

Melville Housing Association



Policy: Equal Opportunities and Human Rights Policy & Strategy

Subject:	Equal Opportunities & Human Rights Policy & Strategy
Section:	Directorate
Objective:	This policy, alongside our Equal Opportunities Policy in relation to service provision and staffing, are designed to ensure that our commitments are met and demonstrated.
Scottish Social Housing Charter	<ol style="list-style-type: none">1. Equalities2. Human Rights
Relevant Legislation	<ol style="list-style-type: none">1. Equality Act 20102. Housing (Scotland) Act 20103. Human Rights Act 19984. Data Protection Act 2018
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1.0 Policy Commitment

- 1.1 Melville Housing Association is committed to tackling discrimination on the grounds of age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
- 1.2 Melville Housing Association will endeavour to focus on ending discriminatory practices for all and in particular towards protected characteristic groups as defined in the Equality Act 2010.
- 1.3 We will also take action to prevent any unlawful behaviour or discrimination whether direct, indirect, by association, or by perception and will deal with harassment, third party harassment or victimisation in carrying out our policy.

We will therefore:

- Eliminate conduct prohibited in law
- Advance equality of opportunity between people who share a protected characteristic and those who don't
- Foster good relations between people who share a protected characteristic and those who don't

We will endeavour to address the needs of those intended to benefit from our activities as:

- Organisational managers (governance)
 - Landlord
 - Service providers
 - Employers
 - Procurers of services
- 1.4 Furthermore, the Association will ensure that, as an organisation, we will seek to actively promote equal opportunities and human rights within our community and beyond.

Caron Quinn
Chairperson

John McMorrow
Chief Executive

2.0 Introduction

2.1 This policy, and the accompanying Equalities Action Plan, describe how we will provide equality of opportunity and fair treatment for all in all aspects of our activities including:

- Everyone who uses, or wishes to use, the Association's services
- Everyone who wishes to be involved in the governance and overall management of the Association
- Everyone who works for Melville Housing Association or who applies to work for us

The Association has adopted several organisational values and one of these is to treat everyone with equality and fairness.

3. Equal Opportunities & Human Rights Context

3.1 Melville Housing Association Ltd was formed in 1994 by a group of Midlothian tenants and staff from the Dalkeith office of Scottish Homes. The first homes were transferred in 1995 and since then Melville has developed a reputation as an excellent provider of high quality and adaptable housing services that constantly works to deliver good value, affordable homes.

3.2 We currently own and manage just over 2,000 properties and we are based at the Corn Exchange, 200 High Street, Dalkeith.

3.3 We rent and lease properties mainly in Midlothian with others in Edinburgh, East Lothian, North Lanarkshire, and the Scottish Borders.

3.4 Many Melville residents' lives continue to be affected by poverty and poor health, which we believe diminishes their life chances.

3.5 This policy along with an Annual Action Plan have been informed by sources of information about the people who live in Melville's homes and communities. These include:

- Statistical information derived from Melville records
- Tenant Satisfaction Surveys
- Statistical Information derived from Census based on the operating area of Melville Housing Association

At present statistical information is not available on some equality groups and work will be undertaken to obtain the relevant information.

3.6 Our aim is to be responsive to all sections of the community, including the less visible minorities (e.g. lesbian bisexual, gay and transsexual, people with mental health issues).

- 3.7 We believe the Association has an excellent track record of responding to diversity and supporting disadvantaged groups.
- Providing housing which is suitable for varying and supported needs through previous and current development programme(s) and an ongoing commitment through our major repairs and adaptations work
 - Creating additional opportunities for varying and special needs
 - Fostering close working relationships with all sections of the community and joint working with agencies and services.
 - Adopting progressive employment practices
- 3.8 The Association will ensure that we also monitor the impact of our work on human rights and that we recognise all aspects of this legislation when we undertake services and support to our tenants and stakeholders.
- 3.9 We will adhere to the Human Rights Act 1998 and the fundamental rights and freedoms that everyone in the UK is entitled to.

In adhering to this we recognise (respect and protect) the following specific rights:

- Right to Life
 - Freedom from torture and inhuman or degrading treatment
 - Freedom from slavery and forced labour
 - Right to liberty and security
 - Right to a fair trial
 - No punishment without law
 - Respect for your private and family life
 - Freedom of thought, belief and religion
 - Freedom of expression
 - Freedom of assembly and association
 - Right to marry
 - Protection from discrimination
- 3.10 The Association recognises that we will not have a direct impact regarding some of these rights, however, we will support all rights and will not do anything or work with any organisation that directly opposes these rights whether deliberately or inadvertently.
- 3.11 We note, however, that in relation to our role as a housing provider we have seven principles that apply in our work that relate to human rights:
- **Security of tenure:** legal protection from forced eviction, harassment by landlords and other threats to having a settled home.
 - **Habitability:** A dwelling in a decent state of repair that provides a dry, warm home and adequate living space.

- **Availability of services:** A dwelling has the facilities that makes it habitable, such as sanitation and waste disposal facilities, washing facilities, cooking facilities, storage, heating and lighting
- **Affordability:** Housing costs are not so high that people struggle to pay for food, fuel and other basics.
- **Accessibility:** Suitable housing is available to those who require it, including housing that maximises the capacity of individuals with a disability or limiting illness to live independently.
- **Location:** Housing is situated in areas that allow access to services (e.g., education, health, shops), paid work and participation in civic society. Housing should not be in an environment that is hazardous to health.
- **Cultural adequacy:** Housing and its allocation should allow people to live in ways that express their cultural identity and does not disrupt their cultural affiliations

3.12 We will therefore work to these 7 principles as we undertake this policy and subsequent work that flows from this.

4. Regulatory and Good Practice Requirement

4.1 Regulatory Standards and Guidance

The RSL conducts its affairs with honesty and integrity

The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements. (5.3)

- 4.2 The Association will adhere to the above Regulatory Standard and will follow national guidance on collecting equality information and/or any future best practice guidance which is published by the Scottish Housing Regulator in partnership with the Scottish Federation of Housing Associations.
- 4.3 The pursuit of equality and the recognition of diversity are a legal, regulatory, moral, employment and business imperative purpose.
- 4.4 Social landlords need to act with determination within their organisations, with their tenants and other service users, and with their staff and members of governing bodies or elected members, to remove unfair discrimination, seek equality and value diversity.
- 4.5 In other words, equality of opportunity goes to the core of what type of organisation an association is. It plays a vital role in helping organisations deliver better and more responsive services, engage more effectively with their customers, ensure that they are accessible to everyone who wants to use their services, and to ensure their staff, tenants, Board profiles are as reflective of their communities as possible. Above all, equality and diversity

is about Associations striving to treat their staff, governing body members and customers fairly and ensuring that no groups or individuals are treated any better, or worse, than anyone else.

5. Legal Framework

- 5.1 The Association has taken account of the Equality Act 2010, Housing Scotland Act 2010, and the Human Rights Act 1998 in preparation of this policy.
- 5.2 The Association has also considered national guidance namely "Collecting Equality Information" in developing this policy.
- 5.3 Overall the Association will ensure that it complies with all relevant statutory and contractual obligations relating to equal opportunities and human rights.

6. Aims and Objectives

Aims

Equality is a key value for the Association and as such this guides the development of our corporate plans.

- 6.1 Bearing in mind the local context, legal requirements, and best practice, the Association is committed to tackling discrimination, harassment, and victimisation. We will promote equality and celebrate diversity.
- 6.2 Our ethos will be to strive to achieve equality of opportunity and treatment for all, irrespective of age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or any other grounds.
- 6.3 We will promote a multi-cultural community.
- 6.4 These policy aims will be achieved through the following objectives.

Objectives

- 6.5 We will adopt policies and procedures, which are responsive to the needs of people living or wishing to live in Melville Housing Association homes.
- 6.6 We will ensure that our Board, Staff and Contractors:
 - Translate our objectives into effective action and reality.
 - Reflect the needs of the local population.
 - Attempt wherever possible to attract underrepresented groups to live in Melville Housing Association homes.
- 6.7 Equal Opportunities will be a central theme throughout all the Association's activities. As previously stated in relation to:

- Governance
 - Our role as a landlord
 - Our role as an employer
 - Our relationship and expectations of third parties that we employ
- 6.8 We will meet our legal obligations and where resources allow, we will strive to achieve and promote best practices with respect to Equal Opportunities and human rights.
- 6.9 We will consult with the entire community when reviewing our policies, procedures, and future plans.
- 6.10 We will monitor our performance against targets set down in our Equality Action Plan.
- 6.11 We will be pragmatic about the level of improvements we can make based on local context and resources.

7. Governance

Objective

- 7.1 To be representative and accountable to the entire community.

Membership

- 7.2 The Association's rules means that membership is open, and we will encourage active membership. Members are eligible to stand for election or vote for their representatives to sit on the Board at an Annual General Meeting.
- 7.3 Members of the Board will be expected to meet the highest standards of probity, be prepared to attend network meetings and training courses.

Representation

- 7.4 The Association will strive to ensure that the composition of the Board represents all sections of the community, whilst maintaining the key skills required to ensure effective Governance of the Association.
- 7.5 We will monitor trends in the composition of the Board based on protected characteristics.
- 7.6 We will analyse the underlying reasons for any under-representation of groups, by consulting all sections of our community.
- 7.7 We will identify what positive actions that we can take to address under-representation.
- 7.8 We will regularly inform the community about our activities, how decisions are taken and how individuals can influence the decision making process.

This will include initiatives aimed at under-represented sections of the community.

- 7.9 We will provide opportunities to participate at different levels. If individuals or groups are interested in specific subjects, they will be invited to contribute on a one off basis.
- 7.10 This may include supporting individuals or groups, to assist developing skills and confidence that will assist greater participation.
- 7.11 We will provide new members with induction training and support; this will include, if necessary, an ongoing 'buddy' system to ensure continued involvement.
- 7.12 When members leave the Board, we will attempt to ascertain the reasons for leaving, if there are factors, which the Association can influence, we will endeavour to ensure that the same situation does not occur.
- 7.13 We will consider using co-options as a way of including under-represented groups on the Board.
- 7.14 It is essential that we provide training for all Board members on all aspects of equal opportunities, diversity and human rights. All members must show a positive commitment to addressing equal opportunities, as it will be a **core value** for the organisation.

8. Equal Opportunities in Melville Housing Association Services

- 8.1 The following sets out how we aim to achieve equality of opportunity, whilst providing housing and associated services.
 - To provide fair and equal access to our housing services for all.
 - To ensure that nobody suffers disadvantages because of their age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
 - To set clear service standards through written policies and procedures
 - To consult in an inclusive way with service users about what service standards should be adopted.
 - To identify distinct needs and produce services that address individual needs.
 - We will measure outcomes of our policy and procedures, taking cognisance of the Equality Action Plan.
- 8.2 Promoting equal opportunities means more than simply offering the same service to everyone. We will assess how our service policies and practices impact on groups and individuals via **equality impact assessments**, to ensure we do not inadvertently disadvantage any section of the community.

We will adjust our approach where necessary to achieve fair access to services, and fair service outcomes.

- 8.3 Many of our policies already state our commitment to equal opportunities. We will give explicit consideration to equality issues as part of all policy and service reviews.
- 8.4 **Appendix 1** provides a summary of our key equalities standards for different service areas.
- 8.5 Our individual policies provide more information; copies of all policies are available from the Association's offices or from our website.

9. Equal Opportunities in Employment

- 9.1 Melville Housing Association recognises that discrimination, harassment and victimisation, can occur against disadvantaged groups of people in the field of employment. We will aim to be an equal opportunity employer and will:
- Ensure that we have access to the widest labour market
 - Secure the best employees for our needs
 - Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, we assist applicants to compete for jobs on a genuine basis of equality and give our staff the help they need to attain their full potential
 - Ensure our workforce reflects the diversity within our community
- 9.2 The Equality Action Plan will set targets for groups that are recognised as being under-represented in the workforce.
- 9.3 We will ensure that the procedures we follow in all aspects of employment (e.g. vacancy advertising, selection and recruitment, training, conditions of service and reasons for termination of employment) are fully consistent with the Equalities Act 2010.
- 9.4 The Association will monitor changes in employment legislation to ensure that practices remain up to date.
- 9.5 Melville Housing Association will make the following commitments:
- Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability, and potential.
 - Ensure there is a mechanism in place to discuss, at any time, but at least once a year, employee's specific needs or ways in which we can develop their career prospects.

- Make every effort to ensure that if employees become disabled, or are affected by a medical condition that could affect their employment status, they stay in employment, if this is their wish.
 - Take action to ensure that all employees are aware of disability issues.
 - Review our commitments and what has been achieved annually.
- 9.6 The Association has employment procedures in place. The following section provides a summary of the overall policy on which our procedures are based.
- 9.7 Wherever possible, we will advertise permanent vacancies simultaneously, internally, and externally. We will aim to ensure that under-represented groups are made aware of vacancies. All vacancy advertisements will include an appropriate short statement on equal opportunity.
- 9.8 We will use selection criteria based on job descriptions and employee specifications. These will focus on essential skills for the effective performance of the job.
- 9.9 We will keep job descriptions and person specifications under review in order that they remain consistent with our objective of equal opportunity.
- 9.10 All participants in the recruitment process, including the selection interviews, will have to undergo equal opportunities training. At all times more than one person will be involved in the recruitment process including the interview stage. All selections will be based on the job description and person specification for the post. We will also record reasons for selection and rejection of candidates.
- 9.11 We will encourage under-represented groups to apply for training and employment opportunities with Melville.
- 9.12 Wherever possible, we will remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the needs of disadvantaged and/or under-represented groups.
- 9.13 The Association will collect monitoring information in respect of employee profiles and job applicants, this will assist to assess if the staff profile reflects the profile of the community.
- 9.14 We will follow procedures, which reflect the law on data protection and access to personal information. The procedure will involve:
- Maintaining records of selection processes for six months after an appointment has been made.
 - Recording the composition of the selection panel.
 - Request all job applicants to complete a monitoring form, which provides information about their age, disability, gender, race, religion

or belief, sex, sexual orientation, marital status, or other grounds.
(Note it is not compulsory that candidates complete)

At the end of each recruitment process we will analyse the process to ensure that all applicants enjoyed a 'level playing field' and no discrimination, harassment or victimisation has occurred.

10. Equal Opportunities in Contracts with Third Parties

- 10.1 We strive to ensure equality across all our activities. This applies whether the Association delivers services directly or if we contract elements of our work to contractors including sub-contractors, consultants or voluntary organisations.
- 10.2 We will make contractors and consultants fully aware of our overall policy and ethos in respect of equal opportunities. We will detail any specific behaviour or requirements, which are required during the service being procured. We will specify particular requirements relating to the conduct of employees, customer satisfaction and overall standards of customer care.
- 10.3 We will aim to employ contractors and consultants that are willing to meet our requirements. At tender stage we expect all organisations to have their own equal opportunities policy. For fixed term contracts, contractors must abide to a code of conduct obligation on equal opportunities.

All other contractors must demonstrate evidence of their approach to equal opportunities.

This approach could include:

- Information on the ethnic origin and gender of directors and employees.
 - Whether the organisation has premises that are accessible for people with disabilities.
 - Targets to redress any under-representation amongst the organisation's workforce on the grounds age, disability, gender, race, religion or belief, sex, sexual orientation, marital status, or other grounds.
 - Details of any actions we have taken to promote equality of opportunity in the recent past.
 - How acts of discrimination or harassment by employees are dealt with by the organisation's employment policies.
 - Compliance with the Equality Act 2010.
- 10.4 Contract documentation will detail requirements for contractors and consultants to comply with our policies in relation to equal opportunities, discrimination and harassment, in relation to other employees, tenants and members of the public. Organisations that are unable to meet these

expectations or where there are serious or persistent breaches of the policy, will result in these organisations being removed from our approved lists.

11. Implementation

- 11.1 The Board is responsible for approving the Equal Opportunities Policy, and for reviewing the outcomes achieved.
- 11.2 On a day-to-day basis the Chief Executive Officer and senior staff will have the responsibility to ensure that the policy is implemented effectively.
- 11.3 Every member of the Board and staff have an individual responsibility to ensure that the ethos of equal opportunity taking cognisance of diversity and needs is applied throughout all the work of the Association.
- 11.4 We will provide a copy of this policy statement to all employees, and will clearly communicate requirements to new employees as part of an induction process.
- 11.5 Our Code of Conducts for Board Members and Staff articulate standards of personal conduct, which are expected. Behaviour or actions, which are inconsistent with the Equal Opportunities Policy, will be treated as serious disciplinary matters.

Equality Action Plan

- 11.6 The Equal Opportunities Policy articulates our commitment to providing equal opportunity for all, in all aspects of service delivery.
- 11.7 It is widely recognised that equalities issues can be difficult to manage. Best practice states that an Equality Action plan provides a number of immediate benefits:
 - Brings together in one place a statement of the key components of our equality activities.
 - The plan presents our activities in a systematic, concise and coherent manner, clarifying the thinking behind how the plan is expected to work.
 - Provides a useful, concise communication tool in the equalities area.
 - Can help manage pressure that could result in over ambitious or unrealistic objectives being set where the necessary resources are not available.
 - Makes it easier to clarify and manage the division between the responsibilities of the Board and senior staff to meet objectives.
 - The plan can also provide a defence against litigation.
- 11.8 The Association will produce an Equalities Action Plan, covering a three-year period. The plan will:

- Describe the local context, detailing the extent and range of the need within Melville
- State our broad equality objectives, relating to the functions of the Association and themes relevant to the community (they will include targets and performance indicators).
- Detail the activities we will engage in to meet these objectives over the lifetime of the plan.
- We will recognise and articulate the level of resources required to achieve these targets.

12. Monitoring, Review and Continuous Improvement

12.1 We will collect and analyse information about the effectiveness of our Equal Opportunities Policy. The main objectives of us undertaking this monitoring include but are not limited to:

- Highlighting possible inequalities.
- Which weaknesses or omissions within policies, procedure or practices are responsible.
- How can these policies or procedures be improved to address inequality.

12.2 The areas of activity that will be monitored:

- Housing Applications
- Allocations
- Membership
- Board Membership
- Workforce
- Employment Applications
- Housing Services
- Contractors' policies and activities
- Scottish Public Services Ombudsman Complaints

12.3 To ensure a consistent approach to monitoring and reporting, reports will provide statistical data and also detailed objectives for each activity, this will allow the Board to measure the success of the policy and plan.

12.4 An Annual Report will be presented to the Board providing information on:

- Housing Applications and Allocations
- The profile of Organisation
- Tenants, Management Board and Staff
- Satisfaction with services
- Reports of racist incidents and outcomes
- Reports of harassment on other grounds and outcomes
- Complaints in respect of equality

12.5 The Annual Report will be accompanied by commentary which:

- Articulates our aims and objectives
- Describes the findings, emphasising trends
- Indicate any qualifying factors or limitations of information
- Set out implications for policies and procedures
- Summary of key points
- Draws clear conclusions

12.5 We will also report our performance in respect of equality to tenants and other service users through the Association's Annual report, newsletters and at any other events.

12.6 The Association is committed to achieving continuous improvement in all our activities including equal opportunities.

12.7 We will review the Equal Opportunities Policy every three years or more frequently if required.

12.8 The Equalities Action Plan will be reviewed annually.

12.9 We may alter targets, procedures and working methods outside the review cycle, where monitoring highlights weaknesses or deficiencies.

12.10 Policy review will involve consultation with service users, local groups and be subject to an appropriate and proportionate Equality Impact Assessment. We will also be open to advice from organisations that specialise in Equal Opportunity and Human Rights issues.

13. Data Protection

13.1 In undertaking this policy we will have due regard to the UK Data Protection Regulation (GDPR) and the Data Protection Act 2018.

13.2 Therefore we will process equality data in line with at least one of six data protection principles. This will include our regulatory requirement to satisfy specific conditions on collecting data on the protected characteristics.

13.3 We will ensure that special categories of data is given greater protection as we undertake the above requirement, namely:

- Health
- Political Opinions
- Racial or ethnic origin
- Religious or philosophical belief
- Sex life
- Sexual orientation
- Trade union membership

14. Policy Review

- 14.1 This policy and strategy will be reviewed every three years or before on issue of Scottish Housing Regulator guidance or changes in legislation best practice, or Association policy.
- 14.2 We will update the Equality Action Plan on an annual basis.

Appendix 1

Summary of Melville Housing Association's Equalities Service Standards

Service Area

Summary of Melville's Service Standards

Access and Allocations

- We will comply with all anti-discrimination, harassment and victimisation measures contained in legislation
- We will provide information freely about the availability of housing, and how to apply for housing.
- Information about access and allocations will be made available in other languages and formats upon request from customers.
- We will operate an allocations policy, which is clear, comprehensive and which provides equal access for all to our housing list.
- Our allocations policy will give priority to meeting extreme forms of housing need which some applicants may be experiencing – for example, victims of racial harassment and domestic abuse (including same sex relationships) and disabled people with urgent rehousing needs.
- We will maintain records of housing which is suitable for disabled people, to facilitate the matching of people and accommodation
- Bearing in mind the local context, we will examine the options to create targets for minority Ethnic groups.
- We will monitor the outcomes of the allocation process to ensure that we are addressing needs across groups within society.
- All allocations decisions will be scrutinised by a second member of staff, to minimise the risk of inadvertent discrimination.
- We will give priority to tenants occupying properties that can be adapted to suit people with specific needs thus increasing opportunities.

Tenancy Agreements and Procedures

- Tenancy Agreements will, upon request, be available in alternative formats, to meet customers' needs.
- We will conduct tenancy sign-up meetings in the customer's first language, where required.

Repairs and Maintenance

- In tenancy management matters, we will consider the support needs of disabled tenants with learning difficulties or mental health problems.
- We will ensure that all tenants receive a high quality service as described in our Property (Reactive Maintenance) Policy.
- We will assess periodically (through comprehensive tenants' satisfaction surveys and ad hoc monitoring exercises), the quality of service provided to equalities groups. This will focus on repair response times and satisfaction levels for minority groups.

Rent Management and Tenancy Terminations

- We will maximise the range of methods available for making rent and factoring payments.
- We will establish personal contact with tenants in arrears. In doing so, we will accommodate any language or other communication needs the tenants have.
- We will monitor the frequency with which legal action, including evictions, is taken against protected characteristic tenants, relative to the tenant population.

Harassment

- We will endeavour to ensure that all our tenants are protected from harassment and nuisance.
- We will operate a robust regime to deal with racial harassment and other types of harassment. As part of our policies, we will:
 - Monitor the number of racist incidents and the Association's response
 - Ensure that all allegations of racial incidents are investigated and acted upon
 - Ensure that victims are supported and kept informed
 - Co-operate with the police and other agencies on the collection, recording and exchange of information
 - Work with community groups to help provide support to victims
 - Work in partnership with local groups to develop anti-racist and crime prevention strategies

Development Programme and Existing Stock

- We will carry out equality assessments and this will involve assessment of local housing needs to inform the types and sizes of houses provided through our

development programme, considering the housing needs of all sections of the community.

- Our assessment of housing needs will be informed by consultation with equalities groups, by the Local Authorities' Local Housing Strategy, and by the results of community care locality planning.
- We will adopt design standards, which allow tenants to minimise their dependence on others and maximise choice in their daily life.
- We will seek to respond to people's changing needs over time rather than moving them from their existing home.
- Houses modernised or built by the Association will be based on the achievement of barrier free and Housing for Varying Needs standards, to maximise the accessibility of our housing stock.
- We will carry out an ongoing programme of adaptations (subject to availability of funds) to existing properties, to meet the needs of tenants with disabilities.
- We will actively seek to involve all sections of the community in the way in which the Association sets out and reviews policy, procedures, and service standards.
- We will will make particular efforts to involve younger and disabled people.
- Information about our service and activities will be available in a range of formats and languages upon request from potential service users. We will also endeavour to meet best practice criteria in respect of Standard Print Formats and Spoken Communication.
- Where information or a particular support service is required to meet a specific need, we will ensure that this is achieved as soon as practically possible.
- We will actively publicise our complaints policy and procedures to all service users.
- We will publicise projects or initiatives that promote equal opportunities and diversity.
- Our staff will treat all customers with respect and courtesy. We will provide staff with regular training to promote awareness of disability, different cultures, languages, social conventions and lifestyles and the needs of disadvantaged groups.

**Consultation
and
Communication**

- We will ensure that our office premises and services are accessible to all service users.
- Contractors or consultants employed by the Association will be required to observe standards set by us in relation to general conduct of employees in respect of equal opportunities, and to ensure no act of discrimination or harassment occur towards tenants or members of the public.
- We will undertake Equality Impact Assessments to ensure that new and/or revised policies and decisions promote equal opportunity for all and do not adversely affect any protected characteristics.