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1. Introduction

- 1.1 This document outlines the Association's Equality and Diversity policy. It updates the previous "Equal Opportunities Policy and Action Plan" which was approved by the Management Committee in April 2012. It has been developed in collaboration with both staff and Committee members as well as local residents who attended a consultation event in October 2011 and consideration of changes to recommended practice since the 2012 review.
- 1.2 The policy is supported by an action plan which sets out what the Association will do on a day-to-day basis to help ensure that the policy's objectives are achieved and that the Association can be proactive in its work in equality and diversity. The Association has an accompanying action plan which is presented as a separate document and which is revised on an annual basis.
- 1.3 To help us ensure that those wishing to use our services, which includes the general public, tenants, and contractors as well as our employees, are clear about our commitment to equality of opportunity, the Association will:
- a) Place a notice in the interview rooms publicising the policy's existence and that it is available in a variety of formats
 - b) Feature the new policy in the summer 2015 newsletter and explain the main elements of the action plan on our website, www.cernachha.co.uk
 - c) Continue to ensure that staff and Committee receive appropriate training in the area of equality and diversity – we will conduct appropriate training by the end of 2015

2. Legal, regulatory and good practice framework

2.1 This Policy on Equality and Diversity takes account of legal, regulatory and best practice requirements, including (but not limited to):

- a) The Equality Act 2010
- b) Human Rights Act 1998
- c) The Housing (Scotland) Act 2010
- d) Section 9 of Raising Standards in Housing
- e) The Scottish Social Housing Charter Outcome Number 1
- f) Section 5.3 of the Regulatory Standards of Governance and Financial Management
- g) “Getting the Balance Right”¹

The Equality Act 2010 consolidates much of the previous equalities-related legislation into one single Act. It therefore replaces, for example, the Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995.

2.2 The Scottish Government published the Scottish Social Housing Charter in March 2012 and it came into effect on 2 April 2012. The Government’s commitment to ensuring that RSLs behave in a way that promotes equality and diversity and seeks to eliminate discrimination is characterised by the fact that Outcome Number 1 addresses Equalities.

2.3 At the same time as the Charter, the Scottish Housing Regulator introduced the Regulatory Standards for Governance and Financial Management. Section 5 requires RSLs to “conduct their affairs with honesty and integrity and, within this, RS5.3 requires RSLs to pay “due regard to the need to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements”.

¹ Published by the Scottish Federation of Housing Associations in November 2011.

2.4 The Management Committee wishes to be clear, however, that its work in equalities is motivated by a belief and commitment to ensuring equal opportunities for all, and to do all that it reasonably can in this regard – we are doing it because we want to and not because we have to. Whilst we will make reference to legal, regulatory and best practice requirements to ensure that we are not placing the Association at risk of a legal or regulatory breach, our main motivation in reviewing the policy is because we want to continue to improve our approach in this area.

The Equality Act 2010

2.5 The Equality Act 2010 is the main piece of legislation relating to equalities. It was passed by the Westminster Government and therefore applies throughout the UK. It has two main aims: the first is to harmonise previous pieces of anti-discrimination legislation and the second is to strengthen and extend the law in a number of respects.

2.6 There was initially some debate when the Act was first introduced as to how it applied to registered social landlords as it was not clear whether RSLs were “public authorities” for the purposes of the Act – Schedule 19 Part 3 of the Act defines a Scottish public authority and RSLs are not expressly included in this. However, Cernach’s view was that we should seek to comply with the principles outlined in the Act and that our work in the area of equalities should always reflect the spirit of the Act; this view has become the norm as RSLs have revised their policies in the years since the Act was introduced and it continues to be Cernach’s view.

2.7 The National Housing Federation highlights the undernoted areas as the main ones in the Act likely to be relevant to RSLs as:

- protected characteristics (see section 3.2)
- the definitions of unlawful discrimination
- the disability related aspects
- the provision of goods, facilities and services

- positive action and the genuine occupational requirements
- employment related matters and pay reviews
- the duties to advance equality
- tackling socio-economic inequalities
- procurement

3. Policy statement, general principles and protected characteristics

3.1 The policy has two main aims:

- to ensure that no person, group of persons or organisation who deal with the Association in any way or who requires a service, assistance or advice from the Association, or who is employed by (or serves) in any capacity by the Association², is treated less favourably than any other person, group of persons or organisation – put more simply, anyone who has any sort of contact with Cernach Housing Association.
- To promote the policy so that anyone dealing with the Association in any capacity is made aware that the Association has a policy and that there is a zero tolerance of any act which contravenes the policy/policy principles in any way

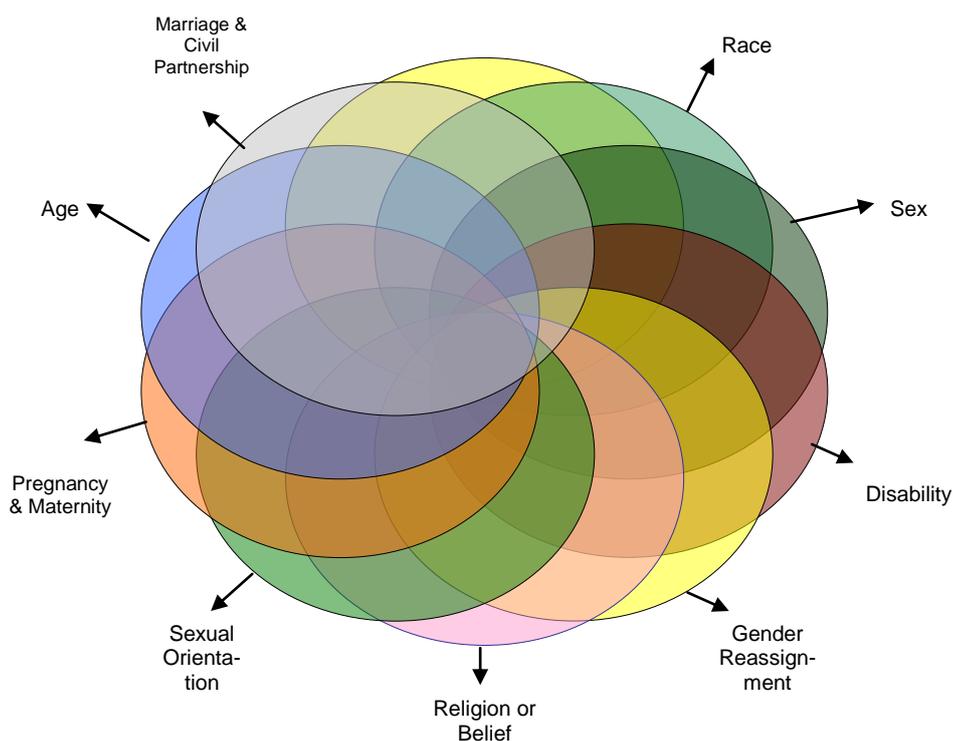
3.2 We will seek to promote and to achieve equality of treatment and opportunity for all groups in society without discrimination or prejudice on any grounds. The Equality Act introduces the term “protected characteristics” to describe groups against whom any sort of discrimination is unlawful. Section 4 of the Act specifies nine protected characteristics:

- Age
- Disability
- Marriage and civil partnership
- Pregnancy and maternity

² This includes Committee members, contractors, consultants, agents and anyone attending in a voluntary capacity for work experience.

- Race
- Religion or belief
- Gender (referred to as “sex” in the Act)
- Gender reassignment
- Sexual orientation

In addition, the Act recognises that unlawful discrimination can occur because of a combination of protected characteristics and so people will be able to make a claim because they are both female and disabled or black and gay. The diagram on the following page was used by Employers in Voluntary (EVH) in their October 2010 model Equality and Diversity policy and shows how protected characteristics can overlap.



3.3 The Association is keen to emphasise, however, that it will not tolerate any sort of unfair treatment or discrimination on any grounds. In addition to the above, therefore, our zero tolerance will be broadened (but not confined) to the following:

- National origin
- Cultural background
- Ethnic origin
- Tenure
- Issues related to literacy or numeracy
- Employment status
- Domestic circumstances

Each of the above is equally important, and we will take all reasonable steps to ensure that no discrimination, whether deliberate or inadvertent, occurs.

3.4 To help achieve the main aims as outlined in section 3.1, the Association has devised the following six statements, which will form the basis of the separate action plan.

- a) ensure that no one is discriminated against on the basis of any of the nine protected or seven other characteristics noted above
- b) ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services
- c) actively assist disadvantaged minority groups within the local community to benefit from its housing services
- d) ensure equality of opportunity and treatment for all people in relation to the employment of staff
- e) ensure that all staff are aware of the Association's commitment to, and obligations in relation to, equality and diversity
- f) be mindful of its equalities commitments in relation both to the procurement of contractors/consultants and to the composition and operation of the Management Committee

4. Types of discrimination

4.1 The 2010 Act contains seven types of discrimination, and these are discussed in sections 4.2a to g. We have also added an eighth category, institutionalised discrimination, for the purposes of this policy and this is outlined in section 4.2h.

4.2 Discrimination

a) Direct Discrimination

This is less favourable treatment of an individual or group less favourably than others, and this treatment is because of a protected characteristic. An example of this would be to refuse to employ somebody because they had an impairment, which had no relevance to their ability to carry out the job they had applied for.

b) Associated Discrimination

This is direct discrimination against someone because they are associated with another person who possesses a protected characteristic. For example, a non-disabled person is discriminated against because they need to take care of disabled dependent.

c) Discrimination by Perception

This is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name on their application form.

d) Indirect Discrimination

This is when an apparently neutral requirement or condition impacts adversely or has a disproportionate effect on a particular equality group. An example of this could be holding meetings at times which are inconvenient for people with child care responsibilities and not providing crèche facilities.

e) Harassment

This occurs when a person engages in unwanted conduct which is related to a protected characteristic, and which has the purpose or the effect of (i) violating the dignity of another person or (ii) creating for that person an intimidating, hostile,

degrading, humiliating or offensive environment. An example might be displaying a topless calendar on a wall where this makes the workplace an offensive place to work for any employee.

f) Harassment by a Third Party

As an employer, the Association is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant.

g) Victimisation

This occurs when someone faces discrimination because she or he has made an allegation of unlawful discrimination or because of assisting or supporting a complainant. An example might be refusing to consider someone for a promotion because they gave evidence on behalf of a colleague who made a complaint of unlawful race discrimination.

h) Institutionalised Discrimination

This was first defined in the context of racism and exemplified in the Macpherson report on the inquiry into the death of Stephen Lawrence as “the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviours which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.”

The Association extends the above to cover all actions where these are related to a protected characteristic.

5. Positive action

5.1 The Act outlines two types of positive action which, in certain circumstances, are permissible:

- General
- Recruitment and Promotion

- 5.2 If the Association believes that persons who share a protected characteristic suffer a disadvantage or have different needs because of that characteristic, then action may be taken to help overcome the disadvantage or address the needs. The Act points out that any action should be proportionate.
- 5.3 An example could be addressing imbalances in the workforce by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets aimed at encouraging people from a particular group or groups to apply for a vacancy in but no quotas will be set.

6. Equality impact assessment

Context

- 6.1 Because equality and diversity issues are fundamental to how Cernach Housing Association works and thinks, the Management Committee has decided to carry out a programme of Equality Impact Assessments (EqIA) on its policy documents. It would be impractical to do all of these at once and so our approach will be to carry out the impact assessments as policies are being reviewed. The EqIAs allow the Association to take proactive steps to identify and remove potential discrimination or, in some cases, the relevant action will be to adapt a policy or practice to better advance equality. It is important to recognise that providing the same service in the same way to everyone can sometimes create a disadvantage.
- 6.2 The Equality and Human Rights Commission in Scotland states that a policy or practice which proactively considers equality, particularly using relevant evidence and consultation or involvement, is likely to be a better quality policy in terms of it being more responsive to the needs of those affected. It further recognises that EqIA helps mainstream equality considerations into policy and decision-making, and this is something that the Association has promoted in its equality policies since 2003.

Policies Subject to Equality Impact Assessment

6.3 The Association has applied a screening process to determine which policies should be subject to impact assessment. This is not an exact science and some judgement therefore needs to be used, but the approach is to ask the undernoted questions to every policy. Where the answer to any one question is “yes”, then an impact assessment will normally be carried out.

- a) Does the policy affect service users, employees or the wider community, and therefore potentially have a significant effect in terms of equality? The relevance of a policy will depend not only on the number of those affected, but also the significance of the effect on them.
- b) Is it a major policy, significantly affecting how functions are delivered in terms of equality?
- c) Does it relate to policy areas or issues that previous consultation or involvement activities have identified as being important to particular protected groups?
- d) Does it relate to an area where the Association has identified a need to improve equality outcomes?
- e) Does it relate to an area where there are known inequalities?
- f) Does it relate to a policy where there is significant potential for reducing inequalities or improving outcomes?

6.4 It is expected that EqIAs will be applied to all of our service delivery policies as a minimum.

Format of the Impact Assessment

6.5 All policies subject to an impact assessment will have an individual assessment template completed and this will normally be Appendix 1 of the policy document. The format is outlined in the remainder of this section.

Aims of the policy

6.6 The following questions will be asked and the responses noted in

a table:

- What is the purpose of the policy
- Target audience(s) – who is affected by the policy or who is intended to benefit from the policy, and how?
- Who is responsible for delivering the policy?
- How does the policy fit into our wider or related policy objectives?

Target Audience(s)

6.7 What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience? The outcomes in the policy are to be available to all tenants and other customers regardless of factors such as (but not limited to) their age, disability, gender, marital status, sexual orientation, race, religion or belief, marriage or civil partnership, or pregnancy/maternity. Each target audience should be identified³ and the following should be addressed:

- Comment on what the information we have tells us about how the policy in question might impact positively or negatively on the different groups within the target audience(s).
- Identify whether the policy provides an opportunity to promote equality and diversity or good relations by altering the policy or working with others.
- State whether a further impact assessment is required to be carried out and state the timeframe for this.
- Highlight any follow up action not already programmed and state the timeframe for this.

³ The target audiences will often, but not necessarily, be all of the protected characteristics groups.

Follow-up Action

- 6.8 Where there is a need for follow-up action, the tasks and timeframe for achieving them need to be noted in this section. Tasks therefore need to be incorporated into the Equality and Diversity Action Plan to ensure that they are addressed.

Impact Assessment on Equality and Diversity Policy

- 6.9 The impact assessment for this policy is contained at Appendix 1.

7. Risk management

- 7.1 The Association recognises the potential risks should we fail to adhere to the Equality and Diversity Policy and/or the accompanying Action Plan. It is not only the Association's credibility that would be compromised, but that of the Management Committee should there be a major deviation from policy, and possibly even the sector as a whole. In order to combat this, Section 15 of this policy outlines the method of investigation that would be adopted should any allegation of a breach be made.

8. Communications in alternative formats

- 8.1 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually-impaired resident may not be able to read the allocations policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is all the more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.
- 8.2 To help combat this, the Association will provide information to customers in any special formats as required. Special formats may include:

- Large print
- CD
- Translations into community languages
- Use of language or sign interpreters
- Braille

Please note that it is impractical to have all possible formats available immediately. Our commitment therefore relates to the ability and willingness to produce documents in the formats required (or an interpreter if requested) within a period of three days. All costs in relation to this will be borne by the Association.

8.3 During the development of this policy, we consulted with the Royal National Institute for the Blind (RNIB) on font size. The RNIB confirmed that the Association's current approach of all letters, policies and information being produced in 12 point Arial as standard with larger font available on request complies with their Clear Print Guidelines. This will therefore remain our policy but, as part of the Equality and Diversity Action Plan, we will discuss how we can identify more customers who would benefit from receiving all communications from us in large font (we identified a small number of people during the resident consultation but it is likely that there are others within our area).

8.4 To ensure that this strategy is effective, the availability of documents in other formats will be publicised on our website and on the notice board within the interview rooms.

9. Publicising the equality and diversity policy

9.1 It is absolutely critical that the policy is publicised if it is to stand any chance of being successfully implemented. The level of interest in the policy will vary from one person to another depending on a whole range of factors. To help respond to this, we will publicise the policy in the following ways:

- a) we will publicise the policy review and the Association's work in relation to promoting equality and diversity in the summer 2015 newsletter
 - b) We will ensure that all new tenants are made aware of the Association's commitment to equality and diversity as part of the sign-up process
- 9.2 All employees, applicants for employment and contractors will be notified of the existence of the policy and will be asked to familiarise themselves with it within a week of it being approved, or within five days of returning to work for anyone who is absent when the policy is reviewed (the Director will send an email to all staff informing them that it has been approved and signposting them to the copy on the common drive). Staff training will take place within three months of the policy being approved and staff will be encouraged to raise any queries they have relating to the policy to their line manager in the first instance.
- 9.3 Copies of the policy will automatically be provided for successful job applicants within their Induction and Staff Handbook and contractors being used by the Association, within the Application Pack.
- 9.4 Committee members will continue to receive on-going equality and diversity training and will be involved in approving the final document. All members will be encouraged to keep up to date with development in the area of good practice in equality and diversity.
- 9.5 Anyone wishing to inspect the Equality and Human Rights Commission's (EHRC) Code of Practice on Racial Equality in Housing can view this in the Association's office or download a copy from the Association's website, www.cernachha.co.uk or direct from the EHRC website:
http://www.equalityhumanrights.com/uploaded_files/code_of_practice_on_racial_equality_in_housing_scotland.pdf

10. Target setting – gender, race, age and disability

- 10.1 Whilst embracing the principles of equality and diversity is something that the Association takes very seriously, it is nonetheless important that there is some system in place to demonstrate that we actually achieve our objectives (or, perhaps more importantly, to highlight areas where we do not). In other words, we must ensure that this policy statement is not used merely to pay lip service to equality and diversity.
- 10.2 One of the ways of doing this is to develop a set of targets against which our performance can be quantified – we are not able at present to set targets for all protected characteristics groups (please see section 14). What is crucial, however, is that we set a range of targets that are realistic and achievable for the Association, otherwise the Committee risks a seemingly poor performance in this area.
- 10.3 It is proposed that we incorporate targets in the following areas within the Internal Management Plan and evaluate the position every twelve months, with figures being compared with the APSR.
- a) Increase the proportion of applications for housing from members of BME groups in line with current demographic figures
 - b) Increase proportion of existing tenants from members of BME groups to reflect the proportion of BME households on the housing list
 - c) Maintain the current level of representation from BME groups on the Management Committee and seek to address the gender and age imbalance and under-representation from people with disabilities
- 10.4 The most up-to-date Census information relates to the 2001 figures. It is widely accepted that demographic are constantly changing and the Census information is therefore increasingly

unreliable for the purposes of equality action planning. Whilst we will take cognisance of the Census, we will also make use of other information that may be available, such as that from our own housing lists and those of the other local RSLs.

11. Identifying problems and taking remedial action

- 11.1 Because the Association is reviewing progress against the Equality and Diversity Action Plan on an annual basis, areas where there may be problems will be flagged up so that remedial action can be taken.
- 11.2 It is not possible to be prescriptive about how the Association should identify problems and take appropriate action in this policy statement as there are too many potential outcomes, all different from each other. The general process to be followed by staff is: -
- a) Advise Committee of the underachievement
 - b) Outline action already taken to achieve the objective
 - c) Make suggestions for further action, in consultation with other RSLs who may have solved similar problems
 - d) Agree refinements to the Equality and Diversity Action Plan and implement these
- 11.3 Realistically, it may emerge that some tasks are difficult to achieve and this is something that the Association recognises. This does not mean, however, that we will cease trying to achieve these. The Association will do all that is possible and reasonable to ensure that equality and diversity targets are met.

12. Staff and Committee responsibilities

- 12.1 Ultimate responsibility for ensuring that the Association conforms to the principles outlined in this policy and strives to achieve the targets set lies with the Management Committee.
- 12.2 Responsibility for ensuring that Committee is kept adequately informed of progress and alerted to any areas of

underachievement lies with the Association's Management Team. It will therefore be the Management Team's responsibility to ensure the quality and completeness of information and recommendations being presented to the Committee.

13. Dissemination of key targets and performance

- 13.1 The Committee will consider an annual report on equality and diversity at its April or May meeting. This will be produced by the Management Team and will be based on the outturn figures to the end of March.
- 13.2 In May or June, this performance will be summarised in the "Annual Statement on Equality and Diversity". This will be distributed to all tenants and members by way of a newsletter and posted on the website.
- 13.3 The Association will report clearly on its performance, and this will include highlighting areas where targets have not been met.

14. Areas not currently subject to target setting

- 14.1 As noted in the opening section, the Association actively promotes equality of opportunity and treatment for all groups in society. In the main, the Association will be able to gather information to help it assess the degree to which the policies and procedures across all areas of the business inherently contain an equal opportunities approach.
- 14.2 In the past, we have not asked questions relating to sexuality and religion as part of our standard equalities monitoring questionnaires because tenants and other stakeholders told us during consultations that they considered these questions inappropriate and/or intrusive. Following on from this, we have not been able to set targets in these areas.
- 14.3 It has become a regulatory expectation and a good practice requirement that RSLs at least attempts to gather information in

relation to all protected characteristics groups, and the Association will amend its equalities questionnaires accordingly (pointing out that anyone can refuse to respond to any or all of the equalities questions). Over time, therefore, the Association will obtain statistics relating to the sexuality and religion of its tenants, applicants and other stakeholders. Once we have sufficient information, we will discuss whether we can set meaningful targets in these areas.

15. Breaches of the equality and diversity policy

- 15.1 The Association has a policy of zero tolerance as far as discriminatory practices and breaches of equal opportunities are concerned.
- 15.2 Any allegations against a member of staff or Committee will therefore be investigated thoroughly by the Association's Director. If the allegation is made against the Director, the investigation will be conducted by the Chairperson and the most senior officer not directly involved.
- 15.3 Before the investigation begins, the Association will seek advice from Employers in Voluntary Housing. Unless there is very good reason not to, the advice of EVH will be followed. It is also advisable to contact the Association's solicitor.
- 15.4 The member(s) of staff/Committee member(s) should be advised of the allegations and informed of what action the Association is planning to take by way of investigation. They should also be advised to contact an independent representative, such as a solicitor or Trade Union representative.
- 15.5 The Association's disciplinary procedures should then be followed as appropriate.
- 15.6 If the allegation is against a resident of the Association's property, the Director should ensure that the solicitor is contacted for advice

(as there may be tenancy implications under certain circumstances).

16. Policy review

- 16.1 As a strategic document, the Association's Equality and Diversity Policy will be reviewed every three years. The next review will therefore take place in April 2018.

- 16.5 As an operational document, the Equality and Diversity Action Plan will be reviewed by the Management Committee annually.

d) How does the policy fit into our wider or related policy initiatives?

The policy underpins all of the work that we do and is linked to all policies and policy initiatives

2. What do we already know about the diverse needs and/or experiences of our target audience?

Do we currently have information on:

| | | | | |
|--------------------------------|-----|---|----|---|
| Age | Yes | ✓ | No | |
| Disability | Yes | ✓ | No | |
| Marriage and Civil Partnership | | ✓ | | |
| Pregnancy and Maternity | | ✓ | | |
| Race | Yes | ✓ | No | |
| Religion and Belief | Yes | | No | ✓ |
| Gender | | ✓ | | |
| Gender Reassignment | Yes | | No | ✓ |
| Sexual Orientation | Yes | | No | ✓ |

Tenants and other residents

2.1 Whilst we require to update and broaden the information we have on tenants and other residents, we would expect all of the protected characteristics to be represented within this target audience. One of the main barriers to equality in service provision is likely to be inaccessibility. The policy outlines our commitment to addressing this and, further, it requires us to be proactive in seeking out and responding to all the communications and access needs that may exist.

2.2 The policy helps us ensure that we are providing services (which, in this context, includes addressing physical housing requirements) that are responsive to the requirements of all groups.

Owners who may participate in improvement schemes

2.3 As at 2.1 and 2.2, above.

People who live in the local area and housing applicants

2.4 As at 2.1 and 2.2, above.

Staff and Management Committee

2.5 The policy ensures that we observe equality and diversity issues in employment and in the recruitment of Management Committee members. The office and Committee areas are accessible and the policy allows information to be provided in any format that would make it possible for staff or Committee to better fulfill their roles.

2.6 All staff and Committee are made aware of theirs and the Association's rights and responsibilities in relation to equality and diversity and receive periodic training. They know about the Association's zero tolerance approach and are aware of how to raise any concerns.

Contractors and consultants and partner organisations

2.7 The policy requires the Association to observe equality and diversity issues in the procurement of consultants and contractors and our relationships with partner organisations.

2.8 Any contractors or consultants working for or representing the Association are made aware of our commitment to equality and diversity and are advised of our expectations in terms of how we require them to observe our policy at all times. Any consultants/contractors or anyone representing a partner organisation who feel they have been discriminated against are aware of how to raise these concerns.

2.9 The policy requires action to be taken against any consultants or contractors found to be in breach of our policy.

3. **What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience?**

3.1 We have some information on age, disability, gender and race/ethnicity but this mainly relates to tenants and housing applicants and requires to be updated regularly in order to remain accurate. We have not yet collected information on sexuality and religion/belief, but this is being introduced and, over time, we will begin to build up a picture of sexuality and religion/belief of our tenants and other stakeholders. This information will be analysed and we will consider setting targets by June 2014.

3.2 The Equality and Diversity Action Plan, which is due to be approved by the Management Committee in April 2012, will address in more detail what the impact may be on the different groups within our target audience.

4. Do we need to carry out a further Impact Assessment?

4.1 Yes, a further impact assessment will require to be carried out once the Equality and Diversity Action Plan has been agreed. The impact assessment will be presented to the Committee by the end of June 2012.

5. How will we monitor and evaluate this policy to measure progress?

5.1 Ongoing monitoring by staff and an annual written report Management Committee and annual revision of the Equality and Diversity Action Plan (any issues or concerns highlighted by the ongoing staff monitoring will be reported to the Committee via an exceptions report). We will also produce an article in the Annual Report which is sent to tenants and members.