

# Diversity Policy

Upon request this document is available in large print, audiotape, Braille, pictorial format and in languages other than English



Reviewed December 2007

# DIVERSITY POLICY

## INTRODUCTION

Broadacres Housing Association is committed to developing an organisational culture which values people from all sections of society and the contribution which each individual can make.

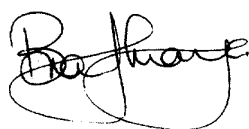
As such we understand that Diversity is essential for an effective and efficient organisation. In short we believe that:

- everyone should be treated in a fair, open and honest manner; and
- it is the right of all employees, service users and visitors to be treated with dignity and respect.

In order to ensure that this happens in practice, the policy is closely related to the Association's Code of Conduct, Bullying, Harassment and Discrimination Policy (both of which can be found in the Association's Terms and Conditions of Employment), the Race Equality Scheme and Disability Equality Scheme, copies of which are available from the Human Resources Manager.

The aim of this policy is to support these commitments by providing a framework for continuous improvement. It covers the procedures and systems established to measure and monitor our performance, both in eliminating discrimination and in implementing good practice.

This policy focuses beyond the traditional concept of 'disadvantaged groups'. It recognises the need to value each individual, in their own right, regardless of whether or not they belong to a particular section of society. Its objectives are to ensure that all staff are able to participate fully in the work of the Association and that our services meet the needs and requirements of all our customers and employees.



.....  
**Reverend B Mayne**  
Chairman of the Board



.....  
**Steve Towers**  
Managing Director

## **POLICY STATEMENT**

Broadacres Housing Association has a commitment to equality of opportunity and the management of Diversity. This means that:-

- In the provision of all its services and the employment of staff, Broadacres will seek to ensure equality and fair treatment for all persons.
- No person or group of persons applying for housing or housing related services, a job, or for contracts with Broadacres, will be treated less favourably than any other person or group of persons because of their sex, sexual orientation, marital status, responsibilities for dependants, race, colour, nationality, ethnic origin, religion/belief or political beliefs, age, class, disability or unrelated spent criminal convictions.
- In hiring contractors and other agencies to work for it, Broadacres will be mindful of its commitment to Diversity.
- In the composition and operation of its Board of Management, Broadacres will be mindful of its commitment to Diversity.
- Responsibility for formal monitoring and review of Broadacres Diversity Policy and practice will be that of the Association's Diversity Development Team in conjunction with the Senior Management Team.
- The role of the Board of Management is to ensure that this policy underpins all aspects of the Association's work.
- We are committed to taking positive steps to ensure that equality of opportunity and management of diversity are integral features of all our activities.

### **Scope of Policy**

This policy applies to the following areas of our business:-

- ~ the governance of Broadacres Housing Association;
- ~ the provision of housing and related services;
- ~ the provision of care / supported housing services;
- ~ the recruitment, employment and training of staff ;
- ~ our public relations activities;
- ~ our procurement and purchasing practices.

## **RESPONSIBILITIES / IMPLEMENTATION**

### **All Staff**

All staff have a responsibility to ensure that this policy is put into practice. We expect a personal commitment from all employees in making it effective and in setting an exemplary standard for others to follow.

Additional and specific responsibilities apply to those who manage staff and to those who are involved in recruitment, promotion, training and development.

All members of staff have a contractual responsibility to:

- understand the values and beliefs of equality and diversity;
- familiarise themselves with this policy, follow it and ensure that any staff members for whom they are responsible do so as well;
- draw to the attention of their line manager any instances of apparent discrimination or any perceived problems in relation to employment or in the provision of services.

### **The Board of Management and Senior Management Team**

The Board of Management as part of its governance role has corporate responsibility for ensuring that this policy underpins all aspects of our work. The Managing Director has a responsibility for developing the organisational culture in which this policy can operate effectively and for ensuring that it is implemented. The Board will receive annually a progress report on the effectiveness of the Association's policies in relation to equality and diversity, as well as statistical information in relation to service delivery, lettings, access to information and advice, tenant participation, tenant satisfaction, dealing with incidents, procurement, Governance, staffing and employment, and the Associations performance against the Housing Corporations Good Practice Note 8 (GPN8). In addition our Board Members and the Senior Management Team will receive information and training in equality and diversity issues.

### **The Diversity Development Team**

The Diversity Development Team is made up of staff from all levels and departments and is accountable directly to the Senior Management Team. The Team will meet every two months to monitor equality and diversity in the Association, including the development of policies and the effectiveness of procedures and systems. More specifically it will:

- review relevant information e.g. national monitoring statistics;
- review developments and initiatives;
- consider changes to legislation and best practice;
- consider new diversity matters and make policy recommendations;
- promote an understanding and culture of diversity throughout the Association.

The Team will also ensure that the principles of equality and diversity are applied to all our services by the provision of regular information, training and the review of services.

## **COMMUNICATION**

A copy of the Diversity Policy Statement together with a summary of each individual's responsibility will be given to all job applicants and staff, to help ensure that our policy is put into practice.

We will adopt appropriate means of communication and receiving feedback, such as the use of Language Line, and upon request make our documents available in large print, audiotape, Braille, pictorial format and in languages other than English.

Further copies of this policy are available from the Human Resources Manager

## **DEVELOPMENT AND REVIEW**

This policy is designed to encourage practical changes. The Association therefore expects to update it in light of experience, from applying it in practice and as a result of changes in legislation or our own internal organisation and policies.

## **IMPLEMENTATION OF THE POLICY IN RESPECT OF EMPLOYMENT**

The Association will operate this policy and all other policies and practices relating to it in line with statutory requirements and government codes of practice, e.g. in relation to race, gender, disability or age. The present statutory framework and guidance is shown in Appendix 1. This will be added to and revised in light of any future legislation.

We will ensure that in all of our employment policies and practices we comply with the principles set out in this policy.

We will also strive to ensure that the particular needs of each individual are recognised and respected, regardless of whether they belong to a particular group provided for by legislation.

The Board of Management and its Senior Management Team have overall responsibility for its implementation and effectiveness.

### **Monitoring Our Effectiveness**

To help us to assess the effectiveness of this Diversity Policy in relation to employment, we will regularly analyse staffing statistics, including workforce composition and recruitment. These will be compared with relevant external data such as ethnic profile of the local workforce. We will also benchmark our policies and practices against best practice and make any appropriate amendments.

### **Recruitment and Retention**

Our 'Process for filling vacancies' contains specific guidance on ensuring equality of opportunity across all stages of the process – including job specification, shortlisting and interview, selection tests and appointment arrangements. The context and effectiveness of our recruitment procedures will be continually reviewed and may be altered in light of experience, circumstances and legislative change.

In our recruitment advertisements and literature, we will make clear that we welcome applications from all sections of society. We will monitor applications, shortlisting and appointments in order to identify any areas of concern and to take remedial action where necessary.

In line with our policy statement, we are committed to encouraging and promoting the recruitment and retention of people from all sections of society. This commitment includes a specific policy for recruitment and retention of people with disabilities.

We will also maintain and develop a range of policies and procedures, which offer staff the means to combine work and family life. These include flexible working hours, time off for dependants, part time working, maternity, paternity and adoption leave.

### **Induction, Training and Development**

All new staff will be required to attend training on the implications of this policy for their work as part of their induction programme.

Existing staff will be required to attend training to bring them up to date with new policy and practice since their appointment. This will be on a three-year rolling programme.

### **Staff Appraisal**

The Association will ensure that managers undertaking competency-based appraisals are properly aware of equality and diversity issues. Before each appraisal round, all line managers will be reminded of the need to ensure consistency and objectivity when undertaking performance assessments and the need to guard against less obvious forms of discrimination.

### **Conditions of Employment**

The Association will keep our terms and conditions of employment under constant review to ensure that they comply with legislative changes and the principles laid down in this policy.

### **Working Environment**

It is intended that proper access for people with disabilities be provided throughout all work places and a programme be set up for improvements where this is not already the case.

Every effort will be made to ensure that the special needs of people with disabilities are met including providing adapted equipment, changes of working methods to help meet their needs and any alterations to premises.

Working arrangements will be as flexible as possible to take account of people's responsibility for dependants and/or their personal circumstances.

A supportive working environment will be created for all staff so as to prevent the occurrence of any direct or indirect discriminatory working practices. Where necessary managers should receive training to enable them to meet these ends.

## **IMPLEMENTATION OF THE POLICY IN RESPECT OF TENANTS AND HOUSING APPLICANTS**

### **Access to Housing Services**

The Association's Lettings Policy specifically highlights that there is no discrimination against, or disadvantage to, any person.

In line with this principle we will:-

- ensure that the principles of equality and diversity are applied to the provision of housing and related services;
- work with our partners to access and prioritise the needs of local communities;
- ensure we have the relevant procedures in place and staff will be trained to prevent discrimination in the allocation of our houses and other services;
- maintain an effective monitoring and review system for preventing discrimination.

### **Housing Management - Harassment**

We have an existing Racial Harassment policy and procedure, which is currently being reviewed as part of Best Value. This policy extends into other forms of harassment. Copies of this procedure are available from the Area Housing Managers.

### **Housing Management – Graffiti**

Any graffiti aimed at harassing or discriminating against anybody will be removed within 24 hours of it being reported.

### **Tenancy Conditions**

A clause stating that harassment by tenants will not be tolerated has been included in the Association's Conditions of Tenancy.

### **Broadacres Literature**

No Broadacres literature will include any sexist, racist or otherwise discriminatory language.

A translation service will be made available where required. The Association will provide information upon request on audiotape, large print, pictorial format, Braille and languages other than English.

## IMPLEMENTATION OF THE POLICY IN RESPECT OF CONTRACTORS

Broadacres housing Association is concerned to ensure the well being of its employees and tenants and as such wishes to impress that abuse and harassment of any kind will be treated extremely seriously and will under no circumstances be tolerated. Any alleged incident will be thoroughly investigated in accordance with the Association's procedures. Any contractor or consultant directly or indirectly employed who is found by the Association to be causing abuse or harassment may be removed from the Association's approved list and thus prevented from working for the Association until further notice.

The Housing Corporation's Regulatory Code / Guidance states:

*'as a criterion for award of work or contracts and a condition of doing business, associations should pass on requirements in respect of staffing, customer satisfaction and dealing with racial harassment to their consultants, contractors and suppliers'. (Regulatory Code 2.7 - **The Way Forward; Our Approach to Regulation.** [2002])*

To address this obligation all contractors / consultants working for Broadacres are required to provide a copy of their Equal Opportunities / Diversity Policy to the Association. In the event that they do not have such a policy then they are required to sign up to the Broadacres policy.

We will:

- Ensure that our contractors and consultants comply with our policy and do not discriminate in the execution of our contracts.
- Ensure the selection of contractors and consultants is fair and non discriminatory and where possible be drawn from the communities in which we operate.
- Monitor contractors/Diversity Policies/Practices and that Diversity will be a standard item for meeting with contractors.

## MONITORING AND REVIEWING THE DIVERSITY POLICY

As indicated earlier, responsibility for monitoring and reviewing the Association's Diversity Policy will be that of the organisation's Diversity Development Team in conjunction with the Senior Management team.

The terms of reference and Mission Statement of the above Group is attached to this Policy at Appendix 3.

Membership of the above Group will be drawn from a cross section of the organisation and will include a member of the Senior Management Team and the Human Resources Manager.

An annual progress report will be presented to the Association's Board of Management. This report will include the results of service reviews undertaken by the Group during the year and provide information on how far the organisation's services/staffing reflect the community Broadacres serves. The report will also provide an update on the performance of Broadacres in relation to Equal Opportunities and the management of Diversity against an agreed action plan.

In addition, the Diversity Development Team will undertake regular reviews in conjunction with Directors / Service Managers of the Association's current practices, using Equality Impact Assessments, to identify gaps and areas for improvement in services.

**Legal Obligations – The Statutory Framework**

The Association will operate this policy and all other policies and practices relating to it in line with statutory requirements. The present statutory framework within which we apply this policy is shown below:

- The Race Relations Act 1976 and associated Codes of Practice issued by the Commission for Racial Equality (CRE) (Particularly Employment and Code of Practice for rented housing).
- The Race Relations (Amendment) Act 2000 and associated Codes of Practice issued by the CRE.
- The Housing Act 1988 (in particular Section 56 which makes specific reference to Section 71 of the Race Relations Act 1976).
- The Sex Discrimination Act 1975 and 1986 (as amended) and associated Codes of Practice issued by the Equal Opportunities Commission (EOC).
- The Disability Discrimination Act 2005 and associated Codes of Practice.
- The Equal Pay Act 1970 (as amended) and the EOC Code of Practice on Equal Pay.
- The Human Rights Act 1998.
- The Employment Relations Act 1999.
- The Employment Act 2002.
- Employment Equality (Sexual Orientation) Regulation 2003.
- Employment Equality (Age) Regulations 2006
- Equality Act 2006.

In addition, we will apply this policy in line with:

- The government Code of Practice 'Age Diversity in Employment'.
- Performance Standards for registered social landlords: Equal opportunities.
- Black and Ethnic Minority housing policy (1998).
- Older people's policy (1995).
- Overcoming disability discrimination: a guide for registered social landlords (2000).
- The Race and Housing Enquiry's Challenge Report 2001.
- The recommendations of the Stephen Lawrence Inquiry

## **TERMS OF REFERENCE FOR DIVERSITY DEVELOPMENT TEAM**

The Diversity Development Team is made up of a cross section of staff and reports directly to the Senior Management Team.

The role of the group is:

To continually review, manage and audit the Association's Diversity Policy.

To analyse and implement necessary actions resulting from changes to Government and other relevant policies.

To audit the Association's practices and procedures to ensure compliance with relevant legislation and relevant Codes of Practice and make recommendations for change ensuring at all times the Association adopts and implements best practice.

To promote the concept of Diversity.

To increase the awareness of the issues and to promote attendance of staff on the Associations mandatory Diversity training programmes.

To identify specific Equality and Diversity training requirements as it relates to their individual service area and to make recommendations for inclusions within the Associations Diversity training programmes e.g. Cultural Awareness Training.

To receive information and monitor equality and diversity within the organisation.

To report annually to the Association's Board of Management on the implementation of policy, analysing progress against agreed actions and making recommendations where appropriate.

**MISSION STATEMENT**

Our aim is to create an environment within our area of influence where there is a recognition of individuals differences, needs and preferences.

This will help maximise the potential of staff and enable us to deliver a more diverse and effective service.

In order to achieve this we will:

- ensure all staff and Board Members attend the Associations mandatory Diversity training courses;
- continually to ensure that all staff and Board Members have a commitment, understanding and awareness of equality and diversity;
- introduce, maintain, implement and evaluate policies and procedures;
- be aware of and promote best practice;
- continually undertake impact assessments/reality checks on the Associations systems and practices when delivering its services.