

**London Housing Trust**

**EQUAL**

**OPPORTUNITIES**

**Policy Statement**

**And**

**Codes of Practice**

## **Policy statement**

London Housing Trust is committed to operating in a manner which recognises that Britain is a pluralistic society, diverse in race, culture, creed and interest and includes people with a variety of disabilities. We are aware that individuals and groups of people are sometimes discriminated against {or harassed,} both directly and indirectly, in unjustifiable ways.

We believe it is a fundamental Christian understanding to hold that all human beings are created in the image of God, that all are valued equally by God and share equally in God's creative love. We believe that God longs for our well-being and fulfilment, and that we are equally responsible to God for the way we treat each other.

In the light of this Christian affirmation, in recognition of our Lord's commandment to love our neighbours as ourselves, and as a Christian organisation, we declare our conviction that prejudiced treatment of people is an affront to the purposes of God, and is morally indefensible.

In practice this means that there will be no unjustifiable discrimination and no harassment. Discrimination will only be allowed where it is justified by operational requirements. So for example, London Housing Trust is an old and listed building without lifts or disabled access, therefore staff/clients with mobility difficulties could not be accommodated.

In this policy, "discrimination" means discrimination where a person is treated less favourably than another on the grounds of:

- age
- colour
- disability
- gender
- marital status
- nationality
- race
- religious affiliation or
- sexual orientation

We will work to ensure that there is no direct discrimination, treating a person less favourably than another person, on any of these grounds where they cannot be shown to be operationally necessary.

We will also work to ensure that there is no indirect discrimination which imposes an unjustifiable requirement for employment, or access for clients which on the face of it appears to be the same for all but which has a disproportionately adverse effect on one group.

We will work to ensure that there is no harassment of any person within our sphere of influence.

## **Statement of Intent**

London Housing Trust's agreed criteria of its operational requirements, we declare that it is our intention to ensure that no one is disadvantaged on any of the above grounds by conditions or requirements that cannot be shown to be justifiable: -

- in the recruitment, consideration for promotion and treatment at work for those who are employed in a paid or voluntary capacity within the Society;
- with regard to access to the benefits, facilities and services we provide;
- in the selection of clients and access to the services provided by the society;

It is our intention to take positive action, within the law and as the law encourages, to ensure equality of opportunity on the matters specified above throughout our sphere of influence, in so far as it lies within our power. We will monitor our progress in implementing this policy and produce a regular report on it. Training will be provided in accordance with the Codes or Practice.

We require all our Staff and Board members, both paid and voluntary, and those we care for, to adhere strictly to and promote this policy. The policy will be made known to all. Any grievance, or any other matter relating to it, should be taken up, in the first instance, by using our Grievance Procedure and Appeals mechanism.

We will not tolerate acts which breach this policy, and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated, and may be subject to our disciplinary procedures.

We will not tolerate any form of harassment of or by our employees, volunteers, or those we care for, and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated, and may be subject to our disciplinary procedures. *The Code of Practice relating to harassment, bullying in the workplace and victimisation of or by our employees or volunteers is in the process of being written.*

The overall responsibility for ensuring that the policy is effective is that of the Project Manager.

## **Code of general practice**

### **Introduction**

The Equal Opportunities Codes of Practice, (both this general code and the specific code relating to disability) supplement the Society's Equal Opportunities Policy Statement. The policy and the codes of practice are designed to ensure fair treatment in all aspects of the Society's work. Fair treatment may be hindered by entrenched attitudes causing people of different race, gender, etc., to be stereotyped and not give proper consideration. The policy and codes should help those with relevant responsibilities within the our to be aware of these attitudes and their possible effects.

There are theological, organisational, economic and legal reasons for the Society to adopt an Equal Opportunities Policy and Codes of Practice:

- as a Christian organisation, to reflect God's values of justice and fairness;
- as a good and reasonable employer, to set an example to those we employ, and serve and to the wider community;
- to ensure that the talents of all members of the Society's people are used to the full;
- to create an ethos which is conducive to a harmonious and effective working environment;
- to improve motivation and performance;
- to improve accessibility to all we serve; and
- to ensure that we comply with relevant legislation;

## Recruitment and selection

Every post must have a job description written in a clear and precise manner. A job description should include the main objectives of the post and a summary of the key tasks. It should also specify who is the line manager of the post as well as those who are accountable to the post.

Every job vacancy must also have a person specification, which should specify essential and desirable criteria for the role. It should also set out key terms, including salary range and other principal benefits, location and hours.

All stated job requirements must be clearly justifiable in terms of the functions of the post or training. Only requirements that can be objectively assessed by the short listing and interviewing panel may be used. [Formal qualifications should only be required if there is a specific requirement for the post holder to be formally qualified.] The criteria contained in the person specification should be strictly relevant to the job or training, and should not be unnecessarily restrictive so as to exclude disadvantaged groups.

Job descriptions and personnel specifications will be reviewed by the Project Manager and Board of Trustees for compliance with the Equal Opportunities Policy prior to recruitment.

## Advertising

All job vacancies will be the subject of advertisement.

All advertisements must carry a closing date. The media used will depend upon the vacancy and the guidelines are as follows: -

Post	Where to advertise
Officers in charge, managers of a Hostels, etc; all management posts.	National and/or local newspapers and / or professional journals; Job Centres
Middle-ranking support staff	Internal within the establishment; local newspaper; and Job Centres
Care and domestic staff in hostels, etc; junior support staff	Internal within the establishment; and / or local newspaper Job Centres

## **Short-listing and interviewing**

It is the Society's long term aim that at least one member of staff participating in the short-listing, interviewing and selection process will have been trained in all aspects of recruitment and selection with emphasis on the equal opportunities implications.

No short-listing or appointment should be made before the closing date of an advertisement (with the exception of candidates for training).

At least two people will be involved at each stage of the selection procedure and, where possible, panels should include at least one male and one female.

All short-listing and interviewing panels are required to make a clear record of their reasons for selecting or rejecting each candidate at all stages of their involvement of the recruitment process. All such records are to be kept at London Housing Trust.

Short-listing criteria must reflect the requirements contained in the person specification.

Adequate notes of the interview must be kept by panels in order to make a fair comparison between candidates. The same topics should be covered with all candidates and should reflect the requirements contained in the person specification. This does not preclude specific questions to individual candidates on matters arising from their application form or CV.

Interviewers must not ask questions about a candidate's personal circumstances, which are unrelated to the requirements of the job or training. For example, questions about personal circumstances or family commitments must not be asked. Neither should candidates be asked about their ethnic origin nor how they would react to a line manager of different sex or race.

A job that has particular demands should be described – e.g. the job requires travel away from home, late hours, etc. It is not the business of the Society to stipulate that the worker must be single, married with or without children; it is up to the individual candidate how they organise their domestic lives. For example, the question "How will you cope with children/spouse, house, etc., while you sleep away three nights a week?" may not be asked.

Questions should be phrased so as to ensure that the candidate fully understands the requirement of the job/training course and has thought through the implications in so far as their domestic responsibilities are concerned. Such questions should be asked of all candidates - it must not be assumed that the questions only apply to women with children.

If any member of an interviewing panel feels that discrimination has occurred in the selection process, the matter must be reported to his/her line manager, who should consult with the Board of Trustees. No selection decision should be made until the issue is resolved.

## **Monitoring and training**

In order to ensure that the Society's Policy objectives are being met, data needs to be gathered and progress monitored. The following steps will be taken: -

- A recruitment monitoring form will be issued with every application form. These are confidential and should be kept at London Housing Trust.
- The results and analysis of recruitment monitoring will be periodically reviewed and action will be taken on the basis of the results.
- An annual review will analyse the Society's people, summarising by ethnic background, gender and age, and will identify numbers who have a disability.

This is intended to show whether there is a preponderance of one group who:

- do not apply or apply in a significantly lower proportion than their expected rate of application;
- are not recruited or are appointed in a significantly lower proportion than their rate of application;
- Are concentrated in certain jobs, management tiers etc.

Training is an integral part of promoting Equal Opportunities, especially in raising awareness of gender, race and disability matters. Training will be provided for all staff so that they gain more understanding about Equal Opportunities and develop strategies for increasing equality. London Housing Trust will organise Equal Opportunity courses as an integral part of its overall training strategy.

## **Client Referral Procedure.**

As this is an equal opportunities projects referrals can be taken for clients of any ethnicity. Throughout the referral procedure there are steps in place to prevent discrimination occurring against clients and referrals that are being taken.

When a vacancy becomes available it is first logged with Greenwich Borough Council, for 7 days. If at the end of the 7 days, no referral has been received from Greenwich Borough Council, then referrals from other alternative stakeholders can be discussed.

In the first instance a referral is discussed over the telephone for suitability to the project. The only reasons why the client discussed may not be appropriate are as follows:

- Has support needs.
- A recent history of Violence.
- A history of arson or sexual abuse.
- The client is not yet clean from drugs, even if they want to become clean.
- The client is not working & not eligible for benefits.

- The client has no ID so a Housing Benefit claim could not be processed.

At this point a note is made of the ethnic origin of the client discussed on the Referral Monitor Form, even if upon discussion, it is felt that the client is not appropriate. If upon discussion the client is felt to be suitable then a referral interview will be booked for the client. As the demand upon vacancies far exceeds their existence & thus their supply, staff see 3 potential clients for referral interviews, that way ensuring that those in most need are the ones to whom the vacancy is given.

## **The Referral Interview**

This is conducted by two members of staff to ensure that no discrimination has occurred & to ensure the safety of staff. This does mean that sometimes a period of time will elapse before a slot becomes available to see potential clients for a referral interview. During the interview if either of the staff members feel that discrimination has occurred then they should report it to their respective line manager.

Of the clients that are seen the one with the most needs will be the first choice. In the event of there being two or three clients with equal needs, priority will be given to referrals from the Greenwich area. In the event of a referral being received from the Council of the Borough of Greenwich, they will always be given priority. During the Referral Interview, the Referral Interview Form will be filled in for every client. These forms will be kept for analysis purposes even for referrals that are not accepted.

Once a decision has been made to accept a client and they have been informed then an admissions interview will be booked.

In order to ensure that the Society's policy objectives are being met data will be taken about the number and type of referrals that are being received, both at the initial stage when the referral is received, when the information is logged on the Referral book, & at the admissions stage, when the information is taken on the Equal Opportunities form. This information is confidential and will be kept at London Housing Trust. The results of this information will be periodically reviewed to ensure that if there are certain groups that the project appears not to be targeting then this problem can be addressed.

## **Code of practice - matters relating to disability**

### **Introduction**

We are committed to providing equality of opportunity, wherever practicable and making reasonable adjustments where necessary, to all members of our staff, applicants for employment and people we care for, whether or not they have a disability. We recognise that people with disabilities can offer exactly the same range of skills and talents and the same level of commitment to the Society as other people, (however the constraints of a listed building should be taken into

consideration). This code of practice should be read in conjunction with the general code of practice contained in the Equal Opportunities Policy.

### **Definition of disability**

Consistent with the Disability Discrimination Act 1995 we will use the following definition of disability:

“A person has a disability if he or she has a physical or mental impairment, which has a substantial, and a long-term adverse effect on his or her ability to carry out normal day-to-day activities.”

For the purposes of this code of practice we also include those who have had a disability within the definition above even if they have since recovered.

We recognise that people with disabilities do not constitute a uniform group whose conditions are apparent. Indeed, the opposite is the case. People with disabilities may include, for example: those with mobility, visual or hearing impairment, epilepsy, diabetes, a facial disfigurement, a mental illness, learning difficulties, arthritis and dyslexia. We recognise that each person is an individual and should be treated as such.

### **Recruitment and development**

We will continue to review and develop all aspects of our recruitment procedures to encourage applications from and the employment of people with disabilities.

### **Retaining staff / Clients who become disabled or whose disability worsens**

We recognise that employees / or people we care for, may become disabled during their time at London Housing Trust. We intend that any employee or client who becomes disabled or whose disability worsens whilst in our employment should be given the full support of his or her line manager / key worker and the Board of Trustees to maintain their place within the Society. We will insure that reasonable and practical steps are taken to provide adequate support to enable his or her employment / residency to continue. Where a condition is progressive and worsening we will increase the degree of adjustment necessary for as long as this is practicable and reasonable.

### **Actions when “reasonable adjustments” are no longer sufficient**

We recognise, however, that there may be times when a disabled person cannot, or can no longer, meet the requirements of a job even if “reasonable adjustments” have been made. Where an existing member of staff is no longer able to meet the requirements of a particular job for these reasons, suitable alternative employment within the Society will be sought. Where this search fails, arrangements will be made to terminate the individual's employment as compassionately as possible, using ill health.



In the case of people we care for, if there needs develop beyond the constraints of the building and the services provided by the Society alternative and appropriate accommodation should be found and this should be done with the client in a compassionate way.

### **Establishing the needs of people with disabilities and seeking to accommodate them**

We will seek to make reasonable adjustments to all aspects of the conditions of service of a person with a disability where this is needed. Such adjustments might include, for example, physical relocation or other adjustment of the person's workstation, provisions of special equipment, and changes to the person's working hours, adjustment to the person's job description and provision of retraining. Consistent with the law, cost will be a factor in deciding what constitutes a "reasonable adjustment".

We recognise that the person best able to determine the needs of a person with a disability is often the person him or herself. We therefore intend to work towards a position in which staff/client are confident to tell their line managers / key worker when they have a disability where action would be desirable to allow them to develop and use their abilities more fully. Staff who become disabled during their time of employment are expected to make this known to the Project Manager.

### **Confidentiality**

Information given to the Project Manager / Key worker about disabilities will be treated in confidence and not disclosed to third parties without the consent of the person with the disability.

### **The project environment**

We will take reasonable and practicable steps to ensure that London Housing Trust does not preclude people with disabilities from carrying out duties for which they are suitably qualified.

### **Staff training and disability awareness**

We will take specific steps to raise awareness of disability matters throughout the Society. Priority will be given to raising the awareness of staff involved in recruitment and selection, senior managers, and those regularly involved in face-to-face contact with the general public.

Our aim is wherever possible to prevent discrimination in respect of disability through improving staff understanding about disability.