

LONGHURST GROUP

EQUALITY AND DIVERSITY POLICY

CONTENTS

SECTION ONE	POLICY STATEMENTS
SECTION TWO	EMPLOYMENT POLICY AND MONITORING PROCEDURES
SECTION THREE	HOUSING MANAGEMENT - EQUAL OPPORTUNITIES FOR HOUSING AND SOCIAL NEEDS
SECTION FOUR	MAINTENANCE - MONITORING OF CONTRACTORS
SECTION FIVE	DEVELOPMENT - MONITORING OF CONTRACTORS
SECTION SIX	MEMBERSHIP OF LONGHURST GROUP
SECTION SEVEN	KLOE 31 GENERIC ACTION PLAN

SECTION 1

EQUALITY AND DIVERSITY- STATEMENTS OF POLICY

INTRODUCTION

Longhurst Group (“the Group”) was formed on 19 February 2001 with the objective of providing key central services to the operating companies in the Group. The Group also acknowledges that in society certain people may be discriminated against and is committed to taking positive steps to redress the effect of unfair discrimination on these people. The Group’s aim is to be more inclusive and engage positively with people.

In July 2006, the Diversity Policy (which supplemented the former Equal Opportunities Policy), was intergrated into the Equal Opportunities policy to create the new Equality and Diversity Policy.

- 2.0** Employment, training, and development opportunities, recruitment of board members must not be influenced by myths and misconceptions regarding for example the ability of disabled people to undertake meaningful employment. In cases where difficulties may seem to exist, amendments to facilities and equipment can be effective in overcoming apparent barriers. The Company Policy Statement aims to ensure that disabled people are given full and fair consideration and that their employment should not be influenced by preconceived ideas regarding their ability to undertake meaningful employment.
- 3.0** This Group is committed to equal opportunity and diversity and to eliminating either direct or indirect discrimination in the following areas: -
- 3.1** Race, Creed or Ethnic Origin
 - 3.2** Sex or Sexual Orientation.
 - 3.3** Marriage
 - 3.4** Disability
 - 3.5** Rehabilitation of Offenders
 - 3.6** Age
 - 3.7** Religion
 - 3.8** ***Nationality***

The scope of the Diversity policy by its nature is wider than the legislative acts defined under Section Two, point 1.0, on page 5 and covers

- race
- ethnicity
- national origin
- gender

-
- age
 - marital status
 - sexual orientation
 - disability

 - religious beliefs, agnosticism and atheism
 - economic status
 - social class
 - immigration status
 - educational attainment
 - political affiliation.

Diversity applies to all our:

- staff
- Board members
- recognised tenants' groups
- contractors and consultants
- managing agents and partners.

4.0 We are committed to creating and sustaining a varied, inclusive and open culture at Longhurst. Therefore we will:

- treat everyone fairly, as individuals, with dignity and respect
- work to create communities that are tolerant and inclusive
- make decisions in a transparent and fair way, that are open to challenge
- encourage diversity through the way we work with customers and other organisations
- acknowledge our weaknesses and work to overcome these
- publicise our successes and achievements

4.1 We will promote a management culture based on respecting and encouraging diversity. We will treat people as individuals who may not define themselves by gender, racial or other stereotypes. We aim to foster a positive working environment where everyone is valued for his or her own uniqueness. This enhances individual pride, personal achievement and performance.

4.2 Our approach to diversity aims to combat disadvantage and help build tolerant and sustainable communities. This is necessarily a subtle process, and aims to avoid giving any particular group an advantage at the expense of another. We will link support to an objective assessment of specific needs rather than subjective opinions or assumptions, which may or may not be accurate for that individual.

We will take positive action wherever possible in line with current legislation:

- by providing culturally sensitive and specific training for staff and Board members
- providing training and employment opportunities such as through the Positive Action Training and Recruitment Agency Scheme (PATRA)
- tailoring specific services and support to individual needs

Managers and Board members will be particularly aware of diversity issues in:

- recruiting staff and Board members

-
- induction, training and coaching new staff and Board members
 - handling grievances
 - capability and disciplinary action.

4.0 In implementing the Equality and Diversity Policy the Group will have regard to all aspects of its work including:

- 4.1** Membership of the Group, its Board or any Committee
- 4.2** Employment matters, recruitment, training and development.
- 4.3** The provision and access to Housing Services
- 4.4** Working with contractors and consultants, including partnership working
- 4.5** Governance in its day- to- day work.
- 4.6** Community development and tenant involvement.
- 4.7** Tackling racist or sexist incidents, or any other discriminatory behaviour.

5.0 Training will be offered to all Members, Staff, Board and Volunteers to enable them to be aware of our Policy and Procedures and to understand the importance of equality and non-discriminatory behaviour and practices.

6.0 **MONITORING THE EQUALITY AND DIVERSITY AND ITS IMPLEMENTATION**

6.1 The Board, in accepting the implications of this policy statement, and as part of its governance arrangements, accepts both responsibility for its implementation and of monitoring its effectiveness.

6.2 In carrying out the task of monitoring the progress and effectiveness of the Equality and Diversity Policy the Board will check performance against targets and seek feedback on how the policy is operating by use of quarterly Departmental performance reports and an annual review. We will also observe the Commission for Racial Equality's Code of Practice for Employment, and any updates or any other relevant Codes which may apply.

6.3 The implementation of this policy is set out in Part Two and Three of this document. Sections four and five deal specifically with contractors and consultants, with section five, referring to Governance matters.

In Section 7.0 the Audit Commission's Key Line of Enquiry KLOE 31 Generic Action plan is attached, as a reference guide for companies in the Group.

SECTION 2

EMPLOYMENT POLICY - EQUAL OPPORTUNITIES

- 1.0** The Group recognises that certain employment groups experience particularly severe disadvantages both directly and indirectly in employment.

The groups so affected are: -

- | | | |
|------------|-----------------------|---|
| 1.1 | Ethnic Groups | (Race Relations Act 1976) |
| 1.2 | Women | (Sex Discrimination Act 1975 - 1986) |
| 1.3 | Disabled Persons | (Disability Discrimination Act 1995) |
| 1.4 | Past Offenders | (Rehabilitation of Offenders Act 1974) |
| 1.5 | Lesbian or Gay People | (REC Code of Conduct Reg, Employment Equality Regulations 2003) |
| 1.6 | Age of People | (Employment Equality (Age) Regulations 2006) |
| 1.7 | Religion or Belief | (Employment Equality Regulations 2003) |

In complying with the employment requirements of all the Acts listed above, the Group will follow the guidelines set out below and whilst every effort will be made to consider all applicants impartially, regardless of race, religion or belief, creed, sex, sexual orientation, disablement and past offenders. ***We also recognise individual's rights as outlined in the Human Rights Act 1998.*** The Group will also pay due regard to ensuring that "reverse discrimination" does not occur.

2.0 ETHNIC GROUPS

The Group undertakes not to discriminate either directly or indirectly against an applicant purely on grounds of Race, Nationality, Ethnic or National Origins.

3.0 WOMEN

The Group undertakes to treat applications for employment on an equal basis for both men and women: the same commitment to ensuring equal treatment and equality of opportunity will apply to all aspects of training and development, promotion, demotion, dismissal and any other aspect of employment and staff development.

4.0 THE DISABLED

In accordance with the Statutory Requirement and good practice, the Group undertakes to employ disabled people in areas where it is safe so to do. In making this statement, it is clearly not safe for a disabled person to be employed in caring for the elderly when their disability is such that it becomes dangerous for either the tenant or prospective employee. The Group will not unfairly discriminate either directly or indirectly in the treatment of disabled persons applying for employment.

- 4.1 Where a disabled person - who has declared his or her disability in full - is selected for interview, the Group will make every possible effort to consider the employment of the disabled person where it is reasonable and safe to do so. All disabled applicants who meet the minimum requirements for the post are guaranteed an interview.
- 4.2 The Group will make all reasonable efforts to continue to accommodate those who become disabled during their working life, including assistance with their rehabilitation and re-training.
- 4.3 The Group will ensure disabled people receive fair and equal consideration in respect of career development and promotion opportunities and will examine modifications to equipment and work environment to make full use of an individual's ability to enable the individual to work.
- 4.4 In order to facilitate this policy close links will be maintained with the Disabled Services Authority, the Employment Service and specialist voluntary bodies.

5.0 PAST OFFENDERS

The Group recognises the rehabilitation period of previous offenders and will not discriminate against prospective employees either directly or indirectly. The Group have registered with the Criminal Record Bureau, and will adhere to the Criminal Record Bureau's Code of Practice.

6.0 SEXUAL ORIENTATION

The Group undertakes to ensure that there is no discrimination whatsoever on grounds of sexual orientation.

7.0 AGE DISCRIMINATION

The Employment Equality (Age) Regulations 2006, ensures age discrimination does not occur in relation to recruitment and selection, training, employment practices/benefits, and retirement. The Group will follow best practise and avoid unfair age discrimination in employment.

8.0 RELIGIOUS AND CULTURAL BELIEFS

The Group undertakes to ensure that there is no discrimination whatsoever in relation to employment and vocational training.

9.0 IMPLEMENTATION OF RECRUITMENT POLICY

9.1 IMPLEMENTATION

In implementing a 'no discrimination' policy the Group undertakes to abide by the following good practice: -

- To advertise in appropriate newspapers and magazines and not to discriminate either directly or indirectly in an unfair manner, but to appoint on merit.
- Not to use age limits or age ranges in job advertisements.
- To place no discriminatory requirements to the post being filled.
- To ensure equality of opportunity in all aspects of training and promotion.
- To place no emphasis on an individual's ability to complete an application form for employment where this is linked to language difficulty or physical disablement.
- When advertising a vacancy, to ensure the selection process is made clear and easy to understand.
- Not to discriminate on grounds set out in Section Two parts 1.1 and 1.4 should it become necessary to implement dismissal or redundancies.
- Not to discriminate when carrying out Staff Development Interviews.
- Not to discriminate when determining grievance procedures or in implementing terms of employment rules.
- Not to discriminate in redundancy and early retirement situations on the grounds of age.
- Not to discriminate on grounds of religious needs.
- To ensure no unnecessary and discriminatory requirements are applied to a vacant post.

9.2 RECRUITMENT

Recruitment will be on the basis of the skills and abilities needed to do the job, which will be stated clearly in the job description. Selection will be on merit, focusing on the application form information, the candidate's skills and abilities and performance at interview.

When interviewing a disabled candidate the interviewer must:

- 9.2.1** ignore disabilities that have no relevance to the performance requirements and skill needs of the job;

9.2.2 not take account of any adjustments to the job, equipment or working environment, which might be necessary if the applicant was successful.

Where there is any doubt about the ability of a disabled candidate, consideration will be given to the Employment Service's Job Introduction Scheme, which provides a subsidy for a trial period of up to six weeks.

9.3 INDUCTION

Following normal induction and follow-up procedures, any problems that occur should be identified and discussed fully with the individual concerned by the supervisor with the objective of finding acceptable solutions.

9.4 RE-EMPLOYMENT OF EXISTING EMPLOYEE BECOMING DISABLED

Where existing employees become disabled, every endeavour will be made to assist them in their full employment, whether within their existing job or by agreement regarding a suitable alternative.

9.5 CAREER DEVELOPMENT AND TRAINING

Care will be taken to ensure that disabled employees are not denied opportunities for training, extra responsibility, or more demanding work because of preconceived ideas about any limitations that may result from their disability.

The development of disabled people must be based on a realistic assessment of their ability, with specialist advice where appropriate.

9.6 ADVICE AND ASSISTANCE

Managers seeking advice on the recruitment and retention of disabled people should contact the Personnel Manager for help, advice and information on the various facilities and grants available.

10.0 MONITORING PROCEDURES

The Group undertakes to monitor the Ethnic Origins of applicants for employment by means of a survey of applications. This survey will be conducted on an "anonymous" basis and records maintained. (A copy of the survey form is at Annex A).

The Group will undertake to ensure that a full monitoring procedure is carried out on all applications for employment. This monitoring will include, (in addition to the monitoring of ethnic origins) a procedure whereby all disabled applicants are identified, and, where the post is suitable, interviewed. Statistics will also be monitored on the sex of applicants for employment.

A full report will be presented to the respective Company and Group Boards, on a quarterly basis.

SECTION 3

HOUSING MANAGEMENT - HOUSING & SOCIAL NEEDS

1.0 SITUATION

The Group manages homes throughout the East Midlands, which has a very diverse population

The Group recognises particularly that incidents of racial harassment can occur anywhere. Our policy on racial harassment is therefore included under item 2.0 below.

The Group further recognises the need to operate clear and unequivocal policy of equal opportunities in the allocation of our homes. We will therefore comply with relevant codes of practices and in particular, the Commission for Racial Equality Code of Practice in Rented Housing.

2.0 RACIAL HARASSMENT

Longhurst Group will not tolerate any racist incidents. We will investigate all reports of racist incidents involving our tenants and take action against anyone responsible for these incidents.

2.1 Racist incidents can take many forms, such as:

- verbal or written racist abuse
- threatening or abusive racist behaviour
- physical assault
- damage to property
- racist graffiti
- arson or attempted arson

2.2 We have adopted the definition of racist incidents recommended by the Stephen Lawrence Inquiry. This states that:

a racist incident is any incident which is perceived to be racist by the victim or any other person.

This means that if anyone believes that it is racist, it is, regardless of the victim's ethnicity, race or national origin.

2.3 The formal procedure for dealing with racial harassment cases is included in Longhurst Group's full policy and procedure document.

2.4 Any cases involving racial harassment will be formally reported to the relevant Company and Group Board at the first meeting following the incident. A quarterly report on all cases will be presented to the Boards as part of the Housing Management performance monitoring report.

2.5 The Group provides training for all staff on equality and diversity issues. Staff directly involved in day-to-day housing management will be trained specifically on race awareness, anti social behaviour, racist incidents and

the Group's racial harassment policy and procedure.

2.5 The Group publicise its policy on racial harassment through the tenancy agreement, tenant handbook and tenant newsletters.

2.6 The Group is involved in a number of multi-agency groups monitoring racist incidents, racial harassment covering Nottingham, Peterborough and Lincolnshire.

3.0 ACCESS TO HOUSING

As indicated, the Group recognises the need to ensure fair access to housing for all applicants for accommodation. The following methods are employed to monitor performance in this area:

3.1 The application form for accommodation includes a question on the ethnic origin of our applicants. This data is then computerised as part of the operation of our waiting list system.

3.2 The Group is keen to ensure all sections of the community have access to our housing. In areas of particular concentrations of people from ethnic minority groups, the Group seeks to establish links with local community groups. The Group will endeavour to ensure that our annual lettings reflect the population make up in the areas where our housing is provided.

3.3 The Group has participated in the CORE system of monitoring homes let since the scheme's inception. We are therefore able to monitor: -

3.3.1 The ethnic origin of all tenants housed in each letting year.

3.3.2 The sex and age banding of the heads of households housed in all tenancies granted to sole tenants.

3.4 The Group monitors available statistical information from external sources on demographic change.

3.5 Respective Company Boards receive quarterly performance monitoring reports. The Housing Services report includes details of the percentage of allocations made to applicants from BME communities against targets set by the Equality and Diversity Group.

4.0 EQUAL TREATMENT OF TENANTS AND RESIDENTS

No resident or tenant of the Group will be treated less favourably than any other resident or tenant.

4.1 The Group will endeavour to provide the same high standard of housing management, warden and technical services to all tenants and residents. Customer Charter principles will be applied equally to all residents and

tenants.

- 4.2 The Group staff will be provided with customer care and equal opportunities training.
- 4.3 The Group will review its housing management and maintenance policies regularly to ensure the Group's commitment to Equal Opportunities has been maintained.
- 4.4 In September 2000, Longhurst Housing Association Board formerly approved the Black and Minority Ethnic Housing Strategy. This will be adopted by Longhurst Group and reviewed on a yearly basis. The strategy identifies two key points:
 - 4.4.1 To improve career and participation opportunities for people from Black and Minority Ethnic groups
 - 4.4.2 To ensure that management and development services respond to Black and Minority Ethnic housing needs.

5.0 TENANT PARTICIPATION

The Group believes that tenant participation should be positive and active, and the Group encourages the involvement of tenants and residents in the decision making process at agreed and defined levels. The Group recognises the need to ensure that the make-up of Tenants' Associations, Tenant Forums, and Area and Main Committees reflects the balance of the communities which they serve eg in relation to age, ethnic origin, disability, gender and sexuality.

The Group undertakes only to give official recognition to Tenants' and Resident's Associations that have a written constitution, which undertakes not to discriminate through its actions or activities on the basis of age, race, colour, disability, gender or sexuality.

SECTION 4

1.0 MAINTENANCE - MONITORING OF CONTRACTORS

The Group annually reviews its panel of Contractors employed on maintenance and repair duties. In doing so, it will actively encourage those contractors who have a policy which covers all aspects of Equality and Diversity and who follow the same pro-active policy adopted by this Group.

Many of its panel of Contractors, however, because they are usually small business of self-employed people, do not employ staff in sufficient numbers to have detailed formal Equality and Diversity Policy.

However, whenever possible, the Group undertakes to actively encourage and monitor the contractors approach to Equality and Diversity. In addition, whenever a new Contractor is added to the Panel, details of their Policy will be included in the monitoring process.

2.0 MONITORING PROCESS

The Monitoring process will be conducted annually by requesting details from Contractors of their Equality and Diversity Policy. In addition, whenever a new Contractor is added to the Panel, details of their policy will be included in the monitoring process.

The annual review of the Panel of Contractors by the Board will include reference to their Equality and Diversity Policy.

SECTION 5

1.0 DEVELOPMENT - MONITORING OF CONTRACTORS AND CONSULTANTS

Prior to any new development contract being let, contractors are asked for details of their Equality and Diversity Policy unless a copy of the policy has already been received within the previous 12 months.

Consultants are asked for a copy of their Equality and Diversity Policy at the time of review of the Group's development consultant panel.

2.0 MONITORING PROCESS

The Monitoring process is such that contractors with an adequate Equality and Diversity Policy are favoured when tender lists are being drawn up for individual projects. Whenever possible, the Group will actively encourage equal opportunities amongst contractors, whilst accepting that it would be impractical for the Group to become involved in the detail of such policies across large numbers of contractors on the approved panel.

SECTION 6

1.0 MEMBERSHIP OF LONGHURST

The Group has adopted the promotion of Equality and Diversity as one of its core values. This is stated in our Governance policy. Clearly, in appointing new Members of the Group, the Board or any sub-committees the application of Equality and Diversity policy will apply.

2.0 RECRUITMENT OF MEMBERS

Recruitment of Members will comply with good Equal Opportunities practice. The following methods will be used to recruit members:

- Election at General Meetings
- Appointment by the full Board
- Advertising and subsequent appointment
- Referral from the National Housing Federation
- Nomination by Local Authorities

3.0 BOARD MEMBERS

All Board Members will be formally appointed and will be required to uphold the values and policies of the Group including the Equality and Diversity Policy.

4.0 TRAINING

A training induction will be planned for new board members. Members will also be able to access the National Federation's yearly course programme and Annual Conference. The Group will, as required, bring in Consultants to provide bespoke training, as determined by the needs of each respective Board. Members are able to participate in this training throughout the Group companies.

5.0 MONITORING

Each Board will hold annual appraisals of individual members (for the purpose of the Group Board this will only apply to independent Board Members). The whole Board will discuss annually its composition and skill balance and determine policy, regarding any variance that may arise at its first meeting after the Annual General Meeting.

Ethnic Origin Breakdown	Post:				Post:				Post:						
	Enquiries		Interviewed		Enquiries		Interviewed		Enquiries		Interviewed				
	M	F	M	F	M	F	M	F	M	F	M	F			
White: British															
White: Irish															
White: Other															
Asian/Asian British: Indian															
Asian/Asian British: Pakistani															
Asian/Asian British: Bangladeshi															
Asian/Asian British: Other															
Mixed: White & Black Caribbean															
Mixed: White & Black African															
Mixed: White & Asian															
Mixed: Other															
Black/Black British: Caribbean															
Black/Black British: African															
Black/Black British: Other															
Chinese															
Other															
Not Known															
Undisclosed															
Outcome:															

-
- The figures in brackets under interviewed indicate those who regard themselves to have a disability

SECTION SEVEN

Generic Action Plan

The generic action plan has been based on the Audit Commission's Equality and Diversity Key Line of Enquiry (KLoE 31). The main areas to be addressed are outlined below.

Corporate Culture

- The organisation needs clear and consistent leadership (from the board) in the promotion of equal opportunities and diversity
- Addressing legislation and good practice; having a clear understanding of the demographic base of our area and making an appropriate response to external factors
- Involvement of service users and stakeholders; widespread training programmes; users' views informing at every level
- Governance structures

Access to Customer Services

- Customer communication should be conducted in a manner that meets their needs and allows access to services – telephone, internet, out of hours service; to have an awareness of needs and then try to meet them
- Information on resident vulnerability should be available and relevant – computer alert system, up to date and accessible information, sharing of knowledge and experience
- Aids and adaptations to be carried out appropriately – process, communication and speed

Customer Involvement

- The organisation needs to be aware of the diversity of all its customers and diversity should be promoted. Any under-representation must be addressed; do residents and stakeholders understand and buy into the organisation's aims on diversity?
- Views of groups and the diverse needs of customers need to be taken into account when developing and improving services – use of survey information, methods and marginalised groups should be heard.

Partnerships

- Ensure that contact is made with communities, involving other agencies and partners as appropriate
- Ensure contractors and suppliers are committed to equality and diversity