

Introduction:

Northwards Housing takes pride in being based within north Manchester and is committed to delivering services that are responsive to the needs of our employees, tenants, local residents and all our customers.

We are keen to contribute to the regeneration of the area, ensuring that north Manchester is a place where people chose to work and to live, and in which companies want to invest. Northwards works with partners to help create an environment where everyone has equal access to services, employment, training and other opportunities that help to create successful communities.

Northwards recognise that in order to do this we must understand the needs and aspirations of the diverse communities and individuals living in north Manchester, and take an active role in promoting equality for everyone and address discrimination in all its forms.

This Comprehensive Equality Policy supports Northwards Housing's organisational aims and objectives in relation to equality, and outlines our commitments towards the creation of a fairer and more equal society.

Purpose:

Northwards recognises that people experience discrimination, harassment and victimisation on a daily basis which can be as a result of, amongst others, their age, disability, ethnicity, race or national origin, gender, gender identity, sexual orientation, religion or beliefs. Northwards acknowledge the impact that this may have on an individual's ability to access support, training and employment in their local area and the barriers this can create for that person to become a valued member of their local community.

We realise that it only through the promotion of equality that we can help to create:

- A workforce that is representative of the local community
- Services that are responsive to the individual needs of our customers, and that are culturally sensitive
- Neighbourhoods where everyone is valued and included

- Real opportunities for engagement and participation
- Strong, cohesive and integrated communities

Northwards' Comprehensive Equality Policy sets out our overall commitment to achieving equality and fulfilling these objectives.

Northwards Housing's Single Equality Scheme and three year action plan sets out the specific actions that will be taken to achieve these aims. Equality actions will also be highlighted within annual Team Improvement Plans and will be updated quarterly to reflect work undertaken, and to identify new actions required to further Northwards Housing's equality aims and objectives.

Northwards will also work in partnership with Manchester City Council to progress through the Equality Framework for Local Government (EFLG).

Scope of the policy:

Northwards Housing has a duty to promote equality and take active steps to prevent discrimination under the following legislation:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Equal Pay (Amendment) Regulation 1983
- Statutory Maternity Pay (General) Regulations 1986 and the various amendments to the Regulations
- Disability Discrimination Act 1995
- Pensions Act 1995
- Employment Rights Act 1996
- Employment Relations Act 1999
- Sex Discrimination Act (Amendment) 1999
- Employment Act 2002 (Flexible working regulations)
- Race Relations (Amendment) Regulations 2003
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Religion or Belief) Regulations 2003
- Gender Recognition Act 2004
- Disability Discrimination Act 2005
- Employment Equality (Age) Regulations 2006
- Equality Act 2006
- Equality Act (Sexual Orientation) Regulations 2007
- Equality Bill (Expected to come into force autumn 2010)

Northwards Housing will ensure that, as an absolute minimum, we meet our legal obligations under these pieces of legislation, and in many areas will go further than the legislation demands in order to promote equality and eliminate unlawful discrimination.

Northwards will also comply with best practice guidance from housing regulators, Audit Commission (including Key Lines of Enquiry, good practice

notes 4 and 8), and the Commission for Racial Equality's Code of Practice for Rented Housing, amongst others.

Governance and Leadership

Northwards Housing has a duty to act as a community leader and to promote initiatives and issues which are in the interests of local people. We see equality and diversity as central to this and, as a result, it is at the heart of everything we do.

Northwards recognises that we must lead by example as an organisation, and that good governance is essential for achieving our equality goals and objectives. Northwards Housing's Board, Executive Management Team (EMT) and Senior Management Team (SMT) therefore have overall responsibility and accountability to ensure that this policy underpins all aspects of our work.

The Board, EMT and SMT will do this by:

1. Ensuring Northwards takes every opportunity to promote equality and show our commitment to valuing diversity.
2. Recognising how discrimination and disadvantage affects our customers and communities and making sure Northwards plays an active role in redressing this. This helps to ensure equal access to our services and employment opportunities.
3. Receiving regular reports on performance related to equality aims and objectives, and challenge areas of concern when necessary.
4. Undertaking regular equalities training to maintain awareness of equalities issues, and to keep members up to date on any changes in equalities legislation.
5. Engaging with local BME, faith and other minority/community groups to ensure the diverse needs of our customers are taken into account in our decision-making processes.
6. Measuring how reflective we are of the communities we serve. Northwards Board will review its membership on an annual basis, and set targets to increase involvement from under-represented groups.

Employment and Training

Northwards Housing is a significant employer in North Manchester. We fully recognise that our employment practices are a major influence on the community at large, and as such our equality policies should reach out into the community we serve.

We are committed to equality of access to employment and training opportunities offered by Northwards Housing. We strive to ensure that no applicant or employee receives less favourable treatment than others as a result of their age, race, ethnic or national origin, disability, gender, gender identity, marital or partnership status, religion or belief, socio-economic status, sexual orientation, trade union activity or role as carer.

In order to combat indirect discrimination, no conditions or requirements will be applied to any Northwards Housing job which would have a disproportionately adverse effect on a particular individual or group. The only requirements or conditions which will be applied will be those which are strictly justifiable and endorsed by Northwards Housing.

Northwards Housing recognises our duty to treat all employees fairly and equally. We undertake specific work to ensure that all forms of discrimination are eradicated from the workplace, and to ensure that our employment practices are inclusive of, and reflect the needs of, all employees and potential employees.

Northwards Housing Human Resources Team will:

1. Monitor the composition of the workforce and set equality targets with the aim of having a workforce that reflects our community. Targets will be set in relation to Northwards' customer profiling information and other local area data establishing the extent to which the following groups in the workforce are reflective of population we serve:
 - People from all age groups
 - People from Black and Minority Ethnic (BME) communities
 - Disabled people
 - Women
 - People who are transgender
 - Lesbian, gay and bisexual people
 - People from a range of religious/faith groups

Information will also be monitored and equality targets set in relation to the top 5% of earners at the organisation.

2. Actively promote programmes of positive action with meaningful targets to tackle under-representation in the workforce and to ensure equality of opportunity in employment.
3. Target under-represented groups and monitor all recruitment and selection methods to ensure we provide fair and equal processes.
4. Promote our commitment to equality and diversity when advertising vacancies, work placement opportunities and other employment related activities.
5. Offer reasonable adjustments to support employees and potential employees, in particular people with a disability, to reach their potential. We will do this through the provision of equipment and adaptations, changes to working hours or practices, and by offering support and flexibility within our recruitment and selection processes.
6. Regularly communicate with employees to ensure they are aware of extra support that they may benefit from in the workplace. This will include reasonable adjustments as well as flexible working

opportunities, employee wellbeing initiatives and employee support groups.

7. Provide Equality & Diversity induction training to all new employees and Board members, and regularly update and refresh this training with all members of staff.
8. Ensure employee development opportunities are provided to employees on an equal basis, and that they are monitored.
9. Actively deal with any reports of bullying or harassment in a sensitive, equal and fair manner.
10. Take disciplinary action against any employee whose conduct or actions are inconsistent with this policy.

The policy applies to potential, as well as actual, workers and relates to all aspects of employment, including recruitment, pay, terms and conditions of service, promotion, training, transfer, grievance and disciplinary procedures, and to the arrangements made for working in the company. The policy will be made known to all employees and applicants.

Access and Provision of Services

Northwards Housing is committed to promoting equality of access and efficient use of its services and facilities. Northwards Housing will treat all people equally whether they are:

- Seeking accommodation
- Seeking or using Northwards Housing services
- Applying for funds
- Contracting to supply or purchase goods or services to or from Northwards Housing

Northwards Housing is committed to eliminating both direct and indirect discrimination. Within the resources available to it, Northwards Housing will provide appropriate, sensitive and accessible services.

Northwards will ensure that all our public offices, meeting rooms and hired venues are accessible to the needs of disabled people. The Access to Services Strategy provides a clear and consistent approach to access, and outlines steps that are being taken to continuously improve the way our diverse range of customers access our services.

Northwards Housing will ensure that, where it funds services or projects in partnership with outside bodies, this policy will be used to promote equal opportunities in services which those bodies provide through partnership agreements (see also partnership working).

To help ensure that the Northwards Housing provides services to everyone fairly, we make the following commitments:

1. Northwards Housing services will be planned and delivered with the conscious intention of tackling discrimination and disadvantage.

Northwards Housing will collect data to enable it to develop profiles for north Manchester's geographical communities and communities of interest. The profiles will include both demographic data about social inclusion issues (housing, employment, health), and perceptual data, as appropriate. Northwards will use this information to identify groups within the community whose needs/requirements are less well met than those of other groups, and to then develop services that are more responsive and appropriate to these needs.

Northwards Housing will also use this information to provide specially tailored and responsive services to the individual needs of our tenants. We will also, with consent from our tenants, share this information with our partners to ensure that the services they provide on our behalf is consistent with our approach.

2. Northwards Housing will carry out regular Equality Impact Assessments in all service areas, and by each equality strand. This will determine whether our new policies, procedures and initiatives may have potentially adverse impacts on particular individuals or groups. Action will be taken to address any negative impacts, and where appropriate areas of positive practices will be shared across the organisation.
3. Northwards Housing will develop equality aims and objectives which will be included in all annual service area Team Improvement Plans. Consultation will be carried out with our employees, Area Panels, Resident Forums, local community and voluntary groups and other relevant community members to determine areas of priority, and to set performance indicators and/or targets where appropriate.

Equality actions will specify exactly what work is being undertaken, and what targets that work is intended to achieve. Teams will specify the resources required to carry out work to improve equality in their department. Equality actions will be open to scrutiny from Northwards Sub-Committees, Area Panels and Resident Forums.

4. Northwards will regularly review and update our Interpretations and Translations Policy. This will ensure that the way in which we respond to individual communication needs is consistent with government guidance, makes use of developments in modern technology, and offers best practice in terms of service delivery.

Community Engagement and Involvement

Northwards Housing recognises the benefits that can result from gathering together a diverse range of opinions and views. It is important that all sections of the community have the opportunity to be involved in these processes, particularly individuals and minority groups who may have historically been marginalised and excluded from consultation exercises. This includes people from minority ethnic backgrounds, disabled people, young people, people from different religious/faith groups, as well as lesbian, gay, bisexual and transgender (LGBT) people.

Northwards recognises that under-represented groups must be engaged to ensure that the actions we take are fair and representative of the wishes of all our communities. We will therefore:

1. Provide a wide range of opportunities for tenants, residents and local community/voluntary organisations to be involved, and to express their opinions about Northwards Housing, the services it offers and how it provides them.
2. Actively seek to remove any barriers that may prevent involvement from our diverse communities. We will, in line with our Interpretations and Translations Policy, respond to any communication needs of people wishing to get involved, for example through the provision of British Sign Language (BSL) or language interpreters. We will also take into account tenants' cultural as well as individual needs, for example by holding events at times that do not conflict with religious festivals or practices.
3. Review our arrangements for consultation on a regular basis. We will monitor the people who are actively involved with Northwards Housing and set meaningful targets to increase the number of people from under-represented groups. This will help to ensure that the different needs and requirements of all communities we serve are properly represented in our consultation processes. This will be carried out in line with regular reviews to Northwards Resident Involvement Agreement, Area Panel constitutions, and Tenants and Resident Groups constitutions.
4. Assist community groups, and especially those groups from marginalised sections of the community, to develop their knowledge of Northwards Housing procedures and their ability to influence the decisions of Northwards Housing through such consultation processes.
5. Ensure that people involved are aware of and adhere to the principles of this policy. This includes a commitment to treat everyone fairly, equally and with respect. This will be supported by regular equalities briefings and training sessions.

Partnership Working

Northwards recognises that, whilst we value diversity and aim to provide services that are responsive and culturally sensitive, this is not something we can achieve alone. As a result, Northwards Housing will form active relationships with other organisations in the private, voluntary and other parts of the public sector. Through these partnerships we will promote our commitment to equality, and work together to tackle prejudice and discrimination in all its forms.

For example, Northwards' approach to hate incidents will be based on a multi-agency approach. We will work closely with the Police, Manchester City Council and other partner agencies to tackle all forms of hate crime. We will also engage with other agencies such as Victim Support and the Lesbian & Gay Foundation, and link with local support groups in the area to ensure that victims are given extra reassurance and support to following incidents.

Similarly, the support we offer to victims of domestic abuse will also be carried out in partnership with other agencies. This approach helps us to ensure that victims are given support that is tailored to their needs, and are given appropriate advice to make choices and enable them to rebuild their lives.

Northwards also endeavours to work in partnership with all local voluntary and community groups, as well as local charities. For example, we will form working relationships with local groups supporting BME, LGBT, faith and other minority communities, as well as engaging with relevant regional and national organisations, such as MENCAP and Age Concern. This will ensure that we access up to date information on current issues facing our diverse communities, which will then be used to shape future planning and delivery of services.

Northwards will also work closely with other ALMOS and social housing landlords to share best practice in terms of equality. This may be through benchmarking exercises or through participation in dedicated forums, for example the North West Equality & Diversity Network for Housing Practitioners.

Procurement

Northwards Housing will ensure that we adopt fair and consistent practices when seeking tenders from contractors and consultants. We will also take every opportunity to promote the local economy through the use of Social Enterprises, Small and Medium Enterprises (SMEs) and Black and Minority Ethnic (BME) Groups.

Similarly, Northwards Housing will make all contractors, suppliers and consultants who wish to deliver services on our behalf aware of our equality policy. We will work together to take a proactive approach to deliver our equality aims and objectives through joint employment and training initiatives. We will offer guidance on these requirements through our tender

documentation, and we will only appoint contractors and consultants who are able to demonstrate their commitment to equality and diversity.

When appointed, Northwards will monitor performance in relation to equality in the following ways:

- Northwards will regularly request updated copies of contractors, suppliers and consultants' equality policies, and other related policies.
- Contracting partners will produce quarterly reports on their workforce profile by all equality strands, where data is available. Northwards will encourage contracting partners to take steps where data is not available to gather this information; support and guidance will be offered throughout this process.
- An update of actions and new initiatives taken to address areas of under-representation will accompany the quarterly workforce profile reports.
- Northwards will require contracting partners to deliver Equality and Diversity Training for all new employees and apprentices. This will be supported by other relevant training exercises related to equality, for example the use of translations services, disability awareness.
- In addition, Northwards will work with partner organisations to develop training and employment initiatives designed to encourage people from traditionally under-represented groups to work in the construction industry.
- Northwards will monitor and set meaningful targets for satisfaction with services delivered to our tenants by contracting partners. Satisfaction will be reported quarterly by age, disability, ethnicity and gender and by November 2009 religion/belief and sexual orientation.

All actions relating to equality performance by contracting partners will also be monitored regularly through the Impact Manchester Partnership, a housing procurement consortium of which Northwards are key member.

Responsibility:

The policy relates to Northwards Housing Board, employees, tenants, partners and residents living in the Northwards area.

Northwards Housing's Board and Executive Management Team (EMT) will hold overall responsibility for the management and implementation of this policy. All Sub-Committees and Area Panels will also share responsibility for mainstreaming equalities issues.

The Senior Manager Team (SMT) are directly responsible for ensuring that the services delivered by their teams are in accordance with this policy, and that employees are provided with all necessary support and direction to fulfil its aims.

Whilst the Board, EMT and SMT will take a lead role, Northwards also believe that it is everyone's responsibility to promote equality. We therefore expect all Northwards' employees and partners to assume responsibility to promote equality and help tackle all forms of discrimination in the workplace, and in the local community.

Every Northwards Housing Board Member, employee and representative will be responsible for their own behaviour, in accordance to this policy. They should be actively involved in tackling inequality where it occurs and in challenging inappropriate behaviour.

Equality /Diversity considerations & Equality Impact Assessment:

This policy is available in large print, Braille, DVD, CD and in languages other than English. It is also subject to the translation policy for Northwards Housing. This policy and its related procedures have been Equality Impact Assessed and a summary of this is detailed below.

Information sources and reference documents:

This policy supports and is directly related other Northwards policies and strategies, including:

- Access to Services Strategy
- Bullying & Harassment Policy
- Dignity at Work Policy
- Domestic Abuse Policy
- Hate Incident Policy & Procedure
- Interpretations and Translations Policy
- Learning & Development Policy
- Procurement Strategy
- Recruitment & Selection Policy
- Single Equality Scheme

Policy information:

This policy is linked to:	Northwards Housing Team/Service Improvement Plans
This version:	September 2009
Approved by:	
Next review:	
Lead Officer:	Tara Kelly
Policy reference number: (to be completed by Business Improvement Team)	

Appendix: Definitions and Terms

- *Age*
Ageism is a form of discrimination that is experienced across all age ranges. As such this policy relates to discrimination against young people, old people and any other occasion where a person is being unfavourably treated because of their age.
- *Disability*
Disability is defined as “a physical or mental impairment which has a substantial long-term adverse effect on the ability to carry out day to day activities.” This includes mental health problems, physical impairments, sensory impairments, and since 2005 also covers Multiple Sclerosis, Cancer and HIV/AIDs.
- *Direct Discrimination*
This means treating someone less favourably than others are or would expected to be treated in the same circumstances
- *Ethnicity*
Everyone has an ethnicity which can be based on a variety of factors such as cultural, language, religion, nationality or physical appearance. For the purposes of this policy ‘minority ethnic’ refers to anyone who does not identify as White British.
- *Gender*
This policy refers to the inequality of treatment that can occur in the way men and women are treated, and in the way services are managed and delivered to them.
- *Harassment*
Where service users or employees feel there has been interference, either verbal or physical, with their comfort or safety.
- *Indirect Discrimination*
Applying a requirement that, intentionally or not, has a disproportionately adverse effect on a particular group and this cannot be shown to be justifiable.
- *Religion/Belief*
This policy aims to protect individuals from being discriminated against because they hold a certain religion or belief, or because they do not hold any religion or belief.
- *Sexual Orientation*
This policy relates to discrimination or unfair treatment of a person because they are, or they are perceived to be, lesbian, gay, bisexual or heterosexual.

- *Transgender*
The term transgender in this policy refers to individuals who do not identify with the gender identity they have been given at birth.
- *Victimisation*
Where a person is treated less favourably because they have pursued, or it is expected they will pursue, their rights under this policy.