anti-social Behaviour Policy  
Cobalt Suspension Policy  
Cobalt Hate Crime Policy  
Cobalt Racial Harassment Policy  
Cobalt Access to Services Procedure  
BBCCHA Equality and Diversity Action Plan  
BBCCHA Anti-Social Behaviour Policy  
BBCCHA Anti-Social Behaviour Procedures  
BBCCHA Allocation and Lettings Policy  
BBCCHA Racial Harassment Policy  
BBCCHA Protection of Vulnerable Adults Policy  
BBCCHA Tenant Involvement Action Plan

## **5. Definitions**

**BME:** Black and Minority Ethnic Communities

**Equality:** to treat everyone in an equal and fair manner

**Diversity:** understanding that each individual is unique, and recognizing our individual differences.

**Procurement:** The purchasing of goods or services at the best cost.

**Regulatory Framework:** Sets out the fundamental obligations of housing associations as set by the Housing Corporation.

**Social Inclusion:** Social inclusion refers to the extent that individuals, families, and communities are able to fully participate within their neighbourhood.

### **People with additional support needs:**

Any person or group who feel they require additional support to maintain their tenancy and / or to promote a return to independence and safe, active participation within the community.

LHT recognises that any person can require additional support at any time during their tenancy and that additional support needs may arise as a result of one or more of the following circumstances:- Age / frailty, Mental health problems, Learning / physical / sensory disabilities, Drug and alcohol problems, threat of domestic violence, teenage pregnancy, refugees, history of homelessness / imprisonment / tenancy loss.

## **6. Legal and regulatory requirements**

The Vicinity Group and its subsidiary organisations have a duty to comply with the following statutory legal requirements:

Asylum and Immigration Act 1996 (amended 2004)  
Civil Partnership Act 2004  
Disability Discrimination Act 1995 and 2005  
Equality Act 2006  
Equality Act (Sexual Orientation) Regulations 2007  
Equal Pay Act 1970 (amended 1984)  
Employment Equality (Religion or Belief) Regulations 2003  
Employment Equality (Sexual Orientation) Regulations 2003  
Employment Equality (Age) Regulations 2006  
Gender Recognition Act 2004  
Protection from Harassment Act 1997  
Race Relations Act 1976 amended 2000  
Racial and Religious Hatred Act 2006  
Sex Discrimination Act 1975

(See appendix A for further details regarding legislative requirements)

### **Regulatory Requirements:**

- The Housing Corporation Regulatory Code 2005
- The Commission for Racial Equality (CRE) Code of Practice on Racial Equality in Housing 2006
- The Commission for Racial Equality (CRE) Code of Practice on Racial Equality in Employment 2006
- The Housing Corporation Good Practice Notes 4 (Race Equality and Diversity) & 8 (Equality and Diversity)
- Race and Housing Challenge Report
- Disability Discrimination Act 1995 Code of Practice: Rights of Access. Services to the Public, public authority functions, private clubs and premises (amended 2006)
- The Duty to promote Disability Equality Statutory Code of Practice, England and Wales December 2006
- Employment and Occupation 2004
- This Policy also addresses the Audit Commission expectations outlined in its Key Lines of Enquiry.

As a member of the National Housing Federation (NHF), Vicinity Group will also take into account guidance produced by the Federation, e.g. the NHF Code of Equality in Housing.

## **7. Equality Impact Assessment**

The implementation of the policy will assist in eradicating inequality and discrimination, ensuring services are accessible to all and that there is equality of opportunity.

Vicinity will regularly undertake Equality Impact Assessments when reviewing any policy or service area to ensure that any changes made meet the needs of all our residents and staff, and do not unfairly disadvantage any particular groups or individuals.

Vicinity will monitor demographic information with the aim to tailor services to meet the diverse needs of tenants and residents.

## **8. Resource Implications**

There are no direct resource implications.

Resources are outlined within individual subsidiary policies as listed above.

## **9. Appendices**

A. Outline of Legislative Requirements (in relation to this policy)

## Appendix A: Legal Requirements:

**Asylum and Immigration Act 1996 (amended 2004)** - Made it a criminal offence to employ anyone subject to immigration control unless they have permission to live and work in the UK. From May 2004, amended regulations came into force amending the procedures which organisations have to follow in order to assure themselves that new employees are eligible to work in the UK.

**Civil Partnership Act 2004** – same sex couples who register a civil partnership have the same rights as a married couple.

**Disability Discrimination Act 1995 and 2005** – prohibits discrimination against disabled people in employment and in the provision of services, including the management and disposal of premises. Public bodies must carry out their duties in a way that eliminates discrimination and promotes equality of opportunity for disabled people. Landlords must provide ‘reasonable adjustments’ if these are needed by a disabled person to live in a property.

**Equality Act 2006** – it is unlawful to discriminate on the grounds of sex. The Act imposes a duty to promote equality of opportunity for women and men.

**Equal Pay Act 1970 (amended 1984)** – prohibits discrimination in pay and conditions of work between men and women

**Employment Equality (Religion and Belief) Regulations 2003** – makes it unlawful to discriminate on the grounds of religion and belief. The regulations apply to vocational training and employment.

**Employment Equality (Sexual Orientation) Regulations 2003** – makes it unlawful to discriminate on the grounds of sexual orientation. The regulations apply to vocational training and employment.

**Employment Equality (Age) Regulations 2006** – makes it unlawful to ‘directly’ or indirectly’ discriminate against on the grounds of age. The regulations apply to employment.

**Gender Recognition Act 2004** – It is illegal to discriminate against trans-sexuals in the work place. Trans-sexual people who have acquired legal recognition of their gender can obtain benefits and state pension in the same way as anyone else of that gender.

**Protection from Harassment Act 1997** – makes it illegal for any person to pursue a course of conduct which amounts to harassment of another.

**Race Relations Act 1976 amended 2000**– outlaws racial discrimination in employment, education, the provision of goods, facilities and services and the disposal and management of premises. Public bodies must carry out their duties with due regard to the need to eliminate unlawful racial discrimination and promote equality of opportunity and good race relations.



**Racial and Religious Hatred Act 2006** – makes it unlawful to stir up hatred against people because of their religious beliefs or lack of them.

**Sex Discrimination Act 1975** – makes it unlawful to discriminate against anyone on the grounds of gender or to discriminate against married people in the field of employment.