

# **Merlin Housing Society**

## **Single Equality Scheme**

**2008-2012**

**(Incorporating Race, Disability, Gender, Age,  
Sexual Orientation, Religion & Belief  
Equality Schemes)**

March 2009

## Contents

Page

<b>1. INTRODUCTION TO MERLIN HOUSING SOCIETY</b> .....	<b>4</b>
5.1 FRIENDLY, RESPONSIVE AND ACCESSIBLE SERVICES FOR ALL .....	6
5.2 SERVICES BASED ON NEED .....	6
5.3 CONSULTATION WITH RESIDENTS AND LOCAL STAKEHOLDERS.....	6
5.4 TARGETED RESOURCES .....	7
5.5 INFORMATION FOR EVERYONE.....	7
5.6 PROCUREMENT .....	7
<b>6. GOVERNANCE STRUCTURE</b> .....	<b>8</b>
<b>EQUALITY DUTIES (RACE, DISABILITY, GENDER)</b> .....	<b>9</b>
<b>7. RACE RELATIONS (AMENDMENT) ACT 2000 DUTIES</b> .....	<b>9</b>
7.1 THE RACE EQUALITY SCHEME .....	9
7.2 EMPLOYMENT AND THE RACE EQUALITY SCHEME.....	10
7.3 LEGAL RESPONSIBILITIES AND ACTIONS .....	10
<b>8. THE DISABILITY DISCRIMINATION ACT 2005 DUTIES</b> .....	<b>11</b>
8.1 THE DISABILITY EQUALITY SCHEME.....	11
8.2 EMPLOYMENT AND THE DISABILITY EQUALITY SCHEME .....	12
8.3 LEGAL RESPONSIBILITIES AND ACTIONS.....	12
<b>9. THE SEX DISCRIMINATION ACT 1975 (PUBLIC AUTHORITIES) (STATUTORY DUTIES) ORDER 2006</b> .....	<b>13</b>
9.1 SPECIFIC DUTIES.....	13
9.2 THE GENDER EQUALITY SCHEME (GES).....	14
9.3 EMPLOYMENT AND THE GENDER EQUALITY SCHEME .....	14
9.5 LEGAL RESPONSIBILITIES AND ACTIONS.....	15
<b>10. SEXUAL ORIENTATION</b> .....	<b>15</b>
LEGAL RESPONSIBILITIES AND ACTIONS .....	15
<b>11. RELIGION AND BELIEF</b> .....	<b>17</b>
LEGAL REQUIREMENTS .....	17
THE NATIONAL CONTEXT .....	17
KEY CHALLENGES.....	18
<b>12. AGE</b> .....	<b>19</b>
<b>13. ARRANGEMENTS FOR ASSESSMENT</b> .....	<b>21</b>
13.1 SUMMARY .....	21
13.2 UNDERLYING PRINCIPLES .....	21
<b>14. ARRANGEMENTS FOR ASSESSING AND CONSULTING ON THE LIKELY IMPACT OF PROPOSED POLICIES ON PROMOTING RACE, DISABILITY, GENDER, AGE, SEXUAL ORIENTATION, RELIGION &amp; BELIEF</b> .....	<b>22</b>
14.1 ASSESSMENTS .....	22
14.2 LEVELS OF IMPACT ASSESSMENT .....	23
15.3 CONSULTING AND INVOLVEMENT .....	23

14.4 INFORMATION USED IN ASSESSMENT.....	24
14.5 POST ASSESSMENT.....	24
<b>15. ARRANGEMENTS FOR PUBLISHING THE RESULTS OF ASSESSMENT, MONITORING AND CONSULTATIONS.....</b>	<b>25</b>
<b>15.1. ARRANGEMENTS FOR ENSURING PUBLIC ACCESS TO INFORMATION AND SERVICES .....</b>	<b>25</b>
15.2 PRINCIPLES.....	25
15.3 SPECIFIC ACTIVITIES TO PROVIDE ACCESS TO INFORMATION .....	25
15.4 SPECIFIC ACTIVITIES TO PROVIDING ACCESS TO SERVICES.....	26
<b>16. ARRANGEMENTS FOR TRAINING STAFF ON THE GENERAL AND SPECIFIC DUTIES.....</b>	<b>27</b>
16.1 PRINCIPLES.....	27
16.2 POSITIVE ACTION.....	28
16.3 EQUAL OPPORTUNITIES AND JOB RESPONSIBILITIES .....	28
16.4 MONITORING AND REVIEW .....	28
<b>17. THE EMPLOYMENT DUTY .....</b>	<b>29</b>
17.1 PRINCIPLES.....	29
17.2 MONITORING.....	29
17.3 METHODOLOGY.....	29
17.4 MONITORING CATEGORIES.....	30
17.5 DATA ANALYSIS .....	30
17.6 PUBLISHING THE DATA.....	30
<b>SCHEDULE OF APPENDICES .....</b>	<b>31</b>

## 1. INTRODUCTION TO MERLIN HOUSING SOCIETY

Merlin Housing Society is a not-for-profit organisation run by a Board of 15 members. Five of these members are residents, five more are South Gloucestershire Councillors and the remaining five are independent members with specialist knowledge, skills and experience.

Merlin Housing Society took over the ownership of South Gloucestershire Council's housing stock in February 2007 following a ballot of tenants in 2006.

The Society's Board and staff are committed to providing excellent services and homes, and are planning to spend £75m to ensure that by 2013 all homes that need them will have:

- A kitchen less than 20 years old
- A bathroom less than 30 years old
- External doors (entrance doors to flats) that provide high levels of security and insulation
- Modern energy efficient heating
- UPVC or aluminium-framed double-glazed windows (except in the rare cases where this is not permitted by Planning restrictions)
- Modern regularly-inspected electrics
- Secure and clean communal areas

Other service improvements include:

- Creating dedicated anti-social behaviour posts
- Involving residents in deciding how to improve customer services
- Keeping free decorating and gardening services for older and disabled residents as per the pre-transfer promises
- Crime prevention and environmental improvements budgets for use in consultation with residents' representatives
- Having a dedicated aids and adaptations strategy

Merlin Housing Society is registered with the Tenant Services Authority a government body which supervises and regulates housing providers across the country. The Society employs about 250 employees in its offices across South Gloucestershire and is managed day-to-day by a team of four executive directors led by a Chief Executive.

Merlin Housing Society has an Equality and Diversity strategy which sits above this document and explains what we are looking to achieve and how we will do it. This document explains how we will meet our legal obligations in terms of gender, race and disability. We are also mindful of requirements in the forthcoming Equalities Bill and are therefore extending the scheme to include age, sexual orientation, religion & belief.

## 2. Our Vision

“To be a first class provider of affordable housing and related services for communities across South Gloucestershire, with our residents at the heart of everything that we do”.

## 3. Our Values

Include	Ensuring everyone who needs our services has the opportunity to use and contribute to them.
Respond	Listening to our customers, communities, staff and stakeholders, ensuring they influence what we do and how we do it.
Improve	Always looking for ways to improve.
Respect	Understanding and responding to the rights, interests and values of everyone we engage with.
Empower	Encouraging a culture where our staff, Board Members, Customers and Communities can achieve their full potential.

## 4. Our Key Business Objectives

In order to deliver the vision and mission, Merlin has the following key business objectives:

- To be a first class provider of value for money housing and related services
- To put residents and customers at the heart of everything that we do
- To be a viable, influential and respected organisation
- To be recognised as a good employer, encouraging staff to achieve their potential
- To invest in our communities and their environment

## **5. MERLIN HOUSING SOCIETY EQUALITY AND DIVERSITY VISION**

Our vision as a provider of social housing and related services is to ensure that no individual, group or community is unfairly disadvantaged or discriminated against.

Our Equality and Diversity policies (which cover employment, service delivery and procurement) aims to achieve the following regarding all stakeholders:

Merlin embracing diversity and will work to promote this within its work. This includes providing equality of opportunity and striving for equality of outcome.

### **5.1 Friendly, responsive and accessible services for all**

Our services will be welcoming to all and respond to a variety of needs and requirements. This means being prepared to adapt and change what we provide to ensure our services are on a level playing field for people with different needs, for example, catering for those with disabilities and individual needs; older and younger people; and different religious and cultural needs.

Our equality and diversity policies are designed to lead to better services, and also a better working environment for staff, which are sensitive to the variety of needs and requirements of our residents and local communities.

We aim to give fair access to our services to everyone and this may mean, in some cases, making special or separate provision.

### **5.2 Services based on need**

It is vital to know the make-up of our relevant target population so we can assess whether services delivered are reaching all residents in a way that is appropriate to their needs. We must understand and appreciate the diversity of need within our communities.

This means knowing and understanding about population trends in our areas of operation and knowing the composition of our resident population in terms of their age, gender, race, disability, sexual orientation, and religion or belief.

It also means knowing and understanding and effectively using the information about income levels, health, educational attainments etc, so that those most in need are receiving vital services and benefits.

### **5.3 Consultation with residents and local stakeholders**

We will make sure we know the views and experiences of our residents and community and statutory agencies regarding the services we deliver. To achieve this, we will set targets to try to ensure that the groups we talk to regularly, such as neighbourhood committees, voluntary organisations, tenants' / residents' associations are representative of the local population and resident profile. We will

also make special or separate arrangements to consult various groups using a variety of methods and beyond our traditional formats.

We will make sure we know the views of staff through our staff consultation committee, staff survey, focus groups and other appropriate consultation methods.

#### **5.4 Targeted resources**

In a climate of declining resources, there will be difficult decisions to be made about resource allocation. Equal opportunities principles and practice require us to make choices which reflect needs rather than traditional ways of apportioning services. We will review the take-up of services and methods of delivery to ensure they are in line with residents' needs and aspirations.

#### **5.5 Information for everyone**

Information will be widely circulated, be available in different formats and languages and encourage all groups to use our services. It will also make clear to everyone what determines access to services.

Information about services is a crucial element of an equality and diversity framework. If it is not made available in an understandable format to all sections of the community we serve, then access to service is in practice restricted to those people "in the know".

#### **5.6 Procurement**

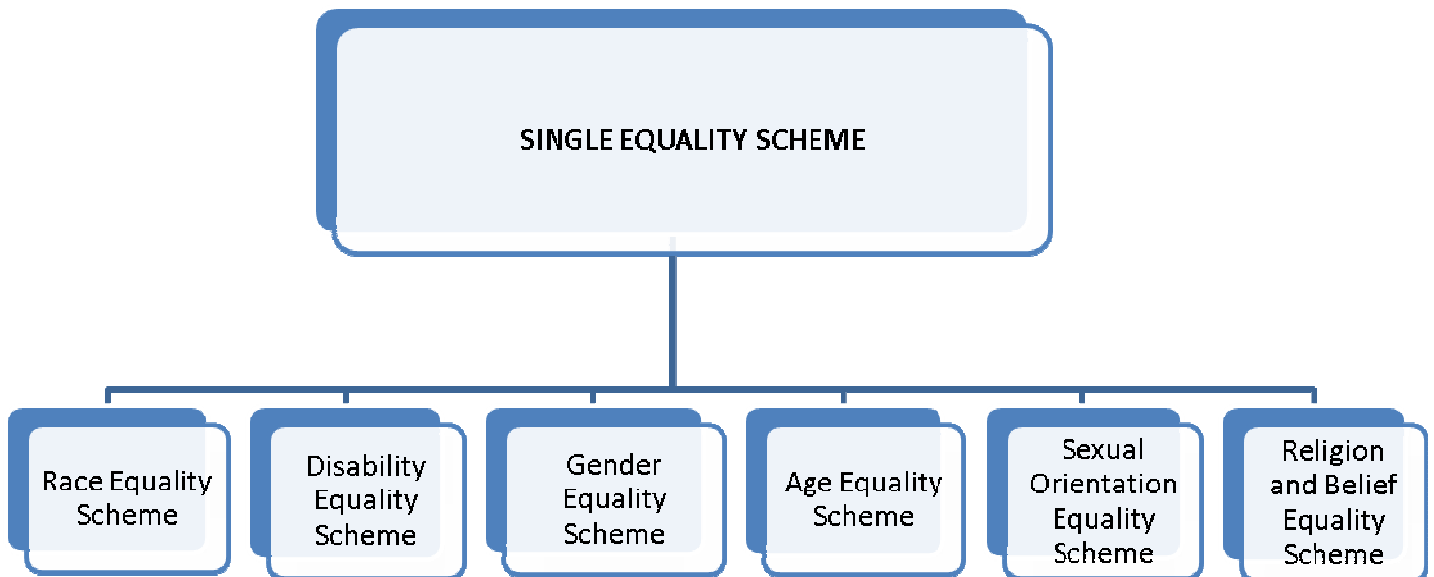
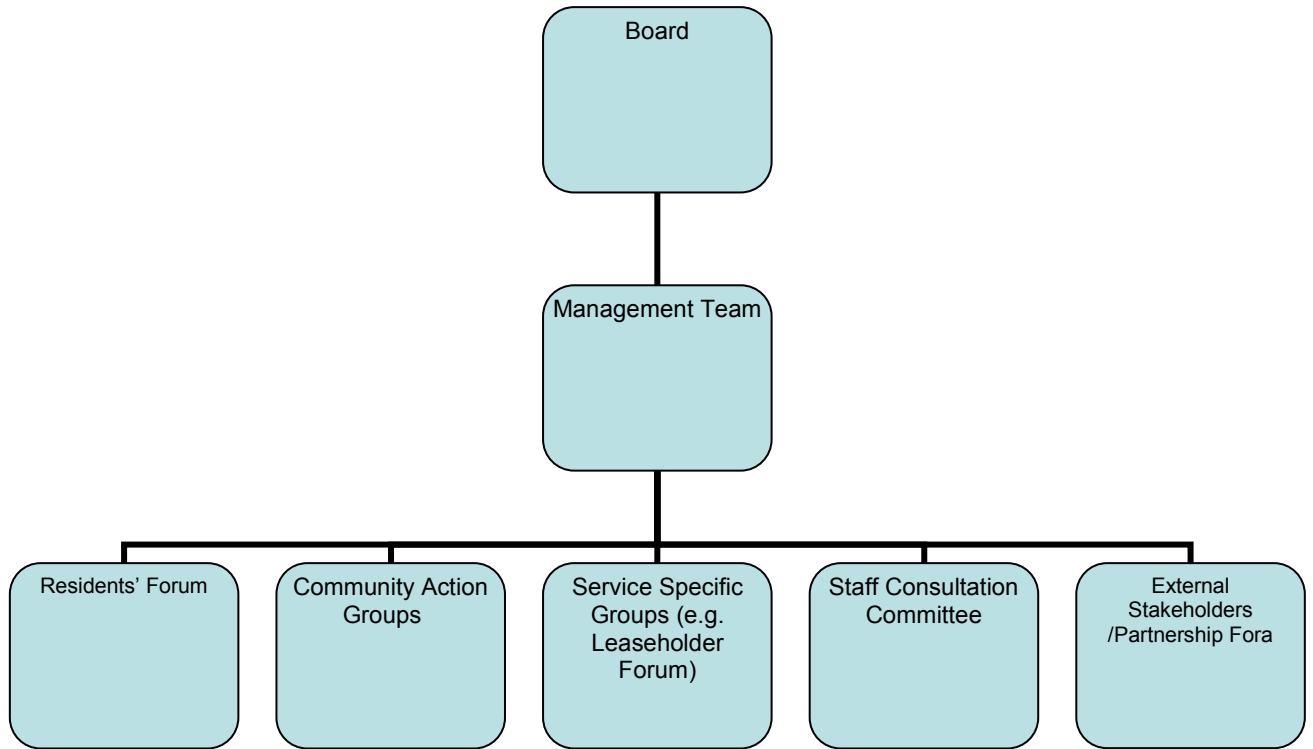
We are not just a provider of housing services but a major employer and procurer of services. Our partners, stakeholders and customers need to be able to identify with us and feel that they will be listened to.

They also want to be represented in the decision making process and to have influence on the policy makers.

Our approach to consultation and involvement is part of giving residents greater influence and empowering them to be willing to contribute and express their ideas and needs clearly.

We will request information on potential contractors approach to equality and diversity as part of the tendering process and use this as part of the decision making process. We will ensure that all appropriate contracts include the equality and diversity commitments.

## 6. GOVERNANCE STRUCTURE



# **EQUALITY DUTIES (RACE, DISABILITY, GENDER)**

## **7. RACE RELATIONS (AMENDMENT) ACT 2000 DUTIES**

The Race Relations (Amendment) Act 2000 set out a General Duty which requires all public authorities and listed authorities, to which the Act applies, to have due regard to the need to:

- Eliminate unlawful racial discrimination
- Promote equality of opportunity
- Promote good relations between persons of different racial groups

Under powers granted the by the Act, the Secretary of State for Home Affairs introduced a Specific Duty that came into force on 3rd December 2001.

The Specific Duty requires public and listed authorities, to which the Act applies, to carry out an assessment of its functions, policies and proposed policies and, in light of their relevance to the General Duty, produce a Race Equality Scheme, which shall have the following components:

- Arrangements for monitoring existing policies for their adverse impact on the General Duties;
- Arrangements for assessing and consulting on the likely impact of any proposed policy or policy change;
- Arrangements for publishing the results of the assessments, consultations and monitoring;
- Arrangements for ensuring that the public have access to information and services, and;
- Arrangements for training staff on the General Duty.

Although Merlin Housing Society is not for the purposes of the Act regarded as a public authority, it is keen to implement the principles as set out in the Act, in order to ensure best practice in equality & diversity. This document sets out our Race Equality Scheme. It details and describes how we will meet each of the components of the Specific Duty outlined above.

### **7.1 The Race Equality Scheme**

The Race Equality Scheme is effectively a strategy and action plan. It summarises our approach to (race) equality and our corporate race equality objectives. It also says how we plan to meet each part of the duties, that is, our arrangements for assessing, consulting, monitoring and training.

The final draft of our Single Equality Scheme (incorporating race equality scheme) will be agreed following consultation with all relevant stakeholders.

Our Race Equality Scheme in accordance with the Race Relations (Amendment) Act 2000 aims to:

- Achieve race equality in all our undertakings, and develop and maintain a racially diverse workforce at every level to reflect the ethnic composition of the locality and tenant profile
- Achieve race equality in all aspects of our services.
- Secure a fairer and cohesive society where every resident regardless of their ethnicity, race, colour or nationality has equal opportunity and access to develop and attain their full potential.

We will also monitor and report what we are doing and how we are performing on an annual basis.

## **7.2 Employment and the Race Equality Scheme**

Employment is designated a relevant function under the 2000 Act with a Specific Duty attached to it. The scheme will therefore apply in all employment matters as well as the specific employment duty to monitor, analyse the resulting data by racial group and publish the results on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

## **7.3 Legal Responsibilities and Actions**

We have been actively working to promote race equality and diversity across all areas of service delivery and in employment. For example, partnership against hate crime which involves working in partnership at a strategic and case review level and target setting and monitoring of performance indicators covering operational delivery and staffing.

In particular we will meet our legal obligations and duties including those defined under the following legislation:

- The Race Relations Act 1976
- The Race Relations (Amendment) Act 2000
- The Race Relations Act 1976 (Amendment) Regulations 2003

## **8. THE DISABILITY DISCRIMINATION ACT 2005 DUTIES**

The Disability Discrimination Act 2005 (DDA) set out a General Duty which requires all public authorities and listed authorities to which the Act applies to have due regard to the need to:

- Promote equality of opportunity between disabled persons and other persons
- Eliminate discrimination that is unlawful under the Act
- Eliminate harassment of disabled persons that is related to their disabilities
- Promote positive attitudes towards disabled persons
- Encourage participation by disabled persons in public life
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

The Specific Duty under the Act requires public and listed authorities to publish a Disability Equality Scheme (DES) which must.

- Include a statement of the way in which disabled people have been involved in its development
- Set out the methods for impact assessment
- Set out steps towards fulfilling its General Duty (the 'action plan')
- Set out arrangements for gathering information in relation to employment, and service delivery
- Set out arrangements for putting the information gathered to use, in particular in reviewing the effectiveness of its action plan and in preparing subsequent DES
- Publish a summary report of the delivery of the action plan, the results of its information gathering and the use to which it has put the information.

### **8.1 The Disability Equality Scheme**

The Disability Equality Scheme is effectively a strategy and action plan. It summarises our approach to (disability) equality and our corporate disability equality objectives. It also says how we plan to meet each part of the DDA duties.

The objectives of the DES are to:

- Show how we have involved disabled people in formulating the DES.
- Find out what barriers are faced by disabled stakeholders, as users of services and employees, and to take steps to remove the barriers.
- Find out what disabled people need from the Society and which of these needs are the most important to them.

- Ensure we meet our legal duties and to tell all stakeholders what our responsibilities are.
- Explain how we make things fairer for disabled people in planning our services and what we do.
- Provide information about our involvement, assessments and training arrangements.
- Work in partnership with others to prevent ignorance and prejudice in the wider community
- Show what has changed as a result of involvement and set out our three-year disability equality action plan on how we will put the Scheme into practice.
- Monitor and check what we are doing and report each year.

## **8.2 Employment and the Disability Equality Scheme**

Merlin Housing Society takes the same approach to employment in relation to disability as it takes to race, whilst taking account of the specific duties above. We will monitor and analyse the resulting data to ensure that disabled staff do not face discrimination and publish the results on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

## **8.3 Legal responsibilities and actions.**

We have been actively working to promote disability equality and diversity across all areas of service delivery and in employment.

Investments are made each year to upgrade our building and housing stock and the Society is promoted as an equal opportunity employer to all existing and prospective employees.

In particular we will meet our legal obligations and duties including those defined under the following legislation:

- The Disability Discrimination Act 1995 and 2005
- The Building Regulations 2000 (as amended)
- The Regulatory Reform Order (Fire safety) 2006
- Statutory Code of Practice on Disability Equality published by Disability Equalities and Human Rights Commission

## **9. THE SEX DISCRIMINATION ACT 1975 (PUBLIC AUTHORITIES) (STATUTORY DUTIES) ORDER 2006**

The Sex Discrimination Act 1975 (Public Authorities) (Statutory Duties) Order 2006 places a statutory General Duty on all public authorities to promote gender equality. The Duty provides a framework within which public and listed authorities can carry out their functions more effectively, and tackle discrimination and its causes proactively, by making gender equality part of all their decisions and activities.

Under the General Duty, when carrying out their functions, public authorities must have 'due regard' to the need to:

- Eliminate unlawful discrimination
- Eliminate harassment
- Promote equality of opportunity between men and women.

### **9.1 Specific Duties**

The General Duty is supported by Specific Duties. A framework has been set out to assist in planning, delivering and evaluating activities to meet the General Duty and to report on those activities. All public and listed authorities covered by the Specific Duties must:

- Publish a Gender Equality Scheme (including an Action Plan) – showing how it will meet its general and specific equality duties, setting out objectives
- Consult employees, service users and trade unions to determine gender equality objectives
- To gather and use information on how policies and practice affect gender equality in the workforce and the delivery of services.
- Demonstrate that the Scheme sets out appropriate actions The Society has taken or intends to take. Assess the impact of these policies
- Implement the actions set out in the Scheme within three years unless this is unreasonable or impracticable
- Report on progress annually
- Review and revise the Scheme - at least every three years

## **9.2 The Gender Equality Scheme (GES)**

The Gender Equality Duty aims to make gender equality central to the way that public and listed authorities work, in order to create:

- Better-informed decision-making and policy development
- A clearer understanding of the needs of residents, tenants and employees
- Better quality services which meet varied needs
- More effective targeting of policy and resources
- Better results and greater confidence in services delivered
- A more effective use of talent in the workforce.

The Duty is intended to address the fact that there is still widespread discrimination – sometimes intentional, sometimes unintentional – and persistent gender inequality.

Policies and practices that seem neutral can have a significantly different effect on women and on men, often contributing to greater gender inequality and poor policy outcomes. Individual legal rights have not been enough in themselves to change this.

The Duty is intended to improve this situation for both men and women, Gender roles and relationships structure men's and women's lives. Women are frequently disadvantaged by policies and practices that do not recognise their greater caring responsibilities; the different pattern of their working lives; their more limited access to resources and their greater vulnerability to domestic violence and sexual assault.

Men are also disadvantaged by workplace cultures that do not support their family or childcare responsibilities; by family services that assume they have little or no role in parenting, or by health services which do not recognise their different needs. Both sexes suffer from stereotyping of their roles and needs.

## **9.3 Employment and the Gender Equality Scheme**

Merlin Housing Society takes the same approach to gender as it takes to Race and Disability with regard to employment. Merlin will monitor and, analyse the resulting data to ensure that male or female staff do not face discrimination and publish the results on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

## **9.4 Objectives/outcomes**

This Scheme sets out our commitment to making gender equality integral to our work, and describes our strategy for meeting the statutory General Duty and the specific duties including a realistic action plan. Specifically, the Gender Equality Scheme explains:

- The actions taken, or intended, to address the causes of any gender pay gap
- How we will collect and analyse information to see if our policies and practices affect gender equality in the workplace and in the delivery of services
- How we will consult our employees, services users and others
- How we will assess the impact of our current and proposed policies and practices on gender equality
- How we will implement the scheme through action plans
- How we will publish the scheme
- How we will monitor and review the effectiveness of the steps set out in the action plan.

## **9.5 Legal responsibilities and actions**

We have been actively working to promote gender equality and diversity across all areas of service delivery and in employment.

In particular we will meet our legal obligations and duties including those defined under the following legislation:

- The Equal Pay Act 1974
- The Sex Discrimination Act 1975
- The Sex Discrimination Act 1975 (Public Authorities) (Statutory Duties) Order 2006

## **10. SEXUAL ORIENTATION**

### **Legal Responsibilities and Actions**

We have been actively working to promote equality and diversity across all areas of service delivery and in employment. For example working in partnership against hate crime at a strategic and case review level and target setting; and monitoring of performance indicators covering operational delivery and staffing.

In particular we will meet our policy commitments and legal obligations including those defined under the following legislation:

- The Employment Equality (Sexual Orientation) Regulations 2003
- Human Rights Act 1998
- Equality Act 2007 (covering service delivery)

As yet, there is no duty requiring us to do so, but as part of our ongoing commitment to equality and diversity, we have produced the following Sexual Orientation Equality Scheme.

**The society has identified the following key challenges in respect of advancing equality for lesbian, gay and bisexual people, and therefore our Sexual Orientation Equality Scheme aims to:**

- **Address homophobic prejudice and abuse**
- **Improve access to information, support and services**
- **Create community cohesion**
- **Clarify an approach to monitoring**

In order to move towards meeting our aim of equality, the Sexual Orientation Equality Scheme must ensure that:

- The key issues of our equality and diversity agenda are widely understood.
- Key objectives of the scheme are translated into business plans and members of corporate management team take responsibility for advancing equality for lesbian, gay and bisexual people in their Directorates.
- There is greater and more consistent inclusion of under-represented views and opinions in customer consultation and feedback, and monitoring data is rigorously analysed against equality categories.
- Our approach to monitoring around sexual orientation is defined and implemented.
- The role of corporate Human Resources is embedded in taking forward employment issues.
- There is a commitment to setting realistic and challenging targets and indicators, and where targets are set a strategic approach to achieving the target should be in evidence.

The scheme will be applicable in all employment matters and aims to monitor, analyse and publish the results of data collected with regards to sexual orientation on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

We recognise that in order to collect and analyse data relating to sexual orientation, we must create a safe working environment that is free from harassment and prejudice. By so doing, it is envisaged that staff will have the confidence to provide monitoring data that will inform ongoing assessment processes.

## **11. RELIGION AND BELIEF**

The Religion and Belief Equality Scheme responds to the European Directive on religion and belief and puts in place the framework and reporting arrangements for effective monitoring of issues within Merlin Housing Society.

There are some critical areas in respect of the everyday life of our residents that deserve particular attention. It is important that focus is paid to effective working in partnerships with key agencies to address inequalities and adverse impact with respect to access to services, personal and community safety, resources, opportunities, workforce diversity and access to employment.

### **Legal Requirements**

We will meet our policy commitments and legal obligations including those defined under the following legislation:

- The Employment Equality (Religion and Belief) Regulations 2003
- Human Rights Act 1998
- Equality Act 2007 (covering service delivery)

As yet, there is no duty requiring us to do so, but as part of our ongoing commitment to equality and diversity, we have produced the following Religion and Belief Equality Scheme.

### **The National Context**

77% of the population of England regard themselves as having some religious affiliation (2001 Census). Whilst many of these people will not be actively involved in the worship activities of a faith community, a substantial number are committed members of faith groups whose teachings to a greater or lesser extent guide their values and beliefs.

The Christian Churches continue to have a large influence in shaping UK society, and make significant contributions in a wide range of areas such as community development, education, social inclusion and heritage. A key contribution has

also been made by the long established Jewish community and is increasingly being made by those faith communities most of whose members are more recently settled, such as Muslims, Hindus and Sikhs. Together, all the faith communities make a significant contribution to the richness and strength of this country.

Faith community organisations are gateways to access the reserves of energy and commitment of their members, which can be of great importance to the development of civil society. This is especially pertinent for newer communities who frequently relate to the wider community through trusted organisations that serve their religious and or ethnic group.

### **Key challenges**

We aim to continue building on our commitment to being active in identifying and acting on best practice. This Scheme reinforces and deepens that commitment, recognising the unique and significant role that faith has in the life and cohesion of Merlin's communities. The Society aims to:

- Promote harmony and understanding between different faith groups with the view to promoting community cohesion
- Challenge discrimination on the grounds of religion and belief
- Promote equality for employees and service users, regardless of their religion or belief
- Provide responsive and appropriate services for all sections of the community
- Create an environment free from harassment and victimisation for faith groups
- Improve communication, participation and engagement with faith groups

In order to move towards meeting our aim of equality, the Scheme must ensure that:

- The key issues of our equality and diversity agenda are widely understood
- Key objectives of the scheme are translated into business plans and members of corporate management team take responsibility for advancing equality for different faith groups in their Directorates
- There is greater and more consistent inclusion of under-represented views and opinions in customer consultation and feedback, and monitoring data is rigorously analysed against equality categories
- Our approach to monitoring around religion and belief is defined and implemented
- The role of corporate Human Resources is embedded in taking forward employment issues
- There is a commitment to setting realistic and challenging targets and indicators, and where targets are set a strategic approach to achieving the target should be in evidence
- Equality and diversity training is available for all staff as well as cultural awareness training/events
- We celebrate diversity and promote good examples of co-religious working

The Religion and Belief Equality Scheme requires high-level commitment and support if it is going to bring the change that is envisaged. Responsibility for the effective implementation of this scheme lies with the Society.

The scheme will be applicable in all employment matters and aims to monitor, analyse and publish the results of data collected with regards to Religion and Belief on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

We recognise that in order to collect and analyse data relating to religion and belief, we must create a safe working environment that is free from harassment and prejudice. We must also create opportunities that provide greater cultural awareness in ways that outline our differences and celebrate our diversity. By so doing, it is envisaged that staff will have the confidence to provide monitoring data that will inform ongoing assessment processes.

## **12. AGE**

From 1 October 2006 the Employment Equality (Age) Regulations made it unlawful to discriminate unfairly with regards to recruitment, terms and conditions, promotions transfers, dismissals and training of employees, job seekers and trainees because of their age. The protection covers direct and indirect discrimination, harassment and victimisation. The regulations do not cover the provision of goods and services.

Ageism is not restricted to older people. Being seen as too young can also act as a barrier to employment. A lack of skills and qualifications is one of the largest barriers to employment for young people. A substantial percentage of young people are still leaving school or college at risk of social exclusion because of having no qualifications, low grades and low basic skill levels. Disaffection among these young people can then result in them turning away from education training and employment.

While there is no legal requirement to produce an age equality scheme The Society has decided to develop an age equality scheme to complement the other schemes.

We aim to ensure that:

- Human Resources address issues around employment law on age
- Guidelines are produced on age legislation for staff and managers
- We are clear about the impact of age legislation affecting opportunities for training which may otherwise be available for individuals meeting a particular age range

The Age Equality Scheme will be applicable in all employment matters and aims to monitor, analyse and publish the results of data collected with regards to Age on the following indicators:

- Existing staff
- Applications for jobs
- Promotion
- Training
- Grievance
- Disciplinary actions
- Outcomes of performance appraisals, especially where they include sanctions or benefits
- Staff leaving The Society

We recognise that in order to collect and analyse data relating to age, we must create a safe working environment that is free from harassment and prejudice. By so doing, it is envisaged that staff will have the confidence to provide monitoring data that will inform ongoing assessment processes.

## **13. ARRANGEMENTS FOR ASSESSMENT**

### **13.1 Summary**

We will carry out an assessment of our policies and their functions for their relevance to the General Duty. This will be guided by the following:

- The underlying principles and the criteria adopted by the Society for the assessments;
- The model used for the assessment

### **13.2 Underlying principles**

The assessment model we have adopted is underlined by experience, evidence from equalities monitoring returns and a review of equality case law. These indicate that, in respect of service delivery, the likelihood of unlawful racial, disability and gender discrimination, promotion of good race/disability and gender relations and promotion of equal opportunities amongst all groups are potentially greater in services where the following characteristics are greatest:

- The service is frontline, provided directly to the user.
- The service users are individually identifiable, and not 'the public' at large which is too anonymous.

We will monitor the way we deliver services, and the outcomes for service users, to ensure that they are not unfair or discriminatory. This will include the collection of data so we can analyse the effectiveness of our working arrangements.

## **14. ARRANGEMENTS FOR ASSESSING AND CONSULTING ON THE LIKELY IMPACT OF PROPOSED POLICIES ON PROMOTING RACE, DISABILITY, GENDER, AGE, SEXUAL ORIENTATION, RELIGION & BELIEF**

The foundation for the arrangements for assessing and consulting on the likely impact of proposed policies (to also include strategies, process and functions) on the General Duty is the development and implementation of a comprehensive equalities impact assessment process consisting of the following key stages as provided under EHRC publications.

### **14.1 Assessments**

The principles we have adopted mean that we will consider how our policies are likely to affect people from different racial, disability, gender, age, sexual orientation or religion and belief groups. This will involve consulting those people who are likely to be affected and reviewing and revising our policies in light of our assessment and consultation if adverse impact is shown on some groups.

We will assess all our policies to ensure that they do not have a negative effect on any particular group of people and also to ensure that we are not missing opportunities to do more to promote equality. We are committed to carrying equality impact assessments of all our core work.

In addition, we have further developed the following to fully implement the assessment process:

- Training – development and delivery of equalities impact assessment training workshops for all appropriate staff
- Tool/template - development and usage of an equalities impact assessment tool/template
- Assessment guidance - development and usage of a training workbook and assessment guide for trained assessors (*need to check with Merlin, if in place*)

In practice, we will roll out a programme of assessment of functions, policies and practice led and coordinated by the Corporate Services Director in conjunction with the Equality & Diversity Working Group.

The key stages of the impact assessment process can be summarised as follows:

- Map all policies
- Screen the policy to determine priority
- Identify what internal and external consultation has been done and what is going to be done

- For data collection and evidence, establish what information has been collected and what further information needs to be collected. We will base our monitoring categories on the National Census
- Assess and analyse the policy in terms of the positive and negative impact it may have and its potential to cause unlawful direct and indirect discrimination
- Where necessary identify alternative policies to be put in place to reduce adverse impact and promote equality more positively
- Consider the obligations our external contractors have when working with us as well as any organisations we work with
- Establish what practical actions are required to reduce or remove any adverse or negative impact and how the results of the equality impact assessments will be published

## **14.2 Levels of impact assessment**

We will utilise the three levels of impact assessment as follows:

Initial assessment or screening – This will be used when developing new policies or considering changes to existing policies. The initial screening will be based on data already collected and though it may only produce anecdotal evidence of unequal impact it will enable us to decide whether a partial or full assessment is required.

- Partial assessment – will be used to build on the information obtained from the screening stage and also include advice from expert and interested groups
- Full assessment – will include, in addition to the information from the partial assessment, results of external consultation, a final recommendation and arrangements for monitoring and evaluating the policy and its impact.

## **15.3 Consulting and Involvement**

Our process for consulting on proposed policies can be summarised as follows:

- Choose the proposed policy for consultation
- Set out clear aims for the consultation
- Draw up a timetable for consultation and decision making
- Choosing the consultation method
- Consult with stakeholders
- Prompt analysis of the consultation results
- Results fed into decision making and published
- Consider actions to take and implement

The consultation methods as provided in the Consultation and Involvement strategy include the use of the following:

- Formal and informal questionnaires
- Focus and syndicate group interviews
- Community mediators and facilitators
- Independent local research
- Telephone interviews

We have an Equality and Diversity Working Group which regularly reviews our activities and impact assessments. The Equality and Diversity Working Group meet at least 5 times a year.

#### **14.4 Information used in assessment**

The following information will be used to inform any conclusions, recommendations and decisions made as a consequence of the assessment:

- Audit Commission Equality and Diversity Key Lines of Enquiries (KLOE) indicators
- Housing Corporation Equality and Diversity Regulatory Code (as adopted by the Tenant Services Authority)
- Appropriate equalities performance indicators
- Use of all relevant data classifications and coding
- Use of equal opportunities monitoring data
- Use of best value and community participation monitoring statistics

#### **14.5 Post assessment**

All policies and functions that have been impact assessed and requiring further actions will be monitored for implementation through the following key processes:

- Equalities impact assessment action plans
- Equality & Diversity Working Group (EDWG) meetings
- Business plans reviews
- Senior Management Team meeting

## **15. ARRANGEMENTS FOR PUBLISHING THE RESULTS OF ASSESSMENT, MONITORING AND CONSULTATIONS**

Merlin Housing Society aims to promote social inclusion and community cohesion. Where relevant, the results of assessments, consultation / involvement and monitoring will be published on our website and relevant publications made available to anyone who asks for them

In addition, an annual report of our performance on equality and diversity will be produced and reviewed by the Board.

All published information will be made available (on demand and if applicable) in languages other than English as well as in formats such as audio tapes, Braille, large print etc.

### **15.1. ARRANGEMENTS FOR ENSURING PUBLIC ACCESS TO INFORMATION AND SERVICES**

#### **15.2 Principles**

We are committed to ensuring that all residents and tenants have access to the information and the services provided. This means that everyone, whatever their background, can get information about our services and the organisation.

Information that can be requested includes those of our functions, powers, duties, policies, services, complaints procedures as well as residents' / tenants' rights.

Everyone has a right to receive fair treatment and can complain using our Complaints Procedure, if they feel they have experienced discrimination.

We recognise that we will be failing in our duty if people from our diverse communities do not know about particular services, are not confident about using them and meet barriers when they try to use those services.

#### **15.3 Specific activities to provide access to information**

We will:

- Through agreements with organisations like the LanguageLine Service and other local specialist organisations, ensure information published in English can be translated to languages used by local people for whom English isn't their first language and in alternative formats such as audio tape and Braille.
- Communicate directly with community groups
- Arrange open days, visits, focus group interviews with minority groups through our consultation and involvement process

- Encourage people from minority and hard- to-reach groups to get involved in consultation exercises through our partnership-working with local groups.

#### **15.4 Specific activities to providing access to services**

We will:

- Through our consultation and engagement process hold sessions in venues used by people from the communities that we provide services to
- Through our community involvement programmes, work with local community organisations representing the communities that we provide services to
- Train our staff in equality and diversity and discrimination laws
- Set clear standards for staff behaviour, backed by appropriate sanctions

## **16. ARRANGEMENTS FOR TRAINING STAFF ON THE GENERAL AND SPECIFIC DUTIES**

### **16.1 Principles**

We will train relevant staff to ensure we meet our obligation under the Duties to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different groups. In doing so, we will;

- Ensure that all staff have the required understanding, knowledge and skills to meet the Equality and Diversity requirements of Merlin.
- Ensure all staff are aware of the needs of individuals and value diversity
- Ensure there is understanding of community cohesion, Merlin's approach to this, and how each member staff can play their part.
- Ensure staff know how to respond to complaints of discrimination
- Draw up a list of tasks that staff will need to carry out in order to meet our General and Specific Duties
- Select the staff who will carry out the tasks and decide what knowledge and skills they need to effectively discharge it
- Design a training programme to meet these needs
- Choose qualified trainers to design and deliver the training programme
- Monitor the effectiveness of the training, making changes where necessary

Front line staff will receive training appropriate to their role within the Society, including refresher courses on equality and diversity awareness.

Managers will also receive training in:

- The understanding and management of equality issues and their impact on delivering statutory services
- Equalities legislation and its implications
- An understanding of the concept of "Equality Schemes" and how to develop Delivery Plans to put it into practice
- Conducting assessments, consultation and monitoring including publishing of this information
- How to develop services which will contribute to Merlin's Equality and Diversity agenda

All new staff, as part of their induction programme, will receive Equality and Diversity Awareness training which provides the basic principles, the Society's approach to equality and diversity (through our strategy and policies) and the implications for their duties and responsibilities.

A rolling programme of equalities impact assessment training has been developed in partnership with external consultants as part of the comprehensive equalities impact assessment process.

All training programmes are monitored annually to review their effectiveness and an evaluation report published as part of the annual human resources workforce information.

## **16.2 Positive action**

We have implemented a number of positive action training and access to work initiatives for ethnic minority (Centre for Employment and Enterprise Development apprenticeships), disabled and female trainees. We have worked with local schools to promote construction careers for females.

These initiatives will continue and form part of our overall strategy on equality and diversity. We will get 'Positive about Disabled' accreditation.

We will continue to research and consider new opportunities for positive action initiatives that will contribute towards our Equality and Diversity agenda. This will include promoting jobs in wider publications that are used by groups traditionally facing discrimination.

## **16.3 Equal opportunities and job responsibilities**

As part of the commitment to continuous improvement, all employees have responsibility for promoting and implementing our policy on equal opportunities and diversity as an integral part of their job descriptions.

Performance on equality and diversity will form part of individual work reviews, objective and target setting and employee appraisal / development plans.

## **16.4 Monitoring and review**

We will monitor our policies on equality and diversity annually to ensure that policy objectives are being achieved. This monitoring result will be published widely to all our residents / tenants as well as to all other key stakeholders and partners to encourage and promote the sharing of best practice.

## **17. THE EMPLOYMENT DUTY**

### **17.1 Principles**

Under the Specific Duty for employers, we have a duty to monitor, by reference to the racial/disability/gender groups that staff belong to. We also will monitor staff by age/religion/sexual orientation. We will monitor the number of:

- staff in post
- applicants for employment, training and promotion for each such group

The breakdown of staff who:

- receive training
- benefit or suffer detriment as a result of its performance assessment procedures
- are involved in grievance procedures
- are the subject of disciplinary procedures
- cease employment with The Society

Publish the results of its monitoring annually.

In light of the proposed changes in the Equalities Bill, Merlin Housing Society is committed to extending the gathering of data and monitoring to age, sexual orientation, religion and belief.

### **17.2 Monitoring**

We will utilise monitoring process to collect, store and analyse the above data. Our Human Resources (HR) system will be used for monitoring.

This information will be used to meet our general duty to promote equality i.e. to eliminate unlawful discrimination, promote equal opportunities and promote good relations amongst all groups. We will:

- Collect and monitor information about ethnic background
- Ascertain whether there are differences between different racial and other groups
- Investigate the reasons behind the differences
- Deal with any unfairness, disadvantage or possible discrimination
- Consider remedies to any discrepancies.
- Put in place action plans to deal with differences.
- Publish the result annually

### **17.3 Methodology**

- Equal opportunities form contained within job application packs

- Staff survey/ focus groups
- Feedback forms from training sessions
- Equal opportunity sections of appraisal, grievance and disciplinary forms
- Exit interviews

#### **17.4 Monitoring categories**

Our HR system will incorporate the official ethnic/disability/gender/religion/sexual orientation categories used in the 2001 census and where applicable (e.g. age), categories that are compatible with the census categories or status survey.

#### **17.5 Data analysis**

Information collected will be analysed in order to meet our general duty to promote equality in order to identify patterns of inequality that may need further investigation.

For job applicants, we will compare:

- the number of applications received from different racial/disability/gender groups with their profile in the community
- the success rates of different racial /disability/gender groups at short listing and selection stages

For existing staff, we will analyse the workforce profile according to racial/disability/gender groups by:

- grade
- promotions
- specialist posts
- training/development opportunities
- complaints
- grievances
- disciplinary actions

#### **17.6 Publishing the data**

We will publish the results of our data collection and information monitoring about ethnic/disability/gender background of job applicants and existing staff in our annual report on Equality and Diversity.

## **SCHEDULE OF APPENDICES**

### **Equalities Scheme Action Plans**

- Appendix 1 – Over arching Action Plan
- Appendix 2 - Disability Action Plan
- Appendix 3 – Gender Action Plan
- Appendix 4 – Race Action Plan
- Appendix 5 – Older People Action Plan
- Appendix 6 – Sexual Orientation Equality Plan
- Appendix 7 – Religion and Belief Action Plan

**MERLIN HOUSING SOCIETY**  
**EQUALITY SCHEME ACTION PLAN 2009 - 2011**

**Over – Arching Action Plan**

<b>TASK</b>	<b>OUTCOME</b>	<b>LEAD</b>	<b>TIMETABLE</b>
Collect appropriate data on resident profile, staff, board, contractors and partners in order to develop a comprehensive picture of all the people we work with. Data to include information on ethnicity, gender, age, disability, sexual orientation, religion & belief	Organisation has comprehensive information on all its residents, staff and stakeholders		
Develop a plan of action from the above data on gaps the organisation needs to fill in order to meet its legal and statutory obligations	Organisation has a clear plan of action to meet its immediate responsibilities		
Include equality and diversity and community cohesion training for all staff, board, contractors and suppliers at induction and at regular intervals	Develop a culture that is inclusive and accessible for all		
Train all staff in relevant equality and diversity legislation and in how to apply practical solutions in service delivery			
Set targets on equality and diversity objectives for all managers through the appraisal mechanism			
Work positively with employees and residents to develop the organisation's strategies, objectives and action plans on Equality & Diversity			
Ensure staff are able to celebrate and honour faith days, or manage disabilities, or fulfil caring	Staff feel involved and are committed to		

responsibilities through use of flexible working and annual leave	delivering on Equality & Diversity strategy		
Carry out Equality Impact assessments across the organisation's policies, processes, functions and strategies on a three year rolling programme			
Develop conclusions, recommendations and action areas as identified through the Equality Impact Assessments	Organisation knows where its policies and processes need to be improved		
Promote equality and diversity issues positively in all job adverts	Organisation is accessible to all in providing employment opportunities		
Develop a positive action programme to recruit individuals/groups under represented in the organisation including at senior levels			
Include equality and diversity monitoring questions on all surveys for staff, residents, board, contractors and stakeholders and use the data to review service provision			
Ensure information is available in various forms in order to provide wide access to information, to include: Different languages Braille Large print Audio tapes British Sign Language	Organisation is seen to be accessible by all sections of the community		
Research and evaluate demand and resources required to provide information in accessible formats through recording use and requests at front line of service delivery			
Ensure service areas report on diversity KLOE on an annual basis			

Ensure organisation keeps abreast with current best practice as recommended by the EHRC on an annual basis			
Monitor and review hate crime statistics			
Develop policies and processes for dealing with perpetrators of hate crimes, including disability-related incidents, homophobia, violence against women, religion and racial hatred			
Assess frontline services and their impact on community cohesion			
Develop a community cohesion strategy for the organisation in collaboration with its partners and stakeholders			
Review procurement procedures to include explicit supplier compliance with the organisations diversity strategy			
Ensure contractors deliver goods, works and services that cater for all user's needs			
Be sensitive to the needs of different groups and individuals when planning and organising events			
Consult tenants/residents and partners on Equality & Diversity strategy, objectives and targets	Tenants understand and own the organisation's strategy on equality & diversity		
Review domestic abuse policies and procedures to include explicit reference to female, male, gay and lesbian victims			
Conduct pay and benefits audit in line with Equal Pay Act			
Use photography and other forms of illustration that reflect positive images of diverse people in our publishing and communications work			
Agree suitable budget and staff resources to carry out all identified actions for the equality scheme and			

the implementation of the Equality & Diversity strategy			
Monitor complaints using the six area of equality and diversity and ensure no group is disadvantaged			
Forge partnerships with local community and voluntary organisations that can maximise our response to hate crimes and enable us to contribute to cohesive, local communities			
Consider commissioning of specialist services			
Consult with residents to see how effectively you are responding to hate crime/ contributing to cohesive communities, providing services for BME communities			
Consider IT solutions to deliver efficient implementation of Equality and Diversity services			
Forge links with community organisation so that we can effectively signpost people and work in partnership			

## Disability Action Plan

<b>TASK</b>	<b>OUTCOME</b>	<b>LEAD</b>	<b>TIMETABLE</b>
Carry out accessibility audits of all offices and communal building in order to develop a plan of action for adjustments			
Include criteria for accessibility for disabled people in any future procurement of offices	All offices are accessible to disabled people		
Gain disability access standard for all offices	Organisation recognised for its best practice		
Procure appropriate IT and communication tools in order to meet the needs of disabled staff, residents, future residents and board members			
Include lifetime homes compliance statistics in asset management reports and develop action plans for gaps in provision			
Develop asset management strategies that identify and address needs of disabled people			
Consult with mental and physical health disabled partners and agencies working with the disabled to inform and improve accessibility			
Obtain Positive about Disabled accreditation.			
Train staff on how to assist people with disabilities in a respectful way			

## Gender Action Plan

TASK	OUTCOME	LEAD	TIMETABLE
Monitor transgender and gender responses of stakeholder involvement activities	Organisation is seen to reach hard to reach groups in the community		
Conduct pay and benefits audit in line with the Equal Pay Act			
Implement actions to reduce gender inequalities in pay and benefits			
Review domestic abuse policy and procedures to include explicit reference to male, gay and lesbian victims			
Monitor transgender responses through stakeholder involvement activities and agree action where necessary			

## Race Action Plan

TASK	OUTCOME	LEAD	TIMETABLE
Develop and improve local partnership working with local BME groups and race equality agencies			
Develop a mechanism for hard to reach BME tenants and stakeholders to participate in the development of strategies, policies and action plans	Organisation seen to be accessible to hard to reach groups		
Develop a strategy and policy for working with refugee communities in order to meet their housing needs			
Compare satisfaction levels from BME tenants/residents with general data and consider action where necessary			

## Age Action Plan

TASK	OUTCOME	LEAD	TIMETABLE
Consider extension of contracts for employees wishing to remain in employment after 65	Organisation recognised for best practice in this area		
Provide more tailored support for people of all ages as identified by their needs			
Provide access to IT and training for older people			
Support older people to stay in their home for longer or offer alternatives			
Work with partners and house builders to meet new homes which meet the aspirations of people of all ages			

## Sexual Orientation Action Plan

TASK	OUTCOME	LEAD	TIMETABLE
Develop and improve local partnership working with local LGB agencies			
Develop an awareness raising campaign on sexual orientation issues amongst staff, board, contractors, suppliers and stakeholders			
Collect sexual orientation data in areas where other data is already gathered to assist the future development of strategies and action plans			

**Religion & Belief Action Plan**

<b>TASK</b>	<b>OUTCOME</b>	<b>LEAD</b>	<b>TIMETABLE</b>
Make information available on the differing practices of religions and how to identify and overcome the resulting impacts on service delivery	Organisation understands the religious and cultural needs of all its residents		
Publish a religious festivals calendar on the Extranet			