

1. Our Policy Statement

1.1 Genesis Housing Group, as both a major employer and a large social landlord, is committed to eliminating discrimination and encouraging diversity amongst our workforce and the communities in which we serve. We aim to ensure that our workforce is truly representative of all sections of society and that each employee feels respected and able to give their best. Furthermore, we will work together to ensure that our residents, and other customers, are provided with a responsive and culturally sensitive service, which addresses issues of discrimination and harassment in our housing.

1.2 We recognise that some forms of disadvantage and discrimination are widely experienced by particular groups (because of race, ethnic origin, colour, national origin, disability, sexuality, religion, gender, marital status or age). We oppose all forms of unlawful and unfair discrimination and will seek to achieve equality by eliminating discrimination experienced on these grounds and promoting social cohesion.

1.3 We acknowledge that social cohesion is the bringing together, with the participation of all residents in an integrated way, of the economic, social, health and educational policies that will create a sustainable community. Genesis Housing Group's charitable trust Community, continue to develop and implement projects that actively contribute to the social cohesion of communities within which we operate.

1.4 In addition, we support and promote diversity, by recognising that all people are different. We aim to recognise the needs of individuals and treat each person, in employment and through service provision, with dignity and respect.

2. Introduction and Summary

2.1 Introduction

2.1.1. Genesis Housing Group recognises the important role we have, both as an employer and influential landlord, in eliminating all forms of discrimination and harassment under our sphere of control and in promoting tolerance, fairness and equality.

2.1.2. In addition to our moral and legal obligations, we recognise there is significant strength to be gained from an effective Equalities and Diversity Policy:

- It will help build a positive public image to residents, prospective residents, other customers, partners and stakeholders. Good performance on equality will help win new business.
- Taking account of diversity is crucial to developing new services to meet future need and to keep existing services relevant.
- A governance structure and workforce that reflects the customer base at all tiers will be better equipped to deal with the range of needs and aspirations of service users.
- It will help improve staff recruitment and retention, with people not only wanting to join the organisation but employees remaining and creating significant loyalty. Genesis Housing Group is working towards becoming an Employer of Choice.
- Recruiting a diverse workforce will ensure a wider choice of applicants by making use of all available talent, bringing different outlooks and expertise.
- An inclusive approach will result in a more motivated work force which feels valued and willing to contribute to the success of the organisation. It should

lead to reduced absence and turnover, with people able to attend work, free from prejudice, fear and harassment or other forms of discrimination.

- It will avoid, or reduce, costs associated with discriminatory action.

2.1.3. Our commitment to equalities and diversity is explicit in two of the corporate objectives contained within our Business Plan:

- To assist in promoting social inclusion in recognition of the diverse communities in which we work.
- To provide services that support vulnerable and disadvantaged residents in their homes.

2.2 Using This Document

2.2.1. Our Equalities & Diversity Policy is in three parts:

- Policy Statement - setting out our overall position in relation to equality and diversity matters.
- Policy Framework - setting out our specific policy aims and our strategic objectives to achieve those aims. Our policy aims and strategic objectives are given both in terms of our areas of operation (e.g. employment or access to housing) and across the various categories of discrimination (e.g. race or disability).
- Implementation – setting out overall responsibilities for implementation, communication and review of the Policy.

2.2.2. The Policy document will be supported by a number of Implementation Plans detailing the specific actions to be undertaken to achieve our policy and strategic aims.

2.2.3. We will work towards the development of individual Implementation Plans covering the following aspects of equalities:

- 'Age Champion' Implementation Plan
- Disability Implementation Plan
- Black & Minority Ethnic Implementation Plan
- Family Friendly / Flexible Working Implementation Plan

(For more information, see section 5.6 below).

3. Policy Framework: Areas of Operation

Our Equalities & Diversity Policy covers all areas of our operation:

3.1 Governance

We believe that the accountability of our organisation is enhanced by the representation and involvement, on our governing bodies and sub-committees, of individuals from the diverse communities in which we serve.

To achieve our aims we will:

3.1.1. Be fair and transparent in the recruitment of shareholders to our governance structures.

3.1.2. Keep our shareholder membership and the membership of governing bodies and sub committees under review and will implement ways to improve under-representation of people from minority groups.

3.1.3. Ensure that all in governance are well informed about equality and diversity issues.

3.2 Recruitment And Staff Development

We recognise that employing staff, who reflect the range of experiences of the local community, assists in the delivery of effective services.

To achieve our aims we will:

3.2.1. Ensure that staff recruitment is conducted in accordance with equal opportunities principles.

3.2.2. Regularly review the recruitment level of under represented groups, particularly at senior levels, and take effective action to rectify any imbalance.

3.2.3. Value and respect the identities and cultures of all our employees, and encourage all employees to reach their full potential.

3.2.4. Develop and maintain opportunities for the career development of under represented minority groups. Where appropriate we will use lawful positive action to redress any imbalance within the workplace.

3.2.5. Undertake to provide training in equality issues to all staff in relation to both the provision of services and the implementation of this Policy.

3.3 Resident Participation

We strongly believe that resident involvement is a way of empowering residents and delivering services more effectively. We recognise that there are difficulties in involving residents from diverse communities and groups, who may face institutional barriers or hostility from other residents.

To achieve our aims we will:

3.3.1. Seek to ensure that our mechanisms for resident consultation, involvement and participation promote the full and active contribution of residents and groups based within the diverse communities within which we work.

3.3.2. Encourage best practice in terms of involving BME residents and residents from other 'hard to reach' groups.

3.3.3. Endeavour to use appropriate means of communication which recognises the diverse communities within which we operate.

3.3.4. Discourage residents voicing discriminatory views in our offices and at public meetings.

3.4 Procurement

The Group provides a large amount of work to contractors, consultants and other suppliers. We recognise our responsibility in ensuring there is no discrimination in the allocation of this work and our responsibility in promoting equality issues.

To achieve our aims we will:

3.4.1. Regularly review our procedures on selection of contractors and contract

compliance to ensure they are not adversely affecting BME, and other minority, contractors.

3.4.2. Monitor to ensure that our contractors comply with our equality policies and do not discriminate in the execution of contracts. Ensure that those who provide services in people's homes are sensitive to different needs.

3.4.3. Work with local authorities and others to identify and develop good practice in equal opportunities for BME, and other minority, contractors.

3.5 Housing Needs and Housing Strategies

We recognise that as a major social landlord we need to understand and address the housing and related needs of everyone in the various communities we serve.

To achieve our aims we will:

3.5.1. Work in partnership with local authorities and other local agencies, in order to ensure that we accurately assess the housing needs and aspirations amongst diverse communities and minority groups.

3.5.2. Regularly review our contribution to meeting those needs through the use of existing stock or developing new housing.

3.5.3. Review the role of low cost home ownership in meeting the needs of BME and other minority groups.

3.6 Development and Community Regeneration

We recognise the importance of responding to the needs of the diverse communities within which we operate, when considering new developments and priorities for community regeneration activities.

To achieve our aims we will:

3.6.1. Consult with diverse communities to explore location and design issues in order to develop appropriate housing.

3.6.2. Regularly review our community regeneration strategy to ensure that it takes account of the advantages and disadvantages and needs of diverse communities in assessing priorities and allocation of resources.

3.6.3. Work with other agencies to ensure additional services are in place to meet the needs and aspirations of BME groups and other under-represented minority groups (e.g. opportunities for training employment and business development).

3.6.4. Use opportunities afforded by our community development activities in order to promote diversity.

3.7 Harassment and Bullying

The Group condemns harassment, bullying or intimidation of any kind and is committed to taking effective action to end such behaviour and provide proper redress.

To achieve our aims we will:

3.7.1. Implement a Dignity at Work Policy which stresses the entitlement of every employee to work in an environment that promotes dignity and respect and outlines the organisation's response to inappropriate behaviour. Any incident of discrimination or harassment will be viewed as a serious disciplinary matter.

3.7.2. Work towards the elimination of harassment in our housing schemes. Publicise our stance on harassment to residents (e.g. through the tenancy agreement and tenants handbook) and take swift action against the perpetrators of harassment. This includes safeguarding our staff from harassment by residents or members of the public.

3.7.3. Work with local authorities and other local agencies to ensure support is provided for the victims of harassment.

3.7.4. Work to ensure an effective degree of multi agency co-operation and information exchange in tackling harassment.

3.7.5. Regularly review our policies covering harassment, bullying and intimidation. We will ensure these policies are implemented effectively by rigorous monitoring.

3.8 Access to Housing

We recognise that certain minority groups are disproportionately represented amongst those in housing need and that this must be addressed within our allocations policy.

To achieve our aims we will:

3.8.1. Ensure that access to our properties is transparent and accountable and give equal access to all groups of applicants.

3.8.2. Monitor all lettings to ensure our lettings to BME households and disabled residents are in proportion with local housing needs.

3.9 Resident Satisfaction with Service Delivery

We recognise the need to ensure that our services are responsive to the needs and aspirations of the diverse communities within which we operate.

To achieve our aims we will:

3.9.1. Be proactive about publishing available services to all residents, focusing on under represented groups within the community.

3.9.2. Adopt non-discriminatory housing management and maintenance policies and procedures.

3.9.3. Monitor service take-up and resident satisfaction with the delivery of service by ethnicity and other minority group.

3.9.4. Encourage all residents to indicate clear preferences in order to provide

a fair, equitable, relevant and sensitive service.

3.9.5. Monitor by ethnicity all legal action taken by the Group.

3.10 BME Housing Associations

We recognise the fundamental role of BME housing associations in empowering BME communities and the added value that BME associations bring in terms of understanding the needs of BME communities.

To achieve our aims we will:

3.10.1. Support the development and growth of BME associations through development, partnership arrangements, management agreements and stock transfers.

3.10.2. Be proactive in seeking work with BME associations in delivering services to particular BME communities.

3.10.3. Adopt fair and transparent procedures for the selection of partner organisations and the establishment of partnership arrangements.

4. Policy Framework: Categories of Discrimination

4.1 Racial Discrimination

Racial discrimination is defined as treating a person, or group of people, less favourably based on their race, colour, nationality or ethnic origin. This can take the form of, for example, withholding facilities, services or opportunities from someone who should be entitled to them and who is denied them on the basis of race. Such discrimination can involve exclusion, oppression, stereotyping and marginalisation.

Genesis Housing Group works in some of the most ethnically diverse areas in the country. We recognise that employing staff, who reflect the racial and cultural diversity of our communities, at all levels of the organisation, will assist in the delivery of effective services. We also recognise the general disadvantage of BME communities amongst our residents, although there are important differences between the experiences of different BME groups. We will strive for racial equality.

To achieve our aims we will:

4.1.1. Continue to support the London-wide COFEM group (Career Opportunities for Ethnic Minorities) with mentoring master-classes at the core of the programme. We will sponsor a number of staff per year, to take part in this scheme, so facilitating their individual career development.

4.1.2. Take a proactive stance against discriminatory behaviour, combating racial prejudice, raising awareness and challenging unfair practices and racial stereotypes. We will regularly review our policies covering racial harassment and other forms of discriminatory behaviour to ensure that these policies are effective and implemented fairly. We will monitor satisfaction with our approach to combating harassment.

4.1.3. Monitor lettings within permanent and temporary housing, and low cost home-ownership sales, by ethnicity and other categories, and report this information regularly to the Equalities and Diversity Committee.

4.1.4. Strongly promote 'best value' in service provision and will encourage the involvement and consultation of the diverse communities within which we operate.

4.1.5. Ensure that information about services and standards is widely publicised in plain English and provided in alternative formats and languages to accommodate speakers of other languages.

4.1.6. Measure and analyse customer satisfaction and explore areas where satisfaction is lower in certain groups than for customers as a whole.

4.2 Sex Discrimination (Including Trans-Gender Status)

Sex discrimination is defined as treating a person or group of people, less favourably on account of their gender, marital status or gender reassignment.

Genesis Housing Group is committed to ensuring women and men are fully and properly represented at all levels of the organisation and are rewarded equally for their contribution.

To achieve our aims we will:

4.2.1. Encourage men and women men to take up training and development opportunities in areas and levels where they are under-represented.

4.2.2. Challenge gender stereotypes and sexist language and behaviour.

4.2.3. Ensure that female employees are not treated unfavourably on the grounds of pregnancy and / or child birth. This will also include unfavourable treatment on the grounds of the effects of pregnancy or maternity leave, for example, any temporary lack of capacity during pregnancy.

4.2.4. Recognise the importance of family-friendly policies (e.g. those relating to flexible working arrangements), in assisting to promote gender equality in employment, especially through supporting the needs of those with caring responsibilities. As a minimum, we will meet our statutory obligations in this respect. Within the constraints of effective service delivery, we undertake to give fair consideration to other requests for different working arrangements.

4.2.5. Ensure that men and women are valued equally and that salaries, pensions and other financial rewards and benefits reflect parity and are free from any form of bias.

4.2.6. We recognise that people who plan to undergo, are undergoing, or have undergone gender re-assignment can face discrimination and / or harassment. We will ensure that transgender / transsexual employees and residents are not discriminated against in relation to employment or service provision and will seek to ensure they are treated with dignity and respect.

4.3 Sexual Orientation Discrimination

Sexual orientation discrimination is defined as treating a person, or group of people, less favourably based on their sexual orientation or their perceived sexual orientation (i.e. on the grounds that they are gay, lesbian, heterosexual or bi-sexual).

We recognise the very real discrimination and harassment that people experience on the basis of their sexuality and are committed to the fair treatment of all employees and residents, irrespective of sexuality.

To achieve our aims we will:

4.3.1. Encourage respect for different lifestyles and challenge negative stereotypical views. We will be proactive in enforcing this message to employees and this is an important element of the 'Welcoming Diversity' Course, which is mandatory for all staff.

4.3.2. We will ensure that our employment policies are not based on the assumption that everyone is heterosexual.

4.3.3. We will ensure that our harassment policies are implemented effectively, rigorously monitored and regularly reviewed. We will work with other agencies to ensure that support is provided to victims and will promote multi agency cooperation and information exchange in tackling harassment of this nature.

4.4 Age Discrimination

Ageism is unjustified discrimination against a person, or group of people, on the grounds of age. Ageism usually displays itself in one of two forms: discrimination against young people and discrimination against older people.

The Group seeks to cultivate an environment which values all people regardless of their age.

To achieve our aims we will:

4.4.1. Ensure that all employees are aware that the Equalities and Diversity Policy includes being positive about age. We will challenge misconceptions and stereotypes based on age, both in employment and in the delivery of services.

4.4.2. Promote the benefits of a mixed-age workforce and will work towards becoming an Age Positive Employer. This means that we are committed to tackling age discrimination and taking practical steps to address any discriminatory practices in our day to day operations.

4.4.3. Review our recruitment, selection, training schemes and promotion processes to ensure there are no hidden age barriers.

4.4.4. Encourage employees of all ages to develop their potential and will promote a good spread of ages at all levels of the organisation.

4.4.5. Ensure that we do not consider age as a factor when making decisions about redundancy.

4.4.6. Endeavour to offer employees fair and flexible retirement options.

4.5 Disability Discrimination

Disability discrimination can be defined as treating a person, or group of people, less favourably than others because of a particular disability or for a reason related to a disability. Discrimination also occurs if an employer or service provider fails to comply with their legislative duty to make reasonable adjustments to accommodate the needs of a disabled person and the failure to do so cannot be justified.

The Group is committed to achieving disability equality by eliminating unlawful discrimination and the disadvantage experienced by people with a disability, wherever reasonably possible.

We will adopt the wide definition of disability contained in the Disability Discrimination Act 1995 (as amended) covering a wide range of impairments, illnesses and other conditions, both physical and mental.

To achieve our aims we will:

4.5.1. Challenge stereotypes about people with disabilities and will seek to focus on what people can do rather than what they cannot.

4.5.2. Work towards the commitments of achieving the 'Two Ticks' Disability Award and will regularly review our progress in this respect.

4.5.3. Interview all applicants with a disability who meet the minimum requirement for a job vacancy and will consider them on the basis of ability.

4.5.4. Ensure that there is a system in place to discuss at any time, but at least once a year, with disabled employees what can be done to make sure they can develop and use their abilities.

4.5.5. Make every effort when employees become disabled to make sure that they stay in employment.

4.5.6. Undertake to make appropriate adjustments in the workplace (e.g. to working arrangements and the work environment) to help people with disabilities to be, and remain, employed and to achieve their full career potential.

4.5.7. Take action to ensure that all employees develop the right level of disability awareness needed to deliver our commitments.

4.5.8. Continue to provide a full range of housing services, addressing the wide variety of needs of disabled residents, including the provision of adaptations to support independent living, floating tenancy support and supported housing accommodation.

4.5.9. Maximise access to our housing and services and will strive to provide services which are relevant to the needs of people with a disability. We will provide information in ways that are accessible to those with sensory impairment or other special communication needs (e.g. through use of sign language translators, home visits, alternative formats). Similarly, we will assist residents to communicate their needs (e.g. through use of text phones or induction loops).

4.6 Religion or Faith Discrimination

Religion or belief discrimination involves treating a person, or group of people, less favourably on account of their religion, religious belief or similar philosophical belief. Discrimination can also take place on the grounds of a mistaken perception of someone's religion, belief or faith.

Genesis Housing Group recognises individuals' right to freedom of belief and protection from intolerance. We undertake to treat people fairly irrespective of their religion or belief and aim to promote good relations between people of different religions and beliefs. We also give a commitment to make every effort to provide a prayer room for employees whenever possible.

To achieve our aims we will:

4.6.1. Develop employment practices in ways which recognise and respect religion and belief. We will seek to improve the understanding of religion and belief among our staff.

4.6.2. Deliver our services in ways which recognise and respect religion and belief. We will work with other agencies and community organisations to promote understanding and good relations between people of different faith communities.

4.6.3. Tackle unlawful discrimination and harassment. We will ensure that our harassment policies are implemented effectively, rigorously monitored and regularly reviewed. We will work with other agencies to ensure that support is provided to victims and promote multi agency cooperation and information exchange in tackling harassment of this nature.

4.7 HIV Discrimination

HIV discrimination is treating a person, or group of people, less favourably on the grounds that they have, or are thought to have, HIV or AIDS. This discrimination takes many forms and may result in gossip, rejection or violence when their HIV status becomes known, potential loss of income or job opportunities or potential problems with insurance and mortgages.

Genesis Housing Group recognises that we need to work towards creating a more supportive environment for people with HIV or AIDS.

To achieve our aims we will:

4.7.1. Challenge biased, fear based and prejudiced attitudes to HIV, in particular by sharing facts about HIV.

4.7.2. Seek to create an environment for both employees and residents whereby individuals may disclose their status without fear of rejection, discrimination and or violence, if they choose to do so.

5. Implementation

5.1 Responsibility for Implementation And Review

5.1.1. The Board: The Board of Genesis Housing Group has overall responsibility for the implementation of the Equalities and Diversity Policy. The Board has delegated this authority to the Diversity Committee.

5.1.2. The Equalities and Diversity Committee: The Equalities and Diversity Committee has delegated responsibility from the Board for approving this Policy, for ensuring that adequate resources are provided to implement this Policy, for monitoring progress in implementation and for its regular review.

5.1.3. Group Director of Corporate Services: This role is responsible for ensuring that a framework of policies and procedures surrounding diversity and equalities issues are developed and implemented.

5.1.4. Equalities and Diversity Adviser: This role is responsible for the practical implementation of the Equalities and Diversity Policy. This will be achieved through the provision of advice to staff members and managers in relation to the application of the Policy within the workplace. Additionally, the Equalities and Diversity Adviser will be responsible for co-ordinating the regular review and updating of this document.

5.1.5. Directors and Senior Managers: All directors and senior managers are responsible for championing equality and diversity, ensuring that all staff work within an equalities environment and that service provision is provided within this context.

5.1.6. All Managers: All managers are responsible for ensuring that they manage staff within the requirements of the Equalities and Diversity Policy. Managers are responsible for ensuring that all staff are fully aware of the requirements of this Policy and that any breaches of this Policy are challenged and corrected.

5.1.7. All Staff: All staff are responsible for the implementation of the Policy across the Genesis Housing Group. It is the responsibility of each individual to ensure that they are fully conversant with the requirements of the Policy. Individuals are encouraged to speak out against any behaviour which they believe is in breach of the Policy.

5.2 Training, Communication and Awareness

5.2.1. This area is a vital component which underpins the implementation of our Equalities & Diversity Policy. The Group is committed to ensuring that relevant training, guidance and information is provided to enable staff and board members to fulfil their responsibilities under this Policy and that open debate is encouraged. In addition, we will ensure that our position on equality issues is communicated to those people who may be subject to discrimination. We will make use of the following means:

5.2.2. Recruitment Packs: A summary of this Policy will be included within the job application packs provided to prospective employees.

5.2.3. Staff Induction folder: A summary of this Policy will be included within the staff induction folder issued to every employee.

5.2.4. In-house Training Programmes: The importance the Group attaches to equality and diversity is emphasised to all staff through the mandatory attendance requirement attached to the 'Welcoming Diversity' Course. In addition, tailored training is made available for those staff who need additional skills and knowledge to fulfil their roles (e.g. cultural or disability awareness training for front-line staff and specific training for those recruiting staff).

5.2.5. Employee briefings: Managers receive regular updates on equality and diversity issues, with the intention that this information is cascaded throughout the organisation through the GenBrief process. This is an important means of communicating the organisation's values and policies in this area.

5.2.6. Staff representatives: Members of the Staff Council are encouraged to raise any issues and concerns in relation to equality and diversity issues.

5.2.7. Intranet (Genie): The Group's internal intranet, Genie, allows up to date information on equality and diversity issues to be made available to all staff (e.g. minutes of the Equalities and Diversity Committee, Implementation Plans, progress in meeting targets, details and implications of forthcoming legislation).

5.2.8. Residents Handbooks: A summary of this Policy will be included within the handbooks issued to residents at the commencement of their tenancy / lease.

5.2.9. Website: The Group's external website will publicise a summary of this policy.

5.3 Impact Assessments

5.3.1. Impact Assessments are a systematic method of assessing whether a proposed policy will impact all groups equally.

5.3.2. The Group is working towards the implementation of impact assessments for new or amended policies, in order to:

- ensure the identification of any actual or potential inequalities and
- Consider alternative ways of achieving the aims of policy, to avoid or reduce any adverse impact.

5.4 Equality Projects

5.4.1. COFEM: The continued support and promotion of the 'Career Opportunities for Ethnic Minorities' mentoring scheme amongst disadvantaged groups, remains a primary focus of the Group. The Group will sponsor a total of ten members of staff per year, to take part in this scheme, so facilitating their individual career development.

5.4.2. Dignity at Work: The Group's Dignity at Work policy document defines unacceptable conduct in the work place and sets out procedures for tackling incidents of inappropriate behaviour swiftly and decisively in a sensitive and confidential manner.

5.5 Complaints Procedure

5.5.1. All complaints of discrimination or harassment will be taken seriously.

5.5.2. Employment: Any employee who believes that they have been the victim of discriminatory treatment, or who has witnessed discriminatory behaviour, should follow the procedure outlined in the Dignity at Work Policy.

5.5.3. Service delivery: Complaints about how we deliver our services are dealt with through our formal Complaints Procedure.

5.6 Implementation Plans

5.6.1. This Policy document will be supported by the development of a number of Implementation Plans, detailing the specific actions to be undertaken to achieve our policy and strategic aims. We will work towards establishing individual Implementation Plans covering the following aspects of equalities:

- 'Age Champion' Implementation Plan
- Disability Implementation Plan
- Black & Minority Ethnic Implementation Plan
- Family Friendly / Flexible Working Implementation Plan

5.6.2. Each Plan will set out a schedule of actions and targets designed to measure the effectiveness of our Policy and to ensure continuous improvements in our performance. Each Plan will contain:

- the specific actions to be undertaken and performance targets (where set)
- the resources required
- target dates for implementation
- the lead person with responsibility for each action.

5.6.3. As a minimum, the BME Implementation Plan incorporates targets in the following areas, as required by the Housing Corporation Regulatory Code: lettings, tenant satisfaction, dealing effectively with racial harassment, governing body membership, staffing, representation in residents associations and employment performance of suppliers, contractors and consultants.

5.6.4. Performance is monitored against individual targets and reported to the Diversity Committee quarterly. The Plans are regularly reviewed and updated and actions to rectify poor performance are built into the next cycle.

5.6.5. Copies of the individual Implementation Plans will be available from the Equalities and Diversity Advisor and staff will be able to download from Genie, the internal intranet.