



## Equalities Policy

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# Govanhill Housing Association Group Policy on Equality and Diversity

## 1. Purpose of the Policy

- 1.1. This Policy describes how Govanhill Housing Association (GhHA) will promote equality and diversity in our service delivery and in the management of our organisation. The Policy applies to GhHA and to our subsidiary Govanhill Community Development Trust (GCDT).
- 1.2. The Policy addresses the legal and regulatory requirements that GhHA must meet, and describes what we will do take action that will benefit our customers, communities and employees.

## 2. Policy Commitment and Objectives

- 2.1. Equality is central to GhHA's values, and we are committed to ensuring equality of opportunity and fair outcomes for all people and groups in our communities. Govanhill is one of the most diverse communities in Scotland, and GhHA will respond to the needs of all sections of the community and promote integration and community cohesion.
- 2.2. The objectives of this Policy are as follows:

- ❖ To eliminate discrimination and advance equality of opportunity for all, in our role as a housing provider and employer.

- ❖ To treat all of our customers and employees fairly and with dignity and respect.
- ❖ To deliver our services in a way that responds to the individual needs of our customers.
- ❖ To show zero tolerance of harassment and hate crime.
- ❖ To promote tolerance and community cohesion in our neighbourhoods.
- ❖ To comply with legislation and seek to meet best practice standards.
- ❖ To encourage our contractors and suppliers to promote equality, respect diversity and prevent discrimination.

- 2.3. To help achieve these objectives, GhHA will:

- ❖ Require all of our staff and members of the GhHA Management Committee (MC) to show a positive commitment to equality and diversity.
- ❖ Develop good quality information about our customer base and individual customers.
- ❖ Engage with, and seek feedback from, all sections of the community about our services.
- ❖ Seek to ensure that our governance, management and workforce are broadly representative of the communities we serve.

### 3. The Local Context for Equality and Diversity

- 3.1. This section of the Policy provides a brief commentary about the key issues relating to equality and diversity in Govanhill. **Appendix 1** provides a profile of the area based on statistical and other information, to inform our strategic approach and help us to identify local priorities for action.
- 3.2. Govanhill has experienced significant population change in recent years, as well as a number of negative changes in the local housing market, notably the rapid growth of poor quality private rented housing in the area, underinvestment in improving poor quality housing, high levels of overcrowding and deterioration in the quality of the area's physical environment.
- 3.3. Addressing these issues is vital to achieving GhHA's vision, which is that:

#### **Everyone living in Govanhill and Merrylee should:**

- ❖ **Enjoy good quality, warm, safe and affordable housing that contributes to their health and wellbeing and to community pride**
- ❖ **Live in a neighbourhood that is clean and well cared for, with excellent neighbourhood services and opportunities for all.**

- 3.4. GhHA's commitment to promoting equality and diversity is embedded in the delivery of our core services, supplemented by a number of specific initiatives such as:
- ❖ GOSIP, which provides tailored access to our services for members of the BME community
  - ❖ The South West Govanhill acquisition and repair programme, which combines improvements in property standards with tenancy support and community development for residents from the Roma community
  - ❖ Our joint working with GCDT, which is currently delivering significant programmes to support local residents from minority communities.
- 3.5. Many aspects of inequality are present in Govanhill, as shown below:

- ❖ The ethnic diversity of Govanhill is unparalleled in any other Scottish neighbourhood, and ethnic minority residents are more likely to live in poor quality or unsuitable housing, particularly in private sector housing
- ❖ Most of Govanhill's housing consists of walk-up tenements, which reduces accessibility for disabled people and for older people with mobility problems
- ❖ Poor health and low life expectancy
- ❖ The health and social impacts of alcohol and drug use
- ❖ Educational attainment across all age groups

- ❖ Children living in workless households
- ❖ High numbers of young people not in employment, education or training
- ❖ High levels of poverty and low incomes and levels of economic activity
- ❖ Unemployment levels, particularly among people who are long-term unemployed
- ❖ Overcrowded housing, particularly in the private sector, and the lack of housing in the area for larger families
- ❖ The impact of poor quality and badly-managed private rented housing on individual tenants and on the area as a whole.
- ❖ Social exclusion and vulnerability among many BME residents, particularly those from Eastern Europe
- ❖ The need to promote community cohesion and integration.

3.6. Responding to these issues involves different approaches. In many cases, GhHA and/or GCDT will take direct action in our own right. In other cases, we will work in partnership with others or let other agencies to take the lead.

3.7. GhHA and GCDT will continue to work closely with Govanhill Community Action (GoCA) and the Govanhill Regeneration Group, to help ensure that there is good dialogue about how best to plan and deliver services that will address inequalities in Govanhill.

## 4. Legal and Regulatory Requirements

4.1. GhHA will meet all of its legal obligations as set out in the following legislation:

- ❖ The Equality Act 2010
- ❖ The Human Rights Act 1998 and associated European Union directives
- ❖ The Scotland Act 1998
- ❖ The Housing (Scotland) Acts 2001 and 2010

4.2. **Appendix 2** provides a commentary on each piece of legislation and what it means for GhHA. This section of the Policy summarises the most important requirements.

### The Equality Act 2010

4.3. The Equality Act 2010 sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all.

4.4. There are nine “protected characteristics” in the Act:

- ❖ Age
- ❖ Disability
- ❖ Gender
- ❖ Gender reassignment
- ❖ Marriage and civil partnership
- ❖ Pregnancy and maternity

- ❖ Race
- ❖ Religion or belief
- ❖ Sexual orientation

4.5. it is unlawful to discriminate against, harass or victimise a person because they have one or more of the protected characteristics.

4.6. When carrying out “public functions” – this term covers just about all of the services GhHA provides – GhHA must also meet the **general equality duty** set out in section 149 of the Equality Act.

4.7. The general equality duty means that GhHA must:

- ❖ **Eliminate unlawful discrimination** (including direct and indirect discrimination and discrimination arising from disability), as well as harassment and victimisation.
- ❖ **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it.
- ❖ **Foster good relations** between people who share a protected characteristic and people who do not share it.

#### **Human Rights Act 1998**

4.8. The Human Rights Act 1998 specifies that every individual has the right to own and enjoy the ownership of property; the right to respect for private life; the right to respect for family life; and the right to respect for their home. The Act

provides protection against discrimination with regard to any of these rights and could affect many of the housing and other services that GhHA provides.

4.9. The European Convention on Human Rights contains articles setting out the rights that are protected, while alleged breaches of the articles are heard by the European Court of Human Rights (ECHR). It is likely that the status of the Act and the jurisdiction of the ECHR will change when the UK exits the European Union.

#### **Scotland Act 1998 and Housing (Scotland) Act 2001**

4.10. As well as UK legislation, the Scottish Parliament has powers under the Scotland Act 1998 to “encourage and promote” equal opportunities.

4.11. Equal opportunities requirements are written in to section 106 of the Housing (Scotland) Act 2001 which states that when providing housing and related services, registered social landlords (RSLs) must:

**“ ... act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements” set out in the Scotland Act.**

#### **Housing (Scotland) Act 2010: Scottish Social Housing Charter**

4.12. The Scottish Social Housing Charter sets standards and outcomes that all social landlords should achieve when performing their housing activities. The updated version of

the Charter (April 2017) sets a number of equalities obligations to be met by social landlords:

- ❖ Performing 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.
- ❖ Complying with equalities legislation.
- ❖ Understanding the needs of different customers and delivering services that recognise and meet these needs.

### **Regulatory Standards on Equality**

4.13. The Scottish Housing Regulator (SHR) sets equivalent standards for the governance and financial management of RSLs in Scotland. The SHR's standards and guidance state that:

**The RSL pays 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.**

## 5. GhHA's Equality and Diversity Commitments

This section of the Policy describes the main actions GhHA will take across all aspects of our work. In addition to the commitments shown, the Association will prepare an Equality and Diversity Action Plan to set out specific actions we will take to meet these commitments.

### GhHA's Equality and Diversity Commitments are to:

#### Governance

- 1) Promote a culture that respects and promotes equality, diversity and inclusion.
- 2) Ensure that GhHA's Management Committee (MC) provides leadership and commitment, and makes resources available to achieve our equality objectives.
- 3) Encourage people from all sections of the community to become involved in membership of the MC and the Board of GCDT, making particular efforts to achieve a committee profile that reflects the diversity of our local communities.
- 4) Maintain equalities profile information for the governing bodies of GhHA and GCDT, and use this to inform our succession planning.
- 5) Provide all committee members with training on equality and diversity, along with periodic refresher training.

- 6) Ensure that all committee members sign and abide by the Code of Conduct.
- 7) Encourage all of our committee members to carry out one equality-related activity each year, such as training, attending a community event or a volunteering activity.

#### GhHA's Services

- 1) Comply with the Scottish Social Housing Charter.
- 2) Promote the availability of our housing to all sections of the community and maintain open access to our housing list.
- 3) Make sure our services are accessible to all of our customers.
- 4) Tailor our approach to service delivery, where needed, to take account of customers' individual needs.
- 5) Ensure that all GhHA staff have awareness of the issues that different customers may experience, and know how to respond to these issues in a person-centred and flexible way.
- 6) Ensure that GhHA's office premises are fully accessible to our customers, employees and visitors.
- 7) Take prompt action to address all alleged instances of discrimination, harassment or victimisation.
- 8) Describe how we will address equality issues in our policies and procedures for individual service areas (e.g. housing allocations, repairs, property adaptations, tenancy agreements, harassment).

## **Service Development and Customer Involvement**

- 1) Encourage and enable customers to help shape our policies and service delivery.
- 2) Encourage input from underrepresented groups.
- 3) Be sensitive to the cultural, mobility and other needs of different groups when we are planning consultation events.
- 4) Identify the equality and inclusion impacts that significant changes to our policies and procedures may have, before they take effect.
- 5) Develop relationships with community/ interest/voluntary groups who can help us advance our commitment to equality and diversity.

## **Information and Communication**

- 1) Meet requests for our policies and other documents to be provided in different formats or languages, wherever possible.
- 2) Make confidential, effective language and communication assistance available to customers who need this, either through our own staff who speak community languages or through our membership of the Happy to Translate scheme.
- 3) Offer help with filing out forms, where this is needed.
- 4) Through the programmes delivered by GCDT, remove barriers to communication by offering English for Speakers of Other Languages (ESOL) classes and community development support for residents who require extra support.

## **Understanding our Customers and Service Outcomes**

- 1) Use customer profile data, to tailor our services to individual needs and identify trends across our customer base.
- 2) Monitor the profile of who is or is not using our services and take action to remove any barriers to equal outcomes.
- 3) Monitor customer satisfaction results.

## **Procurement**

- 1) Ensure that contractors and suppliers have an acceptable Equality and Diversity policy, and, if not, require their compliance with GhHA's Policy.
- 2) Consider the equality and diversity commitment and performance of contractors and suppliers in tendering and selection processes.
- 3) Make contractors aware of the diverse needs of GhHA's customers, so that they are equipped to meet these.
- 4) Set clear standards of conduct, so that all GhHA customers and staff are treated with courtesy and respect at all times.
- 5) Provide opportunities for smaller contractors and suppliers since these may be more likely to employ workers from ethnic minority groups.
- 6) Have systems in place to monitor the performance of our contractors and suppliers.
- 7) Use GhHA's purchasing power on larger contracts, to secure community benefits that will address disadvantage and inequality in our communities.

### **Investment in New and Existing Homes**

- 1) Research and respond to the diverse housing needs in GhHA's communities, when planning new developments.
- 2) Provide quality new housing of the type and design people need.
- 3) Regularly review the condition of GhHA's existing homes, ensuring that residents' needs and aspirations are taken into account when we invest in their homes.
- 4) Carry out an ongoing programme of adaptations to existing homes, to meet the needs of tenants with disabilities or health conditions that require changes to be made to their homes.

### **Staffing and Employment**

- 1) Promote a culture that respects and promotes equality, diversity and inclusion within the workplace.
- 2) Treat all employees, whether permanent or temporary, full time or part time, fairly and with respect.
- 3) Ensure that all aspects of our procedures and practices are consistent with legislation and statutory guidance.
- 4) Operate in accordance with the EVH model terms and conditions.
- 5) Seek advice when required, to ensure that our practices are lawful and meet good practice standards.

### **Recruitment and Development**

- 1) Aspire to a workforce that broadly reflects the diversity of the communities we serve.
- 2) Advertise vacancies for permanent jobs internally and externally, wherever feasible.
- 3) Advertise and/or promote job vacancies to protected characteristic groups who are underrepresented within our workforce.
- 4) Appoint and promote staff objectively and on merit, based on their experience, ability and potential.
- 5) Monitor the profile of job applicants and successful candidates, based on the protected characteristics.
- 6) Ensure fair treatment for all colleagues in relation to opportunities for career development and progression.

### **Discrimination, Harassment, Bullying and Dignity at Work**

- 1) Ensure that no GhHA or GCDT employee is subjected to any form of discrimination, harassment or bullying by managers, co-workers or committee members, and that any allegations of such treatment are investigated thoroughly in accordance with GhHA's policies.

### **Staff Training and Commitment**

- 1) Ensure that all members of staff receive suitable training on equality and diversity, and that refresher training is provided periodically.

- 2) Encourage all of our staff members to carry out one equality-related activity each year, such as training or a volunteering activity, or proposing a work-related change.

### **The Workplace Environment**

- 1) Make sure that our office premises are fully accessible to disabled colleagues and visitors.
- 2) Provide a workplace environment that meets the needs of all of our staff, making reasonable adjustments and adaptation where this is required.

### **Remuneration**

- 1) Pay the Living Wage.
- 2) Use EVH salary scales to help ensure equal pay for equal work.
- 3) Ensure fairness and transparency, if we are conducting job evaluations that will result in changes to gradings and pay.

## **6. Gathering and Using Information about our Customers and Staff**

- 6.1. Systems for collecting information and monitoring performance are a key part of this Policy, since good data help us to understand our customers and provide a more responsive service.
- 6.2. The Scottish Housing Regulator's 2016 thematic inquiry report on "Use of Equality and Diversity Information by Scottish Social Landlords" recommends that social landlords should take the following actions:
  - ❖ Review their data collection for the equality elements of the ARC (ethnicity and disability), so that submissions are complete as far as reasonably possible and minimise the number of "unknowns";
  - ❖ Use equalities data to help inform their understanding of the individual needs of their tenants and other service users;
  - ❖ Use equalities data to tailor and target their approach to communicating with tenants and other service users.
- 6.3. GhHA will seek information for the following groups:
  - Management Committee members
  - Staff members
  - Job applicants

- Existing Tenants
  - New Tenants
  - Applicants on the Housing List.
- 6.4. [We will request information from people in these groups based on gender, ethnic origin and disability, while also using population-based data for sensitive personal information such as religion and sexual orientation.](#)
- 6.5. We will collect information from customers at the following stages:
- **Housing Applicants and New Tenants**  
Housing application (failing which housing offer or tenancy sign up, failing which settling-in visit)
  - **Existing Tenants**  
Requests to provide information in GhHA newsletters and website, or as part of our ongoing customer contact with tenants
- 6.6. In asking for co-operation, we will make clear that the customer can choose not to provide some or all of the information requested.
- 6.7. We will also explain clearly the reasons for asking for the information and how it will be used, i.e. the data collected will help GhHA to:
- ❖ Understand the needs of our customers, so that we can provide a better service that meets the customer's needs.
  - ❖ Identify any areas of possible discrimination and plan our services in a way that meets our equality and diversity objectives.
  - ❖ Meet our legal duties to prevent discrimination and promote equality.
- 6.8. As part of our Action Plan, we will review the effectiveness of our systems for collecting and analysing equality and diversity information. This will include consideration of what improvements are possible using the Capita software system for housing management.
- 6.9. [We will review our approach to collecting information when the Scottish Housing Regulator's current review of its Regulatory Framework has been completed. The Regulator has indicated that equalities information collection will be one of the areas considered as part of its review.](#)
- ## 7. Policy Implementation and Management
- 7.1. The Management Committee is responsible for approving this Policy, and for overseeing its implementation. The Director and Management Team have operational responsibility for policy implementation, and for reporting to the Management Committee the outcomes GhHA is

achieving, trends in customer complaints, and any changes in GhHA's legal obligations.

- 7.2. Every employee and Committee member must always act in accordance with the Association's core values and ensure that this Policy is applied in practice. Failure to do so may result in disciplinary action.
- 7.3. Wherever practical, GhHA will reflect our equality and diversity objectives in how we work, as shown in our Equality and Diversity Commitments.
- 7.4. GhHA will produce an Equalities Action Plan, normally covering a period of two years. This will:
  - State our top priorities for development or improvement.
  - Describe how these priorities will be implemented, and how success will be measured (recognising that this will often involve a mix of statistical and qualitative information).
  - Be reviewed annually, to assess the progress that has been made.