

HOMES FOR LIFE HOUSING PARTNERSHIP

EQUALITY AND DIVERSITY POLICY

Date Issued:	April 2008 (Version 3)
No of Pages:	16
Objective:	To set out how the Company intends to fulfil its commitment to equality and diversity
Responsible:	Business Manager
Next Review Date:	March 2013

1.0 INTRODUCTION

- 1.1 Homes for Life Housing Partnership is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination, by providing equality of opportunity for all. Throughout Homes for Life Housing Partnership there will be a consistent approach in promoting equality and diversity and activities. This includes governance, employment, membership, consultation/participation, re-housing, estate management, factoring and any other activities or services provided by the Company.
- 1.2 Homes for Life Housing Partnership oppose all forms of unlawful discrimination. This policy covers discrimination by and towards tenants and other customers, employees, directors, contractors, members of the public, and staff from other agencies. All employees and directors are required to abide by this policy.

2.0 POLICY PRINCIPLES

This Equality and Diversity policy aims to:

- 2.1 Ensure integration of equality and diversity practices into everything Homes for Life Housing Partnership does, and ensure that tenants and other customers, employees, and directors are treated with fairness and respect from each other and from members of the public, directors, contractors and staff from other agencies.
- 2.2 Implement fair and just practices ensuring that no housing or job applicant, tenant, sharing owners, owners who receive a management service, other customer, employee, contractor or supplier will receive less favourable treatment

on the grounds of sex, race, colour, marital status, sexual orientation, religious/belief, disability or age.

- 2.3 Ensure people can access and receive housing services, prioritised according to their needs, as assessed under the relevant Company policies, in line with good practice for Registered Social Landlords.
- 2.4 Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions will be based on only relevant merits.
- 2.5 Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each others differences and promotes dignity, equality and diversity.
- 2.5 Ensure all contractors and consultants employed by the Company, suppliers to the Company, and other agencies with whom the Company contracts have in place appropriate Equality and Diversity Policies or undertake to abide by the Company's Equality and Diversity Policy.
- 2.6 Ensure the effects of the Company's actions are monitored and assessed by the Board.

3.0 LEGAL FRAMEWORK

Relevant legislation includes:

- **Equal Pay Act 1970 and Equality Act 2006**
- **Rehabilitation of Offenders Act 1974**
- **Sex Discrimination Act 1975, 1986 and 2003**
- **Employment Equality (Sex Discrimination) Regulations 1995**
- **Disability Discrimination Acts 1995 and 2005**
- **Race relations Act 1976, 2000 Amendment and 2003 Amendment Regulations**
- **Employment Equality (Religion or Belief) Regulations 2003**
- **Employment Equality (Sexual Orientation) Regulations 2003**
- **Sex Discrimination (Gender reassignment) and Gender Recognition Act 2004**

- **Employment Equality (Age) Regulations 2006**
- **Age Discrimination Act 2006**
- **Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2002**
- **Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2000**
- **Crime and Disorder Act 1998**
- **Protection of Vulnerable Groups (Scotland) Act 2007**

In addition to these, the Company must meet the relevant Performance Standard and related guidance published by the Scottish Housing Regulator, as well as complying with relevant Code of Conduct and good practice guidance published by the Scottish Federation of Housing Associations.

4.0 BACKGROUND

- 4.1 Tackling inequality is not something new. UK Governments have been addressing equality and diversity issues for many years, although progress has been made but inequalities still exist in Scotland and in the UK. As the government continues to tackle discrimination and promote equality a number of new and updated pieces of legislation have come into force in recent years. As a result it is vital that Homes for Life Housing Partnership has an equality and diversity policy to illustrate its compliance with legislation and also support the government in its aim in promoting a culture of dignity and respect for all and eliminating discrimination.
- 4.2 Lack of Equality and Diversity is not only a serious moral issue but also has a significant impact on business performance. Studies have shown that high levels of motivation are achieved in an environment of respect and fairness. Homes for Life Housing Partnership will aim to ensure that all employees will be treated with fairness and respect and not be discriminated on the grounds of marital status, gender, race, colour, nationality, ethnic or national origins, sexual orientation, disability, age, religion/belief or to be disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance. Homes for Life Housing Partnership will therefore ensure all tenants and other customers, employees, and directors are provided with equality of opportunity in the course of their access to and use of the Company's services, involvement with, or employment by the Company.

5.0 **DEFINITIONS**

5.1 **Diversity**

Is about valuing individual differences, Homes for Life Housing Partnership is committed to valuing and managing people's differences, to enable all employees to contribute and realise their full potential. Homes for Life Housing Partnership recognise that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit the services provided by Homes for Life Housing Partnership, and the communities within which we provide housing and related services. It also recognises that we have a diverse population with diverse service needs and by providing a diverse service the quality of that service will improve.

5.2 **Equality and Diversity**

Is making sure people are treated fairly and given fair chances.

Equality and Diversity is not about treating everyone in the same way, but recognises that their needs are met in different ways.

Equality and Diversity focuses on those areas covered by the law, namely the key areas of ethnic origin, gender, disability, nationality, religion, belief, sexual orientation, age and health, as well as marital status and family circumstances.

5.3 **Direct Discrimination**

Is treating someone less favourably than others based on their belonging to one of the groups covered by discrimination law?

5.4 **Indirect Discrimination**

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

5.5 **Harassment**

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

5.6 **Victimisation**

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

5.7 **Positive Discrimination**

Giving advantage to groups in society which are often under-represented. Positive Discrimination is unlawful in the U.K.

5.8 **Positive Action**

Addressing imbalances in the tenant, employee, member or director profile, by encouraging members of under represented groups to apply for tenancies, jobs, membership or directorship. Positive action may be applicable in setting equality targets. No quotas will be set by Homes for Life Housing Partnership but equality targets may be set to encourage people from a particular group or groups to apply for a vacancy in Homes for Life Housing Partnership in comparison to the local community where they are under represented.

5.9 **Failure to make Reasonable Adjustments**

Where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

6.0 **IMPLEMENTATION OF THE POLICY**

6.1 Homes for Life Housing Partnership will ensure that all new employees and directors will receive induction on this policy. The policy will be widely promoted and integrated into all policies and procedures within Homes for Life Housing Partnership.

6.2 Appropriate training and guidance will be available to promote equality and diversity among existing staff and directors. This policy applies to everyone in Homes for Life Housing Partnership and all have a responsibility to be alert to discriminatory behaviours and practices when they occur. Unacceptable behaviour and practices must not occur, however if or when a situation arises it will be dealt with immediately, as inaction is not an option. Breaches of the equality and diversity policy will be regarded as misconduct and will lead to disciplinary action which may include dismissal of employees or removal of directors.

6.3 This policy will be brought to the attention of applicants, tenants, and other customers. Copies of the policy will also be freely available and displayed in Homes for Life Housing Partnership's office.

7.0 **THE COMPANY'S RESPONSIBILITIES AS AN EMPLOYER**

Recruitment and selection

7.1 It is Homes for Life Housing Partnership's goal that all recruitment decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

- 7.2 A fair recruitment process will remove barriers where possible to the employment of people of different backgrounds. This will enable the organisation in recruiting from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving. A more diverse workforce should improve the organisation's service delivery, as it will include staff with more knowledge and experience about meeting the needs and aspirations of service users and potential service users.
- 7.3 To highlight Homes for Life Housing Partnership's commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy within Homes for Life Housing Partnership will state that an equality and diversity policy is in place. In addition the advert will also display any signs of equality bodies that Homes for Life Housing Partnership is affiliated with. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply Homes for Life Housing Partnership will ensure that all applications will have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.
- 7.4 Homes for Life Housing Partnership will ensure all staff involved at any stage in the recruitment and selection process will receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

Terms and Conditions of Employment

- 7.5 As part of the employment relationship being covered under this equality and diversity policy all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's terms and conditions will be standard across all employees regardless of their race, gender, disability, nationality, religion, belief, sexual orientation and age. Employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and the grade it attracts.

Training & Development

- 7.6 Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role with their line manager. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials

will provide a positive image of people reinforcing an image and of equality of opportunity.

Redundancy & Selection

- 7.7 Redundancy selection will be made according to the statutory requirements and in line with Homes for Life Housing Partnership's Redundancy Policy. Criteria will be discussed with the Trade Union and or nominated representatives. The criteria will be set out and will be objectively fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

8.0 EMPLOYEE AND BOARD OF DIRECTOR RESPONSIBILITIES

- 8.1 The Company expects all employees and directors to recognise their individual responsibilities in order to ensure that the principles of equal opportunities are adhered to.

To this end employees and directors will not discriminate against other Company employees and directors, contractors, job applicants, clients or customers in the course of their duties. Company employees and directors must comply with the relevant provisions in their respective Code of Conduct, and must draw to the attention of the Business Manager any apparent instances of discrimination, whether relating to recruitment and selection, training, promotion, or the application of conditions of service, policies or service delivery of the Company.

- 8.2 The Company views as very serious any act of harassment. Any alleged incident will be dealt with promptly and sensitively. Any employee or director who is found to have harassed another member of staff or director will be subject to the Company's disciplinary process, which could lead to dismissal or removal from the Board.

- 8.3 Any member of staff who considers that he/she has suffered discrimination or harassment should pursue the complaint in accordance with the Company's Grievance Procedure. Any director who considers that he/she has suffered discrimination or harassment should report the matter to the Business Manager, or Chairperson, as appropriate, who will ensure that appropriate action, is taken under the Company's Standing Orders the matter is investigated and brought to the attention of the Board.

9.0 THE COMPANY'S RESPONSIBILITIES AS A REGISTERED SOCIAL LANDLORD

- 9.1 The Company will seek to ensure that all customers are treated with equal courtesy and respect and that all policies, procedures and practices are applied

consistently and fairly. Information on the Company's policies will be made available, on request, to speakers of a first language other than English; in large print; in Braille; on tape or on computer disc etc. This is explored in more detail in Section 11 which deals with Communications in Specific Formats.

- 9.2 The Company's procedure for dealing with allegations of harassment aims to ensure that such allegations are dealt with promptly and sensitively. Sympathetic consideration will be given to transfer requests and the points system will reflect the seriousness of harassment.
- 9.3 Through the Business Manager, the Board of Directors will be provided with both quarterly and annual reporting on housing applicants and housing allocations on the basis of gender, ethnic origin and disability. This will enable the Board to monitor the effectiveness of the Company's Equal Opportunity and Diversity Policy and help identify where there are blocks to equality and why these may have occurred. Where inequalities are identified, the Board will produce a programme of action to overcome these.

10.0 THE COMPANY'S RESPONSIBILITY IN PROCURING SERVICES

- 10.1 The Company will seek to ensure that all contractors, consultants and suppliers of goods and services, who wish to work for the Company, are committed to the principles of Equal Opportunities.
- They will be expected to confirm that they:-
- have their own Equal Opportunities Policy; are complying with its terms and that its content and their commitment to it is acceptable to the Company OR
 - are prepared to abide by the Company's when under contract to them.

11.0 COMMUNICATION IN SPECIFIC FORMATS

- 11.1 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually impaired resident may not be able to read the allocations policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is all the more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.
- 11.2 To combat this, the Company will provide information to tenants in any special formats as required. Special formats may include:
- large print
 - audio tape
 - translations into relevant languages

- use of language or sign interpreters
- Braille

Please note that it is impractical to have all possible formats available immediately. Our commitment therefore relates to the ability and willingness to produce documents in the formats required, or an interpreter if requested, within a reasonable time, taking account of the urgency of the request, and generally within 5 working days. All costs in relation to this will be borne by the Company.

- 11.3 In accordance with recommendations made by the Royal National Institute for the Blind (RNIB), all publications and communications sent out by the Company will be at least 12-point font.
- 11.4 To ensure that this strategy is effective, the availability of documents in other formats will be publicised regularly to our residents, members and all those with whom the Company deals.

12.0 PUBLICISING THE EQUALITY AND DIVERSITY POLICY

- 12.1 All tenants, members and other residents will be advised that the policy has been re-launched in the first newsletter following the review. This will outline the main points and encourage readers to request a copy of the policy in full or in summary (in any appropriate format or language).
- 12.2 All employees, applicants for employment and contractors will be notified of the existence of the policy and will receive individual copies – it should be noted that various staff members were involved in reviewing the policy in any case. All existing employees will receive training.
- 12.3 Board members will be aware of the policy from their part in approving it. Nonetheless, all will be encouraged to keep up to date with development in the area of good practice in equal opportunities.
- 12.4 Copies of the CRE Code of Practice in Rented Housing and Employment are available for inspection in the Company's office.

13.0 RACIAL DISCRIMINATION

- 13.1 In line with accepted good practice, the Company will:
- comply with the provisions of the Race Relations Act 1976, 2000 Amendment and 2003 Amendment Regulations and all relevant Codes of Practice, (for example, the CRE's 1991 "*Code of Practice in Rented Housing*" and its 1984 "*Code of Practice in Employment*"), to help ensure that there is no racial discrimination in the provision of housing, services or employment,

- recognise and, where necessary, use the specific laws relating to racial harassment in the Crime and Disorder Act 1998
- adopt policies and procedures which ensure equal treatment and the elimination of racial discrimination and which, where appropriate, encourage positive action on behalf of disadvantaged groups
- take action to improve the involvement of tenants from ethnic minority groups in its work
- ensure that there is no racial discrimination in relation to the recruitment and selection of employees, general members of the Company and the Board
- take action against tenants found guilty of racial harassment
- deal with racial, sectarian or otherwise offensive graffiti immediately by having it removed as an emergency repair
- review and monitor its current membership in order to ensure equal representation and, where necessary take action to redress any imbalance

14.0 TARGET SETTING– GENDER, ETHNIC ORIGIN, AGE AND DISABILITY

- 14.1 Whilst embracing the principles of equal opportunities is something that the Company takes very seriously, it is nonetheless important that there is some system in place to demonstrate that we actually achieve our objectives (or, perhaps more importantly, to highlight areas where we do not). In other words, we must ensure that this policy statement is not used merely to pay lip service to equal opportunities.
- 14.2 The most effective way of doing this is to develop a set of targets against which our performance can be quantified. What is crucial, however, is that we set a range of targets that are realistic and achievable for Homes for Life, otherwise the Board risks a seemingly poor performance in this area.
- 14.3 The method we will use across all areas of target setting is:
- Obtain statistical/demographic information for East Lothian Council area.
 - Using these figures, establish appropriate targets in each measured category
 - The Board receives recommendations from staff, together with an accompanying paper, on annual target figures

- Produce a statement on the current position and agree necessary action
 - Incorporate targets and any necessary actions into Internal Management Plan to be picked up by the quarterly performance review process
- 14.4 Progress against targets will be facilitated by the monitoring process described in the following section.

15.0 EQUALITY MONITORING – GENDER, ETHNIC ORIGIN, AGE AND DISABILITY

15.1 The Company will collect and monitor information that will help staff and the Board of Directors to ensure that no groups are discriminated against in relation to employment, membership, consultation/participation or re-housing opportunities. This will also have a crucial role to play in allowing the Company to assess how well it is performing against the targets set by the Board of Directors.

15.2 Information will be gathered specifically on:

- All aspects of Allocations, including the housing list maintained by East Lothian Housing Association, appeals, lets made, offers refused by the applicant, applications rejected by the Company
- existing tenants and shared equity purchasers
- owner occupiers to whom a factoring service is being provided
- existing share membership
- the composition of the Board of Directors
- the composition of the staff team
- applications for employment including monitoring the applications received, applicants interviewed and the successful applicants.

15.3 Information will be collected and monitored in the following categories:

- gender
- ethnic origin
- age
- disability

15.4 All information will be collected on a voluntary basis, anonymous and will remain confidential. It will be used only for the purpose of equality and diversity monitoring in relation to the activities of the Company. This is consistent with the terms of the Data Protection Act 1998.

15.5 In addition, the Company is keen to ensure that all agents, consultants and contractors employed are committed to operating under the same equality and

diversity principles. In this regard we insist that all firms practice an equality and diversity approach, consistent with that of the Company, across all areas of their business. Where a written undertaking is not provided in support of this, the Company will not enter into any agreement with the firm in question. This indirect monitoring of our agents, consultants and contractors will apply in all cases.

Frequency of Monitoring Reports

15.6 Because of the importance of Equality and Diversity to the Company, it is inevitable that continual reference will be made on an *ad hoc* basis. To ensure that this is accompanied by a more formal system of reporting, the following will be presented to the Board:

- | | |
|--|----------|
| • Housing list, lets made, applicants refusing offers and applicants being refused entry to the list | Annually |
| • General membership | Annually |
| • Board membership | Annually |
| • Contractors, consultants and agents | Annually |
| • Staff employed during year and overall staff complement | Annually |

16.0 IDENTIFYING PROBLEMS AND TAKING REMEDIAL ACTION

16.1 Because the Company is reviewing progress across all IMP operational targets on a quarterly basis, areas where there may be problems will be flagged up so that remedial action can be taken.

16.2 It is not possible to be prescriptive about how the Company should deal with such a situation in this policy statement as there are too many potential outcomes, all different from each other. The general process to be followed by staff is:

- Advise the Board of the underachievement
- Outline action already taken to achieve the objective
- Make suggestions for further action, in consultation with other housing organisations who may have solved similar problems

16.3 Realistically, there may be some targets that are difficult to achieve and this is something that the Company recognises. This does not mean, however, that we

will cease trying to achieve these. The Company will do all that is possible and reasonable to ensure that Equality and Diversity targets are met.

17.0 THE COMPANY'S OTHER RESPONSIBILITIES

17.1 Design Standards

The Company seeks to ensure that wherever possible that all developments are built to barrier free and agreed minimum standards. This will allow tenants to reduce their dependence on others; maximise their choice and provide equality of housing opportunity, irrespective of people's physical or support needs. Wherever possible, the Company will involve tenants and potential tenants in the design process and this will be used to adapt its Design Guide. The Company will seek to provide housing that is sensitive to the cultural, religious and health needs of its tenants.

17.2 Publicity Material

The company will seek to ensure that the language used in its publications is clear, easily understood and non-discriminatory. Where there is demand, it will produce published material in other languages and formats.

17.3 Membership

Every effort will be made to ensure that the Company's membership reflects the composition of the communities in which it operates. It will also be mindful of its commitment to Equality and Diversity in the composition and operation of its Board and steps will be taken to address any imbalances identified.

17.4 Right of Appeal

Any person involved in any way with the Company will have the right to appeal against any decision of the Company, which they feel to be unfair on the grounds of Equality and Diversity, by using the Company's published Complaints Policy. Complainants will also be advised of their right to complain to the Scottish Public Services Ombudsman, if still dissatisfied after exhausting the Company's own Complaints Process, as well as to seek independent advice/advocacy, or to complain to the Scottish Federation of Housing Associations, who has procedures for dealing with complaints against member organisations.

18.0 DISCRIMINATION AGAINST EMPLOYEES - INTERNAL

This procedure is complemented by Homes for Life Housing Partnership's Dignity at Work policy. For further details please refer to the policy.

Where an employee feels they have been discriminated against, victimised or harassed, there are different ways in which a claim can be dealt with depending on the circumstances. In the first instance the employee should raise the issue

informally with their line manager (unless the claim is against their manager, in such circumstances the employee should raise the issue with the manager next in line.)

18.1 Informal Stage

Initially the employee and manager should aim to resolve the matter informally as it may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted. This is often the most efficient way with dealing with such circumstances in order to maintain current working relations.

However, even though the matter has been treated informally a file note should be kept on the complaining employee's file of the incident and should include a statement that the note will only be taken into account if further complaints are made. The file note may be necessary if there is a requirement at a later date, should any unacceptable behaviour or practice continue.

Dealing with the matter informally does not remove the individual's right to have the matter dealt with formally if they believe that be the most appropriate next course of action, or at a later date, should any unacceptable behaviour or practice continue.

18.2 Formal Stage

If the employee is dissatisfied with the outcome, or the complaint is very serious, the employee should raise the matter, in writing detailing the complaint. The complaint should then be actioned under Homes for Life Housing Partnership's Grievance policy. In line with this process an investigation into the claim will be carried out. Employees who feel they are being subjected to harassment should raise the issue in line with Homes for Life Housing Partnership's Dignity at Work Policy.

If the outcome of the investigation is that a formal disciplinary hearing should take place this should be conducted in line with Homes for Life Housing Partnership's disciplinary procedures. Please refer to the policy for full details.

19.0 DISCRIMINATION INVOLVING MEMBERS OF THE PUBLIC, COMMITTEE MEMBERS, CONTRACTORS AND STAFF FROM OTHER AGENCIES

The right to be treated equally with dignity and respect applies to outside contractors, directors and other agencies whilst on business at or for the Company, as well as to the Company's tenants and other service users. They can complain using the Company's Complaints Policy and Procedures and the complaint will be investigated by Homes for Life Housing and appropriate action will be taken.

Employees also have a right to complain if they feel they are being discriminated against by those not directly employed by Homes for Life Housing Partnership.

If a staff member or colleague feels that they are being discriminated against in the course of their working day from any of the above, the following procedure should be adopted.

19.1 Informal Stage

Where possible, incidents should be dealt with informally. If the employee, member of the public, committee member, contractor or agency worker feels able to do so they should inform the bully or harasser if possible at the time, that they find their actions/remarks and behaviour to be unacceptable. If the situation warrants the need for a witness, individuals are advised to approach a colleague to accompany them when approaching the alleged bully or harasser. The matter should be reported as soon as possible to the line manager if a Company employee is the victim or to any manager at the Company should the victim be a member of the public, director, contractor, tenant or other service user of the Company, or agency worker from a member of staff at Homes for Life Housing Partnership. As with before it maybe that the discriminatory action is unconscious and easily resolved once the situation is highlighted. However, again a file note should be kept on the complaining employee's file of the details of the situation and the outcome.

Where the victim does not feel able to speak to the individual in person they can ask their line manager or where appropriate any Company manager to do so and it will be the responsibility of the manager to discuss the situation and explain what will happen if any further incidents occur. It will be made clear to the individual that continuation of conducting themselves in this way may be deemed to be refusing services altogether which could result in either the withdrawal of a service or refusal of access to Homes for Life Housing Partnership premises. Where the situation involves an employee of Homes for Life Housing Partnership being the bully/harasser then this could lead to disciplinary action. Any action will be carried out in line with Homes for Life Housing Partnership's Disciplinary and Grievance policy. Regardless of future action a file note will be kept in any complaining employee, director tenant or other service users file providing details of the incident and the action taken where applicable.

If informal action proves insufficient to deal with persistent inappropriate behaviour, the employee, director, tenant or other service user or management may instigate formal action.

19.2 Formal Stage

Where formal action is the most appropriate way to deal with the person in question, they will be written to officially by the relevant senior manager informing them that their comments, actions, and behaviour is not acceptable and potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in the withdrawal of services. In the situation of

an employee of Homes for Life Housing Partnership acting inappropriately towards a member of the public, director, contractor or agency worker, then they will be investigated under Homes for Life Housing Partnership disciplinary procedures, where disciplinary action may be an outcome including dismissal. In cases of physical violence or serious threats the senior manager should also involve the police if appropriate.

In cases where the discrimination involves contractors or staff from other agencies the stages as detailed above will be carried out. However, due to the specific nature of the relationship between the organisation and these individuals/organisations, the following additional step should be included in the informal stage.

The Business Manager will contact the appropriate senior person within the company/organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned may be refused entry to organisation premises.

20.0 MONITORING AND REVIEW OF POLICY

Responsibility for monitoring the application of this policy will rest with the Business Manager at Homes for Life Housing Partnership.

The policy will be monitored for compliance annually with any amendments being made as appropriate, and fully impact assessed every five years.

21.0 CONCLUSION

Equality and Diversity is a natural and integral part of good housing management and employment practice, aimed at developing services to the fullest extent possible in the interests of the Company, its employees, directors, tenants, and other service users. The Company's ultimate aim is to ensure that it can demonstrate equality and diversity in all areas of its business.