



Supporting Independent Living

Diversity Policy

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1.0 Purpose of Policy

- The purpose of this policy is to outline our overall commitment to diversity and equality which is summarised in our vision statement.
- Achieve a shared understanding of diversity issues amongst staff and stakeholders.
- Develop an understanding of discrimination and appropriate working practices.
- Motivate the Associations diverse working group
- Inform the Diversity Action Plan.
- Ensure the Association does not discriminate in any way and fully recognises and embraces the wide and diverse communities with which we work, employing a diverse and knowledgeable workforce.
- Enable us to focus on our customers and truly recognise that each individual has differing needs for a variety of reasons: such as age, ethnic background, ability to access services or ability to participate in the life of their community.
- Address any imbalance in the services provided and to ensure our partner agents are providing a high and equitable standard of service.
- Incorporating a wide variety of issues and utilising this information to guide our work, educating and challenging customers, employees, stakeholders and the wider community.
- Remove all forms of discrimination and use different mechanism and opportunities to promote equality and diversity within all areas of our operation.
- Adopt effective approaches to deal with and eliminate discrimination, supporting and assisting those who may be victims or perpetrators of such acts. (Our approach to respect and understand individual needs in society is at the core of our work).
- Continually review our performance and improve upon the services we provide.

2.0 Diversity Vision Statement

The following Diversity Vision Statement reflects how the Association values and embraces difference.

In the Salvation Army Housing Association we are making a difference by understanding our differences.

3.0 Diversity Action Planning

Employees representing departments in the Association regularly meet to review the Associations Diversity Action Plan. The group, known as the Diversity Action Group, oversees and cascades information throughout the organisation; challenges current practice and shares ideas for continuous improvement relating to equality and diversity.

The Association's Diversity Action Plan concerns itself with sector good practice recommended by the Housing Corporation and other organisations such as the CRE, to deliver an excellent service. The Diversity Action Group continually monitors and reviews this plan and has input regarding objective setting.

Our action plan is driven by the following:

- Leadership being clear and consistent when promoting equal opportunities and diversity
- Ensuring legislation and good practice is adopted and addressed
- Involving service users and stakeholders in determining priorities
- Reports to the Board evidencing delivery on diversity
- Access to our services
- Communication with service users
- Information about service users and support needs
- Responding and meeting the needs of service users
- Ensuring a diverse service user base through target setting and monitoring of reports
- Consultation with black and minority ethnic groups
- Community involvement with other agencies and partners
- Understanding cultural needs

- Ensuring contactors and consultants are committed to diversity
- Promoting community cohesion and addressing social exclusion
- Identifying and responding to harassment and domestic violence
- Supporting victims and ensuring clear understanding of policy and procedures and appropriate actions
- Communicating the associations stance and response to harassment and other behaviours considered to be anti social
- Working to promote positive attitudes and respect in communities
- Developing employees understanding of discrimination over and above the better known areas of race, ethnic origin and nationality.

To achieve these objectives we provide training and development for staff through more formal equality and diversity training as well as those informal methods where teams discuss and agree their own local objectives.

We ensure our management agents raise their levels of understanding via monitoring and development and training opportunities within our residential centres.

The Association positively utilises methods that ensure our values and working principles are communicated when engaging with service users, stakeholders and the wider community.

4.0 Diversity Policy

Introduction

The Salvation Army Housing Association (SAHA) is a registered social landlord providing housing for a diverse range of needs. Each year we work with over 7,000 service users in over 3600 units across England ranging from residential centres (homeless hostels), foyers, supported accommodation including sheltered schemes and general needs housing.

Our diverse range of housing, service users and employee base means the association delivers tailored provisions for each service area within the Association. We recognise that we work within diverse communities and believe that we can draw on the experiences, ideas, traditions and practice of many different national, ethnic, religious, cultural, socially discriminated and minority groups to inform and enhance the association, its services and practices.

As a Christian organisation we embrace diversity as it defines our view and belief that we are all different but equal and each person should be valued for who they are – it's what's inside that counts.

This diversity policy is concerned with recognising and valuing such differences and ensuring we positively respond to meet the needs of those who use our services and therefore at all times continually improving the work we do.

It is every employee's responsibility to support and follow this policy and to follow the correct practices in employment, consultation, contracting and supporting our service users.

In the Salvation Army Housing Association we do our utmost to provide housing for all in society enriching lives by how we understand individual needs.

Purpose and Principles

Equality and diversity is vital if we are to provide quality housing and drive progress and achieve business objectives throughout the organisation. Many of our service users and staff have a role to play as they have first hand experience either directly or indirectly of social exclusion or discrimination. Therefore, by listening and involving those we employ and house, plus adopting a multi-agency approach we can minimise discrimination at local levels and promote equality and diversity throughout the association.

We are committed to putting the principles of equality and diversity into practice. This means that our policies, procedures and services must not discriminate either directly or indirectly.

Therefore we will:

Act as a responsible organisation:

- Ensuring that the Board and Senior Management take all reasonable steps to follow legislation and codes of practice and promote good relations amongst different groups.
- Ensuring this diversity policy is understood throughout the organisation and communicated to employees, customers and other stakeholders therefore underpinning the work of the Association.
- Understanding the needs of the communities we serve.
- Monitoring ethnic breakdown of staff and contractors and ensure these reflect the communities where we work.
- Ensuring we have up to date knowledge of legislation, from the Race Relations Act, the Disability Discrimination Act, regulatory requirements from the Housing Corporation and knowledge of good practice guidance issued by the National Housing Federation, the Chartered Institute of Housing and Commission for Racial Equality code of practice on Racial Equality in Housing and comply with requirements from the Audit Inspectors. Communicating these requirements within the association ensuring the Board and Senior Management take on responsibility for monitoring and compliance.
- Providing performance and progress reports on statistics and matters affecting our customers to our senior officers and board members with appropriate targets and benchmarking, ensuring we monitor minority groups who are excluded from housing and share good practice.
- Ensuring we use this policy to influence and revise other association wide policies and procedures.
- Developing employees, service users and stakeholder's knowledge and understanding of equality and diversity hence influencing partnerships to promote community cohesion and address social exclusion.
- Eliminating discrimination within the Association against any person or organisation on racial grounds or by prejudice or stereotyping.

- Designing accommodation considering customers preferences and in consultation with existing service users and partner agencies, ensuring proper consideration has been given to how decisions may have an adverse impact on particular racial and disabled groups.
- Developing procurement and tendering procedures that do not exclude, but require consultants and contractors to demonstrate and sign up to the association's diversity practices and policy.

Act as a responsible landlord:

- Ensuring access to housing is fair and equal across all services within the association and monitoring exclusions and refusals.
- Understanding our customer base and local communities continually monitoring ethnic breakdown of demand and our service users.
- Using appropriate methods to communicate with each individual offering translation services and having documentation available in other appropriate forms.
- Meeting targets set for allocations and ensuring equal access, quality of housing, support and advice to those from minority groups.
- Preventing segregation of tenants by racial grouping.
- Providing disabled access and accommodation where possible.
- Ensuring employees are able to respond to the needs of vulnerable and disabled service users.
- Ensuring those residents who are potentially a risk to themselves or others are identified and risks are communicated within teams and to those liaising with service users on behalf of the association.
- Using clear systems to monitor and review the needs of our service users providing support from staff or through external links with partner agents and taking individual's circumstances into account when offering accommodation.
- Taking action when we receive complaints and ensure we respond promptly to reports of harassment, domestic violence and other anti-social behaviours giving support to victims and dealing appropriately with perpetrators.

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- Designing housing and accommodation in consultation with neighbourhoods to reflect the diversity of needs in our communities and resulting impact.
- Following procedures and monitoring service delivery when dealing with issues regarding rent arrears, evictions, repairs, advice and benefits to ensure equality of service.
- Monitoring, reporting and acting on the views of our service users by use of resident forums, surveys and various participation methods taking particular note of the ethnic breakdown and satisfaction levels of minority groups.
- Addressing any imbalance in service user involvement and ensure minority groups views are heard and understood.
- Offering service users information and guidance about the diverse range of services available in the local area.
- Developing local action plans to address exclusion and promote community cohesion including steering groups and partnerships.
- Working with appropriate agencies, residents and the police to tackle harassment, domestic violence and anti-social behaviour and at all times promote the stance of the association and follow our published policies.

Act as a responsible employer:

- Creating a respectful and inclusive working environment, identifying and encouraging the diversity of staff experience, ability and skills and valuing and accepting the contribution of individual staff to achieve business objectives.
- Promoting our diversity policy during the recruitment phase and demonstrating our commitment to equality and diversity by recruiting staff and board members that have the skills and ability to provide services which reflect the needs of our business and customers.
- Ensuring staff understand both their responsibilities and our policies and procedures and are able to translate their knowledge into their working environment on a daily basis.
- Training staff to identify and deal with different types of harassment and domestic violence and enable them to offer fast and effective action and support to those involved.

- To support employees in suggesting and introducing new initiatives.
- Ensuring staff understand cultural and social issues of significant minority, vulnerable and disabled groups where relevant for the improvement of services and community cohesion. Deleted: Deleted:
- Respond to individuals personal circumstances offering support, advise and flexibility should an employee be subject to domestic violence, harassment or illness resulting in disability preventing them fulfilling their contractual obligations.
- Monitoring employee performance using our appraisal system to check staff's understanding of equality and diversity and promote awareness, identify training needs and encouraging personal development to enable staff to enhance their skills and careers. Deleted: ¶
- Ensure staff breaching the policy are interviewed and action is taken as applicable including consideration of the potential use of the Associations disciplinary procedures.

Monitor our effectiveness

The Diversity Action Group has overall responsibility for the implementation of the policy. This Group also monitors and drives the progress of our action plan, recommending changes and promoting success throughout the organisation.

The Association will monitor and record all applications for employment, showing gender, ethnicity, disability and age and evidence continuous training and development of staff teams regarding equality and diversity.

Our monitoring procedures indicate that our services are diverse and we achieve expected performance targets nationally for access to general needs housing, for residential centre lettings and targets for recruitment.

However our approach to continuous improvement demands a self critical approach to our performance. Success does not generate complacency and we continue to review the robustness of our policies and procedures and reassess our knowledge of good practice conscious that the communities we serve are ever growing and have high levels of needs.

- Government street counts estimate there are about 459 people sleeping outside around England on any one night. (Crisis, Statistics on Homelessness, March 2006)

- 21,140 households applied to their local council and were accepted as being homeless (figures for 4th Quarter 2005, Office of the Deputy Prime Minister)
- 98,730 Homeless households are living in temporary accommodation (December 2005, Office of the Deputy Prime Minister)
- 42% of social housing tenancies contain a person with a disability, compared to 14% in the population. (Source: Disability Rights Commission Annual Review 2003, p4 “one in seven people”).
- 22% of homeless people are from BME groups, compared to 11% within the population. (Source: Census Data 2001)
- By 2021 the elderly will comprise 13.1% of the population. (Source: National Population Projections: 2000-based, National Statistics 2002, table 3.2).

These figures demonstrate the diverse needs of those we seek to serve. Our approach to diversity will, therefore, be measured and consistent with practice as we provide quality and inclusive services.

We are committed to changing our work practices and communities where we work to create more socially inclusive sustainable communities. To do this we will monitor and promote all areas relevant to equality and diversity.

4.0 Defining Equality and Diversity

Ableism

Favouring people who have no disabilities.

Discrimination in favour of those who are not physically or mentally disabled.

Age Discrimination (Ageism)

Discrimination on the grounds of age can include restrictions in access to education, employment, housing, health, justice etc. on account of age.

Appearance

The way somebody looks or seems to other people, creates a particular impression.

Class

The structure of divisions in a society determined by the social or economic grouping of its members.

Disability

Long-term physical or mental condition that affects day-to-day activity. For example; mental health condition, visual impairment, physical restrictions.

Diversity

Diversity is about creating a culture that seeks to respect value and embrace differences such as gender, age, ethnicity, disability as well as differences that are not necessarily immediately apparent, such as sexual orientation, religion or belief and nationality.

Ethnic Origin

Relating to a person or to a large group of people who share a national, racial, linguistic, or religious heritage, whether or not they reside in their countries of origin.

Equal Opportunities

Equal Opportunity is providing fair and equal access/treatment for everybody.

Gender

The fact of people having different genders, male/female, or of people feeling different or being treated differently because of their gender.

Harassment

Unwanted behaviour that has the purpose or effect of violating a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive environment for them. Harassment on grounds of race or ethnic or national origins is a specific unlawful act under the RRA (Race Relations Act). Harassment on other grounds may involve less favourable treatment and may be unlawful direct discrimination.

HIV positive and Aids

Virus which disables immune system either of two strains of a retrovirus, HIV-1 or HIV-2, that destroys the immune system's helper T cells, the loss of which causes Aids.

Nationality

The status of belonging to a specific nation by origin, birth, or naturalization; a people with a common origin, tradition, and often language, who form or are capable of forming a nation.

Racial Discrimination (Indirect)

In terms of race or ethnic or national origins: the use of an apparently nondiscriminatory 'provision, criterion or practice', which puts people of a particular race or ethnic or national origins at a particular disadvantage compared with others, unless it can be shown that the provision, criterion or practice is a proportionate means of achieving a legitimate end.

Racial Discrimination (Direct)

Less favourable treatment of a person, on racial grounds, compared with the treatment of a person from another racial group in the same or similar circumstances.

Racism (Institutional)

A concept introduced by the Stephen Lawrence Inquiry Report and defined as: *The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racial stereotyping which disadvantages minority ethnic people.* The concept has no legal force.

Racial Harassment

Racial harassment refers to harassment suffered by individuals or groups because of their colour, race, nationality or ethnic origins.

Racial harassment involves a wide range of acts, which may or may not include the following:

- Verbal abuse
- Insults and intimidation
- Threatening and/or abusive behaviour including spitting
- Sending threatening letters or making abusive telephone calls (racist nature)
- Writing graffiti of a racial nature within or in the proximity of accommodation
- Damage to property and belongings
- Unprovoked assault
- Arson or attempted arson
- Nuisance and other criminal acts
- Participating in activities to deter the person from occupying a dwelling

Religion (or Belief)

People's beliefs and opinions concerning the existence, nature, and worship of God, a god, or gods, and divine involvement in the universe and human life

Responsibility for Dependents

Accountable to someone for carrying out something as the person is not able to live without support from other people, especially financial support from a parent or child.

Sexual Orientation

Refers to an individual's choice related to sex and suggests people's sexual preferences and behavioural differences that distinguishes if people are:

Bisexual (someone sexually attracted to both men and woman, or has both male and female characteristics or organs)

heterosexual (someone who sexually desires members of the opposite sex)

homosexual (someone sexually attracted to members of his or her own sex)

transsexual (someone who identifies himself or herself as and wants to become a member of the opposite sex or someone who has undergone surgical and hormonal treatment to change his or her anatomical sex)

Sexism (Sex Discrimination)

Discrimination on the grounds of sex. It is unlawful to discriminate directly or indirectly on grounds of sex by treating an employee unfavourably in any way. The Equal Opportunities Commission Code of Practice for employers stipulates that:

“All reasonable practical steps should be taken to ensure that a standard of conduct or behaviour is observed which prevents members of either sex from being intimidated, harassed or otherwise subjected to unfavourable treatment on the grounds of their sex.”

Sexual Harassment

Sexual harassment refers to harassment suffered by a person because of their gender or sexuality. It involves a wide range of acts, which may or may not involve physical assault, verbal abuse, unwanted approaches from another person (verbal or physical), graffiti or damage to property.

Unrelated Criminal Activities

Actions not connected by similarities, source or family to someone who has acted illegally ie somebody who has committed a punishable crime.

Victimisation

Less favourable treatment of a person because they have brought proceedings under the RRA; or given evidence or information in connection with proceedings brought by anyone under the RRA; or because they have alleged that a person has committed an act which would amount to unlawful discrimination; or because they have otherwise done anything under the RRA in relation to any person, or because they intend to do any of these acts, or are suspected of having done or intending to do them.

5.0 Legal and Regulatory Guidance

There are many Legal frameworks which should be considered when applying this Diversity Policy and below are some of the main Acts and Regulations with guidance and suggested further reading.

Disability Discrimination Act 1995 and associated codes of practice

Are disabled people protected from discrimination?

Yes, the Disability Discrimination Act 1995 provides disabled people with protection from discrimination in a range of areas, including in employment and occupation. This means that employers:

- must not directly discriminate against a disabled person.
- must not treat a disabled person less favourably for a reason related to his or her disability, unless that treatment can be justified.
- must make reasonable adjustments in the recruitment and employment of disabled people. This can include, for example, adjustments to recruitment and selection procedures, to terms and conditions of employment, to working arrangements and physical changes to the premises or equipment.

Further information:

- [Disability Rights Commission \(DRC\)](#) - Helpline: 08457 622 633; Textphone: 08457 622 644; email: enquiry@drc-gb.org
- [The DRC site for employers](#)
- [Directory website on rights for disabled people](#)

Equal Pay Act 1970 (as amended), including the Equal Pay (Amendment) Regulations 2003 and the Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002.

Are men and women entitled to equal pay?

Yes, employers must give men and women equal treatment in the terms and conditions of their employment contract if they are employed on:

- 'like work' - work that is the same or broadly similar
- work rated as equivalent under a job evaluation study, or
- work found to be of equal value.

A woman is employed on 'like work' with a man if her work is of the same or a broadly similar nature. It is for the employer to show that there is a genuine reason for any difference in this 'like work', which is which is not based on the sex of an individual.

Individuals may complain to an employment tribunal under the Equal Pay Act 1970 up to six months after leaving the employment to which their claim relates. Normally, they may claim arrears of remuneration (which includes sick pay, holiday pay, bonuses, overtime etc as well as 'pay') for a period of up to six years (five years in Scotland) before the date of their tribunal application.

Further information:

- www.eoc.org.uk
- [Code of Practice on Equal Pay](#)

Do fixed-term employees have the right to equal treatment at work?

The Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002 aim to ensure that employees on fixed-term contracts are treated no less favourably than comparable permanent employees. Under the regulations these employees have the right to the same terms and conditions of employment as comparable permanent employees. Examples of fixed-term work include:

- agricultural workers doing 'seasonal' work
- shop assistants working for the Christmas period
- employees covering maternity leave
- employees doing a specific task - like painting a house.

Further information from the DTI website:

- [Fixed-term work - A guide to the regulations](#)

What rights do part-time employees get?

Part-time workers have the right not to be treated less favourably than comparable full-timers. This means they should:

- receive the same rates of pay
- not be excluded from training simply because they work part-time
- receive holiday entitlement pro rata to comparable full-timers
- have any career break schemes, contractual maternity leave and parental leave made available to them in the same way as for full-time workers and
- not be treated less favourably when workers are selected for redundancy.

Further information from the DTI website:

- www.dti.gov.uk/er
- [The law and best practice - A detailed guide for employers and part-timers](#)

Rehabilitation of Offenders Act 1974

What rights do ex-offenders have at work?

Under the Rehabilitation of Offenders Act 1974 many ex-offenders are given certain employment rights if their convictions become 'spent'. Broadly speaking, anyone who has been convicted of a criminal offence and who is not convicted of a further offence during a specified period (the 'rehabilitation period') becomes a 'rehabilitated person'.

This means that:

- the conviction does not have to be declared for most purposes, such as applying for a job
- employees are given protection against dismissal or exclusion from any office, profession, occupation or employment (with some exceptions) and
- employers cannot prejudice a person in any way because of a spent conviction

A conviction resulting in a prison sentence of more than 30 months can never become spent. There are some exceptions to the Act - broadly relating to work with children, the sick, disabled people and the administration of justice.

Further information:

- *Wiping the slate clean* (available from the Home Office: www.homeoffice.gov.uk)

Race Relations Act (RRA)

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000 and the Race Relations Act 1976 (Amendment) Regulations 2003 issued by the Commission for Racial Equality (CRE).

- The Race Relations (Amendment) Act 2000 and associated codes of practice issued by the CRE. This came into force in April 2000 and puts a new duty on public authorities to “promote racial equality”. The Housing Corporation is defined as a ‘public body’ under the Act and will monitor our activities against this standard

Are employees protected from race discrimination?

Yes, the Race Relations Act 1976 (as amended) makes it illegal to treat a person less favourably than others on racial grounds.

Race discrimination covers all aspects of employment - from recruitment to pay, and training to the termination of a contract.

What does race discrimination cover?

Discrimination covers four areas:

1. direct discrimination - treating someone less favourably on racial grounds
2. indirect discrimination - applying practices that might favour one racial group over another
3. harassment - unwanted conduct that violates a person's dignity and creates a hostile or degrading environment
4. victimisation - unfair treatment of an employee who has made a complaint about racial discrimination.

Can jobs ever be restricted to certain ethnic or national groups?

Yes, a genuine occupational requirement is a valid reason for restricting a job to people of a particular race or ethnic or national origin. A genuine occupational requirement may apply in limited circumstances - for example, to achieve authenticity a theatre company may need black actors to depict certain scenes.

Further information:

- www.cre.gov.uk/
- [Employment Code of Practice](#)

Sex Discrimination Act 1975 and 1986 (as amended)

The Sex Discrimination Act 1975 and 1986 (as amended) and associated codes of practice issued by the Equal Opportunities Commission (EOC)

Are employees protected from sex discrimination at work?

Under the Sex Discrimination Act 1975 (as amended), employers should not discriminate on grounds of sex, marriage or because someone intends to undergo, is undergoing or has undergone gender reassignment.

What does sex discrimination cover?

Sex discrimination covers all aspects of employment - from recruitment to pay, and training to the termination of a contract. It also includes applying requirements or conditions which, though applied equally to all, have a disproportionately detrimental effect on one sex or on married people and which cannot be shown to be justifiable (for instance to be job-related).

There are limited exceptions: the Act permits employers, under certain conditions, to train employees of one sex in order to fit them for particular work in which their sex has recently been under-represented; they may also encourage the under-represented sex to take up opportunities to do that work.

Further information:

- [Code of Practice - Sex Discrimination](#)
The Guide to the Sex Discrimination (gender reassignment) Regulations 1999 (PL99 GR) can be obtained by calling 0845 602 2260.

Is there protection from discrimination on the grounds of Religion or Belief?

Yes, the Employment Equality (Religion or Belief) Regulations 2003 protect people from discrimination on the grounds of all religions and beliefs. The law means that an organisation's recruitment and selection procedures, as well as employment practices must treat everyone fairly regardless of their religion or belief.

Further information:

- [Department of Trade and Industry consultation document on religion and sexual orientation amendment regulations](#)

Is there protection from discrimination on the grounds of sexual orientation?

Yes, the Employment Equality (Sexual Orientation) Regulations 2003 give protection from discrimination on grounds connected with sexual orientation. This includes 'orientation towards someone of the same sex (lesbian or gay men), opposite sex (heterosexual) or both sexes (bisexual)'.

The law means that an organisation's recruitment and selection procedures, as well as employment practices must treat everyone fairly regardless of their sexual orientation.

Further information:

- [Department of Trade and Industry consultation document on religion and sexual orientation amendment regulations](#)