

## **EQUALITY AND HUMAN RIGHTS POLICY**

### **1.0 BACKGROUND**

The Association recognises that social and cultural processes may disadvantage certain groups and individuals in society and is determined to ensure that its actions promote an environment of respect, understanding and the elimination of discrimination by encouraging diversity and providing equal opportunity for all.

This policy is designed to eliminate discrimination on unlawful or unfair grounds and to promote positive action where necessary to redress the effects of past discrimination and to promote equality and human rights in all aspects of the Association's business. It updates the previous "Equality and Diversity Policy" which was approved by the Board on 27<sup>th</sup> September 2018 and was informed by staff and board members who formed part of a working group during 2022.

It recognises that different groups who suffer discrimination share a common problem of disadvantage, but the nature of disadvantage is not the same for all groups. The Association will seek to develop policies and practices that take account of different experiences and so ensure greatest effectiveness in its equal opportunities work.

Lack of equal opportunities is not only a serious moral issue, but it also has a significant impact on business performance.

#### **1.1 Who this policy applies to**

Compliance with the policy is expected from all staff, board members, tenants and others with whom Ochil View Housing Association Ltd. (OVHA) may work (e.g., contractors, consultants, etc.).

### **2.0 LEGAL FRAMEWORK**

Tackling inequality is not something new, UK and Scottish governments have been addressing equality and human rights issues for many years and although progress has been made inequalities still exist within Scotland and the UK. This has led to both Westminster and Holyrood governments continuing to develop legislation designed to tackle discrimination, promote equality, and address inequalities.

This has included the development of the Equality Act 2010 by the UK Government, and the Housing (Scotland) Act 2010 by the Scottish Government, and this policy takes account of both of these acts.

The objective of this policy is to ensure OVHA not only actively promotes equality of opportunity as an employer and provider of services, but is compliant with various legislative and regulatory requirements including:

- The Housing (Scotland) Act 2010
- The Scottish Social Housing Charter
- The Scottish Housing Regulatory Framework
- The Equality Act 2010
- Human Rights Act 1998
- The Scottish Housing Regulator's: "Collecting Equality information: National Guidance for Scottish Social Landlords" (revised April 2022). This will be referred to as 'SHR data collection guidance' through the rest of this policy

This policy will discuss each of these.

## 2.1 The Housing (Scotland) Act 2010 & Scottish Social Housing Charter

Although equalities is a matter reserved to the UK parliament, the Scottish Parliament has powers under the Scotland Act 1998 to "encourage and promote" equal opportunities". Accordingly, the Housing (Scotland) Act 2010 states:

"Social Landlords, when performing housing services, must act in a manner which encourages equal opportunities and in particular the observance of the law for the time being relating to equal opportunities."

This means OVHA is legally obliged to comply with the Equality Act 2010, and any other equality legislation passed by Westminster (UK wide legislation) or Holyrood (Scottish Legislation).

The Housing (Scotland) Act (2010) also established the Scottish Social Housing Charter, which set out the Scottish Government's and Scottish Housing Regulator's (SHR) expectations for Scotland's Registered Social Landlords (RSLs).

The Scottish Social Housing Charter's Equalities Outcome sets out the Scottish Government's expectation 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."*

## 2.2 The Scottish Housing Regulatory Framework

In February 2019, the Scottish Housing Regulator (SHR) published their new regulatory framework through the publication of the "Regulation of Social Housing in Scotland". This new framework took effect from 1st April 2019 and sets out "how we (SHR) regulate both Registered Social Landlords (RSLs) and the housing and homelessness services provided by local authorities"

Section 3 of the framework outlined their regulatory expectations of every RSLs with respect to equality and human rights, as follows:

"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.

To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff.”

As part of the ‘new’ framework the SHR also reviewed and amended their Standards of Governance and Financial Management. OVHA should take account of Standard 5 which highlights the need for RSLs to “conduct their affairs with honesty and integrity” in all areas of their work. Within this standard OVHA needs to play particular attention to Standard 5.3 which requires RSLs to pay “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.”

### 2.3 The Equality Act 2010

This is the key legislation relating to discrimination law in the UK, the introduction of which saw previous discrimination legislation abolished and replaced with one single piece of legislation. This policy will be compliant with the current legislation and promote a culture of dignity and respect for all.

The Act, which applies to both OVHA’s staff and its customers, centres on two key elements, which are:

- The identification of nine “protected characteristics” that require additional protection
- The identification of “unlawful behaviour” not allowed under the act

### 2.4 Protected Characteristics

There are nine protected characteristics, these are the only grounds on which discrimination is prohibited by law. An employee can make a discrimination claim on any of the characteristics against the different types of discrimination, with some exceptions for harassment, perception and association.

1. Age
2. Disability
3. Gender Reassignment
4. Marriage & Civil Partnership
5. Pregnancy & Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

### 2.5 Types of Discrimination

#### ✓ **Direct Discrimination:**

Is treating someone less favourably than others based on them being considered as having a protected characteristic. e.g. refusing to give housing advice to someone because of their sexual orientation.

#### ✓ **Indirect Discrimination:**

Occurs where a policy, criterion or practice applies to everybody but, by doing so it has a disproportionate impact on people with a protected characteristic. e.g., someone not appointed, despite being the best candidate, due to having a disabled partner.

✓ **Associated Discrimination**

Discriminating against a person because they have an association with someone with a particular protected characteristic. e.g., where a non-disabled person is discriminated against because they care for a disabled dependent.

✓ **Perceptive Discrimination**

Discrimination against a person because the discriminator thinks the person possesses a protected characteristic. An example of this would be not shortlisting a person for interview 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.

✓ **Positive Discrimination**

Giving advantage to groups in society which are often underrepresented.

✓ **Positive Action**

Addressing imbalances in the workforce, by encouraging members of underrepresented groups to apply for jobs. Positive action may be applicable in setting equality targets.

✓ **Victimisation**

Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

✓ **Harassment**

Unwanted behaviour related to a protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

## 2.6 The Human Rights Act (1998)

The act's development followed World War 2, when to avoid the atrocities seen during the war, nations agreed all people should enjoy basic rights i.e., the right to life, the right to be free from torture, etc. This led to a series of agreements called international 'treaties' or 'conventions' being established to outline the basic levels of treatment that all individuals deserve because they are human, and the UK signed up to the European Convention on Human Rights (ECHR).

The Human Rights Act 1998 incorporates the rights set out in the European Convention on Human Rights into domestic British law and came into force in the UK in October 2000. The act contains 16 articles which cover a range of rights with a basic aim is to ensure that everyone should be treated fairly, with dignity and respect. Both the UK government and the Scottish Government are committed to the Human Rights act and its key principles.

In 2012, the Equality and Human Rights commission produced “Human Rights at Home” guidance for social housing. OVHA recommends its staff refer to this guidance if they have any questions regarding the human rights act. This can be accessed by clicking on the link below or on request from OVHA.

### [Human Rights at Home Guidance](#)

This guidance recommends staff pay particular attention to articles 6, 8 and 14 when providing services, developing policies and procedures, etc.

Each of these three articles will be discussed in turn

#### **Article 6: Right to a fair trial**

Everyone has the right to a fair hearing (trial). This means people should be given the opportunity to participate effectively in any hearing of their case, and present their case in conditions which do not place them at a substantial disadvantage to any other party in the case (e.g., a person who is subject to a decision-making process in relation to a possible eviction should have access to an interpreter, if necessary). Staff should also ensure that any important decisions (i.e., allocations, evictions, etc.) should be given with reasons for the decision.

#### **Article 8: Right to respect for private life, family life and the home**

Everyone has the right to respect for their private and family life, their home and correspondence. It is important to emphasise that the right to respect for a person’s home is not a right to be given any extra priority to be housed by an association, but is a person’s right to access, and live in their home without intrusion or interference. For OVHA, this has various implications including:

- Personal information about customers should be kept private and confidential.
- The right to respect for family life includes the right for a family to live together
- Taking positive steps to prevent others seriously undermining a person’s home or private life, for example, through anti-social behaviour.

#### **Article 14: Prohibition of discrimination**

This means that everyone must have equal access to an association’s housing and services, regardless of their race, religion, sex, sexual orientation, disability, or any other personal characteristic. For example, a gay couple must be treated in the same way as a heterosexual couple in relation to the right to succeed to a tenancy.

A difference in treatment can only be justified if there is a good reason for the treatment and if it is proportionate in the light of that reason for example an association providing sheltered housing to people over a certain age in accordance with its rules and procedures.

## 2.7 Data Collection

As outlined earlier in this policy OVHA is committed to promoting equality and human rights in all aspects of the Association's business and ensuring discrimination is avoided as both an employer and a landlord / provider of services. OVHA feels the collection of equality data as outlined in the ‘SHR data collection guidance’ “... is integral to a social landlord’s equality strategy” and is committed to

ensuring it uses equality data to deliver quality services to tenants and other customers.

To reflect the importance OVHA attaches to data collection, it was one of the issues discussed by staff and board members who formed part of the equalities working group during 2022. The working group made various recommendations, and as a result it was agreed data regarding OVHA's staff and board would be collected anonymously using an existing survey tool which has been used successfully by OVHA in the past.

The working group delegated authority to their Acting Chief Executive and Housing Services Manager to develop the collection process for its tenants and housing applicants. This led to OVHA agreeing information regarding these two groups will be gathered through a confidential collection process developed by OVHA's software developer – who has previously delivered the Associations tenant portal and digital choice based letting service.

OVHA chose this approach as it ensures data supplied by tenants (and other service users) is automatically stored in a secure location, and OVHA staff will only be able to access anonymous aggregated information. The information will be stored on a separate non-OVHA system which uses a tenant number and a secret key. To ensure compliance with Data Protection Legislation the information held will expire on an agreed anniversary, after which the tenants (and housing applicants) will be asked to update their information.

### **3.0 RESPONSIBILITIES OF THE ASSOCIATION, DEPARTMENTAL MANAGERS AND EMPLOYEES**

This policy applies to all board members and employees of the Association particularly those who have responsibility for others. The Chief Executive will be responsible overall for ensuring the implementation of the policy and for monitoring its operational effectiveness, in consultation with any specialist officers. It will be the duty of the Chief Executive to implement and promote actively equality of opportunity and Human Rights. Departmental Managers must ensure the full implementation of the Equality and Human Rights Policy in the area under their control.

Every employee and board member has a duty and legal responsibility not to discriminate against, harass, victimise or intimidate individuals or disadvantaged groups who they work with, or provide services to, on behalf of the Association. The Association will not tolerate discrimination by any of their employees or board members. Disciplinary action may be taken against any employee or board member who is in breach of the Association's Equality and Human Rights Policy.

### **4.0 POLICY PRINCIPLES – IN RELATION TO OVHA AS AN EMPLOYER**

This Equality and Human Rights policy aims to:

- ✓ Ensure integration of equality and human rights practices into all the Association does, and ensure that employees are treated with fairness and

respect by each other and by members of the public, board members, and contractors.

- ✓ Require the Association to implement fair and just employment practices ensuring that no job applicant or employee will receive less favourable treatment on any grounds.
- ✓ Ensure people are recruited and promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions will be based on only relevant merits.
- ✓ Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.

The Association will aim to ensure that all employees are treated with fairness and respect and not be discriminated on the grounds of marriage & civil partnership, sex, race, disability, age, religion or belief, gender reassignment, pregnancy & maternity and sexual orientation, or disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance. The omission of other groups should not be interpreted as condoning discrimination against them.

This policy will apply to recruitment and selection, training, transfer, facilities, benefits, procedures, terms and conditions of service, the provision of housing and all other services. The overall aim of the policy is to create an environment where all forms of discrimination or oppressive behaviour are considered unacceptable.

To ensure the consistent application of this policy, careful monitoring of its operation will be undertaken and, where appropriate, positive action will be carried out to ensure its effectiveness.

## **5.0 IMPLEMENTATION**

The Chief Executive is responsible for the policy's day to day implementation.

The Association will ensure that all new employees and Board of Management members will receive induction on this policy. The policy will be widely promoted and integrated into all policies and procedures within the Association. Copies of the policy will also be freely available and displayed in the Associations offices. Appropriate training and guidance will be available to promote equality and human rights among staff and board members.

This policy applies to everyone in the Association, and all have a responsibility to be alert to discriminatory behaviours and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the equality and human rights policy will be regarded as misconduct and may lead to disciplinary action which may include dismissal.

### **5.1 Recruitment & Selection**

It is the Association's policy that all recruitment decisions will be based entirely on the merits and abilities of candidates alone and no other criteria. In order to

achieve this, equality and human rights practices will be integrated into every stage of the recruitment and selection process.

A fair recruitment process will remove barriers to the employment of people of different backgrounds. This will enable the Association to recruit from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving. A more diverse workforce will improve the organisation's service delivery, as it will include staff with different knowledge and experience meet and aid in meeting the needs and aspirations of service users and potential service users.

To highlight the Association's commitment to promoting equality and human rights from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy within the Association will state that an equality and human rights policy is in place.

In addition, the advert will also display any signs of equality bodies that the Association is affiliated with. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply the Association will ensure that all applications will have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.

The Association will ensure all staff or board members involved at any stage in the recruitment and selection process will receive equality and human rights awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

Under the Equalities Act 2010, pre-employment health questionnaires are unlawful except in the following circumstances:

- ✓ To make suitable arrangements as part of the selection process
- ✓ For the purposes of equality monitoring
- ✓ For a genuine job-related reason
- ✓ To ensure that the candidate has a disability where the job genuinely requires the jobholder to have a disability.

This means that the Association is unable to ask any health related or absence questions as part of the recruitment process and this includes the application form unless for the reasons stated above.

No questions can be asked until after an offer of employment has been made.

This means that the Association is unable to establish the attendance record of a candidate before offering them a job. The rationale which has driven this part of the act is that asking health related questions could potentially be discriminatory to disabled applicants as they may have a higher rate of absence than a non-disabled person and therefore the practice may adversely affect them.

## 5.2 Default Retirement Age



The abolishment of the default retirement age is part of the Equality Act as it falls under the protected characteristic of age. This means the Association is no longer able to retire an employee when they reach the state retirement age.

Therefore, an employee can be employed until they decide they wish to retire and so the choice is now solely the employee's.

### 5.3 Terms and Conditions of Employment

As part of the employment relationship covered under this policy all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's terms and conditions will be standard across all employees regardless of any of the protected characteristics. Employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and the grade it attracts.

### 5.4 Training & Development

Equality and human rights will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image and of equality of opportunity.

### 5.5 Redundancy Selection

Redundancy selection will be made according to the statutory requirements and in line with the Association's Redundancy Policy. Criteria will be discussed with the Trade Union and/or nominated representatives. The criteria will be set out and will be objectively fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

## **6.0 APPOINTMENT OF CONTRACTORS AND CONSULTANTS**

The Association will ensure that all Contractors and Consultants appointed by the Association have an equalities policy, in a form which is acceptable to the Association. Confirmation of such a policy and associated practices and procedures will be required in writing in order that Contractors and Consultants remain on any "approved" list. Contractors or Consultants who fail to comply with good employment practices e.g., fair wage, good working conditions and health and safety will be removed from any "approved" list.

When working with organisations employing fewer than ten people, it will be acceptable for the organisation to confirm its willingness to operate in accordance with the OVHA's Equality and Human Rights policy, and with any additional requirements we specify for a particular contract.

OVHA expects contractors, consultants, etc. to treat the its customers and employees with courtesy and respect at all times. We will not tolerate any form of discrimination or harassment.

## **7.0 POLICY PRINCIPLES – AS A SERVICE PROVIDER**

The Association's intention is to apply principles in relation to the equality of opportunity and human rights throughout all its operations and the Association recognises that all such areas are interlinked. For the avoidance of doubt the Association's Equality and Human Rights Policy in relation to service provision will be applied to the following:

- Access to Housing
- Quality of Housing and services
- Consultation on Service Provision

### **7.1 Access to services**

OVHA will take positive action to ensure that all members of the community are aware of the services it provides and seek to ensure that all people benefit equally from its services.

The Association will be open about what it is doing, and ensure that all policies and procedures are openly and widely advertised. OVHA will also strive to avoid being seen as inaccessible to those in housing need and take any necessary action as reasonably practical to meet these needs e.g., access for disabled people, appropriate opening and closing hours. The Association will ensure that no communication barriers are put in place or maintained.

The Association will, where appropriate, provide its material in suitable formats e.g., computer disc, tape, Braille, community languages. Any forms and materials published will be in simple jargon free language and, where appropriate, help will be given to fill out the relevant forms. The Association will be sensitive to people with difficulties in communicating.

### **7.2 Key areas of work**

Two important areas of work for all housing associations are providing maintenance and repair services and the allocation of properties. The policy will outline how equality of opportunity underpins OVHA's work in these areas.

#### **Maintenance and Repairs**

OVHA will seek to ensure properties are kept in good repair and installations maintained in proper working order. However, where cause for complaint arises, attention will be paid to tenants' complaints concerning disrepair and service provision, including seeking to ensure that tenants are able to report their complaints in their own language.

As property maintenance is one of the most important services provided to tenants, OVHA will seek to ensure all tenants receive the same quality of service. The Association will, however, be mindful that certain groups, such as older people, may be more vulnerable and consequently will be given priority on certain types of repairs.

Information about maintenance and repairs will reflect contractual and legal rights and will be available where possible in suitable alternative formats on request (OVHA will bear any reasonable costs).

### Allocation of Properties

OVHA allocations policy is clear, comprehensive and unequivocally non-discriminatory, providing equal access for all. All selection and allocation procedures are designed to deal quickly and fairly with applicants for housing. OVHA will ensure proper recording, reporting and monitoring procedures are in place.

In addition, OVHA is fully committed to the principles of its policy and strives to ensure its allocations practices and procedures are non-discriminatory and based around each applicant's housing need. Moreover, OVHA will ensure its housing list is open to all by encouraging applications from all sections of its community throughout the year.

OVHA will make its Allocations policy available in other languages and formats (such as in Braille, in larger font or on audio tape) on request, and at a number of locations including:

- At OVHA's office
- On OVHA's website
- On These Homes website

### 7.3 Policy Development

When reviewing or developing policies OVHA will strive to avoid discriminating and identify any instances of potential imbalances in treatment, or potential discrimination encountered by disadvantaged groups.

The Equality Act 2010 set an expectation for public bodies to identify any adverse effects their policies might have on any protected characteristics. Although not a public body OVHA will, as a good practice measure, develop an Equality Impact Assessment (EIA) tool to ensure any policies reviewed, or developed, take proactive steps to identify and remove potential discrimination or, in some cases adapt a policy or practice to better advance equality.

The development of EIA's also reflects 'SHR data collection guidance' which highlighted that Housing Regulator promotes the use of EIAs through the regulatory requirement to have assurance and evidence that OVHA 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.

## **8.0 COMPLAINTS**

In response, to the Scottish Public Services Ombudsman (SPSO) revising its model complaints handling procedure in March 2021, OVHA updated its complaints handling policy. The SPSO model policy highlighted the importance of ensuring the complaints process is accessible for all, when it stated that it:

"... should take into account individual requirements, for example disabled people, people with learning difficulties, people who are deaf or hard of hearing (including British Sign Language users), people with a visual impairment and people whose first language is not English. Where appropriate, suitable arrangements should be made for the specific needs of those who wish to complain, including provision of interpreting services, access to support or advocacy, and information in a variety of formats and languages, at suitable venues, and at suitable times."

The need to ensure complaints procedures to be as accessible as possible was also highlighted in 'SHR data collection guidance'. OVHA will therefore ensure its complaints process is accessible as possible and easily available in a variety of places and formats.

In accordance with SPSO expectations OVHA will ensure the board receives quarterly complaints' reports, which separate complaints related to equality issues from general complaints. These reports will provide a range of information including the frequency, volume, type of complaint, outcome, etc. of complaints as well as confirming complaints were dealt with appropriately and within the timescales set out in OVHA's policy.

OVHA's policy sets out in detail how complaints against employees, board members, contractors and any others working with, or on behalf of the organisation will be investigated and dealt with.

## **9.0 MEMBERSHIP**

The Association's membership is open to all people interested in the work of the Association without distinction on the grounds of marriage and civil partnership, sex, race, disability, age, religion or belief, gender reassignment, pregnancy & maternity and sexual orientation, or disadvantaged by any conditions or requirements which cannot be shown to be justified.

## **10.0 CONSULTATION AND PUBLICITY**

The Association recognises the importance of encouraging equal opportunities and human rights and will include reference to this in any consultation processes and procedures where appropriate.

OVHA will publicise its commitment to equal opportunities in a variety of ways including:

- Newsletter articles
- An equalities strategy summarising its various commitments to equalities including its policy, action plan, etc.
- Displaying a range of relevant equalities information within OVHA's office
- On the OVHA website and social media

OVHA recognises indirect discrimination through the provision of inaccessible information can create inadvertent barriers to OVHA's services e.g., a visually-impaired resident may not be able to read a policy in standard print size or

someone whose first language is not English may not be able to communicate effectively with staff.

OVHA is therefore committed to ensuring information is available in alternative formats, on request, and these formats may include; large print, audio tapes or CDs, use of language or sign interpreters, Braille, etc.

As it would be impractical and cost prohibitive to have all possible formats available immediately, OVHA will strive to produce information in alternative formats within 10 working days of a request provided that request is reasonable. All reasonable costs in relation to the provision of materials in alternative formats will be borne by OVHA and any requests for materials in alternative formats will be recorded as part of its equalities' monitoring regime.

## **11.0 RESOURCES**

The Association will make adequate resources available to ensure the optimum application of this policy.

## **12.0 MONITORING**

In accordance with the Scottish Social Housing Charter and the 'SHR data collection guidance' the board will monitor the implementation of this policy regularly through the analysis of statistical reports regarding the 9 protected characteristics identified in the Equality Act (2010), in relation to:

- Applicants for housing or employment
- Allocations and appointments made
- Employee, tenant and board profiles

In addition, the board will receive regular monitoring reports, which identify any emerging trends in:

- Access to housing - who has applied, who has been allocated a house, and by what process (e.g., direct applicant, nomination or referral)
- Housing allocations - where applicants were housed, and types of housing allocated (especially if any Equalities need was addressed)
- Access to employment - who has applied, and been appointed, to vacancies within the organisation

Where reports reveal particular issues (e.g., under-representation) appropriate action will be agreed by the board.

## **13.0 DATA PROTECTION REGULATIONS**

The Association will treat all personal data in line with its obligations under current data protection legislation, its own Privacy Policy and its Guidelines for Processing of Special Categories of Personal Data.

#### 14.0 **SUPPORTING DOCUMENTATION**

OVHA Equality Strategy will include various documents in addition to this policy including:

- An Equality action plan
- An Equality data collection procedure
- An Equality Impact Assessment procedure

#### 15.0 **REVIEW**

This policy will be reviewed at least every 3 years.

**Anne Smith**  
**Acting Chief Executive**  
**22<sup>nd</sup> September 2022**

Policy Review and Consultation Process

Considered by Housing Services Manager and Acting Chief Executive on	22 <sup>nd</sup> September 2022
<b>APPROVED BY THE BOARD ON</b>	<b>29<sup>th</sup> September 2022</b>
<b>Date of Next Review</b>	<b>September 2025</b>