

A photograph of a street scene. On the left is a large, multi-story brick building with classical architectural features like columns and a pediment. On the right is a modern, multi-story white building with large windows and a flat roof. The sky is blue with some clouds.

# Group Equality, Diversity and Human Rights Policy

Approved: 2023  
V.03 (Code: Gen 06)

## Shettleston Housing Group

### Shettleston Housing Group (SHG) comprises:

#### Parent

##### Shettleston Housing Association Limited (SHA)

- Registered Scottish Charity, No. SC036687
- Registered with the Scottish Housing Regulator under the Housing (Scotland) Act 2010, No. 183
- Registered under the Co-operative and Community Benefits Act 2014, Registered No. SP1884RS
- Property Factor Registered No. PF000226
- Authorised by the Financial Conduct Authority, No. FRN730115

#### Subsidiary Companies

##### Upkeep Shettleston Community Enterprise Limited (Upkeep)

- Company Registration No. SC277511 (Scotland)

##### East End Housing Development Company Limited (EEHDC)

- Company Registration No. SC293302 (Scotland)

## Our Vision, Mission Statement and Values

### Vision Statement

*'Thriving and prosperous local communities where all residents enjoy great homes and services, an attractive physical environment, and good life chances.'*

This statement is the foundation for SHG's commitment to its residents and the communities they live in.

This commitment is also demonstrated in SHG's values which were agreed following discussions with the Management Board and Staff. These values are fundamental to how we carry out our day-to-day activities.

### Our values are:

- ◆ Customer service
- ◆ Teamwork
- ◆ Make a difference in the community
- ◆ Fairness

### Equality & Diversity Statement

We will ensure that this policy is applied fairly and consistently. In implementing this policy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion/faith, gender, disability, age, sexual orientation or any other grounds. Our commitment to equal opportunities and fairness will apply irrespective of factors such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

This policy and any other SHG publications is available in other formats e.g. other languages, Braille, large print, audio.

## Group Equality, Diversity and Human Rights Policy

### THE PURPOSE

To provide an environment where everyone is treated with dignity and respect while recognising and welcoming diversity.

### 1. Introduction

- 1.1 Shettleston Housing Group (SHG) is committed to treating everyone with dignity and respect and to recognising and welcoming diversity. This policy outlines how SHG will promote equality, diversity and inclusion in our service delivery, staffing and recruitment processes and procurement of services.
- 1.2 The policy applies to all members of the SHG, tenants and applicants, prospective employees and to others with whom we work.

### 2 Policy Principles

- 2.1 We will contribute to ensuring that everyone has an equal chance to succeed in our communities by:
  - Providing our services in ways that make them accessible to all who seek to use them.
  - Supporting our staff and Board Members to help them recognise and meet a diverse range of needs and interests.
  - Adopting recruitment and procurement practices that are open, fair and transparent.
- 2.2 We aim to ensure that our services are equally accessible to all regardless of age, disability, religious or cultural beliefs, race or ethnic background, gender, sexual orientation, marital status or other protected characteristics.
- 2.3 We will ensure that all of our people receive appropriate training to support them in contributing to our aim of eliminating discrimination and ensuring equal access to everyone who wants to use our services, work for us or become involved in our activities.
- 2.4 We will not tolerate discrimination and will challenge any discriminatory actions or behaviour from people who work for or with us or who use our services or who act on our behalf.
- 2.5 Wherever possible, we aim to make reasonable adjustments to meet the needs of people who are disabled to ensure equality of access to all who seek to use our services or to work with us.
- 2.6 We aim to ensure that everyone who lives in one of our properties feels part of their community and is able to participate in community life as fully as they choose. We will do this by treating everyone with dignity and respect and by providing information and access to services in ways that are informed by and meet the needs of the communities that we are active in.

**2.7** We will respect the privacy of our staff, board members, tenants and applicants, and we will take all necessary steps to ensure that the equality information we collect, store, and analyse is held securely and that confidentiality is maintained.

**2.8** We aim to comply with legislation and seek to meet best practice standards.

### **3. Scottish Housing Regulator (SHR) Regulatory Standards**

**3.1** The SHR sets equivalent standards for governance and financial management of Registered Social Landlords (RSLs) in Scotland. The SHR's standards and guidance state that:

“The RSL pays due regard to the need to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.”

### **4. Legal Requirements**

**4.1** This policy aims to be consistent with all relevant legal and regulatory requirements, including those set out below:

- The Equality Act 2010
- The Housing (Scotland) Act 2001 and 2010
- The Human Rights Act 1998
- The Data Protection Act 2018

**4.2** Although the Human Rights Act 1998 applies to public bodies and not directly to RSLs, case law mean actions could be brought against RSLs carrying out duties deemed to be a function of a public body (e.g., allocations, evictions, etc.). We will therefore ensure that when we are providing services, developing policies, etc., which could be considered as a public function we will take account of advice from the Equality and Human Rights Commission (EHRC) as outlined in their “Human Rights at Home” publication. This guidance is available on the EHRC website:

[https://www.equalityhumanrights.com/sites/default/files/human\\_rights\\_at\\_home.pdf](https://www.equalityhumanrights.com/sites/default/files/human_rights_at_home.pdf)

### **5. Definitions**

#### **5.1 Diversity:**

Is about valuing individual differences. **SHG** is committed to valuing and managing people's differences to enable all staff and Board Members to contribute and realise their full potential. We recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit **SHG** and its customers.

**5.2 Equality:**

Is making sure people are treated fairly and given fair chances. ***Equality is not about treating everyone in the same way, but recognises that their needs are met in different ways.***

**5.3 Protected Characteristics:**

Is the grounds upon which discrimination is unlawful. Discrimination claims can be made on the following grounds: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy & Maternity, Race, Religion or Belief, Sex, and Sexual Orientation.

**5.4 Direct Discrimination:**

Is treating someone less favourably than others based on a protected characteristic.

**5.5 Indirect Discrimination:**

A policy, practice, procedure, provision or criteria that applies to everyone in the same way but might disadvantage a particular protected group, and which cannot be objectively justified in relation to the job.

**5.6 Harassment:**

Is conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive environment. The intention of the perpetrator is irrelevant; it is the impact of the individual which determines whether harassment has taken place.

**5.7 Victimisation:**

Is treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

**5.8 Positive Action**

Is addressing imbalances, for example in the workforce by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets.

**5.9 Associated Discrimination**

Is discriminating against a person because they have an association with someone with protected characteristic. For example, a non-disable person is discriminated against because of the action they need to take care for a disabled dependent.

**5.10 Perceptive Discrimination**

Is discrimination against a person because the discriminator thinks the person possess a protected characteristic. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct VISA to work in the UK as they have a foreign looking name on their application form.

## **6. Gathering and using information about our customers, staff and board members**

- 6.1** SHG will collect, review data on a regular basis to inform us on our performance measured against equality issues relating to governance, recruitment, staffing, letting, repairs and complaints.
- 6.2** We will treat all personal data in line with our obligations under the current data protection regulations and our own Privacy and Data Retention Policy.

## **7. Our Actions - What will SHG do: Equality and Diversity Commitments**

**7.1** This section of the Policy sets out the main actions the SHG will take to meet our obligations and objectives in relation to the group's governance; service delivery; procurement and staffing and employment matters.

### **7.2 Governance**

- We will promote a culture that respects and promotes equality, diversity and inclusion.
- We aim to ensure that membership and participation in the governance of our organisation is open to everyone across our communities to achieve a Membership profile that reflects the diversity of our communities.
- We will provide all Board Members with training on equality and diversity, along with periodic refresher training.
- We will ensure that all Board members sign up to and abide by the Code of Conduct.

### **7.3 Information and Communication**

- We will publicise our commitment to equality and diversity through our newsletters and our website.
- We will use language that is clear and free from jargon in all our public documents; we will provide key documents in summary form and will make information about our services and how to access them widely available in written and electronic formats.
- We will ensure that the content of our website is easily accessible to all our service users and stakeholders.
- We will ensure appropriate translation and interpretation services can be accessed as required.

### **7.4 Service Delivery**

- We will provide services that are accessible to all our customers, including housing applicants and will take positive action to ensure that all members of the community are aware of the services we provide and how to access them.

- We will engage in regular consultation with service users and encourage tenants to be involved in our activities.
- We will ensure equality of opportunity in relation to the quality of housing, access to housing, provision of services and complaints.
- We will, as far as practical, make sure that our office premises are fully accessible and comply with the provisions of the Equality Act 2010.
- We will take prompt action to address all instances of discrimination, bullying, harassments or victimisation.
- We will support positive action to address identified housing needs within particular equality groups and to provide housing opportunities reflecting the diversity of our communities.
- We will address equality issues in our policies and procedures for individual service areas.
- We will ensure that staff have an awareness of the issues that different customers may experience, and how to respond to these issues in a person-centred and flexible way.

#### **7.5 Procurement**

- We will ensure that contractors and suppliers have an acceptable Equality and Diversity policy, and, if not, that they are willing to work in accordance with SHG's.
- We will consider the equality and diversity commitment and performance of contractors and suppliers in tendering and selection processes.
- We will make contractors aware of the diverse need of SHG's customers, so that they are equipped to meet these.
- We will set clear standards of conduct, so that all SHG's customers and staff are treated with courtesy and respect at all times.
- We have systems in place to monitor the performance of our contractors and suppliers.
- We will secure community benefits that will address disadvantage and inequality in our communities.

#### **7.6 Staffing and Employment**

- We will promote a culture that respects and promotes equality, diversity and inclusion within the workplace.
- We will aspire to have a workforce that broadly reflects the diversity of the communities we serve.
- We will embed Equality and Diversity practices into every stage of our recruitment and selection process.

- We will appoint and promote staff objectively and on merit, based on their experience, ability and potential. We will make reasonable adjustments to allow new and existing staff with disabilities to perform the requirements of their employment.
- We will ensure that all members of staff receive suitable training on equality and diversity, and that refresher training is provided periodically.
- We will ensure that all staff members sign up to and abide by the Code of Conduct.

### **7.7 Equality Impact Assessment (EIA)**

The Scottish Housing Regulator promotes EIAs to “have assurance and evidence that (each social landlord) considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery”.

We will use EIAs to help ensure that our policies, practices and services do not discriminate against anyone and that, where possible, we promote equality of opportunity.

### **7.8 Quality and Diversity Action Plan**

We will develop an Equality and Diversity Action Plan to support the objectives of this Policy. The Action Plan will identify key priorities in areas of service improvement and employment practice that we are seeking to address. The plan will be subject to an annual review.

## **8. Responsibilities**

The Board has approved this policy and has overall responsibility for ensuring its effective implementation across all of SHG’s activities. On a day to day basis, this responsibility is delegated to the Chief Executive Officer.

Members of the Board and staff have an individual responsibility to uphold the terms of this policy in all of their activities on behalf of SHG. In particular, they have an individual responsibility to:

- Challenge any discriminatory behaviour or action that they become aware of.
- Report any potential breaches of this policy to the Group CEO, Corporate Services Manager (SHA & EEHDC), Head of Operations (Upkeep) or, where appropriate, to their line manager.

### **Members of Staff have specific responsibilities to:**

- Treat all colleagues equally and fairly; consider their needs and provide appropriate support and co-operation.



- Assess and consider the needs of residents and provide appropriate support where necessary.
- Seek to develop an understanding of the communities that Shettleston works in; use and share that knowledge effectively.
- Identify and adopt effective and varied ways to engage with and involve all residents and receive feedback on service delivery from them.
- Ensure all buildings and public access areas that Shettleston delivers services from are accessible to all who wish to use them and comply with regulatory requirements.
- Recognise the need to provide information in a range of formats (e.g. Braille, audio, signing, Type Talk, other languages) and secure their provision.
- Promote good relations between people of different backgrounds living in our communities.
- Consider the implications of policies, practices and potential or proposed changes to them on all protected characteristics.
- Monitor SHG's practices to ensure equality and fairness and report any failings to the Group CEO, Corporate Services Manager (SHA & EEHDC) or Head of Operations (Upkeep).

#### **Tenants and Service Users have specific responsibilities to:**

- Meet the responsibilities of their tenancy or occupancy agreement or lease.
- Report any actions or behaviour which might breach this policy to their housing officer as soon as they become aware.
- Treat neighbours and those who live in their communities, SHG staff and anyone who acts on our behalf with courtesy and respect.
- Not to harass, victimise, discriminate against or otherwise disturb or threaten neighbours, SHG staff, contractors or others acting on our behalf or people living in their community.

## **9. Monitoring and Review**

**9.1** We are committed to ensuring that this policy is implemented effectively. We will do this by regularly monitoring the actions that we are taking and their compliance with the terms of this policy. Monitoring is intended to:

- Identify if and where discrimination or inequality of opportunity exist and take action to remove them.
- Assess our effectiveness in implementing our commitment to equality and fairness.
- Inform service delivery and policy development.
- Ensure compliance with the relevant legislation, regulatory requirements and good practice.

- 9.2** We will review and update this policy every three years. More regular reviews will be considered where, for example, there is a need to respond to new legislation or regulatory guidance.

## **10. Related Documents**

This policy relates to the following documents:

- ◆ SHG Dignity at Work Policy
- ◆ SHG Unacceptable Actions Policy
- ◆ Disciplinary Procedures
- ◆ Grievance Procedures