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# Policy: Equality and diversity

Updated August 2016

## Section 1: Statement of policy

We recognise our duties under equality legislation and will aim to eliminate all forms of discrimination in service delivery, employment and in working with our clients and partners.

We value diversity in our workforce and we understand that our ability to meet the diverse needs of the population we serve is improved by having a diverse workforce which generally reflects the area in which we are based.

The Equality Act 2010 refers to the categories covered by the Act as “protected characteristics”. These are:

- race
- gender and gender re-assignment
- sexual orientation
- disability
- age
- marriage and civil partnership
- religion or belief
- pregnancy and maternity.

Most of Transform’s accommodation is designed for single occupation only and some are for people of a particular age range. Apart from this, no one applying for housing and/or support services will be treated more or less favourably than anyone else. Also no-one applying for employment or other contracts from Transform will be treated more or less favourably than anyone else. Transform will continue to collect and monitor appropriate records of all applications for housing, support, employment or contracts.

Transform has a commitment to be an organisation that:

1. develops services to achieve equality and diversity in all its activities
2. has a workforce generally reflecting the population in which it is based
3. understands how valuing diversity can improve our ability to deliver better services
4. actively consults with our clients and stakeholders to ensure the delivery of our goals and that services that are provided are responsive and reflect the diversity of need
5. provides all employees with the training and development they need to enable them to achieve its goals
6. provides a supportive, open environment where all employees have the opportunity to reach their full potential
7. listens to clients and stakeholders and involves them in the development of services that recognise and value diversity
8. believes that staff, clients and stakeholders have important parts to play in making this happen
9. promotes community cohesion and social inclusion.

We will apply this policy in carrying out our responsibilities and will also seek to apply it to work undertaken for us by external consultants and contractors and other partner agencies. We will ensure that contractors and consultants either have their own policy or sign up to Transform's.

## **Section 2: Responsibilities**

1. Transform's Board of Directors has overall responsibility for the ownership and direction of this policy.
2. Transform's Senior Management Team has overall managerial responsibility for the direction of the policy and the Area teams are accountable for its implementation and delivery.
3. Additional and specific responsibilities apply to those who manage staff and to those who are involved in recruitment, promotion, training and development.
4. Each employee must:
  - read, understand and implement this policy through their work and actions. This should be supported by individual discussion in supervision, by team discussion and training
  - take personal responsibility to implement and promote this policy in their day to day work with clients, stakeholders and each other
  - draw their line manager's attention to any instances of apparent discrimination in relation to employment or the provision of services.

## **Section 3: Community cohesion and social inclusion**

We recognise that our clients are often marginalised in society and are unable to access or benefit from all of the services that others can. In order to address these issues we will focus on the following areas in our work with all of our clients:

- health inequalities
- supporting them to manage their finances
- helping them to develop the skills in all areas of their lives but particularly to support them in improving their employment prospects
- reducing their social isolation and encouraging them to become more involved in their communities.

## **Section 4: Types of discrimination**

1. Direct discrimination  
Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perceptive discrimination below), or because they associate with someone who has a protective characteristic (see associative discrimination below).
2. Associative discrimination  
This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
3. Perceptive discrimination  
This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.
4. Indirect discrimination  
Indirect discrimination can occur when an organisation has a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share

a protected characteristic. (Indirect discrimination can be justified if an organisation can show that it acted reasonably in managing the business and that this is a proportionate means of achieving a legitimate aim.

#### 5. Harassment

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual”.

Anyone may complain about behaviour they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. People are also protected from harassment because of perception and association.

#### 6. Third party harassment

Transform is potentially liable for harassment of their staff or clients by a third party who is not an employee of Transform.

#### 7. Victimisation

Victimisation occurs when someone is treated badly because they have made or supported a complaint or raised a grievance citing circumstances covered by the Equality Act, or because they are suspected of doing so.

To achieve our aims in all of these areas we will:

- ensure that employment practices and services do not discriminate against people in any of the protected characteristics
- offer training to staff to increase their awareness of these issues so that they can sensitively address the needs of individuals
- provide training to staff on the basis of need
- give promotion to staff on the basis of ability
- provide services that are relevant to people’s needs
- strive to create an environment which is free from harassment and discrimination
- aim to create a flexible working environment where work and home life balance requirements are recognised and supported as far as possible, following the Government’s guidance within this area.

### **Race**

Transform aims to achieve racial equality in service provision and employment, to tackle discrimination and harassment on grounds of race and to promote good relations between all racial groups. To achieve our aims we will:

- provide services which are relevant to people’s needs
- ensure our services are accessible and available to all our clients from Black and Minority Ethnic (BME) groups
- strive to give our staff the skills with which to work with all communities
- strive to create an environment which is free from racial harassment and racist behaviour
- collect and review ethnic monitoring data for lettings, client satisfaction, dealing with racial harassment, governing body membership, staff recruitment, and the employment of contractors, consultants and suppliers in order to identify any untoward trends

## **Religion or belief**

Transform aims to tackle unlawful discrimination and harassment on grounds of religion and belief and to promote good relations between people of different religions and beliefs. To achieve these aims we will:

- provide services relevant to people's needs
- strive to create an environment which recognises and respects religion and belief and is free from unlawful discrimination or harassment
- improve the understanding of religion and belief among our staff so that they can sensitively address the needs of individuals

## **Gender and gender reassignment**

Transform is committed to ensuring gender equality both in the employment of staff and in service provision. To achieve these aims we will:

- strive to create an environment which is free from harassment and sexist language and behaviour
- monitor gender representation at all levels within Transform.

## **Sexuality**

Transform recognises the discrimination that people face in their lives due to their sexuality and is committed to tackling any discrimination that takes place due to an individual's sexuality. To achieve these aims we will:

- strive to create an environment which recognises differences in sexuality and is free from discrimination and harassment
- strive to create an environment where lesbians, gay men, bisexual people and people who identify as trans gender are free from unfair treatment and harassment and feel safe to be open about their sexuality if they wish to be. (We acknowledge that some of our clients may act in discriminatory ways or find it difficult to be supported by for example homosexual or trans-gender/cross-dressing staff. In those circumstances Transform will support the member of staff and do everything possible to educate clients to accept members of staff who they perceive as different and to deal with any prejudices that they have.)
- collect and review data in respect of sexuality and to be alert to unwelcome trends

## **Disability**

Transform recognises the discrimination experienced by people with disabilities and is committed to eliminating unlawful discrimination and disadvantage experienced by people with a disability wherever possible. To achieve our aims we will:

- strive to provide services which are relevant to the needs of people with a disability
- strive to ensure that our services and appropriate documentation are accessible and available to people with a disability
- wherever possible, modify procedures and processes to ensure that disability requirements are met
- where practicable, continue to employ staff who become disabled during their employment, and assist in their re-training if possible
- monitor and review disability in staff and clients

## **Age**

We recognise that age is not a bar to most work activities and that employment decisions should not be based on age alone and that services should be sensitive to the needs of all age groups. We will seek to create an environment where people are judged on their talents, skills and experience rather than on misconceptions and prejudices about age. To meet our aims we will:

- avoid the use of age-related criteria in our employment practices
- provide training on the basis of need, regardless of age
- give promotion on the basis of ability regardless of age
- monitor and review the age of staff and clients

### **Marriage and civil partnership**

We will treat people in the same way regardless of their marital or civil partnership status.

We will:

- provide training on the basis of need
- give promotion on the basis of ability

### **Pregnancy and maternity**

We recognise that pregnancy and maternity are no bar to most work activities. We will seek to create an environment where pregnant women or women with children are given the same opportunities as all other staff. We will therefore:

- provide training on the basis of need
- give promotion on the basis of ability
- aim to create a flexible working environment where work and home balance requirements are recognised and supported as far as possible, following the Government's guidance within this area.

### **Section 5: Communication**

1. A copy of our Equality and Diversity policy will be available to all applicants and staff, both on-line and on request, to ensure awareness and implementation of the policy
2. The Equality and Diversity Policy will be included with tender information and contracts for work undertaken for us by external organisations and individuals
3. All our policies will be regularly reviewed and monitored for clarity and plain English. We will arrange for policies and other documents such as the newsletter, to be made available in translation or in another medium if required.

### **Section 6: Monitoring**

Transform will collect statistical information in order to monitor its performance and reports will be made to the SMT and the Board on a regular basis. We will also develop and review our performance against our Equalities Action Plan.

The Current Action Plan is attached at Annex 1.

## EQUALITIES ACTION PLAN

**APRIL 2016 TO March 2018**

Objective	Action	Lead	Target date
To ensure that there is fair access to Transform services	<ol style="list-style-type: none"> <li>1. Collect records of ethnicity of prospective clients and benchmark against current clients to ensure equality of access to services</li> <li>2. Collect records of protected characteristics of clients and, as part of a snap review of clients every 6 months, review that the ethnicity and sexual orientation of clients broadly reflects the local population</li> </ol>	Team managers	<p>On-going</p> <p>6-monthly</p>
To ensure that there is no direct or indirect discrimination in the delivery of services	<ol style="list-style-type: none"> <li>1. Collect records of ethnicity and other protected characteristics of clients</li> <li>2. Review annual Client Satisfaction Survey and records of complaints to ensure there is no disproportionate level of dissatisfaction linked to ethnicity.</li> </ol>	Team Managers	<p>On-going</p> <p>Annually</p>
To ensure that there is no direct or indirect discrimination in the recruitment of new staff	<ol style="list-style-type: none"> <li>1. Collect records of ethnicity and other protected characteristics of prospective employees</li> <li>2. Monitor ethnicity of staff through SMT and the Board and take appropriate action to address any adverse findings</li> <li>3. Carry out staff equalities survey</li> </ol>	<p>HR Manager/Area Managers</p> <p>Director of Client Strategy &amp; Delivery</p>	<p>On-going</p> <p>Every 2-years</p>
Increase involvement to clients by offering opportunities and activities that can make a difference to them and their community	<ol style="list-style-type: none"> <li>1. Person centred support planning</li> <li>2. Involvement in local activities organised by the teams</li> <li>3. Involvement in fundraising</li> <li>4. Involvement in Client Forum</li> </ol>	<p>Team Managers</p> <p>Head of Fundraising &amp; Communications</p> <p>Director of Client Strategy &amp; Delivery</p>	<p>On-going</p> <p>On-going</p> <p>Every 2-months</p>

Ensure that staff have the opportunity to be involved in issues that affect them	<ol style="list-style-type: none"> <li>1. Through monthly 1:1's with line manager, annual appraisal process and regular team meetings</li> <li>2. Via staff Newsletter</li> <li>3. Through the Staff Forum</li> <li>4. Through staff consultation days</li> </ol>	<p>All line Managers</p> <p>Head of Fundraising &amp; Communications</p> <p>HR Manager</p>	<p>On-going</p> <p>Monthly</p> <p>Twice a year</p>
Enhance information available to Clients to make it more accessible	<ol style="list-style-type: none"> <li>1. Produce new Client Handbook, in consultation with clients</li> <li>2. Refresh Easy Read handbook for people with a learning disability</li> <li>3. Enhanced client pages on Transform website</li> </ol>	<p>Director of Client Strategy &amp; Delivery</p> <p>Head of Fundraising &amp; Communications</p>	By October 2016
Have ability to translate key documents or interpret if required	<ol style="list-style-type: none"> <li>1. Offer to produce on tape or in large print if required</li> <li>2. Staff supported to learn Makaton or signing</li> <li>3. Register available of staff who speak different languages</li> </ol>	Head of Fundraising & Communications	On-going
Involve clients in the review of the Equality and Diversity policy	<ol style="list-style-type: none"> <li>1. Discuss the Statement of Policy and the proposed Action Plan at the Client Forum and with other interested clients</li> <li>2. Explore equality and diversity training for formally involved clients</li> </ol>	Director of Client Strategy & delivery	December 2016
Broaden the Racist Incident Policy to reflect potential harassment to any individual	<ol style="list-style-type: none"> <li>1. Update the policy, in consultation with the Client Forum and other interested clients</li> </ol>	Director of Client Strategy & delivery	December 2016
Progress Transform's Digital inclusion Plan	<ol style="list-style-type: none"> <li>1. Provide Wi-Fi access in 7 houses for young people</li> <li>2. Consider next steps to extend digital inclusion to more Transform clients</li> </ol>	Director of Finance SMT as a part of budget preparation due 2017/18	<p>December 2016</p> <p>January 2017</p>

Provide equality and diversity training for new employees as part of their induction programme, and for existing employees where a needs for refresher training is identified by their manager	1. Equalities Training included within Induction programme for all staff	Director of Client Strategy & delivery	On-going induction programme plus every 3-years proposed in Training Matrix
Ensure that all contractors and consultants employed by Transform also have appropriate Equalities Policies	1. All contractors must be registered with Construction Line, who require that an appropriate Equal Opportunities and Diversity Policy is in place 2. Other suppliers required to produce their policy annually	Asset & Maintenance Manager	On-going