

## **EQUALITY AND DIVERSITY POLICY**

### **Regulation & Legislation**

This policy has been written taking into account the Housing Corporation's Regulatory Code and Good Practice Notes 4 and 8, the Equal Pay Act 1970, Sex Discrimination Act 1975, Equality Act 2006, Race Relations Act 1976, Race Relations (Amendment) Act 2000, Racial and Religious Hatred Act 2006, Human Rights Act 1998, Disability Discrimination Act 1995, Disability Discrimination Act 2005, The Employment Equality (Sexual Orientation) Regulations 2003, Civil Partnerships Act 2004, The Employment Equality (Religion or Belief) Regulations 2003 and The Employment Equality (Age) Regulations 2006, Audit Commission KLOE 31: Diversity, Gender and Disability Equality Duties.

### **Link to Corporate Values & Corporate Plan**

The policy is central to our vision, values and delivery of our Corporate Plan. Operational strategies and service action plans will be used to realise and deliver our policy aims. It incorporates the following corporate values:

- Listening to, involving and consulting with our customers to empower them to play an active role in planning and delivering our services
- Consulting our staff, valuing their contribution, increasing their skills and deepening their involvement in our services and success
- Offering choice to customers wherever we can
- Ensuring equality of opportunity and recognising diversity for all our customers, treating everyone fairly and without discrimination
- Being an active and successful partner with other organisations to achieve real improvements to customer service and our assets.

### **Statement of Purpose**

Sentinel aims to be an organisation that recognises, responds to and values the diverse needs of our customers, communities, employees and individuals with whom we work. We aim to treat all people and organisations fairly and with respect and are committed to the promotion of equality of opportunity and the elimination of unfair and unlawful discrimination.

### **Our Policy**

1.1 Sentinel will not discriminate against any person on the grounds of their race, ethnic origin, age, gender, disability, sexual orientation, marital status, faith, religion or any other matter which may cause a person to be treated with injustice.

2.0 We will:

#### **Service Delivery**

2.1 Be fair in our dealings with people, communities and organisations with which we have relations and take into account the diverse nature of their cultures and background.

- 2.2 Provide good quality services for our customers and prospective customers and acknowledge that all customers have the right to the same high standards of service provision.
- 2.3 Ensure our lettings and sales policies are fair, flexible and non-discriminatory and responsive to demand, while contributing to the need to be inclusive and the need to ensure sustainable communities.
- 2.4 Aim to ensure that our lettings are proportionate to black and minority ethnic housing needs in our area of operation.
- 2.5 Treat people with a disability no less favourably than other people, giving due regard to their individual circumstances, unless there is a justifiable reason to do so.
- 2.6 Not unlawfully discriminate on the basis of race, ethnicity, religion, sexual orientation or faith in the provision of housing and related services.
- 2.7 Promote good relations between people of different racial groups and work towards the elimination of unlawful discrimination.
- 2.8 Recognise same-sex couples' civil partnerships and their rights.
- 2.9 Ensure that the services we provide do not restrict or inhibit access by older people.
- 2.10 Work with partners and other agencies to develop, provide and promote services for people of all different age groups.
- 2.11 Manage our homes and related services in a way that is sensitive to the specific needs of diverse communities and take action to prevent harassment and anti-social behaviour.
- 2.12 Develop our services taking account of customers' distinctive and diverse identities and be responsive to their individual circumstances, needs and aspirations.
- 2.13 Wherever we can, endeavour to support and work with our partners in helping them achieve equality and diversity and the elimination of unlawful discrimination on the basis of gender or disability and the promotion of equal opportunity between men and women and disabled and non-disabled persons.

#### **Access to Information and Advice**

- 3.1 Strive, as far as possible, to provide access to our offices and all public meetings.
- 3.2 Ensure all groups have access to a full range of information and advice, taking into account their needs in terms of language requirements, literacy levels and degrees of sensory deprivation.

#### **Customer Participation**

- 4.1 Use a range of involvement and consultation techniques to ensure all customers have the opportunity to participate in our activities and services.
- 4.2 Aim for the membership of our residents' associations to reflect the age, ethnic and gender mix of the communities we serve.

### **Customer Satisfaction**

- 5.1 Aim for customer satisfaction rates for minority groups to be as high as that for non minority groups.

### **Dealing with Incidents and Harassment**

- 6.1 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.
- 6.2 Not tolerate harassment in our workplace and will engender confidence in employees that complaints can be made without their fearing prejudice or reprisal.
- 6.3 Ensure satisfaction with our victim support and action taken against perpetrators in relation to incidents relating to black and minority ethnic persons.

### **Procurement**

- 7.1 Seek to ensure our contractors, consultants and suppliers understand and adhere to our equality and diversity requirements, have appropriate equality and diversity arrangements in place and are sensitive to the differing needs of our customers.

### **Governance**

- 8.1 Aim for the membership of our governing body to reflect the age, ethnic and gender mix of the communities we serve, with a range of skills, experience and up to date knowledge, to meet our targets.
- 8.2 Aim for the number of black and minority ethnic people appointed to the governing body to be proportionate to the number of black and minority ethnic people in the communities we serve. There will be no barrier to disabled people wishing to join the Board.

### **Employment**

- 9.1 Aspire to employ a diverse range of employees, which reflect the communities we serve.
- 9.2 Seek to provide that the number of black and minority ethnic people appointed or promoted at all levels of our organisation are proportionate to the number of black and minority ethnic people in our communities.
- 9.3 Ensure equality of opportunity for all staff and applicants.
- 9.4 Ensure regular training and updates in equality and diversity issues are given to develop skills that enable staff to provide quality services which are sensitive to the needs of customers.
- 9.5 Treat all employees fairly and without unlawful discrimination and ensure that dignity and respect are embedded in our culture.
- 9.6 Promote anti-discriminatory practices at all times.
- 9.7 Where practicable, continue to employ and retain staff who have become disabled during their employment.

- 9.8 Strive to create an environment free from sexual harassment, offensive language and other behaviour and promote gender equality.
- 9.9 Ensure our employment practices do not include age-related criteria (subject to allowable retirement provisions).
- 9.10 Not discriminate in pay and conditions of work between men and women.
- 9.11 Take immediate action against employees found to be in breach of their equality and diversity responsibilities.

### **Financial Impact Assessment**

Equality and Diversity activities will be conducted within budgets and effectively monitored.

### **Risk Assessment**

Failure to adhere to the Housing Corporation's requirements could lead to regulatory investigations. Discriminatory practices could lead to actions taken by customers or employees. This is a low risk.

### **Consultation**

The stakeholders below have been consulted on the following dates:

Cathryn Gee, Human Resources Manager : 4<sup>th</sup> January 2007  
 Cindy Creasy, Head of Neighbourhood Services : 12<sup>th</sup> January 2007  
 Equality and Diversity Working Party: 24<sup>th</sup> January 2007  
 Policy Committee (Direction setting) with Chief Executive : 24<sup>th</sup> January 2007  
 A2 Housing Group: 29<sup>th</sup> January 2007  
 Staff Representatives Group: 30<sup>th</sup> January 2007  
 Basingstoke and Deane Borough Council: 5<sup>th</sup> February 2007  
 Tenant and Leaseholder Forum Groups: 6<sup>th</sup> & 7<sup>th</sup> February 2007  
 East Dorset Housing Association: 8<sup>th</sup> February 2007  
 Hampshire Primary Care Trust: 8<sup>th</sup> February 2007  
 Whitefriars Housing Group: 8<sup>th</sup> February 2007  
 Hampshire County Council: 9<sup>th</sup> February 2007  
 Hart District Council: 9<sup>th</sup> February 2007  
 Rosebery Housing Association: 9<sup>th</sup> February 2007  
 Rushmoor Borough Council: 9<sup>th</sup> February 2007

### **Monitoring and Review**

The operation of this policy will be regularly reviewed by the Company Secretary, in conjunction with the Policy & Strategic Initiatives Officer, with adequate consultation of staff and customers. The outcome of that review will be communicated to the appropriate committee of the board.

### **Approval Stages**

Named Departmental Sign off: Zoe Moncrieff Date: 4<sup>th</sup> January 2007  
 Named Director Sign off: Martin Nurse Date: 5<sup>th</sup> January 2007  
 Committee Approval Date: 9<sup>th</sup> March 2007  
 Board Approval Date: 28<sup>th</sup> March 2007  
 Implementation Date: 30<sup>th</sup> March 2007