



Family Housing
Association (Wales) Ltd

Family Housing Association Equality Scheme 2010 - 2013

*“Cydnabod amrywiaeth,
ymrwymo i gydraddoldeb”*

*“Accommodating diversity,
committed to equality”*



Cartrefi
Cymunedol



Cymru

Community
Housing



INVESTORS IN PEOPLE

FHA Equality Scheme 2010 - 2013
"Accommodating diversity, committed to equality"

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1. Foreword

We believe that tackling inequalities provides a strong foundation for cohesive and confident communities. We believe that all citizens have a right to equal access to life opportunities, including representation, services and employment. To achieve this we are committed to working towards removing barriers to opportunities and to narrowing the gap between the most disadvantaged and others. This Equality Scheme is our public commitment of how we plan to meet the duties placed upon us by the equality legislation.

We value the strength that comes with difference and the positive contribution that diversity brings to communities. As an employer and key public service provider, we aim to eliminate prejudice and discrimination, and to promote good relations between different groups. We aim to deliver high quality services in a fair and equal way to all.

The Scheme demonstrates how the Board plans to continue to meet its duties to promote race, disability, gender equality and the Welsh Language. It will also act as a framework for compliance with legislative and policy guidance outlawing discrimination on the grounds of age, religion and belief and sexual orientation. The principles of equality, fair treatment and social inclusion for all are therefore to be the basis for every aspect of the Association's business and operation.

As Chair and Chief Executive, it is our duty and that of the Board to ensure the successful implementation of this Scheme through all the staff of the organisation. We believe that leadership and commitment at all levels are central to the success of the Scheme.

Cllr. A Lloyd
FHA Chair

Jeff Evans
FHA Chief Executive

2. Introduction

This Equality Scheme demonstrates Family Housing Association's (FHA) commitment to its legal obligations in relation to race, disability, and gender (including gender reassignment), age, religion or belief, sexual orientation and the Welsh Language. It reflects the way in which we will build upon the work already undertaken as we continue to work towards fulfilling our moral, social and legal obligations to put equality at the heart of everything we do.

3. Purpose

The purpose of this Scheme is to create a cohesive approach to embed equality into the day-to-day work of FHA and to value diversity. It is applicable to all services provided by the organisation and employment practices. To do this we will review the governance, planning and service delivery processes across the Association. It reflects our commitment and intent in meeting our statutory and moral obligations, providing an effective platform to enable the mainstreaming of equality issues across the whole Association.

4. Our Corporate Objectives

- To provide a high quality housing service, sensitive to the needs of our customers.
- To provide advice, care and support for those who need it, to live independently.
- To develop high quality homes sensitive to the needs of the communities in which we work.
- To ensure that all our business activities are sustainable and sensitive to the environment.
- To work in partnership with other agencies for the benefit of the community.

5. Other Relevant Policies and Procedures

This Scheme forms part of the Association's general approach to equality of opportunity and supports FHA's Equal Opportunities Policy.

6. Aims

This Equality Scheme aims to:

- Work with customers, volunteers, residents, staff and other stakeholders and public bodies, along with local communities in the development, implementation, and review and delivery of improvements in the services we provide.
- Create a working environment where all staff are treated with professionalism, dignity and respect and are able to deliver and develop to the best of their ability without having to face discrimination or harassment due to their race, disability, gender, age, religion or belief and sexual orientation.
- Meet the legislative and policy drivers incumbent upon us as a public service provider and ensure that equality and fairness are embedded in all areas of our service delivery, planning and employment and in all our business activities.
- Take positive action to address any existing disadvantage and encourage a more inclusive society.
- Provide services that are sensitive to differences in needs, aspirations, languages and culture and to recognise the diversity of local communities and individuals, and to foster good relations between different communities.

7. The Legislative Context

This section outlines the main legislative and regulatory requirements that apply to FHA and deals with each of the strands in turn.

7.1 Age Positive

The Employment Equality (Age) Regulations 2006 introduced laws aimed at ending any discrimination that people may face due to their age in relation to their employment. Age discrimination in its simple form, refers to situations where chronological age is used to determine whether or not people have access to employment or goods and services. Whatever form it takes, it implies a devalued status to people due to their age, particularly older and younger people.

In 2003 the Welsh Assembly launched the Strategy for Older People in Wales. Since then in 2008, phase two of the Strategy Living Longer, Living Better, was launched by the Assembly, in order to effectively plan for an ageing society and to tackle age discrimination. FHA fully supports the Welsh Assembly's strategy and will implement it in its policies, procedures and working practices.

7.2 Disability

The Disability Discrimination Act (DDA) 1995 (amended by the Disability Discrimination Act 2005) introduced laws aimed at ending the discrimination that many disabled people face. It gave disabled people new rights of access to goods, facilities and services as well as in employment and the buying or renting of property. It provided protection from discrimination and harassment for all disabled persons. The DDA (2005) introduced the Disability Duty for the public sector.

7.3 Gender Equality

The Sex Discrimination Act 1975 made it unlawful to discriminate on grounds of sex or marital status in recruitment, promotion and training.

The Equality Act 2006 created the Gender Equality Duty for the public sector and came into force in April 2007. Its purpose is to help men and women have full opportunities and choices to improve the quality of their lives and to be respected and included as equal members of society. The duty requires public service providers, when carrying out their functions, to have due regard to the need to promote equality between women and men and to eliminate unlawful sex discrimination and harassment.

Sex Discrimination (Gender Reassignment) Regulations 1999 extends the protection of the Sex Discrimination Act 1975 and makes it illegal to discriminate in employment and training on grounds of gender reassignment as a form of sex discrimination.

The 1970 Equal Pay Act makes it unlawful for employers to discriminate between men and women in terms of their pay and conditions where they are doing either:

- the same or similar work
- work rated as equivalent in a job evaluation study by the employer
- work of equal value

The significant legal change for transsexual people has been the Gender Recognition Act (GRA) 2004, which came into force in April 2005.

7.4 Race Equality

The Race relations Act (1976) made it unlawful to discriminate in providing goods, services and facilities on the grounds of race. Although housing associations are not legally bound by the Race Relations (Amendments) Act 2000 (The Race Equality Duty), FHA, in keeping with the spirit of the legislation, accepts the responsibility and duty placed on the wide range of public authorities to promote race equality.

This Scheme is based upon and complies with Welsh Assembly Government regulatory requirements, legislation and good practice, specifically:

- Race Equality Housing Action Plan 2008-2011, Welsh Assembly
- Elimination of Racial Discrimination and the Promotion of Equal Opportunities in Employment 1984 (CRE)
- Elimination of Racial Discrimination and the Promotion of Equal Opportunities in Rented Housing 1991 (CRE)
- Promotion of Equal Opportunities in Employment 1984 (CRE)
- Macpherson Report 1999
- Code of Practice on Racial Equality in Housing 2006 (CRE)

7.5 Religion & Belief

The Employment Equality (Religion and Belief) Regulations 2003 outlawed discrimination and harassment in employment and vocational training on the grounds of religion and belief. The

Regulations gave rights in new areas to employees to protect them from prejudice, discrimination and harassment in the workplace.

The Equality Act (Religion and Belief) Regulations 2006 makes it unlawful to discriminate in the provision of goods, facilities and services, in education and in the exercise of public functions on the grounds of religion & belief and non belief.

7.6 Sexual Orientation

With effect from December 2003 the Employment Equality (Sexual Orientation) Regulations became law in the UK. The regulations cover employment and training, including education provision.

The Equality Act (Sexual Orientation) Regulations 2007 outlaw discrimination on the grounds of sexual orientation in the provision of goods and services.

“Sexual Orientation” is a legal term used to describe the direction of an individual's sexuality, often in relation to their own sex or gender. This Scheme underpins our commitment to developing a culture of personal and managerial integrity and professionalism, in which dignity, courtesy and respect are valued, and where employees and customers are treated in ways that are sensitive and respectful regardless of their sexual orientation.

This Scheme seeks to protect everyone i.e. gay, lesbian, bisexual and heterosexual people. It aims to provide protection for staff, customers and contractor's actual or perceived sexual orientation or for those treated less favourably because they associate with LGB (Lesbian, Gay or Bisexual) or heterosexual people.

7.7 Welsh Language

FHA supports the principle established by the Welsh Language Act 2003 that we will treat the Welsh and English languages on a basis of equality. We are committed to offering the public an equal standard of service in Welsh and English, in line with the requirements of the Act.

We will do all that it is in our power to safeguard and promote the Welsh language and its use throughout FHA's operational areas and have developed a separate Welsh Language Scheme to help us achieve this aim.

We monitor and report on the progress of the Scheme and the action plan annually to our Board of Management as well as the Welsh Language Board. In addition we provide statistics on:

- Number of requests for correspondence in Welsh
- Number of requests for meetings in Welsh
- Number of staff receiving training
- Percentage of staff able to communicate in Welsh written and spoken
- Complaints received.

7.8 Equality Act 2010

The Equality Act 2010 will replace the current three general duties (race, disability and gender) with a new equality duty, which will cover disability, race, gender, gender reassignment, age, sexual orientation, religion or belief.

The duty will comprise three broad limbs:

- eliminating unlawful discrimination and harassment;
- advancing equality of opportunity; and
- advancing good relations between different groups.

The Act provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen current equality legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

FHA accepts and fully embraces the responsibilities and duties placed on service providers by all equality legislation including the Equality Act 2010 to provide services in a fair and equitable basis to all service users.

8. What We Want to Achieve

This section contains four separate areas titled *Housing Development & Maintenance Provision*, *Housing & Support Service Provision*, *Employment & Training* and *Consultation, Communication & Participation*. Details of what we want to achieve is stated clearly and an Action Plan is attached in the Appendix demonstrating how we will take these statements of principle forward.

8.1 Housing Development & Maintenance Provision

- FHA will utilise up-to-date research findings and best practice guidance, and endeavour to consult with service users and individuals, in order to establish particular needs in relation to property design, site layout, dwelling mix and location and tenure.
- Wherever possible we will consult with relevant groups and specialist organisations during planning and development stage of specialist housing schemes.
- FHA has and will continue where possible to adopt the Life Time Homes Standards developed by Joseph Rowntree Foundation in all its new schemes and developments.
- We will adopt the aims of the equality agenda in our procurement and selection process when we appoint construction consultants. We will work with Tai Pawb to undertake its 'Equality in Procurement Health Check' across the whole organisation.
- FHA will provide training for its development staff, construction consultants on the needs and requirements in relation to people with disability, older people, BME community and in relation to different religion & belief.
- FHA has signed up to the 'Good practise BME Design Brief', prepared by Tai Pawb, along with other Social Landlords. We will endeavour to implement these principles wherever possible when designing new homes or refurbishing existing ones. We will seek to develop new housing that is sensitive in design to the needs of our tenants.
- We will provide contractors who deal with our customers on our behalf, with the 'Good practice Guidance Manual – Working with Diverse Communities', which we produced as a member of the West Wales Equality in Housing Consortium. The manual provides guidance on the major religions in Wales.

➤➤ We will work with all of our service users to consider their needs when drawing up plans for the development, maintenance and improvement of our stock in line with the Welsh Housing Quality Standard.

➤➤ After assessing the needs of tenants FHA will explore the possibility of attaining 'Visibly better' RNIB Accreditation for properties where required.

8.2 Housing & Support Service Provision

➤➤ We will request our customers' information in relation to their age, disability, gender, ethnicity, religion, sexuality and preferred language they would like to communicate in during application process and throughout their tenure.

➤➤ We will use the information provided to tailor our services to customers needs and build up a resident profiling database.

➤➤ We will monitor take up levels of services by age, disability, gender, ethnicity, religion, and sexuality. We will use positive initiatives to encourage a particular section of the community to use our services where evidence shows that there is a low level of take up of any services we provide.

➤➤ FHA recognises that, in order to make informed choices, people need to receive information in a manner that they can access and understand. We will provide information about our housing and support services which is clear, comprehensive, accessible and easily understood. FHA believes it is vital to be able to facilitate translation and provide access to appropriate community languages, large prints, brail and audio etc. In recognition of this, FHA will put in place procedures that will enable this service to be offered.

➤➤ We will implement a programme and allocate resources to make our online presence more accessible. We will seek to attain a recognised web accessibility accreditation.

➤➤ FHA will provide a supportive environment for staff and customers who wish it to be known that they are lesbian, gay or bisexual. However, it is the right of individuals to choose whether they wish to be open about their sexuality; we will always respect an individual's right to privacy on such matters.

- ▶▶▶ FHA recognises that everyone has the right to define their own sexual identity and believes that discrimination on the grounds of sexual orientation is unacceptable. It will work internally and with partners to combat homophobia, heterosexism, harassment and discrimination.
- ▶▶▶ We will seek to attain Lesbian, Gay, Bi-sexual and Transgender (LGBT) 'Rainbow Mark Accreditation' for our schemes and services, an equality mark recognised by WAG as a signifier of good practice recognising specific needs, issues and barriers facing LGBT community living in Wales.
- ▶▶▶ FHA will endeavour to take the needs of all our service users into account when taking decisions about support and care and other service provision. However we also recognise that the information available to us will often be limited. We will therefore positively encourage people to provide views on the services they receive and how they might be improved.
- ▶▶▶ We will consult with relevant groups of services users and work closely with specialist organisations such as Age Concern, Women's Aid, RNIB, MENCAP and other relevant agencies when delivering specialist support services.
- ▶▶▶ We recognise that people may experience disadvantage linked to their age, disability, gender, ethnicity, religion, or sexuality when accessing services. We will therefore review and Equality Impact Assess all our policies and services across the whole Association to ensure all actual or perceived discrimination is removed.
- ▶▶▶ To make sure we comply with current disability legislation we will implement a programme of disability access audit and make any reasonable adjustments if necessary, where we fall short.
- ▶▶▶ We will attempt to remove any perceptual barriers by the use of positive imagery of the different communities we serve in our publications, websites and through effective communication.
- ▶▶▶ FHA is aware that some may experience harassment, victimisation, intimidation or abuse because of their race, faith, disability or sexuality either from fellow citizens or those who provide services for them. This is referred to as 'hate crime'. We will take positive steps to improve our customer monitoring procedures and train our staff to acknowledge hate crime linked to the equality strands and take appropriate action.
- ▶▶▶ We also recognise people's different dietary requirements and this maybe due to their religion or belief. If a request is made we will attempt to meet those needs when we provide training, undertake meetings or other functions for staff, residents and volunteers.

- ▶▶▶ FHA will continue to review its Board structure regularly to ensure that it is as open as possible and that it reflects the composition of the local communities within which it operates.

8.3 Employment & Training

- ▶▶▶ FHA selects solely on merit but aims to have a workforce which is reflective of the diversity of the community it serves. We recognise that people may experience disadvantage linked to their age, disability, gender, ethnicity, religion, or sexuality. We will therefore continually review all our human resources policies, terms and conditions to ensure that all employees are treated with respect and can perform their jobs free from harassment and discrimination.
- ▶▶▶ We will also ensure that our recruitment and selection practices are non-discriminatory. Job descriptions and personal specifications for all posts will be scrutinised, prior to advertisement, to ensure that they do not contain any unnecessary requirements that may represent a barrier.
- ▶▶▶ We recognise that some may experience hate crime due to their age, disability, gender, ethnicity, religion, or sexuality. We will periodically review our Harassment and Bullying Policy to make sure that it complies with current legislation and Codes of practise. We will seek to protect staff, service users and anyone else who acts on behalf of the organisation.
- ▶▶▶ We will provide training and development opportunities to all our staff irrespective of their background or differences.
- ▶▶▶ Where we believe there is a Genuine Occupational Qualification (GOQ) on the grounds of gender or religion or belief which applies to a post, this will be made clear in the advertisement. The rationale for using a GOQ will also be explained in the advert, application pack and during the selection process.
- ▶▶▶ FHA understands many religions and beliefs have special festival or spiritual observance days. We will accommodate staff requests for holiday wherever possible in order to celebrate festivals or attend ceremonies. We will be flexible as the operating environment allows. Staff should be equally flexible to ensure that both the needs of the service and those of other individuals in the workplace can be met.
- ▶▶▶ FHA also recognises some religions require their followers to pray at specific times during the day. Although FHA is not required by law to

provide time and facilities for religious or belief observance in the workplace, Manager will be made aware of in this when requests are made they should be as flexible as the business environment allows. Staff should be equally flexible to ensure that both the needs of the service and those of other individuals in the workplace are met.



FHA will give consideration to requests for extended leave by staff for the purpose of, for example, going on pilgrimage. We will attempt to accommodate the request. If the extended leave exceeds the remaining annual holiday entitlement, the excess days should form a request for unpaid leave.



We believe diversity is the one true thing we all have in common and therefore in line with the Association's Code of Conduct we will not impose unnecessary dress restriction that could be discriminatory. However, health and safety requirements may mean that for certain tasks specific items of clothing such as overalls, protective clothing, etc., need to be worn. If such clothing produces a conflict with an individual's religious belief, the issue will be sympathetically considered, after carrying out a risk assessment, with the aim of finding a safe but satisfactory solution.



FHA will continue to ensure all new staff and Board Members receive Equal Opportunity training as part of their induction. FHA also encourages and offers its contractors to undertake such training. We will also periodically follow up equalities training for all staff.



We will promote work-life balance and other rewards/benefits and make sure they are applied equally to all staff, and wherever relevant and possible apply equally to same sex partners as to partners of different gender. For example:

- Adoption leave
- Compassionate leave
- Flexible working requests
- Paternity leave








We are aware of the persistent pay gap between women and men in society. As a public service provider we are required through the Gender Equality Duty to comply with the Equal Pay Act 1970 and subsequent amendments. The requirement of the Gender Equality Duty is to carry out a pay review. FHA will regularly monitor the number of staff by gender and by pay band to ensure equity.

- ▶▶ We will strive for equality of representation in training and career development, reward and recognition for all our staff regardless of their age, disability, gender, ethnicity, religion, and sexuality. This includes ensuring women on maternity leave are still provided with a performance review to ensure their career paths are not disadvantaged.
- ▶▶ Consideration will be given to any 'reasonable adjustment' to features of the job, or work conditions to remove barriers that may disadvantage a disabled employee or job applicant. This may take the form of specialist aids, adapted workplaces, changes in working practices etc.
- ▶▶ We will endeavour to support staff who wish to continue in employment after normal state retirement age and this will be reflected in our Retirement Policy.
- ▶▶ We will review our Equal Opportunities Policy to make sure it includes an Age Positive Statement which seeks to create a working atmosphere in which all employees are free from any prejudice and to encourage confidence, respect and support across the whole Association. Therefore, we seek to raise all employees' awareness of age related issues.
- ▶▶ FHA will maintain monitoring information on the composition of staff groups and regularly review this data. Such information helps us to make sure that our equality and diversity policy is working to the benefit of all concerned. Monitoring information also helps us to understand the needs of our staff through consultation with individuals, staff representatives and specially convened groups.

8.4 Consultation, Communication & Participation

- ▶▶ People's housing needs and circumstances change throughout their lifetimes; therefore we will ensure that we continually listen to our customers in the design and delivery of services.
- ▶▶ In our community engagement we will seek to ensure that we involve all our service users so that they feel part of the decision-making process that impacts our services.
- ▶▶ We will explain to all our service users the benefits of the equality agenda. They need to understand the aims; feel confident to give us information regarding their age, disability, gender, ethnicity, religion, or sexuality when it comes to consultation or delivery of services without fear of discrimination. We will incorporate this commitment into our Tenant Participation Strategy.

-  We will foster sound partnerships with relevant agencies, organisations and community groups, such as Care and Repair, Age Concern and others to understand age related issues better and continue to deliver our services in a non-discriminatory manner.
-  We will ensure that we develop effective systems of consultation with community groups, disabled service users and their advocates, to confirm that their needs are understood and translated into policy and decision making areas.
-  We will also seek to develop and support aspects of community initiatives that promote integration and endeavour to support open-minded and practical strategies through direct communication with public, private, voluntary, community groups and other representatives thus creating and maintaining working partnerships within the local areas we operate.
-  Where possible we will work with agencies which will enable us to work with local ethnic community groups, refugee community organisations, resettlement support agencies and race equality councils in order that their views are incorporated into the development of our housing and support services.
-  We believe in continuous dialogue, therefore we will continue to consult with all sections of the communities on their changing needs and the ways we adapt our services to meet those needs. This consultation process will be undertaken in many different ways that are appropriate and suitable to the different sections of the communities. We will incorporate this commitment into our Tenant Participation Strategy.

9. Review and Implementation

We will regularly review and update our Equal Opportunities Policy Statement to ensure that it meets new legislative requirements and reflects FHA's commitment to achieving an inclusive society.

We will periodically draw up an action plan to support the implementation of this Scheme. The Plan will identify responsibilities and resources and will establish a timetable to achieve its objectives. If you would like a copy of the current Action Plan please get in touch with us.

10. Obtaining a copy of the Scheme

Please contact FHA at the address shown below to obtain further copies of the Equality Scheme or to request a copy in a format or language you require. We recognise the diverse needs of the

communities we serve and welcome communication in different languages and format upon request.

11. Feedback: comments and suggestions

FHA aims to provide the highest quality of service which is responsive to the needs of the diverse communities it serves. We believe in a culture of continuous improvement and realise that the level of service can be improved and very much welcome your feedback.

If you would like to provide any feedback about this Equality Scheme, please address it to:

Farid Ali
Quality, Policy & Information Manager
Family Housing Association (Wales) Ltd
41-43 Walters Road
Swansea
SA1 5PN

T: 01792 460192

F: 01792 473726

E: info@fha-wales.com

W: www.fha-wales.com