Equality and Diversity Framework
2012-15
1. Our approach to equality and diversity

This framework sets out that for us:

- equality means treating people fairly;
- diversity means valuing people’s differences - we welcome and celebrate the different contributions diverse groups and individuals make to our community and workplace.

We recognise that our priorities and actions can affect some groups of people differently and that treating people fairly and equally does not necessarily mean treating them the same.

We believe that if our policies and practices are fair then services will be accessible to all, leading to higher levels of involvement, helping influence our business and the services we provide. Those who apply for jobs with us will feel confident in their applications, that they will be treated fairly and with respect.

We want to promote social cohesion and a culture of tolerance and respect in our local communities and our workplace. Over the next three years we will be working with our diverse communities and staff to make sure that they all have a chance to get involved and have their say.

2. The Equality Act 2010

The Equality Act 2010, brings together earlier equality legislation into one simplified and strengthened piece of law. In line with our obligations and values, we will oppose all forms of discrimination and unfair treatment particularly in relation to the nine protected characteristics*, which are:

- Age
- Disability
- Gender Re-Assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including ethnic origin, nationality, nation origin)
- Religion or Belief (or non-belief)
- Sex
- Sexual Orientation

*A full description of what these mean can be found at Appendix 1.

It also introduced new general and specific duties for public bodies. The general duties are to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity between different groups
foster good relations between different groups

The specific duties are legal requirements designed to help us meet the general duties. These regulations require the publication of:

- equality objectives*, at least every four years
- information to demonstrate their compliance with the equality duty, at least annually.

*Our equality objectives can be found in section 6.

To support these duties we will carry out equality analysis on our services and policies to avoid wherever possible adverse impacts upon protected groups. The reasons for doing this are to consider if there are any unintended consequences for some groups and to consider if the policy or practice will be fully effective for all target groups.

3. Our commitments

Six Town Housing will ensure that we meet our legal obligations under the Equality Act 2010, and take a proactive role to advance equality of opportunity for everyone.

Along with our Team Bury partners we have adopted a zero-tolerance stance – this means we will not tolerate the less favourable treatment of any person or any action which causes a person to be treated unfairly. We are committed to supporting those experiencing harassment, discrimination or victimisation. We provide advice and support and, where we can, we will take action against perpetrators. In trying to improve our performance on equality and diversity, we also take into account the areas of hate crime and human rights.

The business case for promoting equality and diversity is overwhelming. Failure to deliver the commitments set out in this framework could lead to claims of unfair treatment / discrimination, legal challenge, fines and damage Six Town Housing’s reputation as an employer, service provider and community leader.

We will comply with the Equality Act Codes of Practice issued by the Equality & Human Rights Commission, including the Code of Practice on Equal Pay, the Code of Practice on Employment, and the Code of Practice on Services, Public Functions and Associations.

We will also work to progress through the three levels of the Social Housing Equality Framework (SHEF). The SHEF has been developed to help social housing providers to mainstream equality and diversity at all levels and help them meet their statutory duties. Using the SHEF framework we can assess ourselves against:

- Knowing our customers and equality mapping.
- Leadership, partnership and organisational commitment.
- Customer engagement and satisfaction.
Our Equality and Diversity Action Group leads on the implementation of our Action Plan to ensure delivery against the standards in the SHEF and our progression through the framework.

4. Framework structure

**Director Champion/ Chief Executive** – strategic lead in the business for E&D. Responsible for ensuring diversity issues are raised in relation to papers submitted to Six Town Housing Executive Team and for challenging other Directors about issues relating to equality and diversity. Acts as our link to the Board.

**E&D Lead (Business Managers for Business Improvement & Customer Focus and for Human Resources)** – the operational lead on diversity for the organisation, turning strategy into action and responsible for the delivery of this framework and Action Plan.

**Business Improvement E&D Champion** – responsible for supporting other staff to embed diversity across the organisation.

**Equality and Diversity Action Group** – a monthly consultative / information sharing and action forum with representatives from teams across the organisation.
Equality Team Champions – these sit on the Action Group and feed back to their respective teams. They are responsible for taking back equality and diversity actions to their teams, delivering the Action Plan and implementing change.

Customer Review Groups – consultation groups considering specific initiatives and monitoring local offer promised around neighbourhoods, home and tenant engagement. As diversity and customer access is a theme that cuts across the business progress on the delivery of the Action Plan will be reported to the Tenant Engagement Group and the other Customer Review Groups as necessary.

Partnership and community networks – our staff work in partnership with many community and minority groups. We use these established relationships to both consult with groups and as away of informing the communities of our services.

Informal customer engagement and customer profiling – we regularly collect information about our customers and ask them about our services as part of our daily working day. We aim to use this information more in future to enable us to tailor services to meet individual needs.

5. Team Bury Equality Charter

Six Town Housing has signed up to be part of the Team Bury Equality Charter – Building a Fairer Bury Together. This lays out the key partners’ Bury-wide commitments towards equality and diversity.

Building a Fairer Bury Together
Team Bury are committed to the principles of equality, diversity and human rights, and will always strive to:-

• Recognise people’s different needs, situations and goals, and remove the barriers that limit what people can do or be.
• Incorporate the principles of respect and equality into everything we do.
• Understand that every individual has a personality, abilities, beliefs, background and social responsibilities that make him or her unique.
• Build strong and positive relationships between people from different backgrounds, by tackling prejudice and promoting understanding.
• Make judgements between competing demands and resources and ensure that decisions are fair, reasonable and reflect our legal obligations.
• Ensure our services are accessible to, and meet the needs of, all people.
• Show zero tolerance towards bullying, harassment and inappropriate language or behaviour, and encourage the reporting of all cases of discrimination or unfair treatment.
• Develop a workforce which reflects the diverse community of Bury, where all employees are treated fairly and with respect.
6. Equality Objective

As part of this work, Six Town Housing has agreed two equality objectives, one focussed on services to our customers, and one which looks at equality and diversity for our workforce.

An Equality Action Plan is being put together which sits under these objectives and will pick up areas where our performance needs to improve or change. The Equality Action Plan will have clear steps on dealing with any issues to make the necessary improvements and progress change through the organisation.

Customer Equality Objective

We aim to ensure our services are accessible, equitable and fair.

a. we will provide a variety of ways customers can access our services
b. we will show the diversity profile of all customers and measure this against those who have accessed our services each year
c. we will report levels of hate crime and ASB cases affecting minority groups and work to reduce these.

Staff Equality Objective

We will aim for a workforce which reflects our diverse community.

a. we will monitor our workforce statistics
b. we will carry out an Equal Pay Audit
c. we will measure the % of our workforce who have successfully undertaken equality training
d. we will include a question in our staff survey to assess whether or not staff feel that as a workforce we value diversity

We will analyse then publish the results, progress will be monitored and evaluated. The objectives will develop annually, and the Action Plan updated with areas for improvement creating a cycle of performance review, reflection and action.

Delivering customer excellence is central to everything we do. ‘Ensuring our services are accessible, equitable and fair’ is central to our business plan and is one of our Customer First Strategic Priorities as well as our Equality Objective.

To deliver our strategic priority we must know who our customers are, understand and respond to their needs and what they think about the service we provide. Critically, it is about using this information to help us plan and improve the way services are delivered.

To achieve our Equality Objective for our customers we will report on a number of measures and monitor our progress. There will be an action plan to deliver
improvements where necessary and demonstrate what has changed as a result of us aiming to achieve the objective.

We see the diversity of our workforce as a real strength and believe people should be treated fairly and with respect. This includes having fair recruitment and selection policies, employment terms, training and development opportunities and equal pay arrangements in place. It is also about making sure the workplace is free from discrimination, bullying and harassment.

All members of staff will be expected to:

- support and carry out their duties in the spirit set out in this framework and the Team Bury Equality Charter;
- treat each other and our customers with respect and dignity;
- challenge discriminatory behaviour they encounter; and
- follow equality legislation in line with our policies and procedures and company values.

To achieve our Equality Objective as an employer, we will report on a number of measures and monitor our progress. There will be an action plan to deliver improvements where necessary and demonstrate what has changed as a result of us aiming to achieve the objective.

We understand that we can’t change the world on our own but know that by working with our partners and being committed to the principles of equality, diversity and human rights we can make a difference. Working with others we can minimise disadvantages suffered by those with protected characteristics, tackle prejudice and promote understanding. As part of the Team Bury family we are signed up to the Bury Equality Charter which frames our shared commitment and the principles we value and work to.

Below is our detailed action plan to achieve our Equality Objectives:
## Action Plan

<table>
<thead>
<tr>
<th>Equality Objective</th>
<th>Key Action</th>
<th>Sub Action</th>
<th>Date</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>We aim to ensure our services are accessible, equitable and fair.</td>
<td>We will provide a variety of ways customers can access our services</td>
<td>Find out what barriers customers face when accessing our services by monitoring take up and evaluate services to ensure they do not discriminate or exclude</td>
<td>March 2013</td>
<td>Business Improvement Advisor</td>
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<td></td>
<td></td>
<td>Consult customers to find out their needs and which are most important and to ensure they help to shape and tailor services</td>
<td>August 2013</td>
<td>Customer Involvement, Regulation and Improvement Lead</td>
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<tr>
<td></td>
<td></td>
<td>Aim to ensure all our services are accessible and available to all</td>
<td>September 2013</td>
<td>Business Manager - Business Improvement and Customer Focus Manager</td>
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<td></td>
<td></td>
<td>Provide information that our customers need, in ways that they find easy to understand. This includes providing information in plain English and making it available in large print, audio tape, Braille or a language other than English on request</td>
<td>Ongoing</td>
<td>Communication and Marketing Advisor</td>
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<td></td>
<td>Ensure good governance of Six Town Housing</td>
<td></td>
<td>Ongoing</td>
<td>Chief Executive</td>
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<td></td>
<td>Share best practice with other social housing organisations to continually improve our approach</td>
<td></td>
<td>March 2013</td>
<td>Business Improvement Advisor</td>
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<td></td>
<td>Carry out a programme of Equality Impact Assessments for all our services and policies</td>
<td></td>
<td>Commence May 2012</td>
<td>All Business Managers/Chief Executive</td>
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<tr>
<td>We will show the diversity profile of all customers and measure this against those who have accessed our services each year</td>
<td>We will provide a variety of ways customers can access our services</td>
<td></td>
<td>December 2012</td>
<td>Customer Involvement, Regulation and Improvement Lead</td>
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<td></td>
<td></td>
<td>Involve customers who represent groups with protected characteristics</td>
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<td></td>
<td></td>
<td>Communicate and consult with tenants and the wider community about the actions we take to promote equality and challenge discrimination</td>
<td>April 2013</td>
<td>Business Improvement Advisor and Communication and Marketing Advisor</td>
</tr>
<tr>
<td>We will report levels of hate crime and ASB cases affecting minority groups and work to reduce these.</td>
<td>We will provide a variety of ways customers can access our services</td>
<td></td>
<td>Ongoing</td>
<td>Business Manager Tenancy Management</td>
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<tr>
<td></td>
<td></td>
<td>Show zero tolerance towards bullying, harassment and inappropriate language or behaviour, and encourage the reporting of all cases of discrimination or unfair treatment</td>
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<td></td>
<td></td>
<td>Work in partnership with other organisations to prevent ignorance and prejudice in the wider community</td>
<td>March 2014</td>
<td>All Business Managers</td>
</tr>
<tr>
<td>Equality Objective</td>
<td>Key Action</td>
<td>Sub Action</td>
<td>Date</td>
<td>Responsible</td>
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<td></td>
<td>Work in partnership with Bury Council, Greater Manchester Police and other partner agencies to prevent and respond to incidents of anti-social behaviour, hate crime and domestic abuse; promote good relations between all people in local communities.</td>
<td>September 2013</td>
<td>Business Manager - Tenancy Management</td>
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<td></td>
<td>Support victims of crime and abuse in a way that is sensitive and appropriate to their needs.</td>
<td>Ongoing</td>
<td>Business Manager - Tenancy Management</td>
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<td></td>
<td>Work with local statutory, voluntary and community groups to promote equality and support vulnerable people (amongst others CAB, Victim Support, BADDAC, Re-Build)</td>
<td>Ongoing</td>
<td>All Business Managers</td>
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<tr>
<td>We will aim for a workforce which reflects our diverse community.</td>
<td>We will monitor our workforce statistics</td>
<td>August 2013</td>
<td>Business Manager Human Resources</td>
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<tr>
<td></td>
<td>Promote opportunities for employment, training and development to local people and under-represented groups in an aim to employ a workforce that reflects the community we serve</td>
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<td></td>
<td>Ensure our recruitment and selection policies are non-discriminatory and encourage applicants from all groups in the community. We will recruit and promote staff solely on their ability and monitor recruitment practices to ensure they are fair and accessible</td>
<td>March 2013</td>
<td>Business Manager Human Resources</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Show zero tolerance towards bullying, harassment and inappropriate language or behaviour, and encourage the reporting of all cases of discrimination or unfair treatment</td>
<td>Ongoing</td>
<td>Business Manager Human Resources</td>
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<tr>
<td></td>
<td>We will carry out an Equal Pay Audit</td>
<td>December 2012</td>
<td>Business Manager Human Resources</td>
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<td></td>
<td>Apply a transparent way of evaluating jobs to ensure equal pay for work of equal value</td>
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<td></td>
<td>We will measure the % of our workforce who have successfully undertaken equality training</td>
<td>Ongoing</td>
<td>Business Manager Human Resources</td>
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<td></td>
<td>Ensure all our employees have fair access to training and learning opportunities and support our staff to reach their full potential</td>
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<td></td>
<td>We will include a question in our staff survey to assess whether or not staff feel that as a workforce we value diversity</td>
<td>Ongoing</td>
<td>Business Manager Human Resources</td>
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<td></td>
<td>Provide a safe and accessible working environment that values and respects the identity and culture of everyone so employees are treated with dignity and respect</td>
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<td></td>
<td>Provide equality and diversity training to staff followed by refresher sessions as and when appropriate. By doing this, we will help them put our equality and diversity commitments into practice on a daily basis and embed it across the organisation</td>
<td>March 2013</td>
<td>Business Manager Human Resources</td>
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<td></td>
<td>Support the equality related employee groups and encourage employees to participate</td>
<td>Ongoing</td>
<td>All Business Managers</td>
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Appendix 1 - The local picture – Knowing our customers and our patch

Six Town Housing provides housing services to around 8,200 homes across Bury. We understand that our patch is a diverse district with distinct rural and urban communities, a growing black and ethnic minority population and a changing age profile.

Knowing the patch, in terms of people’s needs and changing demographic trends, is crucial if we are to deliver services effectively and implement our equality and diversity framework. This includes using information about the community we serve and our workforce.

We will also use and share information collected by the Council and partners to help us plan ahead and tailor services to meet the needs of particular customers. It also includes keeping track of new and emerging communities.

Age
Age is defined in reference to a person’s age group. This could mean people of the same age or people of a range of ages. Age groups can be wide, narrow or relative. For example, people under-18, people in their mid-40s, people older than us.

We have age profile details for 95.5% of our customers, this shows for example that we presently have 47 customers under 20 years old and 139 over 90 years old. For younger tenants our tenancy sustainability team offer support with moving in packs with a basic home start up kit and help with managing their finances. For some of our older customers we offer a ‘support at home’ service and provided winter warmer packs containing useful items and information to get them through the winter period.

Disability
A person is considered as having a disability if they have “a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.” A physical or mental impairment includes sensory impairments such as those affecting sight or hearing. Long-term means that the impairment has lasted, or is likely to last, for at least 12 months or for the rest of the affected person’s life.

We have information on disability for 54% of our customers and know that around 1,100 identify themselves as disabled. We offer home visits for all customers who request it and have flags on our computer systems to tell us if there are any particular requirements customers need to access our services – for example 59 customers have told us they require information in large print or with visual aid and 141 customers have told us they have a mobility impairment so we let our operatives know to allow extra time for customers to answer the door.
Gender Re-Assignment
People who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex have the protected characteristic of gender reassignment. A transsexual person is someone who has the protected characteristic of gender reassignment.

This is an area where we need to improve how we approach customers to ask this sensitive information and will form part of our training with staff on equality and diversity

Marriage and Civil Partnership
Under the Equality Act, marriage covers any formal union of a man and woman which is legally recognised in the UK as a marriage. A civil partnership refers to a registered civil partnership between two people of the same sex under the Civil Partnership Act 2004, including those registered outside the UK. Only people who are married or in a civil partnership are protected against discrimination on this ground. The status of being unmarried or single is not protected.

We collect this information when someone applies for housing with us, however we do not regularly ask customers or employees if this information changes

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. Outside of the employment setting, protection against maternity discrimination is for 26 weeks after giving birth. This includes treating a woman unfavourably because she is breastfeeding.

We collect this information on customers who apply for housing and consider it when allocating properties. We do not routinely collect it for tenants as it would be difficult to keep up to date and could be sensitive. Our Human Resources Team collect this information for employees.

Race
The Equality Act defines ‘race’ as including colour, nationality and ethnic or national origins. A racial group is a group of people who have or share a colour, nationality or ethnic or national origins. For example, a racial group could be ‘British’ people. A racial group can also be made up of two or more distinct racial groups, for example ‘Black Briton’ (people who are black and British citizens) or ‘South Asian’ (people from Indian, Pakistan, Bangladesh, Sri Lanka etc).

Nationality (or citizenship) is the specific legal relationship between a person and a state through birth or naturalisation. It is distinct from national origins. National origins must have identifiable elements, both historic and geographic, which at least at some point in time indicate the existence or previous existence of a nation. For
example, as England and Scotland were once separate nations, the English and the Scots have separate national origins.

Everyone has an *ethnic origin* but the provisions of the Equality Act only apply where a person belongs to an ‘ethnic group’ as defined by the courts. The courts have confirmed that the following are protected ethnic groups: Sikhs, Jews, Romany Gypsies, Irish Travellers, Scottish Gypsies, and Scottish Travellers.

Bury has a relatively low level of BME residents. Our customer profile generally correlates with the BME population identified in the 2001 census. We hold ethnicity data on 7944 customers.

**Religion or Belief**

Under the Equality Act a belief means any religious or philosophical belief, or lack of belief. Examples of philosophical beliefs include Humanism and Atheism. While people have an absolute right to hold a particular religion or belief under Article 9 of the European Convention on Human Rights, manifestation of that religion or belief is a qualified right which may in certain circumstances be limited. For example, it may need to be balanced against other rights such as the right to respect for private and family life, or the right to freedom of expression.

In Bury we know the religion or belief of 81% of our tenants, of those 65% are Christian, 27% have no religion and 3.2 % are Muslim. We use this information to help us decide which festivals to celebrate and to be sensitive to in our work with customers.

**Sex**

Under the Equality Act sex refers to a man or woman, men or women. Both men and women are protected from discrimination under the Act.

We have this information for all our customers, 58% of our customers are female.

**Sexual Orientation**

Under the Equality Act this refers to a person’s sexual orientation towards:
• Persons of the same sex (a gay man or a lesbian);
• Persons of the opposite sex (someone who is heterosexual); or
• Persons of either sex (someone who is bisexual).

Sexual orientation discrimination includes discrimination because a person is of a particular sexual orientation, as well as manifestations of that sexual orientation. This may include someone’s appearance, the places they visit or the people they associate with.

We hold information on sexual orientation for 2,276 customers. We will be training front line staff on collecting this sensitive information to increase collection and so we can be sure that our policies and our service delivery does not exclude customers for reasons of sexual orientation. We are members of Stonewall, an organisation that campaigns against homophobia and for equality for gay men, lesbians and bi-sexual people.
Appendix 2 - Six Town Housing as an Employer

As an employer we encourage our staff to provide us with their personal data for all the protected characteristics outlined above. The information is held confidentially but we publish the data in an anonymised form internally and from 2012, will publish this date externally as well. We use the information we gather to ensure we are treating staff fairly and providing equality of opportunity. We can monitor how our current workforce reflects the diversity make up of the area served by Bury Council, and work towards ensuring it is as representative as possible of this community.

We have arrangements in place to enable Six Town Housing employees to participate in the Equality groups set up by Bury Council, so that these are supported jointly by Six Town Housing and Bury Council.