

The RCH Group Equality and Diversity Policy 2018

Personnel Committee Approval: 14 th November 2018	Policy Manager: Maureen Gimby	Reviewed: Aug 2018 Next Review: Aug 2021
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This document can be made available, on request, in other formats such as in larger print, audio-format, Braille and in other languages

1. Purpose and Aims of the Policy

- 1.1 River Clyde Homes (RCH), its subsidiary, River Clyde Property Management (RCPM) and any future subsidiary created within what will be known as the RCH Group, is committed to promoting social justice as part of its governance policy framework. This is done through our Equality and Diversity Policy that is used to mainstream equality objectives throughout all of our services.
- 1.2 This policy is extremely important as it ensures that we:
- (i) meet our legal obligations concerning equal opportunities in respect of both employment matters and service delivery and
 - (ii) promote good practice guidance throughout our work practices and customer services delivery.

2. Scope of the Policy

- 2.1 This policy applies to:
- Members of the RCH Group Boards
 - All employees in the RCH Group organisations
 - All customers, contractors and other stakeholders visiting or carrying out work on behalf of or with the RCH Group
 - The RCH Group offices and customer hubs

3. Policy Principles

- 3.1 Our core policy objectives consist of twelve key issues that are inter-related. These are described below as our “Equality Charter.”
- (i) **Law and good practice guidance:** We ensure that our housing services meet all relevant law and good practice guidance concerning equal opportunities.
 - (ii) **Mainstreaming of equality objectives into practice:** We audit all our organisational policies and procedures so that equality objectives are promoted throughout all of our services. This is done through our Equalities Action Plan.
 - (iii) **Establishing partnerships:** We work actively with organisations in the public, voluntary and private sectors to promote our equality objectives in all local communities in Inverclyde.
 - (iv) **Accessible housing services:** We provide services that take account of the needs of individual tenants and service users; this is done through our communications strategy and accessibility policy.
 - (v) **Advice and information:** We provide tenants and service users with accurate advice and information about our services or those delivered by partner agencies.

- (vi) **Procurement (or tendering):** We appoint consultants and contractors using robust tendering procedures so that organisations deliver services that reflect our equality standards.
- (vii) **Staff training and other training:** We assess the needs of our staff and provide appropriate equality training linked to their jobs. We also provide training to Board members, as well as providing training to tenants as part of our tenant participation strategy.
- (viii) **Managing performance:** We monitor how effectively the Equality & Diversity Policy is implemented through the Annual Return of the Charter (ARC) for both employees and customers.
- (ix) **Positive action programmes:** We implement positive action equality programmes in line with law and good practice guidance such as the Positive Goals programme in partnership with Greenock Morton.
- (x) **Consultation and review:** We consult with tenants and other service users when developing and/or reviewing the Equality and Diversity Policy and service provision.
- (xi) **Handling complaints:** We address any complaints about this policy or other equality matter through our complaints system. Information on this system is provided to tenants and other service users as required.
- (xii) **Processing information:** We process equality information that we collect about employees, tenants and other service users in line with the provisions of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2016. We use this information to provide appropriate services, including making reasonable adjustments as required in law.

4. Key Roles and Responsibilities for Managing Equality and Diversity

4.1 The Board

The Board is responsible for monitoring compliance with the Equality and Diversity Policy and any associated equality and diversity action plans. The Board will review and approve the equality and diversity policy on an annual basis and review the Equality and Diversity Action Plan on an annual basis. The Board has a collective role for championing equality and diversity within the RCH Group.

4.2 The Chief Executive

The Chief Executive is ultimately responsible for the control and implementation of the Equality and Diversity Policy at all levels of the Group organisations and ensuring the provision of adequate resources for equality and diversity requirements across the Group organisations. The Chief Executive will:

- provide leadership to encourage employees to be conscious of equality and diversity at all times;

- ensure that responsibility for the implementation of, and compliance with, the Equality and Diversity Policy is properly assigned and accepted by the Executive Directors and Heads of Service, known as the Senior Management Team (SMT) and all employees under their control;

4.3 **Executive Directors and Heads of Service (SMT)**

The Executive Directors and Heads of Service, known as the SMT will:

- ensure that the trade unions or employee representatives recognised for consultation by the RCH Group are confident that SMT sponsorship is evident for all employees to report any equality and diversity concerns they may have;
- ensure that the Staff Forum is given SMT sponsorship for the forum members to feel confident to report any equality and diversity concerns they or their colleagues may have; the forum membership will include representative staff from across all RCH Group organisations;
- ensure that managers within their departments are suitably trained, competent and fully understand their equality and diversity obligations;
- support managers by providing effective resources and advice to ensure standards of equality and diversity are achieved;
- support equality and diversity throughout all RCH Group organisations;
- monitor the activities of their directorates and departments in relation to equality and diversity to ensure compliance with relevant legislation, policies, procedures and good practice guidelines;
- complete an Equality Impact Assessment (EIA) on all policies and procedures relevant to their business area and ensure that their managers are confident in the use of these.

The Equalities Impact Assessment template, completed for this policy, is attached as Appendix 1.

4.4 **Managers**

Managers at all levels in the RCH Group organisations will:

- oversee the activities of their team in all equality and diversity matters;
- promote equality and diversity within their everyday roles, for themselves and their staff;
- provide leadership, support and coaching to their team;
- bring the Equality and Diversity Policy to the attention of employees under their management and ensure an understanding of its contents;
- ensure that any equality and diversity responsibilities delegated to employees are clearly understood;
- identify appropriate training needs and provide training opportunities, as providers and commissioners of services;
- monitor the effectiveness of equality policies and programmes in their areas;
- feed into the equality and diversity objective setting and review processes;
- ensure that any legal requirements relating to the operation of their department or team are fully complied with;

- ensure that they have access to a Staff Forum representative to co-ordinate and report on equality and diversity matters within their area
- ensure contractors (and sub-contractors) appointed to carry out works on behalf of the RCH Group are made aware of equality and diversity policies and procedures and comply with our principles.

4.5 Human Resources (HR) Team

The HR Team will:

- keep the Chief Executive and the SMT informed of equality and diversity related matters that may affect the business area under their responsibility;
- ensure equality and diversity is integral to the work of the RCH Group by providing guidance to employees at all levels in the Group organisations on all aspects of equality and diversity;
- monitor, and continually strive to improve, equality and diversity performance in the RCH Group organisations;
- assist line managers to promote high standards of equality and diversity by raising awareness of key issues as and when required;
- regularly review and develop the RCH Group equality and diversity policies, procedures, strategy and actions plan to ensure they are relevant to the business;
- provide SMT, the trade unions, employee representatives and the staff forum representatives with equalities performance information as required;
- consult employees directly, through the formal Trade Union or employee representatives, whichever is relevant;
- attend all staff representative forums in order to share best practice, keep the forums up to date with the latest legislation and capture work undertaken and planned for reporting to SMT;
- assist in identifying and organising appropriate equality and diversity training in conjunction with line managers; and
- provide training on EIAs (attached as Appendix 1) to ensure all relevant employees are confident in the use of these.

4.6 Employees of the RCH Group

In addition to the competences contained within the Staff and SMT Competency Frameworks for Equalities & Diversity, all employees will:

- familiarise themselves with this Policy and all equality and diversity procedures and guidance relevant to their role and workplace;
- promote equality and diversity in all aspects of their work;
- take active steps to challenge discrimination and harassment;
- feed into the equality and diversity objective setting and review processes in their departments, and support managers in their effective implementation;
- attend equality and diversity training courses as necessary;
- contribute and co-operate with the RCH Group management on all matters of equality and diversity;

- develop understanding of EIAs for relevant tasks such as policy and procedures;
- promote equality and diversity in all aspects of their work;
- report any matters they consider not to be line with the equality and diversity policies, procedures and working practices within the RCH Group to their line manager as soon as is practicably possible. This includes any deficiencies or shortcomings they have identified within this policy and/or with the RCH Group arrangements for the management of equality and diversity; and
- immediately liaise with their line manager, SMT member, or raise with the HR Team or their trade union representative or other employee representative if they are faced with a conflict between equality and diversity and the demands of their job

5. Related Documents

- The RCH Organisational Development Strategy
- The RCH Group Employment Policies and Procedures
- The RCH Group Code of Conduct
- The RCH Group Equalities Action Plan

6. Related Legislative and Statutory Framework

- Equality Act 2010
- Employment Rights Act 1996
- All Statutory Regulations, Directives and Approved Codes of Practice

7. Key Stakeholders

- All RCH Group Board members
- All RCH Group Employees
- All RCH Group Customers, Contractors and other Stakeholder Partners

8. Equalities Impact Assessment

8.1 ***The Equalities Impact Assessment for this policy is attached as Appendix 1.***

9. Monitoring and Review of Policy

9.1 The Head of Corporate Services has responsibility for monitoring the effectiveness of this policy and its relevant procedures and documentation. It will be reviewed on a three-yearly basis or earlier if required to respond to new legislation, regulations or best practice requirements. Any review will take account of the views of the trade union partners or employee representatives who use this policy and its relevant procedures on a regular basis.



EQUALITY IMPACT ASSESSMENT (EIA) SCREENING PROCESS

RCH's equality impact screening process is used to ensure that our policies and practices:

- eliminate any unlawful or unfair forms of discrimination in respect of the protected characteristics and other grounds; and
- promote our equality charter.

The EIA screening process involves two main elements: firstly, an initial policy audit against a range of key standards and, secondly, an assessment of the effects of policy documentation on the relevant issues.

It is critical to note that, although the Equality Act 2010 focusses on a range of protected characteristics, individual people should not be defined by these characteristics. Indeed, individual people will “have” a range of protected characteristics at any one point in time; and needs vary through time. For example, a non-disabled person can become a disabled person at any time; while younger people move into older age groups naturally.

EIA: Staff template

The staff template covers five procedural sections: background; the public sector equality duty; the internal EIA; the external EIA; and consultation issues.

Section 1: Background

Name of policy under assessment:	Equality and Diversity Policy 2018
New or existing policy (please specify):	Revised Policy
Key aims of the policy under assessment:	To meet our legal obligations for complying with the Equality Act 2010 in respect of both employment matters and service delivery and promoting good practice guidance throughout our work practices and customer services delivery.
Service or department:	The Corporate Services Department
Person(s) responsible for the assessment:	Nicola Campbell, Senior HR Advisor
Date of assessment:	31 August 2018
Internal sources to RCH	Board, SMT, EMT, Managers, all RCH Group employees, trade union partners and other employee representatives
External sources to RCH	All RCH Group customers, customer groups and other stakeholders, including potential future employees

Section 2: The Public Sector Equality Duty

This decision is based on the following rationale (briefly explain why any of the three issues are relevant for this policy):

General Duty	Is the Policy Likely to have Equality Impacts?	
Elimination of unlawful discrimination, victimisation, or harassment	Yes	
Briefly explain why: <ul style="list-style-type: none"> It ensures that all RCH Group employees and customers are treated fairly in all matters relating to their relationship with the RCH Group, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, including social class or personal characteristics 		
Advancement of equality of opportunity between people with and those without protected characteristic	Yes	
Briefly explain why: <ul style="list-style-type: none"> It ensures that all RCH Group employees and customers are treated fairly in all matters relating to their relationship with the RCH Group, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, including social class or personal characteristics 		
Fostering good relations between people with and those without protected characteristic	Yes	
Briefly explain why: <ul style="list-style-type: none"> It ensures that all RCH Group employees and customers are treated fairly in all matters relating to their relationship with the RCH Group, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, including social class or personal characteristics 		

Section 3: Internal EIA of the policy

The internal EIA is vital as this examines if the policy attains specific standards essential to meeting equality standards.

1 Does the document state, at the front of the document, that it can be made available, on request, in other formats such as in larger print, audio-format, Braille and in other languages, as appropriate?		
		Yes
2 Does the document use Arial font and minimum twelve type size?		
Yes		
3 Is the document accurate in terms of content, for example, are statements within the document accurate when evaluated against law, regulatory standards and related good practice guidance?		
Yes		
4 Are there any rules specified within the policy?		
Yes		
<p>If yes (or unsure), assess if such rules could be discriminatory in terms of equality law and other law (for example, could rules constitute indirect discrimination?)</p> <p>The Policy covers all RCH Group employees and customers and aims to treat everyone fairly, regardless of protected characteristics. It seeks to ensure that there are no barriers to anyone accessing and making use of the policy and related procedures.</p>		
5 Is language appropriate throughout the document, for example, does it promote positive views about - and respect for other people?		
Yes		
<p>If no (or unsure), specify the changes required to ensure that appropriate language is used.</p>		

6 Is the document written in clear and plain language?		
Yes		
<p>If no (or unsure), specify the changes required and amend text as appropriate. This could be part of the document or general paragraphs. (Remember that sentences should, on average, be from fifteen to twenty words in length.)</p> <p>No jargon included within the document and all abbreviations are explained.</p>		
7 Does the document, if relevant, explain how service users can appeal and/or make a complaint?		
Yes		
If no, specify the changes required and amend text as appropriate.		
8 Does the document, if relevant, explain what positive action measures are in place?		
Yes		
<p>If no, specify the positive action required and amend text as appropriate.</p> <p>Contained within the Policy Principles: Equality Charter</p>		
9 Does the document, if relevant, explain what performance monitoring equality measures are in place?		
Yes		
If no, specify specific equality indicators required and amend text as appropriate.		

Section 4: External EIA of the policy

Now that section one to three has been completed, is there any negative or positive effect on people.

Protected Characteristic	Negative Effect Yes/No	Positive Effect Yes/No	Explanation
Age	No	Yes	It is not considered that the Policy will have potential for impact on this protected group(s)
Disability	No	Yes	As above
Gender reassignment	No	Yes	As above
Marriage and civil partnership	No	Yes	As above
Pregnancy	No	Yes	As above
Race	No	Yes	As above
Religion/belief	No	Yes	As above
Sex/gender	No	Yes	As above
Sexual orientation	No	Yes	As above
Social class	No	Yes	As above
Personal characteristics	No	Yes	As above

Section 5: Consultation issues

Summarise what types of consultation have been carried out, if any, and with whom:
Regular consultation is carried out with the Trade Unions; the Staff Forum and Senior Management Team meetings internally and we will consult with the Senate externally
Is consultation required in law and/or due to RCH's policy? Yes
Please explain: It is our policy that we consult with the recognised Trade Unions or employee representatives on issues related to employment and with the Senate for customer consultation on new policies or policy changes

Signed off by Responsible Person: Maureen Gimby, Head of Corporate Services

Date: 31 August 2018

Next policy review date: August 2021