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<b>Policy Name</b>	<b>Equality Policy, Strategy and Action Plan</b>
<b>Policy Author</b>	<b>Assistant Director (Tenancy Services)</b>
<b>Approved by Sub Committee</b>	<b>N/A</b>
<b>Approved by Management Committee</b>	<b>January 2022</b>
<b>Latest date of Next Review</b>	<b>January 2025</b>

West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.

**Registered with the Scottish Housing Regulator No. 203**  
**Registered Charity No. SCO38737, VAT Registration No. 180223636**  
**Registered society under the Co-operative and Community Benefit Societies Act 2014**



**HAPPY TO TRANSLATE**

## 1. Introduction

- 1.1 West Whitlawburn Housing Co-operative has established various governance policies to promote strategic objectives. The equality policy is concerned with promoting cultural values that promote social justice. Our policy sets out the principles through which we will meet our commitments in practice and is intended to eliminate unlawful and unfair forms of discrimination; and to promote equality objectives.
- 1.2 The policy aims to incorporate equality issues throughout all of our housing services through the organisational equality strategy and action plan which puts in place a process for ensuring that equality objectives are incorporated into work practices in a structured and comprehensive manner.

## 2. Law and Regulatory Framework

### 2.1 The Statutory Framework

#### 2.1.1 The Equality Act 2010

The Equality Act 2010 addresses a diverse range of equality matters, including the rights of individuals and the duties of employers and introduced nine protected characteristics and makes it unlawful to discriminate against people with a protected characteristic:

Age	Where this is referred to, it refers to a person belonging to a particular age (for example 32 year-olds) or range of ages (for example 18 to 30 year olds)
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities
Sex	This refers to whether a person is a man or a woman
Gender reassignment	This is the process of transitioning from one gender to another
Race	This refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as atheism). Generally, a belief

	should affect your life choices or the way you live for it to be included in the definition
Sexual orientation	This is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Source: Equality and Human Rights Commission

Under the Act people are not allowed to discriminate, harass or victimise another person because they have any of the protected characteristics. There is also protection against discrimination where someone is perceived to have one of the protected characteristics or where they are associated with someone who has a protected characteristic.

- Discrimination means treating one person worse than another because of a protected characteristic (known as direct discrimination)
- Putting in place a rule or policy or way of doing things that has a worse impact on someone with a protected characteristic than someone without one, when this cannot be objectively justified (known as indirect discrimination).
- Harassment includes unwanted conduct related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment for someone with a protected characteristic.
- Victimisation is treating someone unfavourably because they have taken (or might be taking) action under the Equality Act or supporting somebody who is doing so.

#### Public Sector Equality Duty

The general equality duty is set out in the Equality Act 2010 and requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not

- Foster good relations between people who share a protected characteristic and those who do not

The purpose of the specific duties in Scotland is to help in the performance of the general equality duty and requires

- where and to the extent required to fulfil the general equality duty, assess the impact of applying a proposed new or revised policy or practice against the needs of the general equality duty;
- in making the assessment, consider relevant evidence relating to persons who share a protected characteristic (including any evidence received from those persons);
- in developing a policy or practice, take account of the results of any assessment in respect of that policy or practice;
- publish, within a reasonable period, the results of any assessment where it decides to apply the policy or practice in question;
- make arrangements to review and where necessary revise any policy or practice that it applies in the exercise of its functions.

Although we are not defined as a public authority by the legislation, we must meet this duty when we carry out public functions such as the allocation of housing and estate management.

## 2.1.2 The Scotland Act 1998

The Scotland Act 1998 Schedule 5, L2 defines equal opportunities: “Equal opportunities” means the prevention, elimination or regulation of discrimination between persons on the grounds of sex or marital status, or racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions such as religious beliefs or political opinions”

## 2.1.3 Housing (Scotland) Act 2010

The Housing (Scotland) Act 2010 requires every social landlord to “act in a manner to encourage equal opportunities.”

## 2.2. The Regulatory Framework

### 2.2.1 The Scottish Social Housing Charter

Charter Outcome 1 Equalities states:

Social landlords perform all aspects of their housing services so that:

- every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation. It includes landlords' responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.

## 2.2.2 Regulatory Standards

Standard 5: The RSL conducts its affairs with honesty and integrity.

Guidance 5.3 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.

The Scottish Housing Regulator (SHR) regulatory requirements are that every social landlord must

- Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.
- To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, applicants on waiting lists, governing body members and staff.

The implications of the regulatory requirements for RSL's are that:

- The collection of data is a specific requirement, applying to all protected characteristics
- Social landlords' equality data collection forms must cover all the protected characteristics for the groups specified by the SHR
- This requirement does not refer to job applicants, however social landlords must also gather personal data about job applicants,

including data about an applicant's protected characteristics, and must process this in line with data protection law

- Social landlords must adhere to the statutory guidance unless exceptional circumstances exist.

### **3. Policy Principles**

The Co-operative is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equal opportunity for all and is committed to combatting discrimination either directly or indirectly.

The Co-operative acknowledges that equality is not always about treating people the same way but recognising that people's needs may sometimes be met in different ways.

### **4. Policy Aims**

The aims of this policy is to provide a clear commitment to ensuring that equality and diversity is central to the service we provide.

- Meeting all relevant equality law and guidance
- using an equality strategy and action plan to deliver our equality commitments in practice
- collecting equality data to provide appropriate services to all tenants, applicants and employees
- Encouraging our partners, contractors and suppliers to promote equality, respect diversity and prevent discrimination
- Providing accurate and clear information to all employees, management committee, tenants and other customers
- Providing equality training appropriate to the roles of employees and Committee
- Consulting with tenants on our equality and diversity policy principles through our tenant participation strategy
- Monitoring how effectively we are meeting our equality objectives through our performance monitoring system
- Developing positive action to promote access to housing, services and employment services in line with law and guidance

### **5. Policy Implementation**

We implement our equality policy through our equality strategy and action plan.

The strategy and plan are a process to implement equality principles throughout all organisational services. The action plan details lead

officers responsible for carrying out particular equality activities; and time scales are set to do these activities.

- 5.1 The responsibility for compliance with this Policy ultimately lies with the Management Committee.
- 5.2 The Director is responsible for ensuring Equality and Diversity forms part of the strategic planning of the organisation and for ensuring the service delivery policies and procedures have equality and diversity issues included in them.
- 5.3 This policy applies to everyone in WWHC and all have a responsibility to be alert to discriminatory behaviours and practices when they occur. Unacceptable behaviour and practices will be dealt with immediately, as inaction is not an option.

## **6. Policy Monitoring**

- 6.1 We gather the equality data required to show we are meeting the Scottish Social Housing Charter and its related technical guidance and report this through the Annual Return on the Charter (ARC).
- 6.2 WWHC will gather equality information about its customers on an ongoing basis:
  - As part of the housing application and review process.
  - For all new tenants
  - Through customer feedback surveys
  - Annually for Committee and Staff as part of the compilation of the ARC
- 6.3 We gather equality data for practical purposes only and wholly in line with the Data Protection Act 1998. Respondents to any monitoring form have the ways in which the data will be used explained to them.
- 6.4 We gather feedback on the quality of our services so that we are meeting our equality policy principles. For example, we assess the public documentation that we produce such as newsletters so that it is accurate, in plain language, or in a range of formats. This also covers the quality of advice that we provide to tenants and other customers.
- 6.5 We use equality performance indicators within our policies, as appropriate such as monitoring lets to housing applicants taking account of the specific protected characteristics.

## **7. Complaints Handling Procedure**

WWHC uses the complaint handling procedure developed by the Scottish Public Services Ombudsman. We provide all tenants with information about our complaint procedure when they become tenants. It is also published on our website and all service users are advised about their right to complain when required.

## **8. Policy Review**

The Co-operative will review this policy every 3 years or earlier if there are changes in legislation, regulations or guidance.



# West Whitlawburn Housing Co-operative

## Equality Strategy

### 1. Introduction

WWHC's Equality Strategy outlines our commitments, objectives and vision for fully embedding an equal and diverse culture within the Co-operative.

Equality and Diversity is the responsibility of everyone in the Co-operative. This belief informs and shapes the WWHC's Business Plan, the values that are upheld, the decisions that are made and the actions that are taken.

WWHC will ensure that equality and diversity is promoted and that everyone involved with the Co-operative has an equal opportunity to participate. Our vision is that the best practice principles of equality and diversity are fully embedded in all areas of work that is undertaken by, and on behalf of the Co-operative.

This strategy outlines our commitment to promote equality of opportunity, eliminate discrimination and harassment and to foster good relationships as an organisation and service provider. It compliments and links to a number of relevant policies, procedures and documents including the Business Plan, Equality Policy, Tenant Participation Strategy, Communication Strategy, and all staffing policies.

### 2. Equality Strategy

In addition to the Equality Policy, the Equality Strategy includes the:

- Equality Data Collection procedure (**Appendix 1**)  
Having good information about individuals' needs, including equality information, is essential to enable us to ensure those needs can be addressed.  
The procedure explains why we gather equality data, how we gather data and what we do with that data. This is closely linked to our Privacy Policy as the collection and usage of equality data must comply with the requirements of data protection law, and equality data must be processed in line with data protection legal requirements.
- Communications Strategy  
This strategy applies a wide a range of standards to assess the quality of our public information, as well as our IT systems. These standards cover issues such as accuracy, design and plain language. We will consult with staff and service users, taking

account of their individual requirements when providing services, to ensure that we make reasonable adjustments where possible.

- **Tenant Participation Strategy**  
The Tenant Participation Policy and engagement strategy details the Co-operative's commitment to keeping tenants informed about all aspects of our work and providing opportunities for tenants to participate and influence decisions on the way in which services are delivered while removing barriers to participation.
- **Estate Management Policy**  
This policy includes information on what actions we will take to address harassment, for example, harassment relating to one of the relevant protected characteristics
- **Dignity at Work Policy**  
This policy aims to ensure that all employees, governing body members, agency workers, contractors, and consultants are treated with respect and dignity by each other and members of the public and that they in turn respect the differences within the community they serve and treat customers and members of the public accordingly. WWHC will provide a working environment where all backgrounds, cultures, values and lifestyles are respected and treated with dignity at all times.
- **Equality Impact Assessment Process (Appendix 2)**  
WWHC aims to assess the impact of applying a proposed new or revised policy or practice against the needs of the general equality duty.
- **Inclusive language procedural guide.**  
This guide describes language that should be used to show respect to other people including language promoted in good practice guidance.
- **Equality Action Plan (Appendix 3)**  
The action plan details practical measures and ongoing actions.

Each of these link together to form the strategy.

The Scottish Social Housing Charter, Standard 1 sets out a clear link between customer care and the equality strategy: "...every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services." Having good information about individuals' needs, including equality information, is essential to enable social landlords to ensure those needs can be addressed.

### Equality Data Collection Procedure

Having good information about individuals' needs, including equality information, is essential to enable us to ensure those needs can be addressed.

Equality data collection is part of our equality strategy and in developing our approach to the collection of equality data, we are aware of equality law and data protection law.

WWHC collects equality data to meet our obligations in respect of law and regulatory requirements. We use equality information for a range of purposes, including to help us to:

- protect and promote our customers rights and interests;
- promote equality objectives across our services;
- identify and address our customers' needs, and improve our services;
- identify and eliminate discrimination.
- assess the impact of activities, policies and practices in promoting equality objectives, including through equality impact assessments
- better understand the profiles of committee, staff, tenants, and customers;
- identify patterns that may indicate potential discrimination resulting from policies or process to enable action to be taken to address these;
- report to a committee on each of the above
- inform research projects and programmes.

We encourage people to provide as much information as possible but understand that we can only receive information that people want to give us.

We process equality information strictly in line with data protection law, including by:

- processing equality data confidentially;
- restricting access only to relevant staff members;
- retaining equality information only as long as necessary;
- sharing data only as lawfully permitted; and
- destroying data securely.

We gather equality information from:

- people who apply for a home;
- tenants;
- people who apply for a job with us;
- our employees;
- committee members

In gathering equality data we will follow the National guidance for Scottish Social Landlords on Collecting Equality Information August 2021 produced by Scottish Federation of Housing Associations, Glasgow and West of Scotland Forum of Housing Associations, Association of Local Authority Chief Housing Officers and the Scottish Housing Regulator and will use the model equality monitoring form below.

## **WWHC Equality Monitoring Form**

### **Information for those completing the form**

#### **Why are we asking for equality information?**

We collect equality information to help us to plan and deliver effective services and to meet our legal and regulatory obligations.

#### **What do we do with equality information?**

We use equality information for a range of purposes, including to help us to:

- protect and promote your rights and interests;
- promote equality objectives across our services;
- identify and address our customers' needs, and improve our services; and
- identify and eliminate any form of discrimination.

#### **Do you need to answer every question?**

By answering as many questions as possible you will help us meet your needs better, but we provide options throughout this form to allow you to provide only the information you want to give us. You can complete some questions and not others or you can complete parts of questions. The form has space for you to tell us more about your needs if you want.

We may ask for some information in other forms where this is required by law. For example, where we need to know your age if you are applying for a home as only those over 16 years old can be registered on our housing list.

#### **How do we process your equality information?**

We process equality information strictly in line with data protection law, including by:

- processing your equality data confidentially;
- restricting access only to relevant staff members;
- retaining equality information only as long as necessary;
- sharing data only as lawfully permitted; and
- destroying data securely.

#### **Who do we gather equality information about?**

We gather equality information from:

- people who apply for a home;
- tenants;
- people who apply for a job with us;
- our employees; and
- committee members

**Other formats:** We can provide this document in alternative languages and formats, and more information to help you to complete the form is available by contacting us by phone, email or on our website.

## Name

<b>Name:</b>	
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## Age

Note: We may request a specific date of birth in certain forms when this is required in law. For example, we need to know the age of housing applicants as a person can only be registered on our housing list/register if the person is 16 years of age.

<b>What is your date of birth?</b> (DD/MM/YYYY)	
Prefer not to say	

### **Alternative format:**

<b>Please tick the band for your age:</b>	16–24		25–34	
	35–44		45–54	
	55–65		65+	
Prefer not to say				

## Belief or religion

Please tick the box which best describes your belief or religion from the list below?

Buddhism:					
Christianity					
Catholic:		Protestant:		Other:	
Hinduism:					
Islam:					
Judaism:					
Sikhism:					
Other religion (please state what this is):					
No specific belief in religion (for example, atheism or agnosticism):					
Other belief (for example, humanism):					
Prefer not to say					

Please use the space below to tell us about any particular requirements relating to your beliefs or religion:

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Please tick here if you want to discuss this matter in confidence:	<input type="checkbox"/>
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**Disability**

Are you a disabled person?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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If yes, please tick the box which category you would use from the following list:

Autoimmune: (for example, multiple sclerosis, HIV, Crohn’s/ulcerative colitis)	<input type="checkbox"/>
Learning difficulties: (for example, Down’s Syndrome)	<input type="checkbox"/>
Mental health issue: (for example, depression, bi-polar)	<input type="checkbox"/>
Neuro-divergent condition: (for example, autistic spectrum, Dyslexia, dyspraxia)	<input type="checkbox"/>
Physical impairment: (for example, wheelchair-user, cerebral palsy)	<input type="checkbox"/>
Sensory impairment – hearing impairment	<input type="checkbox"/>
Sensory impairment – visual impairment	<input type="checkbox"/>
Other: If none of the categories above apply to you, please specify the nature of your impairment.	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

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Please tick here if you want to discuss this matter in confidence:	<input type="checkbox"/>
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## Ethnicity

Please tick the box that best describes your particular ethnic group:

### African

African, African Scottish or African British:	<input type="checkbox"/>
Other African background (please specify):	<input type="checkbox"/>

### Asian, Scottish Asian or British

Bangladeshi, Bangladeshi Scottish or Bangladeshi British:	<input type="checkbox"/>
Indian, Indian Scottish or Indian British:	<input type="checkbox"/>
Pakistani, Pakistani Scottish or Pakistani British:	<input type="checkbox"/>
Chinese, Chinese Scottish or Chinese British:	<input type="checkbox"/>
Other Asian background (please specify):	<input type="checkbox"/>

### Black or Caribbean

Caribbean, Caribbean Scottish or Caribbean British	<input type="checkbox"/>
Black, Black Scottish or Black British	<input type="checkbox"/>
Other Caribbean or Black background (please specify)	<input type="checkbox"/>

### Mixed groups

Mixed or multiple ethnic group (please specify)	<input type="checkbox"/>
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### White

English	<input type="checkbox"/>
Gypsy Traveller	<input type="checkbox"/>
Irish	<input type="checkbox"/>
Polish	<input type="checkbox"/>
Roma	<input type="checkbox"/>
Scottish	<input type="checkbox"/>
Welsh	<input type="checkbox"/>
Other British	<input type="checkbox"/>
Other group (please specify your ethnic group)	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

### Marriage and civil partnership

Are you presently in a civil partnership?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Are you presently married?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say				<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

### Pregnancy and maternity

Are you pregnant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you taken maternity or paternity leave in the past year?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say				<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

### Sex

What is your sex?	Female	<input type="checkbox"/>	Male	<input type="checkbox"/>	Intersex	<input type="checkbox"/>
Prefer not to say						<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

### **Gender re-assignment (trans/transgender)**

Do you consider yourself to be a trans person?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>			

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

### **Sexual orientation**

#### **What is your sexual orientation?**

Bisexual	<input type="checkbox"/>
Gay man	<input type="checkbox"/>
Heterosexual/straight	<input type="checkbox"/>
Lesbian/ gay woman	<input type="checkbox"/>
Other	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Please use the space below to advise us if you have any particular requirements:

Please tick here if you want to discuss this matter in confidence:

## General

Please mark this box if there are any issues that you want to discuss with us in confidence

## Consent

Data processing is necessary to comply with any legal obligations to which WWHC as the data controller is subject including regulatory functions.

The processing of special categories of personal data is given greater protection under data protection law than ordinary personal data.

Special categories data includes data relating to a person's:

- health;
- political opinions;
- racial or ethnic origin;
- religious or philosophical beliefs;
- sex life;
- sexual orientation; or
- trade union membership.

I consent to West Whitlawburn Housing Co-operative holding and processing the above data to help provide an appropriate service. This service involves using equality data to ensure that services address any form of discrimination, promote equality objectives and address my needs.

Note: If data processing is based on your consent, then you can withdraw consent at any time by telling us.

<b>Signature:</b>	
<b>Date:</b>	

## **Equality Impact Assessment Process Appendix 2**

### **1. Background**

WWHC aims to assess the impact of applying a proposed new or revised policy or practice against the needs of the general equality duty.

The general equality duty is set out in the Equality Act and requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

The purpose of the specific duties in Scotland is to help in the performance of the general equality duty and requires

- where and to the extent required to fulfil the general equality duty, assess the impact of applying a proposed new or revised policy or practice against the needs of the general equality duty;
- in making the assessment, consider relevant evidence relating to persons who share a protected characteristic (including any evidence received from those persons);
- in developing a policy or practice, take account of the results of any assessment in respect of that policy or practice;
- publish, within a reasonable period, the results of any assessment where it decides to apply the policy or practice in question;
- make arrangements to review and where necessary revise any policy or practice that it applies in the exercise of its functions.

### **2. Assessment Process**

The assessment process will be focused on understanding the effects of a policy or practice in relation to the three needs of the general duty, and taking any necessary action as a result.

#### **2.1 Scoping the assessment**

When proposing to develop a new policy, or revise an existing policy, equality will be considered at the earliest possible opportunity. This will begin with a clear understanding of the policy being developed or reviewed including the purpose of

the policy; the context within which it will operate; who it is intended to benefit, and the results aimed for.

## 2.2 Equality Groups

The assessment should consider the impact of the policy for each of the protected characteristics. If it is decided that assessment is not relevant to some groups, this should be recorded and explained.

## 2.3 Consultation

Information from consultation activity may be useful in developing policy.

## 2.4 Existing information

It is important to have as much up-to-date and reliable information as possible about the needs and experiences of the different groups the policy is likely to affect.

General information to draw on includes demographic information, service-level monitoring data, and recommendations from audit and inspection reports.

This may need to be supplemented for the specific policy under consideration. Where it is not possible to gather new information in time to inform the assessment, actions will be included in the plans to monitor and review the policy.

## 2.5 Impact Assessment

Staff carrying out the policy review or development will make a judgement at each stage of the process as to what the likely effect will be and consider whether changes are needed.

Consideration will be given to whether the policy:

- may result in less favourable treatment for particular groups;
- may give rise to indirect discrimination;
- may give rise to unlawful harassment or victimisation;
- may lead to discrimination arising from disability;
- builds in reasonable adjustments where these may be needed.
- removes or minimises disadvantage;
- meets the needs of different groups;
- encourages increased participation of particular groups;
- takes account of disabled people's impairments.

## 3. Addressing Issues

3.1 No major change – if the assessment demonstrates that the policy is robust and shows no potential for unlawful discrimination

3.2 Adjust the policy by taking steps to remove any barriers to better advance equality or to foster good relations. It may be possible to

remove or change the aspect of the policy that creates any negative or unwanted impact or introduce additional measures to reduce or mitigate any potential negative impact.

- 3.3 Continue the policy despite the potential for adverse impact. The justifications for doing this will be clearly set out along with how the decision is compatible with obligations and objectively justified.
- 3.4 Stop and remove the policy – if there are adverse effects that are not justified and cannot be mitigated. If a policy leads to unlawful discrimination it should be removed or changed.

#### **4. Publication**

The process of assessments will be recorded and published within a reasonable period to contribute to transparency and accountability.

The equality impact assessment tool is appended.

**West Whitlawburn Housing Co-operative  
Equality Impact Assessment**

<b>Name of Policy to be assessed</b>		<b>New policy or revision of existing?</b>	
<b>Person(s) responsible for assessment</b>			
<b>Briefly describe the aims, objectives and purpose of the policy.</b>			
<b>Who is intended to benefit from the policy? (EG applicants, tenants, staff, contractors)</b>			
<b>What outcomes are wanted from this policy? (EG the measurable changes or benefits to members/ tenants / staff)</b>			
<b>Which groups could be affected by the policy? (note all that apply)</b>			
<b>Race</b>		<b>Gender</b>	
<b>Sexual orientation</b>		<b>Gender reassignment</b>	
<b>Age</b>		<b>Religion or belief</b>	
<b>Marital status</b>		<b>Disability</b>	
<b>Pregnant and Maternity</b>			
<b>If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</b>			
<b>Have those affected by the policy / decision been involved?</b>			



<b>Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>	<b>Positive Impact(s)</b>	<b>Negative Impact(s)</b>
<b>What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b>		

Signed: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Please attach to the policy report

## Equality Action Plan

## Appendix 3

The equality action plan has been developed based on operational and strategic need and incorporates recommended action from the Internal Audit on Equalities and Human Rights which was carried out during October 2021.

Purpose: to promote equality and diversity throughout the Co-operative, combating discrimination, and ensuring that no person or group is treated unfavourably on the grounds of race, gender, disability, nationality, religion, belief, sexual orientation, and age.

Action	Responsibility	Target Completion
<b>Governance</b>		
Equality Policy review with impact assessment	Assistant Director (TS)	Jan 2022
Equalities Strategy and Action Plan	Director	Jan 2022
Policies and procedures reflect the positive principles of inclusion, accessibility and diversity by carrying out equality impact assessments	Senior Staff	Policy Review Schedule
Inclusion of Equality and Diversity Clauses within all policies	Director	Nov 2022 Complete
Inclusion of Equalities as a Standing Agenda Item for Management Committee Meetings	Director	Nov 2022 Complete
Annual sign off of Committee and Staff code of conduct	Director	2021/22 Complete
<b>Communications</b>		
Key documents available in alternative formats such as audio, easy read, large print and if appropriate, braille as required	Assistant Director (TS)	Ongoing
Develop accessible website with browse aloud and translation services	Assistant Director (CS)	Mar 2022
Update the Guide to Information and publications on the website	Assistant Director (CS)	Mar 2022
Translation and interpretation services are provided as required	Assistant Director (TS)	Ongoing
Maintain membership of Happy to Translate with refresher training as required	Assistant Director (TS)	Annually
Appropriate written information for hearing impaired	Assistant Director (TS)	Ongoing
Access to sign language interpreters as required	Assistant Director (TS)	Ongoing

Ensure all staff are aware of and have access to Interpreter services, either in person or via phone link	Assistant Director (TS)	Ongoing
Provision of induction loop system	Assistant Director (CS)	Ongoing
Develop accessible communication guide	Director	Feb 2022
Develop an inclusive language procedural guide to support the use of non-discriminatory language	Director	Feb 2022
Establish a combined participation and communications working party	Deputy Director	Mar 2022
<b>Participation and Consultation</b>		
Recommence tenant scrutiny panel	Deputy Director	
Maximise customer feedback by implementing CX feedback tool	Deputy Director	
Review approach to performance information provision with tenants ensuring it is effective and meaningful	Deputy Director	
<b>Service Provision</b>		
Allocations Policy review and consultation to ensure the policy achieves the objective of ensuring allocations made are representative of the community. Ensure equality and diversity groups are included in the review consultation	Deputy Director / Assistant Director (TS)	
Assess the Equality profile of Housing List Applicants to make sure it is representative of the community by providing a breakdown to the Management Committee	Assistant Director (TS)	
Assess allocations made to ensure equality needs are being met by analysis of lets made	Assistant Director (TS)	
Signpost tenants and other customers who need specialist support, to service support providers with that particular expertise when required	Assistant Director (TS)	
<b>Monitoring and Reporting</b>		
Completion of Gender and Ethnicity Analysis based on Scottish Household Survey Results for 2019	Assistant Director (TS)	
Update census information	Assistant Director (TS)	
Collect equality which will measure how we are performing against our policy	Assistant Director (TS)	

objectives in line with data collection procedure		
Analyse equality information on tenants and members; housing list applicants; members of staff and members of the Management Committee	Director / Assistant Director (TS)	
Submit an Annual Return on the Charter each year in accordance with published guidance	Senior staff	May 2022
Report performance in achieving or progressing towards the Charter outcomes and standards to tenants and other service users annually	Deputy Director	Oct 2022
Monitor progress against the Equality action plan	Senior staff Management Committee	Quarterly Annually
Take remedial action where disparities appear between equality and diversity groups and the rest of the community	Senior staff Management Committee	
<b>Accessibility</b>		
Offices and staff remain accessible to all tenants and other customers	Senior staff	Ongoing
Review and update building access audit and management arrangements	Property Manager	
Development will consider, and where appropriate, accommodate a range of physical and wellbeing needs to ensure accessibility and sustainability	Deputy Director	
Carry out aids and adaptations as soon as practical to assist tenants to live independently as noted in the Asset Management strategy and policy	Property Manager	Ongoing
Consider the specific needs of the people living within the community and develop our services to meet those needs. Record tenants and applicants who have a condition which acts as a barrier to accessing our services	Assistant Director (TS)	
<b>Procurement</b>		
Social value will be added to the procurement process where appropriate to do so.	Deputy Director	
Those providing services on behalf of WWHC have policies, procedures and working practices that reflect the principles of WWHC	Senior staff	

Include requirement for provision of Equality and Diversity Policy in quality assessment questionnaire so that the Co-operative may assess whether this in line with the Co-operative's aims.	Senior staff	
<b>Training</b>		
Promote equality throughout the organization to ensure staff and committee are aware of Equality Policy		
Assess equality training needs through staff development review process so that appropriate training and learning is provided to individual staff	Senior staff	
Tenancy services training on data collection guidance and use of model form		
Staff equality refresher training		Nov 2022 Complete
Management Committee equality refresher training	Director	May 2022
Equality training as part of induction process for new employees and management committee members	Senior staff	As required
<b>Recruitment</b>		
Reasonable adjustments will be implemented to support individuals who have alternative requirements.	Senior staff	As required
Enlist the support of specialist agencies like Employers in Voluntary Housing to ensure advertisements for employment reach all equality and diversity groups as required	Senior staff	As required
Equality clauses are incorporated in all staffing policies and procedures.	Director	Ongoing

## Equality Impact Assessment

<b>Name of Policy to be assessed</b>	Equality Policy	<b>New policy or revision of existing?</b>	Review
<b>Person(s) responsible for assessment</b>	Assistant Director (Tenancy Services)		
<b>Briefly describe the aims, objectives and purpose of the policy.</b>	<p>To ensure that our Management Committee, staff, tenants, other customers, contractors and anyone who has dealings with WWHC are treated equally and fairly.</p> <p>To promote an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equal opportunity for all and is committed to combat discrimination either directly or indirectly.</p>		
<b>Who is intended to benefit from the policy? (EG applicants, tenants, staff, contractors)</b>	Tenants, staff, Management Committee, contractors, prospective staff, applicants, other customers and the wider community.		
<b>What outcomes are wanted from this policy? (EG the measurable changes or benefits to members/ tenants / staff)</b>	To be an employer, landlord, service provider and partner which promotes and supports Equality and Diversity and delivers on associated objectives.		
<b>Which groups could be affected by the policy? (note all that apply)</b>			
<b>Race</b>	X	<b>Gender</b>	X
<b>Sexual orientation</b>	X	<b>Gender reassignment</b>	X
<b>Age</b>	X	<b>Religion or belief</b>	X
<b>Marital status</b>	X	<b>Disability</b>	X
<b>Pregnant and Maternity</b>	X		
<b>If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</b>			
N/A			

<b>Have those affected by the policy / decision been involved?</b>		
<b>Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>	<b>Positive Impact(s)</b>	<b>Negative Impact(s)</b>
	<p>Ensure that equality is achieved in all services provided to a customer, applicant, job applicant, employee, tenant and contractor.</p> <p>Ensuring that this policy is embedded throughout all other policy and process will positively impact on all people in a protected characteristic group.</p>	<p>Failure to implement the policy and strategy risks the Co-operative not complying with legal and regulatory requirements.</p>
<b>What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b>	<p>Ensure staff and Committee have adequate training about the policy and equalities.</p> <p>Ensure that we have robust processes in place with equality and diversity embedded within them.</p> <p>Implement the equality strategy and action plan with appropriate training.</p> <p>Ensure effective equality data collection and reporting.</p>	

Signed: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Please attach to the policy report