

Policy:	Equality and Diversity
Effective Date:	January 2017
Date Last Reviewed:	January 2017
Scheduled Review Date:	January 2020
Supersedes:	All previous Policies and/or Statements
Approved by:	Board, 12 th January 2017

PURPOSE

This policy is intended to provide a framework for all Tuntum employees, including group members, to support them in delivering accessible services to all tenants, service users and members of the public. Tuntum expects all its employees to work to the principles of equality and diversity, regardless of who they are dealing with. This policy is based on relevant legislation and good practice.

SCOPE

This is a corporate policy and includes requirements that must be adhered to if Tuntum is to perform its legal responsibilities. For this reason, it also applies to our subsidiary, Homecare Plus.

Tuntum employs many contractors to carry out its work and this policy is also applicable to them under the Contractors Charter.

POLICY STATEMENT

Tuntum Housing Association has a total commitment to Equality and Diversity throughout all our activities.

DEFINITIONS

The Equalities Act 2010 placed a duty on the Homes and Communities Agency (then the Tenant Services Authority) and therefore on all Registered Providers to eliminate unlawful discrimination, promote equality of opportunity, and promote good relations between people of different racial groups. This Act broadened the scope of equality legislation by bringing in the concept of 'protected characteristics', which are:

- Age
- Disability
- Gender reassignment

- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

'BME community' represents different races, cultures, genders, disabilities and ethnicities and includes asylum seekers and refugees

RESPONSIBILITIES

Tuntum Housing Association

1. Tuntum Housing Association as an employer is legally responsible for providing a work environment free of direct and indirect discrimination and harassment of whatever type.
2. Tuntum Housing Association will make resources available, when and where required, in order to discharge this legal responsibility and achieve the aims of this policy.

All Staff

All staff have the responsibility to:

1. Ensure that they work in accordance with this policy;
2. Give full commitment to the principles contained in the policy;
3. Make the policy effective.

In particular, the Association expects all staff to:

- Not use behaviour or language that would harass, abuse or intimidate another employee or potential employee
- Not induce or abet others to practice unlawful discrimination
- Not victimise or attempt to victimise individuals or groups on the grounds that they have given evidence or made a complaint of discrimination
- Inform management of any suspected discrimination
- Act at all times professionally and courteously and to carry out their duties with due regard to the policy

Failure of individuals to observe the principles encompassed in this policy may result in a disciplinary offence and will be dealt with under Tuntum Housing Association's Disciplinary Procedure.

In serious cases, such behaviour may be deemed to constitute gross misconduct, and as such may result in summary dismissal.

Chief Executive and Management Team

The Chief Executive and Management Team have a central responsibility to:

1. Implement the policy within their areas of responsibility;
2. Oversee and review the policy;
3. Actively promote Equality and Diversity;
4. Challenge discrimination within their areas of responsibility.

Human Resources

Human Resources has responsibility for:

1. Ensuring that staff are aware of this policy;
2. Ensuring that all HR policies and practices, especially regarding recruitment, reflect the policy and the values it enshrines.

Recruitment and Staff Development

Tuntum will ensure that:

1. Short listing and internal selection of staff is carried out within equality and diversity guidelines to ensure candidates meet the essential skills for the post unless there is a demonstrable business reason not to.
2. Person specifications are drawn up outlining the skills, experience, knowledge and ability required to undertake the duties of the post.
3. Every job description contains an Equality and Diversity statement.
4. Positive management is given to people with a disability and those groups under-represented within Tuntum.
5. Any reasonable adjustments are carried out for any person employed with a disability.
6. All new staff will receive a structured induction programme within each Department, which will include advice on our commitment to Equality and Diversity.
7. Staff will periodically receive Equality and Diversity training.
8. We will carry out a training needs assessment for each staff member annually as part of the appraisal system. We will make every effort to meet identified needs within a reasonable timescale.

Communications

We will ensure that all information will be non-discriminatory in content and will actively promote Equality and Diversity wherever possible.

1. All new staff will be given a copy of this Equality and Diversity Policy.
2. We will monitor all our documents for plain English and make them available on request in translation or in another medium.

Governance

1. We will ensure that Tuntum Housing Association's Board is diverse, reflecting the communities that Tuntum Housing Association works within whilst maintaining at least 80% BME representation. The Board will establish and maintain a clear lead in championing equality and diversity within Tuntum.
2. Tuntum Housing Association will periodically review the membership of its Board and its sub committees with regard to skills and the need to reflect the communities we serve.
3. Board and Committee Members will receive an induction and ongoing training on Equality and Diversity issues.

Access to Housing

We will:

1. Use a variety of methods to market our homes to ensure equal access to all.
2. Participate in 'sensitive' lettings schemes where appropriate to enable underrepresented groups to have access to good quality homes.
3. Use a wide range of referral agencies to ensure all sections of the community have access to our homes.
4. Have in place an accurate database containing the ethnic composition of applicants and successful applicants (tenants), which will assist in identifying any inequality of access.

In relation to New Homes and Refurbishment, Tuntum Housing Association will:

1. Make sure that any homes we develop will not adversely affect the needs of any local community through their location or design. We will consult with local authorities and communities over these issues.
2. Consider adding extra features such as improved security or lighting when developing homes in areas where particular communities feel threatened.
3. Include the specific needs of people facing discrimination in regeneration and community development programmes.
4. Seek to work in partnership with a diverse range of Associations, including fellow BME and mainstream to:

- a) Explore management agreements with them;
- b) Extend the use of minority contractors on their approved list.

Partners, contractors and consultants

Tuntum operates a zero-tolerance policy relating to abuse to or from contractors or similar around protected characteristics or otherwise.

The association aims to build capacity amongst the BME community by engaging contractors and consultants from minority groups on its approved contractor lists. We aim to ensure that:

1. We select partners, contractors and consultants in a fair and non-discriminatory way.
2. All contractors who work with the Association will demonstrate their commitment to equality by signing the Association's Contractor Charter
3. We will aim to employ contractors for repairs and maintenance who reflect the communities in which we work, including encouraging those contractors to employ an agreed proportion of labour who live in the locality.
4. We take positive action to increase the number of minority contractors on the tender list.
5. We actively support the recruitment of minority contractors where they are able to meet our quality standards, even if it means paying more than a cheaper provider.

Customer Involvement and Consultation

We will make sure that membership of any co-regulatory tenant body such as our scrutiny panel (Magnify) is an option open to all tenants and residents to assist Tuntum Housing Association in offering the best possible service through feedback and structured decision making.

Specialist Housing and Homecare Plus

We will ensure that the services our specialist housing and home care services provide are particularly designed to meet the needs of individuals within the local BME community and, in regard to Homecare Plus, preserves a specialism in addressing the specific needs of BME elders.

REFERENCES:

The main legislative or good practice milestones that have been used in developing this policy are:

- The Race and Housing Enquiry: Challenge Report (2001), stemming from the McPherson Report (Stephen Lawrence), prompted the then Housing Corporation to review its Regulatory Code and Guidance in this area and these revisions came into place in January 2002.
- In November 2002 the Housing Corporation issued a Good Practice Note (GPN4) to help Registered Social Landlords (now Registered Providers of Social Housing) implement these aspects of the Regulatory Code covering Race Equality and Diversity.
- The then Commission for Racial Equality (now Commission for Equality and Human Rights) issued a new "Code of Practice on Racial Equality in Housing" that came in to effect on 1st October 2006. It replaced the statutory codes of practice in rented and non-rented housing issued by the then CRE between 1990 and 1991. It aimed to:
 - Set mandatory standards for achieving racial equality;
 - provide practical guidance that would help organisations and individuals involved in all areas of housing to avoid unlawful racial discrimination and harassment;
 - promote equal opportunities for all and encourage good race relations

In addition to the code there appeared:

- The Department for Communities and Local Government's (DCLG) BME action plan and its subsequent updates
- The Community Cohesion action plan
- The Neighbourhood Renewal Unit's (NRU) Race Equality Action Plan
- The DCLG Housing and Diversity Action Plan
- The Housing Corporation's Race Equality Scheme and (separate) BME action plan.

We have a duty to comply with the following current legislation, regulatory requirements and guidelines:

- The Equality Act 2010
- Human Rights Act 1998
- The Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974
- Asylum and Immigration Act 1996
- Gender Reassignment Regulation 1999
- The Race Relations Act (Amendment) Regulations 2003
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Religion or Belief) Regulations 2003
- The Civil Partnership Act 2004

- The Racial and Religious Hatred Act 2006
- The Employment Equality (Age) Regulations 2006
- The Work and Families Act 2006
- The Care Act 2014
- Homes & Communities Agency's Regulatory Standards.
- Race Equality Code of Practice for Housing Associations 2002.

QUESTIONS

Lynsey Baum, HR Assistant

PROCEDURES

Recruitment Procedures

To attract a wide range of staff from diverse groups;

1. Advertising will state Tuntum Housing Association's Equality and Diversity objectives and be placed in the most appropriate media, including targeted advertising addressed to ethnic minority communities and/or other specific groups.
2. The interviewing panel will agree the wording of the advertisement in accordance with the person specification and decide upon the most appropriate advertising media.
3. Wording of advertisements will state that Tuntum Housing Association welcomes applications from a diverse range of people including the disabled.

All recruitment procedures are designed to satisfy employment legislation and are reviewed regularly with regard to UK and European legislation.

Statements to be within job descriptions:

For posts with management or supervisory responsibilities this is:

"Implement the Association's Equality and Diversity Policy ensuring that all practices and procedures are in accordance with best Equality and Diversity practice and that staff are aware of Equality and Diversity considerations in respect of their duties."

For posts without management or supervisory responsibilities it is:

"To carry out the above duties in accordance with the Association's Equality and Diversity Policy."