



## Control Sheet – Equality & Diversity Policy

### Author

Name	Position	Date
Nick Mardon	Housing Policy Manager	April 2009
Emma Hammond	Corporate Services Manager	April 2009
Ian Harries	Consultant	April 2009.

### Version Control

Version	Status	Description	Date
0.1	Draft	Initial draft	April 2009
0.2	Draft	1 <sup>st</sup> revision	17 <sup>th</sup> June 2009
0.3	Draft	2 <sup>nd</sup> revision (National E&D Group)	14 <sup>th</sup> August 2009
04	Draft	3 <sup>rd</sup> revision (Executive Team)	2 <sup>nd</sup> September 2009
05	Draft	4 <sup>th</sup> revision (National E&D Group)	3 <sup>rd</sup> September 2009
06	Draft	5 <sup>th</sup> revision (CPSG)	21 <sup>st</sup> September 2009
07	Draft	6 <sup>th</sup> revision (Customer Conference)	1 <sup>st</sup> October 2009
08	Approved	7 <sup>th</sup> revision (The Guinness Partnership Board)	14 <sup>th</sup> October 2009

### Legal Framework

- The Equal Pay Act 1970 (as amended), including the Equal Pay (Amendment) Regulations 2003, and the EOC Code of Practice on Equal Pay
- The Sex Discrimination Act 1975 (SDA) (as amendments 1986, 1999 and 2003)
- The Race Relations Act 1976 (RRA)
- Race Relations Amendment Act 2000 (RRAA)
- The Race Relations Act 1976 (Amendment) Regulations 2003
- The Disability Discrimination Acts of 1995 and 2005 (DDA)
- Human Rights Act (HRA) 1998
- The Employment Equality (Age) Regulations 2006
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Civil Partnership Act 2004
- The Racial and Religious Hatred Act 2006
- The Equality Act 2006

## Codes of Practice

- Code of Practice in Rented Housing - Commission for Racial Equality
- Code of Practice for the Elimination of Racial Discrimination and the Promotion of Equality of Opportunity in Employment - Commission for Racial Equality
- Code of Practice for the Elimination of Discrimination on the Grounds of Sex and Marriage and the Promotion of Equality of Opportunity in Employment - Equal Opportunities Commission
- Code of Practice on the Duty to Promote Race Equality – Commission for Racial Equality
- Code of Practice on Equal Pay – Equal Opportunities Commission
- Code of Practice on Sex Discrimination – Equal Opportunities Commission
- Code of Practice for the Elimination of Discrimination in the Field of Employment Against Disabled Persons or Persons Who Have a Disability – Disability Rights Commission
- Code of Practice for Social Landlords: Tackling Racial Harassment – Office of the Deputy Prime Minister
- Race and Housing Enquiry: Challenge Report
- Housing Corporation Regulatory Code
- Race Equality Code of Practice for Housing Associations
- Housing Corporation Good Practice Note 8 “Equality and Diversity”
- Housing Corporation Good Practice Note 4 “Race Equality”
- Homes and Community Agency Single Equality Scheme - Diverse Interventions

## Equality Impact Assessment

EIA	Person(s) carrying out EIA	Date	Comments
Initial Screening	Lisa Sum & Christiana Bennett	10 <sup>th</sup> Sept 09	No need for full EIA

## Approved/Endorsed by

Group	Date
National E&D Group	14 <sup>th</sup> August 2009
Executive Team	2 <sup>nd</sup> Sept 2009
National E&D Group	3 <sup>rd</sup> Sept 2009
Customer Policy Strategy Group	21 <sup>st</sup> Sept 2009
The Guinness Partnership Board	14 <sup>th</sup> October 2009

## **Aims**

The Guinness Partnership believes that fully embracing the Equality and Diversity agenda is critical to the success of our organisation. This policy aims to ensure that we meet the varied and individual needs of our customers regardless of race, gender, age, religious or non-religious belief, ethnic origin, disability, marital status, or sexual orientation.

We will take appropriate steps to tackle any form of discrimination and provide equality of employment and services, respect diversity and help build cohesive and sustainable communities.

We will comply with all equality and diversity legislation.

## **Service Provision**

We will provide appropriate, accessible, effective and efficient services and facilities to all sections of the communities in which we operate without prejudice or bias.

We will ensure our customer involvement structures, staff and Board members reflect the mix of our diverse communities. We will also encourage people with additional support needs and marginalised groups to get involved and take part in shaping our services.

## **Employment**

We are committed to ensuring that all staff and potential applicants are treated fairly and without unlawful discrimination. Our staff bring a wide variety of skills and knowledge to the organisation. We recognise that having a diverse workforce that reflects the communities within which we operate will help us achieve our vision and objectives.

As an employer we will ensure that all staff treat each other and our customers with dignity and respect. We want staff to feel confident enough to bring complaints without fearing prejudice or reprisals.

We are committed to supporting and encouraging staff to reach their full potential.

### **Working In Partnership**

We need to have strong partnerships with external stakeholders, agencies and other organisations to ensure a cohesive approach to providing services within the communities we operate in.

We will take account of equality and diversity issues in the way that we procure goods and services. We require that all services delivered on our behalf by contractors and consultants will reflect our commitment to equality and diversity.

### **Responsibility For Implementing The Policy**

It is the responsibility of the Board and Executive Team to set an example and lead in respect of equality and diversity. Recruitment to Boards will take into account the need to reflect the diversity of the communities we work in.

In order to fully implement the policy all staff need to be aware of their responsibility to integrate equality and diversity in their day-to-day activities. Staff must be aware of and be responsible for equality and diversity in their behaviour with colleagues, customers and stakeholders. Staff must identify equality objectives through the appraisal process, projects, plans and initiatives, and implement these objectives in their day-to-day work.

## The Guinness Partnership

With over 56,000 homes and more than 120,000 customers, The Guinness Partnership is one of the largest housing and care providers in the country.

Our recent growth means we can offer greater housing choice, provide better care and support, create more successful neighbourhoods and deliver a step change in our customer service.

The challenge is to turn our size into strength.

Our Vision is:

**“Great service, great homes, and a great place to work.”**  
The Guinness Partnership – together, really making a difference.

Our Partnership wide Strategic Plan has four objectives:

- Excellence in customer service
- Growth in homes and services
- Neighbourhoods to be proud of
- A great place to work

The Guinness Partnership’s Vision, Strategic Plan and Business Plan are available at [www.guinnesspartnership.com](http://www.guinnesspartnership.com)

In addition each of our main operating companies has a supporting business plan setting out the strategic objectives for that company over the next 3-5 years.

The business plans for each of the following organisations can be accessed from the Internet:

Guinness Trust Business Plan  
Guinness Northern Counties Business Plan  
Guinness Hermitage Business Plan  
Guinness Midsummer Business Plan  
Guinness Care and Support Business Plan  
Guinness Developments Limited Business Plan

For further information on The Guinness Partnership, including these business plans, please contact us on 01494 535823 or email us at: [info@guinness.org.uk](mailto:info@guinness.org.uk)

## 1. Purpose

- 1.1. This policy supports the Equality & Diversity Strategy and is designed to ensure that Equality & Diversity is embedded within the culture of The Guinness Partnership and so provide great service, great homes and a great place to work.
- 1.2. The Guinness Partnership believes that a commitment to equality and embracing diversity is fundamental to our effectiveness as a business and supports us to achieve our vision and strategic objectives.
- 1.3. We accept that within the communities we operate, groups or individuals may have been disadvantaged and that some may not have attained equality of opportunity. We recognise that we have a role to play in reducing the disadvantages that people experience, by making our services more accessible and responsive to individual and community needs.
- 1.4. Our aim is for fair and equitable treatment for all of our customers, staff and other stakeholders. This policy sets out the need to continually listen and learn from our key stakeholders and the world around us to ensure that we provide fair and equal services to the diversity of customers.
- 1.5. Involving and listening to our customers, staff and other partners in the development, piloting, monitoring, reviewing and changing of our services is key to improving their satisfaction with services and ultimately the quality of their lives, within their homes, neighbourhoods and workplace.
- 1.6. This policy supports the delivery of the Partnership Equality & Diversity Strategy which has been created to deliver improvements in services so that we can deliver improved outcomes for customers, service users, staff and other stakeholders. This policy replaces the policy previously agreed by The Guinness Partnership in 2007.

## 2. Period of Review

A review of this policy will be initiated in response to:

- The Equalities Bill 2009 and any other changes in legislation and/or amendments to the law
- Any deficiencies or failure in this policy, as a result of Partnership Companies or findings from any independent organisations or judicial review

In any event this policy will be reviewed by no later than three years from the effective date of this version, approved in October 2009.

### 3. Related Policies & Strategies

This list includes (but is not limited to) the following:

- Equality & Diversity Strategy
- Gender Equality Scheme
- Race Equality Scheme
- Disability Equality Scheme

### 4. Responsibilities for Implementation

4.1. It is the responsibility of the Board and Executive Team to set an example and lead in respect of equality and diversity. Recruitment to Boards will take into account the need to reflect the diversity of the communities we work in. The impact of this policy will be demonstrated through an annual Equality & Diversity report.

4.2. Each Board will appoint an Equality and Diversity Champion. Board Champions will ensure that equality and diversity receives the necessary mainstream profile in the organisation.

4.3. Boards have responsibility to ensure that they take equality and diversity into consideration when developing strategy and policy, particularly when designing new services. Boards will receive regular performance monitoring information.

4.4. A Partnership Equality and Diversity Group has been established. This Group is led by a member of the Executive Team and is made up from staff and customers from companies within the Partnership. The group works to agreed terms of reference which include the following:

- Developing Equality & Diversity Strategy and Policy
- Monitoring, evaluating and reporting on Equality and Diversity Strategy and Policy
- Providing support and guidance for Partnership Companies
- Sharing learning and best practice across the Partnership and identifying common themes and actions
- Tracking changes in legislation and regulation to do with the external environment, changes in good practice and benchmarking with other organisations
- Reporting to Partnership Executive Team, Partnership Board and Partnership Service Improvement Group
- Embedding E&D within shared services from the start up stage
- Communicating and engaging with Board E&D Champions

- Communicating on key issues, producing an annual report and sharing best practice

4.5. In order to fully implement the policy all staff need to be aware of their responsibility to integrate equality and diversity in their day-to-day activities. Staff must be aware of and responsible for equality and diversity in their behaviour with colleagues, customers and stakeholders. Staff must identify equality objectives through the appraisal process, projects, plans and initiatives, and implement these objectives in their day-to-day work.

4.6. Boards and their Management Teams will ensure there is an appropriate challenge to staff, contractors, suppliers and partners to ensure that this policy is embedded.

## 5. Service Provision

5.1. We will provide appropriate, accessible, effective and efficient services and facilities to all sections of the communities in which we operate without prejudice or bias.

5.2. We will ensure our customer involvement structures, staff and board members reflect the mix of our diverse communities. We will also encourage people with additional support needs and marginalised groups to get involved and take part in shaping our services.

5.3. To enable us to achieve this we will:

- Gather information on the profile our customers through our Customer Insight Project. We will use this information to provide services that are tailored and responsive to their individual circumstances, needs and aspirations
- Provide information, agreed types of correspondence and publications, in formats appropriate to the audience they are aimed at. Examples may include, home visits, large print, easy read, audio, Braille and translation into appropriate community languages
- Actively seek the views and involvement of our customers and partners when planning, reviewing or making significant changes to our services to ensure that they are responsive and reflect the diversity of need
- Provide support and training to involved customers and tailor involvement mechanisms to meet the needs of diverse communities
- Tackle any harassment or victimisation on the grounds of sexual orientation, race, faith, religion, disability, age or ethnicity within our communities promptly and in partnership with other service providers, where appropriate

- Act promptly to investigate any complaint about the way we provide our services. Where there is evidence of direct or indirect discrimination we will take immediate and effective action to permanently remove the discrimination
- Provide support and have comprehensive policies and procedures in place in relation to domestic abuse, child abuse, abuse of vulnerable adults and elderly abuse and to, wherever possible, prevent abuse taking place, supporting victims and witnesses and helping to rehabilitate offenders
- Provide support to customers to enable them to retain or promote their independence in their own home
- Take steps to ensure that our offices and communal areas are as accessible as possible, including making sure (where practical) they meet the requirements of the Disability Discrimination Act (Amendment) 2004
- Aim for customer satisfaction rates for minority groups to be as high as that for non minority groups
- Provide support for the victims of and witnesses of harassment and hate crimes and anti social behaviour
- Carry out Equality Impact Assessments on our policies, procedures, service areas, projects and functions
- Deliver regular and relevant equality and diversity training to staff, Board members and offer this facility to contractors and engaged customers
- Set and meet targets for letting our homes that reflect the communities in which we operate
- Maintain accurate records of adapted properties. We will give higher priority so that adapted properties are allocated to the most appropriate people where possible

## 6. Employment

- 6.1. We are committed to ensuring that all staff and potential applicants are treated fairly and without unlawful discrimination. Our staff bring a wide variety of skills and knowledge to the organisation. We recognise that having a diverse workforce that reflects the communities within which we operate will help us achieve our vision and objectives.
- 6.2. As an employer we will ensure that all staff treat each other, our customers and service users with dignity and respect. We want staff to feel confident enough to bring complaints without fearing prejudice or reprisals.
- 6.3. We are committed to supporting and encouraging staff to reach their full potential.

To help us achieve this we will:

- Ensure that all staff complete equality and diversity training
- Provide a work environment that is accessible, free from bullying, harassment and discrimination, responding quickly and effectively through robust policies and procedures when this is not met
- Maintain comprehensive records that will enable us to identify any areas of inequality in relation to recruitment, employment, remuneration, promotion, training, grievance and disciplinary matters. We will report and use this information to review targets and take positive action where required
- Ensure support is available in the employment or prospective employment of disabled people in order to facilitate any reasonable adjustments
- Ensure that our workforce represents the communities that we serve by regularly reviewing our recruitment, training and promotion procedures
- Assist our staff to realise their full potential by ensuring they receive fair consideration of their training and career development needs
- Create a flexible working environment where work and home balance requirements are recognised and supported
- Carry out Equality Impact Assessments on all employment related policies and procedures

## **7. Governance**

7.1. We aim for all our Governance Boards and other forums to be broadly representative of the communities in which they operate.

7.2. We will put in place recruitment and selection processes for Boards which are fair and transparent and which enable The Guinness Partnership to target groups which are under-represented within these structures.

7.3. We will provide Equality and Diversity training for all Board members so they are fully aware of their responsibilities.

7.4. We will provide Boards with regular information on equalities issues and provide an annual equality and diversity performance report.

## 8. Procurement and Supply

- 8.1. We will make it a condition of doing business with The Guinness Partnership that contractors and suppliers offer all our customers the highest standard of service and reflect our commitment to equality and diversity.
- 8.2. We need to have strong partnerships with contractors, external stakeholders, agencies and other organisations to ensure a cohesive approach to providing services within the communities we operate in.
- 8.3. We will work closely with partners, communities and the voluntary sector to support those groups who are marginalised or disadvantaged and strive to improve the social, economic and environmental well-being of those areas of multiple deprivation in which we offer services.

To achieve this we will:

- Work in partnership with Local Authorities and other relevant organisations to ensure that equalities issues are an integral part of the housing needs analysis, nominations and lettings policies and procedures
- Work with Local Authorities and Social Services to provide an effective aids and adaptation service for disabled customers
- Work with relevant organisations to determine and address the current and future housing needs of under represented groups
- In relation to the development programme, ensure that equality and diversity considerations have been built into any assessment of local housing need
- Develop relationships with local strategic partnerships and specialist organisations to broaden our knowledge and support of people with a wide range of diverse needs
- Require that all contractors and consultants sign a Code of Conduct which emphasises our expectations with regard to equality and diversity
- Require our contractors to provide equality and diversity information which we will monitor on a regular basis and develop a monitoring framework and system for collecting this data

## 9. Communication

- 9.1. This policy and related service standards and outcomes will be communicated to customers, staff and other key partners in line with The Guinness Partnership's translation guidance.

- 9.2. This means, for example, that they will be made available in written form, audio and on the internet for customers and key partners to see and comment on and on the intranet for staff to see and comment on.
- 9.3. Where customers, staff or other key partners request the information supplied in different ways e.g. large print, easy read, audio, Braille and translation to appropriate community languages, these will be supplied.
- 9.4. To assist customers, staff and other key partners, they will also be available in summary form, supporting leaflets and in audio/visual format.
- 9.5. Positive outcomes from taking into consideration equality and diversity will be regularly included on our websites and in our publications, to show customers, staff and other key partners the benefits of embracing equality and diversity.

## 10. Consultation

- 10.1 We will undertake systematic consultation with our customers, Board members, partner organisations, staff, community groups and other key stakeholders on policies, functions and issues that significantly affect our approach to equality and diversity.

To achieve this we will:

- Utilise our Customer Insight data to consult appropriately with marginalised groups
- Establish focus groups to obtain qualitative customer perceptions
- Use our formal customer involvement structures such as Customer Strategy Group and Customer Panels
- Produce publications and leaflets
- Develop national and local customer satisfaction surveys
- Utilise Internet and intranet sites
- Involve our customers in service improvement work
- Carry out staff surveys

## 11. Glossary

The following terms are general descriptions and have been obtained from a range of sources.

### **COMMUNITY COHESION**

These means different communities, individuals, groups and agencies talking to each other to find common ground where they respect difference, so they may more powerfully engage with each other to improve everyone's life

A cohesive community is one which enjoys:

- A sense of belonging for all members of the community
- The different backgrounds of people are valued and appreciated
- Equal access to the opportunities life presents

### **CUSTOMER INSIGHT**

Customer Insight is the demographic information we have collected about our customers to enable us to tailor our services to meet the diverse needs of the communities we serve. The data and reports for Customer Insight are available for staff on The Guinness Partnership intranet.

### **DIRECT DISCRIMINATION**

This is treating a person, without justification, less favourably than another, particularly because of one's feelings, assumptions or prejudices about the characteristics, attributes or circumstances of that person. This can include certain forms of harassment or abuse.

### **DISABILITY**

The chosen definition of a disability is: A physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities.

### **DIVERSITY**

Diversity means variety. Valuing diversity means valuing people and recognising that everyone is unique and different but of equal worth.

### **DOMESTIC ABUSE**

This is defined as any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members regardless of gender or sexual orientation.

### **EQUALITY IMPACT ASSESSMENT**

Equality Impact Assessments (EIA's) are a tool and process to ensure that an organisation's policies, procedures, services or functions do not directly or indirectly discriminate against certain groups and, where possible, promote equality. As a Partnership we will make assessments to include the grounds of race, gender, disability, faith, sexual orientation and age.

**EQUALITY**

This means treating people fairly without bias or discrimination and always within the law. Everyone should be entitled to the same opportunities regardless of race, gender, age, religious belief or non-religious belief, ethnic origin, disability, marital status, or sexual orientation.

**HARASSMENT**

This can take many forms from the most obvious abusive remarks to extremely subtle use of power. It can be intentional and unintentional. The key issue is the impact of the behaviour on the person receiving it and the feeling of violating that person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

**INDIRECT DISCRIMINATION**

This is applying, without justification, a request or condition to which, on the face of it applies to everyone but which in practice, forms a greater obstacle to a person, or group of persons, with particular characteristics or attributes.

**MONITORING**

The process of collecting, analysing and evaluating information to measure performance, progress or change.

**PREJUDICE**

Means pre-judgement, forming a view about a person in advance. For example, racial prejudice is having a negative opinion or attitude about an individual or group based solely upon their race or skin colour.

**PROCUREMENT**

The contractual arrangements made to obtain goods, works or services from an outside organisation.

**RACISM**

All those ideas, beliefs, actions, customs, practices and policies that have the effect of disadvantaging and/or discriminating against people because of their skin colour, culture or ethnic origin.

**VICTIMISATION**

Treating people less favourably because of action they have taken for example, made a formal complaint of discrimination or given evidence in a tribunal case.