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Policy Name	Equality and Diversity Policy
Policy Author	Deputy Director (Interim)
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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.



HAPPY TO TRANSLATE

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

1. Introduction

- 1.1 West Whitlawburn Housing Co-operative (WWHC) is committed to ensuring that anyone who wants to access our services, can do so by removing any barriers or obstacles which may prevent them accessing or obtaining the full benefit of our services.
- 1.2 Our Equality 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. Purpose of this Policy

- 2.1 This Policy describes how WWHC will promote equality, diversity and inclusion in our service delivery, and in the management of our organisation.
- 2.2 The Policy aims to ensure that:
- we provide a clear commitment to ensuring that equality and diversity is central to the services we provide
 - an understanding of equality, diversity and inclusion is integrated into all aspects of WWHC's activities
 - tenants and other customers, employees, volunteers, contractors and other partners are treated fairly and with dignity and respect
- 2.3 The Policy takes account of the legal and regulatory requirements we must meet and uses an equality strategy and action plan to deliver our equality commitments in practice.
- 2.4 Through this Policy implementation we aim to promote and sustain a culture of dignity, fairness and equality of opportunity both in the services we provide and the working environment of our employees.

3. Policy Aims

3.1 The Co-operative is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination.

3.2 We want to:

- Combat any discrimination either directly or indirectly
- Promote Equality, Diversity and Inclusion in everything that we do including in our service delivery, the influence we have with stakeholders, partners and contractors, and in the recruitment and retention of our employees.
- Provide equal opportunity for all

4. Legal Requirements

4.1 There are a number of key pieces of legislation in relation to Equality, Diversity and Inclusion which inform this policy. WWHC will meet all of its legal obligations as set out in the following legislation:

- The Equality Act 2010
- The Human Rights Act 1998
- The Scotland Act 1998
- The Housing (Scotland) Acts 2001 and 2010

4.2 **Appendix 1** provides details on each piece of legislation and what it means for WWHC.

5. Regulatory Requirements

5.1 The Scottish Social Housing Charter contains an Equalities outcome as one of the Charter's sixteen outcomes which social landlords must meet. The Equalities Outcome 1 of the Charter requires that:

"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 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 by complying with equalities legislation.

It includes landlords' responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.

5.2 The Scottish Housing Regulator's Regulatory Framework sets out the Standards of Governance and Financial Management and other Regulatory Requirements for social landlords in Scotland.

Regulatory Standard 5.3 sets out that:

- 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.
- EH1: Each 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.
- EH2: 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.

6. Key definitions

6.1 WWHC is committed to the principles of Equity, Diversity and Inclusion (EDI), which is central to our values. For us this means:

- Equality - people with different characteristics are treated fairly and have access to equal opportunities
- Diversity - respecting and valuing individual differences and unique characteristics, both in our organisation and in the community
- Inclusion - creating an environment where everyone feels welcome and valued.

6.2 The [Equality and Human Rights Commission](#) sets out key definitions.

6.2.1 The Equality Act 2010 sets out a range nine of protected characteristics which have special protection under equality law.

Age	A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).
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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	Whether a person is a man or a woman
Gender reassignment	Where a person undergoes, or proposes to undergo, a process for the purpose of reassigning their sex.
Race	A race is a group of people defined by their colour, nationality (including citizenship), ethnicity or national origins. A racial group can be made up of more than one distinct racial group.
Religion and belief	Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
Sexual orientation	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.

6.3 Under the Equality Act 2010, it is unlawful to discriminate, harass or victimise someone because they have or are perceived to have a protected characteristic or are associated with someone who has a protected characteristic

6.3.1 Discrimination

[Direct discrimination](#) is when someone is treated worse than another person or other people because:

- they have a protected characteristic
- someone thinks they have that protected characteristic (known as discrimination by perception)

- they are connected to someone with that protected characteristic (known as discrimination by association)

[Indirect discrimination](#) happens when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic, and they are disadvantaged as part of this group. A 'policy' can include a practice, a rule or an arrangement.

6.3.2 Harassment

[Harassment](#) is unwanted behaviour 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.

6.3.3 Victimisation

[Victimisation](#) is treating someone badly because they have done a protected act - they may have taken (or might be taking) action under the Equality Act or supporting somebody who is doing so - or because an employer, service provider or other organisation believes that they are going to do a protected act.

- 6.4 [Reasonable Adjustments](#) are positive changes to remove or reduce the effect of an employee's disability to do their job or to remove or mitigate barriers to customers accessing a service.

7. Implementation and Responsibilities

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.

- 7.1 The Management Committee is responsible for approving this Policy and for overseeing its implementation, including monitoring the progress of the Equality Strategy and Action Plan annually.
- 7.2 The Director and Senior Staff Team have operational responsibility for policy implementation, and for reporting the outcomes WWHC is achieving to the Management Committee.
- 7.3 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.

- 7.4 The Senior Staff Team will monitor progress against the Equality Action Plan quarterly and will report to the Performance Assurance and Risk Sub Committee.
- 7.5 This policy applies to everyone in WWHC and all have a responsibility to be alert to discriminatory behaviours and practices should they occur. Failure to comply with this policy could result in disciplinary action.
- 7.6 Equality, Diversity and Inclusion awareness training will be delivered to all employees and volunteers as part of the WWHC's induction process, and refresher training will be delivered on a programmed basis.

8. Complaints Handling Procedure

- 8.1 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.
- 8.2 Any complaints with regard to this policy or equalities issues, will be investigated in line with this Policy and Procedure.

9. Policy Review

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

Key Equality Legislation

1. The Equality Act 2010

1.1 The Equality Act 2010 sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. The UK-wide Equality and Human Rights Commission ([EHRC](#)) publishes a range of statutory codes of practice as well as non-statutory guidance, to help ensure the Act is put into practice effectively.

1.2 The Act 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 (defined at Section 6 of the Policy):

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

1.3 Under the Act, it is unlawful to discriminate against, harass or victimise another person because they have one or more of the protected characteristics. This applies to how:

- WWHC, as an employer, treats our staff and people seeking employment with us, and
- WWHC, as a provider of housing and related services, treats anyone who receives or seeks access to our properties and services.

1.4 General Equality Duty in Section 149 of the Equality Act

WWHC must also comply with the general equality duty when we are carrying out what the Act terms “public functions”. The public functions carried out by WWHC and other RSLs include matters such as:

- the allocation of housing, transfer and exchange of properties
- setting rent levels
- complaints procedures
- tenant participation, consulting and informing tenants
- setting the terms of tenancies
- the termination of tenancies and
- dealing with anti-social behavior

When carrying out public functions, WWHC has a legal obligation 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

1.5 (Specific Duties) (Scotland) Regulations 2012

The Equality Act is supported by the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. RSLs are not listed authorities under the Regulations, so do not have an obligation to comply with them.

There are a number of good practice areas that WWHC will reflect in its policies and working practices where this can be achieved in a proportionate way including:

- assess and review the equality impact of policies and practices
- in making the assessment, consider relevant evidence relating to persons who share a protected characteristic
- publish information in an accessible manner

2. **The Human Rights Act 1998**

2.1 The Human Rights Act 1998 provides for an individual to have the right to own and enjoy the ownership of property; the right to respect for private life; the right to respect for family life; and the right to respect for their home. The Act provides protection against discrimination with regard to any of these rights.

2.2 There are many aspects of WWHC's role in providing housing and housing services which could be affected by the Human Rights Act including:

- Housing allocations

- Tenancy agreements
- Housing conditions
- Aids and adaptations
- Rent arrears and other breaches of tenancy conditions
- Anti-social behaviour
- Relationship breakdown
- Tenancy termination, successions and evictions

2.4 The Equality and Human Rights Commission has published a guide for social landlords on complying with the Human Rights Act – [Human Rights at Home: Guidance for Social Housing Providers](#) - WWHC employees will refer to the guide, as required

3. The Scotland Act 1998

3.1 Although Equality is reserved to the UK Parliament, the Scottish Parliament and Government also have powers to “encourage and promote” equality opportunities under the Scotland Act 1998.

The Scotland Act uses a different (and in some respects wider) definition of equal opportunities than UK legislation.

“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”

3.2 Equal opportunities duties for RSLs are written into Scottish housing legislation. Section 106 of the Housing (Scotland) Act 2001 states that when providing housing and related services, “registered social landlords must act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements” set out in the Scotland Act.

4. Housing (Scotland) Act 2010

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

4.2 Housing (Scotland) Act 2010: Scottish Social Housing Charter

The Scottish Government, through the Scottish Social Housing Charter, sets standards and outcomes that all social landlords should aim to achieve when performing their housing activities.

Outcome 1 of the charter is that Social landlords perform all aspects housing and every tenant and other customer has their individual needs and rights recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

This outcome describes what social landlords 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 by meeting their statutory duties on equalities. This includes the need to eliminate discrimination and advance equality of opportunity. It includes landlords' responsibility for finding ways of understanding the rights and needs of different customers, for example victims/survivors of domestic abuse and delivering services that recognise and meet these needs. This may include making reasonable adjustments.

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.

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.

2. Equality Strategy

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

2.1 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.

2.2 Communications Strategy

The Communications 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.

- We are committed to removing barriers to customers accessing this and other documents, whether those barriers are because of language, sensory impairments or other barriers to access.
- We will consider providing documents in different formats on request, this includes in a different language, audio format, large type, easy read or other formats.
- We will provide access to translation and interpretation services where an individual whose main language is not English requests this and where an individual does not have the translation or interpretation assistance of family or friends.
- We will not use children under the age of sixteen years as interpreters for family members when sensitive issues such as rent arrears, court proceedings or domestic violence are being discussed.
- We will use our any relevant data which we collect to improve how we communicate with our customers.

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.

2.3 Publicity and Promotion

We will ensure that the equality Policy is widely publicised to tenants, other customers, contractors, partners and other stakeholders through our website, tenant engagement activities, social media and in our day-to day activities.

A copy of this Policy will be included in induction packs for new employees and volunteers and be made visible and available to visitors to our offices and on request.

Through this Policy our commitments and expectations will be communicated, including through our procurement processes, to contractors providing a service on behalf of WWHC.

3. 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.

4. 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

5. Dignity at Work Policy

This policy aims to ensure that all employees, Management Committee members, temporary 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.

6. 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.

7. Equality Action Plan (Appendix 3)

The action plan details practical measures and ongoing actions.

8. Vision and Values

We are committed to providing excellent housing and services to our members, residents and service users.

8.1 Vision

By putting our members at the centre of everything we do, we will maintain a safe, popular area where people are happy to live.

8.2 Values

Our values are central to what we do and incorporate the importance that we place on people, services and quality. They shape how we operate to achieve our mission and the objectives set out in this plan, underpinning all of the work that we do:

Excellence We are committed to providing high quality, customer focused services that demonstrate value for money, delivered by an experienced staff team.

Integrity Openness, honesty, transparency and trust are at the core of all that we do.

Inclusion We believe all people should be treated with equal respect, irrespective of age, gender, physical ability, race, ethnic background or sexual orientation. We will ensure that all our actions, policies and procedures support equality for all.

Accountability We hold ourselves accountable to the community we serve, the partners we work with and the agencies that support us, by providing the appropriate information all stakeholders and partners need, in order to assess our performance and to be able to contribute effectively to its development and improvement.

Community We are proud to be a fully mutual housing Co-operative controlled by our members on the Management Committee, serving the community in which we work.

The Co-operative's vision and values are reviewed annually as part of the Business Plan review process and staff appraisal system.

1. Introduction

In order to deliver the objectives of the Equality Policy, it is important that we know who our tenants and other customers, employees and volunteers are. Having good information about individuals' needs, including equality information, is essential to enable us to ensure those needs can be addressed.

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:

- promote equality objectives across our services
- identify and address our customers' needs, and improve our services
- assess the impact of activities, policies and practices in promoting equality objectives, including through equality impact assessments
- understand the profiles of committee, staff, tenants, and customers
- identify gaps and barriers to equality, diversity and inclusion, and inform our service delivery to target our services where they are required and where they will bring the greatest benefit.

2. Data Collection

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

2.1 We gather equality information from:

- people who apply for a home;
- tenants / members;
- people who apply for a job with us;
- our employees;
- Management Committee Members
- Volunteers

2.2 We collect equality information:

- Through the housing application and review process, sign ups and new tenant visits
- Through tenant surveys
- During the recruitment process
- Through annual employee survey
- Through annual Management Committee member survey

2.3 We process equality information 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.

2.4 We will make clear that anyone can choose not to provide some or all the information requested. Respondents to any monitoring form have the reasons for asking for the information and how it will be used explained to them.

3. Data Protection

WWHC will collect personal data and equalities information about individuals we employ or provide services to, to inform our service delivery and ensure that we are treating everyone fairly and not discriminating against any person with a protected characteristic.

3.1 Equalities data will be collected and processed in line with our obligations in terms of the UK Data Protection Regulation (UKGDPR), Data Protection Act 2018, the WWHC Privacy Policy and our Fair Processing Notices. We will only collect and process sensitive personal data where we have the appropriate lawful bases for processing that type of data.

3.2 Personal equalities data will be only used in an anonymised / aggregated way.

3.3 Personal data will be controlled and stored in a secure way as set out in the WWHC Privacy Notice. This also sets out how and why we may share data and who we may share it with.

3.4 WWHC will follow the National guidance for Scottish Social Landlords on Collecting Equality Information 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.



Information for those completing the equality monitoring 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;
- board and committee members; and
- elected members (in case of local authorities)

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.

Age				
Please tick the band for your age:	16-24		25-34	
	35-44		45-54	
	55-65		65+	
Prefer not to say				

Sex							
Female		Male		Intersex		Prefer not to say	

Do you consider yourself to be a trans person?					
Yes		No		Prefer not to say	

Sexual orientation			
What is your sexual orientation?			
Bisexual		Gay man	
Heterosexual/straight		Lesbian/ gay woman	
Other		Prefer not to say	

Pregnancy and maternity				
Are you pregnant?		Yes		No
Have you taken maternity or paternity leave in the past year?		Yes		No
Prefer not to say				

Marriage and civil partnership				
Are you presently in a civil partnership?		Yes		No
Are you presently married?		Yes		No
Prefer not to say				

Belief or Religion				
Please tick the box which best describes your belief or religion.				
Catholic:		Protestant:		Other Christian:
Hinduism:		Islam:		Judaism:
Sikhism:		Buddhism:		
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				

Disability			
Are you a disabled person?	Yes	<input type="checkbox"/>	No
If yes, please specify the nature of your impairment.			
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"/>

Ethnicity			
Please tick the box that best describes your 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"/>
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:		Yes	No
Please specify your ethnic group		<input type="checkbox"/>	<input type="checkbox"/>

Prefer not to say:	
General	
Please use the space below to advise us if you have any particular requirements	
Please advise if there are any issues that you want to discuss with us in confidence and if so, please provide contact details	

Consent

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

By submitting this form you 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.

1. Background

- 1.1 WWHC will measure the impact of our key policies on protected characteristics through carrying out an Equality Impact Assessment (EIA) as part of WWHC's policy or service development and / or review programme.
- 1.2 The EIA is used to identify where our policies, proposals or services may, directly or indirectly, adversely impact a protected characteristic group or have unintended negative impacts.
- 1.3 Through this process, WWHC will decide whether to continue with a policy, service or proposal, or put in place mitigating actions to address any inequality or adverse impact found through the EIA process.
- 1.4 WWHC staff involved in the development or review of policies, proposals or services will have responsibility for completing an EIA in relation to a particular policy, service or proposal.
- 1.5 Consideration and approval of the EIA will be the responsibility of Management Committee or a Sub-Committee or other body with delegated authority to approve policies, services or proposals.
- 1.6 A specimen EIA template document is included below.

2. Equality Impact Assessment Process

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

- 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.

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 identified. 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.



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Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer			
Policy / Project / Service		New Policy / Project / Service or revision of existing?	
Is this a reassessment following amendments being required at a previous assessment?			
Briefly describe the aims, objectives and purpose of the policy / project / service.			
Who is intended to benefit from the policy / project / service? (Eg. applicants, tenants, staff, contractors)			
What outcomes are wanted from this policy / project / service? (Eg. the measurable changes or benefits to members/ tenants / staff)			
Consultation			



HAPPY TO TRANSLATE

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

Who have you engaged and consulted with as part of your assessment?

Equalities Impact Assessment

Which protected characteristics could be affected by the policy, practice, or service?	Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impacts for each characteristic group.
Age		
Disability		
Gender Reassignment		
Marriage & Civil Partnership		
Race		
Religion/Belief		
Pregnancy/Maternity		
Sex		
Sexual Orientation		

Action Plan To Mitigate Negative Impact

What action/s are required to address the impacts arising from this assessment?

Protected characteristics	Action	Implementation Date
Age		
Disability		
Gender Reassignment		
Marriage & Civil Partnership		
Race		
Religion/Belief		
Pregnancy/Maternity		
Sex		
Sexual Orientation		
Human Rights		

Final Decision	Tick relevant box	Include explanation if appropriate
Approved for implementation without change		
Amend or change the Policy/Project/Service		

Continue the Policy/Project/Service without change (despite impact)		
Stop the Policy/Project/Service		
Lead Officer Signature		
Date		
Date approved by Management Committee/ Sub Committee		

Equality Action Plan 2024/2027
Appendix 3

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 age, race, sex, gender reassignment, disability, religion/belief, sexual orientation, pregnancy/maternity and marriage& civil partnership.

Action	Responsibility	Target Date	Reporting and progress status
Monitoring and Reporting			
Report on existing equalities data to Management Committee	Deputy Director	Nov 2024	MC report
Monitor delivery of the Equality Strategy and Action Plan Quarterly Quarterly Annually	Senior staff PA&R Sub Management Committee	Ongoing throughout the period of the plan	Committee reports Action Plan updates
Policies and procedures reflect the positive principles of inclusion, accessibility and diversity by carrying	Senior staff	Policy Review Schedule	Committee reports

Action	Responsibility	Target Date	Reporting and progress status
out equality impact assessments			
Equalities issues are considered at Management Committee meetings as required	Director	Monthly	Standing agenda item
Carry out aids and adaptations as soon as practical to assist tenants to live independently	Property Manager	Ongoing	PA&R Sub report Annual Report
Training			
Staff and Committee equalities training: Induction for new staff and committee members Refresher training	Director	Start date 2-yearly	Training records Induction records
Develop guidance and training on Equality Impact Assessment	Senior staff	Dec 2024	Training records Guidance material available
Communications			
Publicise our equalities commitment by making this policy widely available through our website, tenant engagement activities, social media, display at offices and in our day-to-day business activities.	Communications & Participation Working Group	Dec 2024	Report MC confirming how policy has been publicized
Collect/confirm tenant communications preference data		Annual	

Action	Responsibility	Target Date	Reporting and progress status
Full survey of existing tenants Include in sign up process	Communications & Participation Working Group Head of Housing Services	Nov 2024	
Key documents available in alternative formats such as audio, easy read, large print and appropriate translations as required	Communications & Participation Working Group	Ongoing	Publications available
Ensure that all staff know how to access translation and interpretation services (languages and signing) including Happy to Translate	Senior staff	Oct 2024	Training Records
Maintain provision of induction loop system in reception area and at public meetings	Corporate Services Officer	Ongoing	
Maximise tenant / customer feedback opportunities though website / newsletter / consultations and use of Homemaster / CX feedback	Communications & Participation Working Group		
Communicate our equalities expectations to contractors and service providers	Senior staff		Through procurement processes
Data Collection and Analysis			

Action	Responsibility	Target Date	Reporting and progress status
Management Committee	Corporate Services Officer	Annually	Following AGM
Employees	Deputy Director	Annually	Following successful recruitment and through staff surveys
Housing Applicants	Head of Housing Services	Annual report	Through housing application process
New Tenants	Head of Housing Services	Annual report	Tenancy sign up or settling-in visit.
Existing Tenants	Corporate Services Officer	Annual report	Through 3 yearly TSS and annual survey with communications preferences survey
Tenants involved in participation and consultation activities	Corporate Services Officer		
Committee and staff code of conduct confirmation	Director and Senior staff	Annually	Committee update following AGM Annual staff appraisal records
Assess the equality profile of housing list applicants and assess allocations made	Head of Housing Services	Annual report	Report on meeting equality needs by analysis of lets made
Policy Review			
Internal Audit of Equality, Diversity and Inclusion	Director	2026	
Equal opportunities review of tenant participation opportunities	Corporate Services Officer	September 2025	Report to MC
Review effectiveness of systems for collecting and	Senior Staff	Jun 2026	Report to MC

Action	Responsibility	Target Date	Reporting and progress status
analysing equalities information.			
Consult with tenants and residents on Equality Policy Strategy and Action Plan	Communications & Participation Working Group	Sept 2025	Report to MC Revised Policy and Action Plan

Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer	Deputy Director (Interim)		
Policy / Project / Service	Equality and Diversity Policy, strategy and Action Plan	New Policy / Project / Service or revision of existing?	Revision
Is this a reassessment following amendments being required at a previous assessment?	No		
Briefly describe the aims, objectives and purpose of the policy / project / service.	<p>This Policy describes how WWHC will promote equality, diversity and inclusion in our service delivery, and in the management of our organisation.</p> <p>The Policy addresses the legal and regulatory requirements we must meet, and how we will translate our mission and values into tangible outcomes that will benefit our tenants, applicants, employees and other people who use our services.</p> <p>Through this policy we also want to promote and sustain a culture of dignity, fairness and equality of opportunity both in terms of the services we provide and the working environment our employees operate in.</p>		
Who is intended to benefit from the policy / project / service? (E.g. applicants, tenants, staff, contractors)	<p>This Policy aims to ensure that an understanding of equality, diversity and inclusion is integrated into all aspects of WWHC's activities, and to ensure that tenants and other customers, employees, volunteers, contractors and other partners are treated with fairness and respect, and that they also treat others with fairness and respect.</p>		

What outcomes are wanted from this policy / project / service? (Eg. the measurable changes or benefits to members/ tenants / staff)	Everyone we work with will be treated fairly and equally, with dignity and respect regardless of who they are, their circumstances or the background that they come from.
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Consultation

Who have you engaged and consulted with as part of your assessment?

Equality & Diversity Data Collection Report Nov 2023
 Management Committee members.
 We will promote and raise awareness of our strategy and policy through our website, Guide to Information and publications, our Annual Assurance Statement, staff induction and training.

Equalities Impact Assessment		
Which protected characteristics could be affected by the policy, practice, or service?	Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impact/s that could result for each of the protected characteristic groups.
Age	X	Policy and strategy are designed to eliminate unlawful discrimination and promote equality objectives and to have positive impacts for all groups and to improve our approach to Equality Diversity and Human Rights across all of our activities.
Disability	X	
Gender Reassignment	X	
Marriage & Civil Partnership	X	
Race	X	
Religion/Belief	X	
Pregnancy/Maternity	X	
Sex	X	
Sexual Orientation	X	

Action Plan To Mitigate Negative Impact		
What action/s are required to address the impacts arising from this assessment?		
Protected characteristics	Action	Implementation Date
Age		
Disability		
Gender Reassignment		
Marriage & Civil Partnership		
Race		
Religion/Belief		
Pregnancy/Maternity		
Sex		
Sexual Orientation		
Human Rights		

Final Decision	Tick relevant box	Include explanation where appropriate
Approved for implementation without change	X	
Amend or change the Policy/Project/Service		
Continue the Policy/Project/Service without change (despite impact)		
Stop the Policy/Project/Service		
Lead Officer Signature		Stephanie Marshall
Date		09/09/2024
Date approved by Management Committee/ Sub Committee		23/09/2024

