



EAST MIDLANDS HOUSING GROUP POLICY ON EQUAL OPPORTUNITIES

1. INTRODUCTION

1.1 East Midlands Housing (EMH) is aware of its legal obligations under the following acts

- Race Relations Act 1976
- Sex Discrimination Act 1975
- Equal Pay Act 1975
- Disability Discrimination Act 1995
- Employment Rights Act 1996
- Human Rights Act 1998
- Employment Act 1989 & 2002
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Age) Regulations 2006

EMH endorses a Code of Practice for Rented Housing and its intention is that its policies and practices in all areas of equality and diversity will meet the requirements of both statute and recognised good practice.

1.2 EMH is an Equal Opportunities Association. In the provision of housing and related services and in the recruitment of staff, the Board of Management will endeavour to ensure equality of opportunity for all persons. Specifically, no person or group of persons will be treated less favourably than other persons or groups because of their nationality, age, ethnic origin, gender, religion, disability, sexual orientation or marital status.

1.3 Kaleidoscope is the project name for East Midlands Housing Group's equality and diversity scheme.

The Kaleidoscope Scheme aims to define the diverse range of people and needs served by East Midlands Housing and to put in place policies and procedures to ensure that we monitor how we work, eliminate discrimination and promote equality of opportunity.

1.4 Responsible Persons :

Human Resources Director (employment)
Executive Head of Policy (service delivery)

2. HOUSING PROVISION

2.1 Access

Access to housing administered by the Association is determined on the basis of housing need in accordance with the Association's lettings' policies. In publishing its work, and the availability of housing, the Association will be mindful of the need to ensure that information is available to disadvantaged and minority groups within the community and will liaise closely with agencies servicing the needs of these groups. This will also apply to all information related to home ownership products.

In line EMH's Accessible Information Policy, information leaflets will contain a paragraph in a variety of minority ethnic languages offering information in translation on request; verbal translation is available at all times via Language line and audio tapes of letters or other documents are also available. Information in Braille or large print is also available on request.

2.2 Marital Status and Sexual Orientation

In allocating accommodation to couples, there will be no discrimination in terms of tenure arrangements arising from the marital status or sexual orientation of the couple.

2.3 Disability

The Association welcomes applications from people with physical or mental disabilities and will endeavour to provide suitable accommodation and work with statutory and voluntary agencies in facilitating access to housing and support services if required within the community. The Association is aware of its responsibilities in relation to the Disability Discrimination Act's Disability Equality Duty and the Mental Health Act 1983.

The Association's Design Brief will have regard to the needs of persons with physical disabilities and special needs for new builds to be as accessible as possible to those with special needs.

The Association will undertake to facilitate any adaptations or alterations to the premises which are required to enable continued occupation by residents whose circumstances change. In order to do this, the recommendations from any professional organisation, i.e. Health, Social Services or EMH In-House Occupational Therapists will

be taken where appropriate and funding sought internally or from other appropriate grant making agencies.

2.4 Race

The Association's lettings will be monitored to ensure no application is treated less favourably because of the nationality or race of the applicant in terms of both access to accommodation and the quality/location of the accommodation offered. Due regard will be given to the outcome of the research and census information in considering the needs of specific groups.

The Association will expect that where Local Authorities have substantive nomination rights that the nominations made by the Local Authority will reflect the ethnic profile of the locality.

3. EMPLOYMENT PROVISION

3.1 The Association seeks to recruit people with appropriate skills or potential to meet the requirements of posts falling vacant within the Association.

3.2 Vacancies will be widely advertised and applications from all sections of the community will be welcomed. No applicant will be treated less favourably because of race, disability, gender, sexual orientation, or age.

The Association will take positive steps to ensure details of its employment opportunities are accessible to ethnic minority groups. This will involve, where appropriate, liaison with representative organisations within the ethnic population and circulation of job advertisements and translated documents to those groups.

3.3 The Association will consider providing flexibility in working hours, including 'job share' for new and existing employees provided always that this would not be to the detriment of the organisation and the customers it serves.

A questionnaire on race, gender and disability will be included for monitoring purposes with each application form.

3.4 A copy of the Equal Opportunities Policy will initially be sent in the induction pack for all new colleagues. Additionally, the line Manager, as part of the induction process, will ensure that a reasonable level of understanding of Equality and Diversity issues exists and that the Association's obligations under the law and the requirements of this policy are fully understood.

3.5 iMAP

The i-MAP (Individual Moving Ahead Programme) process is set in place to review and evaluate current performance in order to support staff to maximise their potential within and for the Association.

i-MAP should always be a fair and equal process aligned especially to EMH Group's Kaleidoscope Scheme.

Applicable to all colleagues, the i-MAP will identify, agree and provide positive support and development opportunity aligned to corporate/departmental objectives, individual performance and career/personal development.

4. Board of Management

The Association's governing body, the Board of Management, will seek to ensure that its membership reflects the communities that it serves. It will regularly monitor the composition of its membership and that of its committees and report the findings to the equality and diversity scrutiny panel. The board of management will have clear and transparent membership selection processes that promote equality of opportunity. Appropriate learning and development activities will be arranged to raise the awareness of members on diversity issues.

5. Contractors

The Association will require any contractors working on its behalf to either let the Association have sight of its Equal Opportunities Policy or, particularly as many contractors are very small organisations, require the contractors to subscribe to the Association's own Equal Opportunities Policy.

As with its own staff, the Association will terminate forthwith any arrangements with contractors where there are proven incidents of sexual or racial harassment to any residents or employees of the Association.

The Association will make continuing efforts to encourage contractors from minority groups to be admitted to the Approved Contractors List, as part of its commitment to equality of opportunity.

6. HARASSMENT

The Association has developed comprehensive policies to deal with incidents of racial harassment directed towards, or committed by its tenants. As an organisation we believe that all our residents and staff should have freedom from harassment of any form.

These policies require a prompt and supportive response by the Housing Officers and a strong line taken against the perpetrators. All incidents must be brought to the attention of the Area Housing Managers and reported to the Equality and Diversity Scrutiny panel

- 6.2 The same supportive and strong line will be taken in the event of complaints of sexual, racial or other harassment directed towards or committed by members of staff. The matter must be brought to the attention of the line manager, or where this person is claimed to be the perpetrator, a Director or the Group Chief Executive and an immediate enquiry will take place. In line with the Disciplinary and Grievance Procedure, if there is any repetition of behaviour for which previous warning has been given, the consequence of his/her action could lead to dismissal.

7. MONITORING

7.1 Lettings

Each association within the EMH group has its own allocations policy and procedure.

EMH, via its waiting list(s) operates a Banding System of allocation. The aim of the Banding System is to attempt in the medium to long term to create balanced and sustainable communities and open up the opportunity of social housing to groups who have historically struggled to gain accommodation through this route

Monitoring of key performance indicators, including impact on BME groups to ensure they are not being excluded by the banding system, will be undertaken by the Policy & Information Team and reported on a regular basis to Senior Managers and where appropriate Area Committees and the Equality and Diversity Scrutiny Panel.

FHA uses a points system to prioritise its waiting list. Midlands Rural Housing's allocations policy responds to housing need in rural areas.

Midlands Rural Housing is responsible for operating the individual allocation policies of the Rural Housing Associations. In this context, the RHA Boards receive reports on allocations compared to settlement census data, with particular reference to local ethnicity. This is to ensure that lettings are proportionate to the ethnic profile of individual villages and the process is inclusive.

Monitoring is in place for all of these policies to ensure that they are fair and operate in accordance with regulatory requirements.

7.2 Existing Tenants

As part of future surveys, the ethnic origin, age group, incidence of disability and sex of head of household will be monitored by sampling to obtain a picture of our existing tenants. This will be measured against Census and other available information and reported to the Board subsequent to the survey

Monitoring of resident involvement will include the ethnicity of active residents, their gender, age and disability. This will be reported to the Equality and Diversity Scrutiny Panel.

7.3 Employment

The ethnic origin, gender and incidents of disability of job applicants will be monitored at key stages of the process, such as application, interview and appointment. The results of this monitoring will be reported on regularly to the Finance committee and the Equality and Diversity Scrutiny Panel

7.4 Procurement

EMH will regularly monitor the ethnicity and gender of its key contractors and suppliers. Monitoring will include an analysis of any diversity related training provided by contractors to their employees, and any discrimination related employment tribunal cases found against them. The results of this monitoring will be reported annually to the Equality and Diversity Scrutiny Panel.

7.5 Management

The Board of Management, the Association's governing body, will seek to ensure its membership reflects the community the Association serves. Monitoring is in place to ensure this, and is reported periodically to the Equality and Diversity Scrutiny Panel.

Revised: Dec 2006

Date of next Review: Dec 2009