

Equal Opportunities Policy & Procedure

1. Introduction

- 1.1 Solon Wandsworth Housing Association (Solon) recognises that individuals and groups of people have been, and continue to be, discriminated against on the basis of race, colour, ethnicity, sex, class, creed, marital status, disability, caring responsibilities, medical status, sexual orientation, age and religious belief.
- 1.2 In aiming to achieve equality of opportunity Solon will introduce positive measures to combat all forms of discrimination and inequality as a service provider and as an employer. Solon will ensure that all services will be offered with the aim of eliminating disadvantage and promoting equality of opportunity.
- 1.3 The purpose of this policy is to ensure that any persons associated with Solon do not receive less favourable treatment than any others on the grounds set out in paragraph 1.1 or are disadvantaged by conditions or requirements which cannot be shown to be justifiable.
- 1.4 In following these principles the requirements of the Race Relations Act 1976 and the Sex Discrimination Act 1975 and the Disability Discrimination Act 1995 will be fulfilled.

2.1 Responsibility

- 2.1.1 The Association's Management Committee has overall responsibility for ensuring the implementation of and compliance with the policy & procedure.
- 2.1.2 It is the responsibility of each worker to actively promote equal opportunities and to eliminate discrimination and inequality. The Equal Opportunities Working Party will ensure the full implementation of this policy by introducing specific initiatives.
- 2.1.3 Each worker is expected to follow both the letter and spirit of equal opportunities legislation and of this policy at all times.
- 2.1.4 Solon will not tolerate discrimination, victimisation, bullying or harassment of or by any worker or tenant.

2.2 Terms of Reference

- 2.2.1 The Equal Opportunities Working Party will be responsible for recommending policy amendments and for the implementation and monitoring of equality of

opportunity. All policy amendments will be referred to the Workers Meeting for agreement with the Management Committee prior to implementation. (See Appendix I for complete Terms of Reference)

2.3 Definitions

2.3.1 *Direct Discrimination*

This results from treating someone or a group of people less favourably than others in similar circumstances, for example, refusing to house someone just because they are black or deaf.

2.3.2 *Indirect Discrimination*

This is where applying a requirement, procedure or condition which, although applied equally to people of all groups, means that a considerably smaller proportion of a particular group can comply with it and it cannot be shown to be justifiable. An example would be requiring unnecessary educational qualifications in preference to experience.

2.3.3 *Discrimination by Victimisation*

This occurs when an individual is disciplined, dismissed or given less favourable treatment than others in the same circumstances because it is suspected or known that s/he has brought legal proceedings against an employer or given evidence or information relating to discrimination, or alleged (expressly or otherwise) that discrimination has occurred.

2.3.4 *Harassment and Bullying*

This occurs in a variety of ways and may be directed at an individual or group of individuals where they are treated in a detrimental way on improper grounds. It is not the intention of the perpetrator but the deed itself and the impact on the recipient which determines what constitutes harassment. This can include unwelcome physical, verbal or non-verbal conduct e.g. unwanted conduct of a sexual nature, or other conduct based on sex, affecting the dignity of women and men at work.

3. Services

3.1 Solon will establish close links with community organisations for disadvantaged groups where they are under represented in the organisation so that the needs of these groups can be more readily identified. Solon will actively assist these groups to benefit from its services.

3.2 **Accommodation**

- 3.2.1 Solon endeavours to ensure equal access to housing services to all sectors of the community. It aims to encourage access from traditionally disadvantaged groups. All services offered will take account of individual needs, background and cultures.
- 3.2.2 The Housing Management Section will undertake regular reviews of selection and allocation procedures which will be reported to the Tenant Services Sub-Committee.

3.3 **Other Services Provided**

- 3.3.1 All other services will aim to encourage users from traditionally disadvantaged or under represented groups. All services offered will take account of individual needs, backgrounds and cultures. The needs of minority groups will be taken account of in service provision as far as is practical.
- 3.3.2 In relation to development, Solon will consider access for people with disabilities whenever new developments are proposed. All forms of disability should be considered at the planning stage.

4. **Employment**

4.1.1 *Recruitment*

When a post becomes vacant or a new post is created, a job description will be devised covering the range of duties that the job entails. If a job description already exists, then this will be reviewed. From this, a person specification will be drawn up detailing the experience and/or qualifications required.

It is important that the job description and the person specification are not overstated and are limited to essential requirements. The possibility of job share and flexible working should always be considered. In addition equal consideration will be given to those considered to have disabilities in accordance with the Disability Discrimination Act 1995.

4.1.2 *Advertising and Targeting*

Where those groups set out in Para. 1.1 are under represented as employees as a whole in the field or the scale of the vacancy, then those groups will be targeted by advertising the vacancy in places/media accessed by those groups. All advertisements will include the following statements:

“Solon is committed to being an equal opportunities organisation. We welcome applicants from all sectors of the community”.

4.1.3. *Shortlisting and Selection*

All shortlisted candidates should be tested for commitment to an understanding of equal opportunities. Everyone involved in the selection process must have received training in Equal Opportunities.

4.1.4 *Acceptance of Terms and Condition of Employment*

A clause will be inserted into contracts of employment asserting Solon’s position in relation to Equal Opportunities. All new workers will be issued with a copy of the policy.

4.2 *Training*

4.2.1 To assist in the implementation of Solon’s Equal Opportunities Policy an equal opportunities training programme will be developed. The aim of this training is to ensure that all workers and Committee members are aware of the organisation’s Equal Opportunities Policy and have adequate guidance in carry it out.

4.2.2 Regular analysis of training undertaken will be made and a report on the implementation of the training aspects of Solon’s Equal Opportunities Policy & Procedure will be prepared regularly by the Personnel Worker for the Equal Opportunities Working Party.

4.3 *Appraisal and Development*

The Workers’ Meeting will ensure that workers are appraised at least once a year. This must be conducted fairly and based only on objective performance indicators

4.4 *Family and Special Leave*

Solon recognises that at various stages in a worker’s life, domestic and family commitments and responsibilities may affect their ability to fulfil employment responsibilities. Solon also recognises that such responsibilities may affect all workers equally. In order to help reduce the loss of skilled and experienced workers, Solon acknowledges these potential issues and offers assistance through its time off-special leave provisions.

4.5 *Disability*

4.5.1 All applicants will be provided with access details on request.

- 4.5.2 Solon will, wherever possible, provide re-training and/or redeployment for workers who experience changes in their abilities after commencing employing, in accordance with the Disability_Discrimination Act 1995.
- 4.5.3 Solon will examine ways of providing support for employees with disabilities, for example, providing a supportive co-worker for a settling in period and carrying out suitable adaptations to the premises.
- 4.5.4 Solon will examine ways of targeting and identifying specific jobs for people with disabilities.

5. Consultants, Contractors & Agents

- 5.1 Solon is committed to working with other organisations, in particular those within the registered social landlord movement, to ensure fairness and consistency in the application of equal opportunities in regard to dealing with agents, contractors, consultants, and suppliers.
- 5.2 Solon has an internally approved monitoring system and entry onto the approved list of contractors is subject to compliance with standards set down in this procedure.

6. Harassment, Grievance and Disciplinary Policies & Procedures

6.1 Harassment

Solon is determined to provide a safe environment for all tenants and workers. Solon will not tolerate discrimination, harassment or victimisation of or by any worker or tenants, See paragraphs 2.3.4. for definitions. (See Appendix II for Harassment Policy and Procedure)

6.2 Grievance and Disciplinary Policies & Procedures

It is essential for grievance and disciplinary policies and procedures to be implemented fairly and equitably across the organisation to ensure consistency of approach. For full details see the Grievance and Disciplinary Policies & Procedures.

7. Monitoring

- 7.1 Solon will monitor all clients and workers on criteria set out in paragraph 1.1. All data will be analysed.
- 7.2 The Equal Opportunities Working Party will review data collected for an annual report to the Management Committee.

7.3 All monitoring information will be kept separately from other data and will be treated confidentially.

8. Miscellaneous

8.1 *Cultural and Religious Needs*

Where workers have particular cultural or religious needs which may conflict with existing work requirements, Solon will consider whether it is reasonably practicable to vary or adapt these requirements to enable such needs to be met.

8.2 *Translation and Interpretation*

Solon will consider providing interpretation and translation facilities where reasonably practicable.

8.3 *Resources*

8.3.1 Solon's commitment to the success of its Equal Opportunities Policy & Procedure is unqualified, and priority will be given to making the necessary and appropriate resources available within the constraints of the budget in order to achieve the full and effective implementation of the policy.

8.3.2 Reading resources are available for loan from the Personnel Worker.

Harassment Policy and Procedure

1. Policy Statement and Definition

- 1.1 Solon recognises that individuals and groups of people have been, and continue to be, discriminated against on the basis of race, colour, ethnicity, sex, marital status, disability, caring responsibilities, medical status, sexual orientation, age and religious belief.
- 1.2 *Solon will not tolerate discrimination, harassment or victimisation of or by any worker or tenant.*
- 1.3 Harassment and bullying occurs on a variety of grounds and may be directed at an individual or group of individuals where they are treated in a detrimental way. In general terms, harassment can be described as unwanted behaviour which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. It is essential to remember that it is not the intention of the perpetrator that is the key in deciding whether harassment has occurred but whether the behaviour is unacceptable by normal standards and disadvantageous.
- 1.4 Harassment and bullying can range from extremes such as violence, to less obvious forms like ignoring someone. Whatever the form, it will be unwanted behaviour which is unwelcome and unpleasant. Forms may include:
 - unwelcome physical contact
 - jokes, offensive language, gossip, slander, sectarian songs and letters
 - posters, graffiti, obscene gestures, flags, bunting, and emblems
 - isolation or non-cooperation and exclusion from social activities
 - coercion for sexual favours and pressure to participate in political/religious groups
 - intrusion by pestering, spying and stalking
- 1.5 Frontline workers may be particularly vulnerable to harassment, due to the nature of their work. All incidents should be recorded in the Incident Book. Minor incidents may not warrant action being taken, but continual minor incidents could build up to a situation which may constitute harassment and it is important that accurate records are kept.
- 1.6 Cases of harassment will be treated by a victim-centred approach which allows for the necessary support and protection to be given to the victim(s) of harassment and enables the necessary action to be taken against the perpetrator(s) where known.

1.7 Where the perpetrator is not known, Solon will take every reasonable step to try to find out who was involved in harassing the victim.

2 Procedure for reporting incidents of harassment

2.1 Tenant victims should contact any Housing Manager. A worker who is a victim of harassment should contact the Personnel Worker or the Association Secretary. The victim should do this as soon as possible.

2.2 All reports of an incident of harassment should be recorded on the "Initial Report of an Incident" form by a Housing Manager, the Personnel Worker or the Association Secretary, as appropriate.

2.3 Complaints received will be quickly and fully investigated. A timetable will be agreed with the victim.

2.4 All complaints will be treated as confidential. Victims will be encouraged to work with Solon to find the right solution to the problem. No action will be taken without proper consultation with the person or group being harassed.

2.5 Help and support will be offered by Solon to victims of harassment. Solon will liaise, as appropriate, with the police, trade union representatives, community groups and other organisations on behalf of and in conjunction with the victim.

2.6 Any damage to Solon property resulting from harassment will be treated as a priority repair. Graffiti will be removed immediately.

2.7 Firm action will be taken against those involved in harassment. Action will depend on the seriousness of the incident, ranging from written warnings to legal action for possession of the home of a tenant found responsible for harassment. The tenancy agreements clearly state that tenants are responsible for the actions of all members of their households and any visitors to their home.

2.8 Where the victim of harassment requests a transfer, the aim will be to offer alternative accommodation as soon as possible. Transfer of a victim will not reduce the determination of Solon to take action against those responsible for the harassment.