



TITLE	EQUALITY AND DIVERSITY
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This Policy relates to Equality and Diversity and the Group responsibility to ensure that our services promote equality of opportunity and eliminate discrimination.

1 Policy Statement

This policy sets out WM Housing Group's (WMHG) commitment to ensuring that all customers, Board Members, employees, contractors, consultants and agency services are treated equitably and fairly. WMHG values and embraces diversity because we believe this helps to make us stronger as a service provider. Equality and Diversity is core to our business and our aim is to ensure that it is reflected in all our policies, practices and services.

Similarly we are committed to equality of opportunity in all aspects of our work and will not tolerate any form of discrimination, either direct or indirect. We expect this commitment from all Members, staff and others with whom we work, such as suppliers, contractors, consultants and agency services. We also expect our customers to support our commitment and we will promote this policy through the delivery of our services.

This policy aims to cover all aspects of equalities, including eliminating discrimination, promoting equality and promoting good relations on the grounds of race, colour, ethnic origin, nationality, religion and or belief, gender, transgender, sexual orientation, disability and age. However, as well as meeting our statutory and regulatory duties, WMHG believes that these should be a starting point and that we should strive to be an organisation that exceeds these standards and be committed to tackling social exclusion in its widest sense.

Our approach focuses on seven integrated strands to equality and diversity, namely, gender, race, disability, age, religion, sexual orientation and transgender; and the nine protected characteristics detailed in the new Equality Act 2010, those being age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Group will endeavour to reflect diversity in all its activities, make them accessible to everyone and ensure equality of opportunity for all. This approach is also designed to help us to continuously improve our business and services, by extending our understanding and ability to embrace the diversity of the individuals and communities where we work, and so tailor services more effectively to meet their needs.

2 Policy Purpose and Aims:

2.1 This policy supports our values which are:

- Providing Excellent Service
- Valuing People
- Acting with Integrity
- Delivering Creative Solutions

2.2 This policy meets the Tenant Service Authority (TSA's) Regulatory requirement Standard for Tenant Involvement and Empowerment, which requires us to 'understand and respond to the needs of our tenants by treating all tenants with fairness and respect, demonstrate that we understand the different needs of our tenants, including in relation to the seven equality strands and tenants with additional support needs'. It also meets the requirements of the Audit Commission's Key Line of Enquiry (KLOE) Cross-cutting Theme - Diversity, which requires us to promote user involvement, develop our partnership working, deal effectively with harassment and domestic violence and be aware of and respond to legislative changes.

3 Our Policy

3.1 This policy promotes the values of the organisation and will ensure that in:

- Providing Excellent Service we will:-
 - Aspire to excellence in customer services
 - Seek ways to enhance communities
 - Go the extra mile
 - Do what we say we will when we say we will do it and if we don't apologise and take steps to put it right
- Acting with Integrity we will:-
 - Be honest in our dealings with you
 - Run our business in a way which is ethical
 - Use our resources and influence to ensure our policies and practices reflect our commitment to ethical working
- Valuing people we will:-
 - Value you and treat you with respect and understanding
 - Get things right first time and involve you wherever we can on the things that affect you
 - Listen to what you tell us and use this to improve the services you receive.
- Delivering Creative Solutions we will:-
 - Work with you and our partners in a culture of mutual respect

- Work with you and our partners to help find solutions which reflect your needs as an individual or the needs of our communities

3.2 Access to Housing and services

Anyone applying for housing or services will be dealt with fairly and without any form of discrimination. We actively encourage all sections of the communities where we work to make use of WMHG's services.

We are committed to building and delivering services, facilities and resources that are accessible, relevant and of use to the individuals and communities where we work. This involves improving our understanding of our customers and their needs, as well as recognising that how we deliver services may need to be different to meet diverse needs. It also includes making a range of opportunities available for customers to be involved in shaping and improving those services.

3.3 Supporting communities

WMHG works in a wide range of diverse communities so that its contribution varies from leading on local neighbourhood initiatives to working in partnership with others to identify the issues and contribute to addressing them.

We recognise that some people in the communities where we work may be reluctant to approach housing organisations for information or services for a variety of reasons. We will take a pro-active approach to work with local community organisations to enhance community cohesion.

3.4 Employment

WMHG aspires to a diverse workforce whose profile reflects the communities where it works and will:

- demonstrate its commitment to equality and diversity in all aspects of employment, including recruitment, Group pay strategy, performance and development management processes, training and promotion and by ensuring that the Group's job relativity (job evaluation) methodology has been tested to ensure that it is non-discriminatory.
- take action with the aim of having a workforce that reflects the communities it serves.
- inform all employees of this Policy and of their rights to protection from discrimination, harassment, or victimisation.

WMHG will take action to eliminate discrimination, which will include:-

Recruitment

- all vacancies will be advertised in accordance with agreed protocols and in a way that does not discourage traditionally disadvantaged or under-represented groups from applying for posts.
- specific qualifications or experience will only be called for where essential to the job.
- training will be given to staff involved in recruitment to ensure that they understand and apply the policy.
- different means of promoting our vacancies will be considered in recruitment to positively encourage applications from under-represented groups in our employment
- all applicants with disabilities who meet the minimum requirements for a suitable job will be considered for interview.
- all job applicants will be made aware of the Equality and Diversity Policy.

Monitoring

- the composition of both applicants and the workforce will be monitored regularly to ensure the effectiveness of the Policy and practices and recruitment procedures.
- regular reports will be made to the Boards of Management, recommending action where appropriate.

It is a condition of service that employees adhere to WMHG's Equality and Diversity Policy. Failure to do so may lead to disciplinary action being taken which could ultimately lead to dismissal.

3.5 Board Membership

- WMHG will endeavour to ensure that the composition of its governing bodies reflects the communities they serve. This Policy will apply to the recruitment and development of Board members. Where possible, action will be taken to redress any imbalance in membership.
- Board members are required to be aware of the organisations' commitment to equality and diversity at all times and are bound to comply with this Policy in the discharging of their duties.

3.6 Suppliers, including contractors, consultants and agency services

WMHG will ensure that our suppliers are aware of this policy and will encourage them to have similar objectives. All relevant suppliers will be asked to provide a copy of their own policy or alternatively subscribe to WMHG's. Everyone working on behalf of the Group is expected to behave towards customers and staff in a way that demonstrates

their commitment to this policy and contracts may be terminated in cases of proven harassment or discrimination.

We encourage a diverse range of suppliers onto our Preferred and Approved Lists, alongside other business considerations, such as value for money.

3.7 Development and house design

We work closely with local authorities, the Tenant Services Authority / Homes and Communities Agency and other groups to identify the housing needs of diverse groups.

Our Design Brief takes into account the potential needs of diverse groups, especially disabled people, and new homes are provided in line with the Code for Sustainable Homes.

We will consider requests for aids and adaptations or alterations to an existing home, designed to help a resident to remain in their current home, in line with our Aids and Adaptations Policy.

3.8 Communication

We have access to a wide range of communication methods to help us meet diverse customer and staff requirements and continue to explore different ways of communicating with current and potential customers.

4 Equality Impact Assessment

4.1 We will ensure that our services reflect the diverse communities that we work with and are in line with our policies on equality and diversity. WM Housing Group carries out Equality Impact Assessments to understand the impact that our policies may have on groups of people or individuals. These impacts may be positive or negative. We have reviewed our policy with employees, with Customer Service Improvement Groups, Disability Panel. [The policy is out to consultation with various customer groups and partners and staff].

5 Performance Measures and Targets

5.1 We have set targets by reviewing performance over the last three years and have agreed that targets will be set, monitored and reported in the following areas:

- governance
- staffing
- lettings
- evictions

- customer satisfaction with repairs - Tenants
- customer satisfaction with repairs- Homeowners
- Racial Harassment
- Customer Involvement

5.2 Performance will be measured on a regular basis and reported to WM's Board annually against targets in these areas.

6 Monitoring and Review

6.1 This policy will be reviewed where:

- There are significant changes to legislation, regulation or good practice;
- There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations

In any event this policy will be reviewed no later than three years from the effective date of this version.

7. Confidentiality

7.1 WM Housing Group protects information about its customers, staff, members and suppliers in accordance with the requirements of the Data Protection Act 1998. It recognises that people have a right to privacy and will respect this, only sharing information where the law allows for appropriate information exchange, in line with the Group's Data Protection Policy.

8 Responsibility

8.1 The effective implementation of this policy is the responsibility of the Executive Director of Corporate and Business Services within the Group

9 Associated Documents/Policies

9.1 List of documents/associated policies/publications.

- Equality and Diversity Strategy
- WMHG Single Equality Scheme
- Customer Care Policy
- TSA's Regulatory Code
- Audit Commission Key Line of Enquiry -Cross Cutting Themes - Diversity
- Access to Housing Policy Protocol
- Value for Money Strategy
- Harassment and Bullying in the Work Place
- Flexible Working Policy

Appendix 1

WM Housing Group will abide by existing regulatory requirements and legislation as set out below, along with any new ones as they are introduced:

- Equal Pay Act 1970
- Sex Discrimination Act 1975 – updated 1986
- Race Relations Act 1976
- Disability Discrimination Act 1995
- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Employment Relations Act 1999
- The Sex Discrimination (Gender Reassignment) Regulations 1999 (amended the Sex Discrimination Act 1975)
- Race Relations (Amendment) Act 2000
- Disability Act 2001
- Employment Act 2002
- The Flexible Working (Procedural Requirements) Regulations 2002 and the Flexible Working (Eligibility, Complaints and Remedies) Regulations 2002
- The Part-time Workers (Prevention of Less Favourable Treatment) Regulations and Amendment Regulations 2002
- Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- The Maternity and Parental Leave etc Regulations 1999 and the Amendment Regulations 2001 and 2002
- The Paternity and Adoption Leave Regulations 2002
- The Paternity and Adoption Leave (Adoption from Overseas) Regulations 2003
- Equal Pay (Amendment) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- The Social Security Contributions and Benefits Act 1992, The Statutory Maternity pay and Sick pay (Miscellaneous Amendments) Regulations 2002, The Statutory Paternity Pay and Statutory Adoption Pay (General) Regulations 2002, The Employment Rights Act 1996 (Application of Section 80B to Adoptions from Overseas) Regulations 2003 and the Social Security Contributions and Benefits Act 1992 (Application of parts 12ZA and 12ZB to Adoptions from Overseas) Regulations 2003
- Disability Discrimination Act 1995 (Amendment) regulations 2003
- Races Relations Act (Amendment) Regulations 2003
- Civil Partnership Act 2004

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- Housing Act 2004 - Gypsies and Travellers
 - Gender Recognition Act 2004
 - Disability Discrimination Act 2005
 - Employment Equality (Age) Regulations 2006
 - Equality Act 2006
 - Work & Families Act 2006
 - Civil Partnership Act 2005
 - Equality Act 2006
 - Employment Equality (Age) Regulations 2006
 - Childcare Act 2006
 - Equality Act (Sexual Orientation) Regulations 2007
 - CRE Code of Practices on Employment and Housing (now EHR Commission)
 - The Race, Disability and Gender Equality Duties
 - Requirements for the Commission for Social Care (CSCI), Supporting People, the Audit Commission and Housing Corporation
 - The Tenant Service Authority Regulatory Standard 1
 - Audit Commission KLOE Cross-cutting Themes Diversity
 - Equality Act 2010

Appendix 2

The following community groups / organisations were consulted on the policy

Cohesia
Gender Advisory Bureau
Coventry City Council
Age Concern
Princes Trust
African Association
Terence Higgins Trust
Grapevine
Coventry Community Safety Partnership
Coventry Mind
Ken Latchford
Council for the Disabled
Coventry Refugee Centre
Multi Faith Forum