Equality, Diversity and Inclusion Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Our Vision, Our Values, Our Strategic Objectives

Our Vision

A vibrant neighbourhood where everyone can prosper.

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

The Chief Executive Officer has developed this policy, supported by the Governance and Compliance Manager, on behalf of the organisation, and it applies to all employees and Management Committee members of Elderpark Housing.

Purpose of the Policy

The Equality, Diversity and Inclusion Policy has been developed to outline our commitment to achieving equality and diversity and ensuring a consistent approach in promoting this throughout the organisation in all aspects of our operations and service provision.

The Policy addresses the legal and regulatory requirements we must meet, and how we will translate our own mission, vision and values into tangible outcomes that will benefit our customers, communities, employees, management committee members and external stakeholders.

We are committed to ensuring our people and the tenants and residents in our communities do not face discrimination, victimisation, harassment or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

Aims and Objectives of the Policy

The aims and objectives of this policy is to provide a clear understanding of our commitment to ensuring that equality and diversity is central to everything we deliver. These aims and objectives include:

- Eliminating discrimination and advancing equality of opportunity for all, in our role as a housing provider and employer.
- Treating all our tenants, residents, service users, employees and those who engage with the association fairly and with dignity and respect.
- To show zero tolerance of harassment and hate crime.
- To comply with relevant legislation, best practice guidance and regulatory requirements
- To encourage our partners, contractors and suppliers to promote equality, respect diversity and prevent discrimination.
- Ensure integration with equality and diversity practices into all our work and activities and ensure that employees are treated with fairness and respect from each other and from members of the public, Management Committee members, and contractors.

- Make sure we 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 to our employee team, Management Committee and other groups solely based on their own merit, experience, ability and potential and in line with the association's culture and business needs.
- Provide a supportive and inclusive 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.
- Using the collection of data to provide appropriate services to all employees, tenants and other customers
- Provide accurate and clear information to all employees, management committee, tenants and other customers in relation to equality and diversity

This list is not exhaustive, and equality and diversity should underpin every service or action the association takes to deliver high quality services to our tenants and residents and offer a safe, attractive and inclusive environment for our staff and Management Committee to operate within.

Legislative and Regulatory Compliance

Elderpark Housing will seek to meet all its legal obligations as set out in the following legislation:

- The Equality Act 2010
- The Human Rights Act 1998 and associated European Union directives
- The Scotland Act 1998
- The Housing (Scotland) Acts 2001 and 2010
- Data Protection Act 2018
- Data (Use and Access) Act 2025

In addition, we will meet the Scottish Social Housing Charter Outcome 1, 2, 10 and 11. Section 3 of Regulation of Social Housing Scotland that specifically references equalities and the Regulatory Standards of Governance and Financial Management, Regulatory Standards 1, 2 and 5

Equalities

Elderpark Housing will ensure there is a consistent approach in promoting equality and diversity across all areas of our business, which will be embedded within our policies and will be administered in accordance with this policy.

Privacy

This document fully complies with General Data Protection Regulations (2018) and will be published on our website to ensure transparency of how Elderpark Housing will seek to ensure Equality and Diversity across everything we do.

Related Policies

Policy Title	Location
Equality Strategy	To be published to website
Code of Conduct – Management Committee	V:\Elderpark Policy Suite\Governance Policies\G4 Code of Conduct Management Committee.pdf
Code of Conduct – Employees	V:\Elderpark Policy Suite\Governance Policies\G3 Code of Conduct Employees.pdf
Complaints Handling Policy	V:\Elderpark Policy Suite\Governance Policies\G9 Complaints Handling Policy and Procedure.pdf
Expected Behaviours Policy	V:\Elderpark Policy Suite\Governance Policies\G14 Expected Behaviours Policy.pdf
Data Protection Policy	V:\Elderpark Policy Suite\Governance Policies\G33 Data Protection Policy.pdf
Data Retention Policy	V:\Elderpark Policy Suite\Governance Policies\G8 Data Retention policy.pdf
Terms and Conditions	V:\Elderpark Policy Suite\Conditions of Service\(APR 2016).pdf
Dignity at Work Policy	V:\Elderpark Policy Suite\Governance Policies\G25 Dignity at Work Policy.pdf
Recruitment, Selection and Induction Policy – employees	V:\Elderpark Policy Suite\HR Policies\HR 5 - Recruitment, Selection and Induction Policy\HR5 Recruitment & Selection Policy.pdf
Committee Recruitment and Development Policy	V:\Elderpark Policy Suite\Governance Policies\G11 Committee Recruitment and Development Policy.pdf
Membership Policy	V:\Elderpark Policy Suite\Governance Policies\G17 Membership Policy.pdf
Allocation Policy	V:\Elderpark Policy Suite\Housing Management Policies\H2 Allocations Policy.pdf

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1 Introduction

1.1 Elderpark Housing believes in equality of opportunity, embracing diversity and promoting inclusiveness and is committed to promoting an environment of respect and understanding. While encouraging diversity and eliminating discrimination by providing equality of opportunity for all. Equality is not always about treating everyone in the same way but recognising that people's needs may sometimes be met in different ways.

1.2 We aim to ensure that all employees and customers are treated with fairness and respect and not discriminated against on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These are the nine protected characteristics, and we are committed to ensuring that our policies and procedures promote equality.

1.3 There will be a consistent approach in promoting quality and diversity across all areas of the association through our engagement and provision of services to tenants, residents and other service users, the recruitment and retention of employees, procurement and contractual arrangements with contractors, consultants and service providers and in our partnerships with others external agencies.

1.4 This policy also covers discrimination by and towards members of the public, governing body members, employees, contractors, consultants and employees from other agencies working on behalf of Elderpark Housing. We oppose all forms of unlawful discrimination and will take a zero-tolerance approach and take appropriate action against any individual or organisation displaying such behaviour.

1.5 This Equality, Diversity and Inclusion policy is central to service delivery, performance and good governance and re-affirms our commitment to meeting our equality duties and performing our role in a way which encourages and recognises the importance of equality and human rights

1.6 The Management Committee are responsible for approving this Policy, and for overseeing its implementation. The Chief Executive and Management Team have operational responsibility for policy implementation, and for reporting to the Management Committee on areas relevant to equality and diversity.

2 Purpose of the Policy

2.1 The purpose of the Equality and Diversity Policy is to outline our commitment to achieving equality and diversity and ensuring a consistent approach in promoting this throughout the organisation in all aspects of our operations and service provision.

2.2 This policy enables the Management Committee to effectively monitor day to day activities and be proactive in fulfilling regulatory requirements to give due regard to equality and human rights in decision making processes and in its role as an employer.

2.3 This policy also addresses the legal and regulatory requirements we must meet, and how we will translate our own mission, vision and values into tangible outcomes that will benefit our customers, communities, employees, management committee members and external stakeholders.

2.4 We are committed to ensuring our people and the tenants and residents in our communities do not face discrimination, victimisation, harassment or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

3 Aims and Objectives of Policy

3.1 The aims and objectives of this policy is to provide a clear understanding of our commitment to ensuring that equality and diversity is central to everything we deliver.

3.2 These aims and objectives include:

- Eliminating discrimination and advancing equality of opportunity for all, in our role as a housing provider and employer.
- Treating all our tenants, residents, service users, employees and those who engage with the association fairly and with dignity and respect.
- ensure that our services are accessible to all regardless of age, disability, gender or gender reassignment, marital or civil partnership status, pregnancy or maternity, religious or cultural beliefs, race or ethnic background, sex or sexual orientation
- To show zero tolerance of harassment and hate crime.
- To comply with relevant legislation, best practice guidance and regulatory requirements
- To encourage our partners, contractors and suppliers to promote equality, respect diversity and prevent discrimination.
- Ensure integration with equality and diversity practices into all our work and activities and ensure that employees are treated with fairness and respect from each other and from members of the public, Management Committee members, and contractors.
- Make sure we 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 to our employee team, Management Committee and other groups solely based on their own merit, experience, ability and potential and in line with the association's culture and business needs.

- Provide a supportive and inclusive 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.
- Using the collection of data to provide appropriate services to all employees, tenants and other customers.
- Provide accurate and clear information to all employees, management committee, tenants and other customers in relation to equality and diversity.
- Ensure that all our people receive appropriate training to support them in contributing to our aim of eliminating discrimination and ensuring equal access to everyone who wants to use our services, work for us, or become involved in our activities

3.3 Fundamentally the aims and objectives of our Equality, Diversity and Inclusion Policy is to ensure that we take appropriate consideration of the legislation and good practice to provide an environment which is open to all, has a zero-tolerance approach on any forms of discrimination and recognises the individuality of anyone who comes into contact with the association.

4 Legal and Regulatory Framework

4.1 Elderpark Housing will meet all our legal and regulatory obligations as set out in the following legislation:

- The Equality Act 2010
- The Human Rights Act 1998 and associated European Union directives
- The Scotland Act 1998
- The Housing (Scotland) Acts 2001 and 2010
- Data Protection Act 2018
- Data (Use and Access) Act 2025

4.2 **The Equality Act 2010** sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. There are nine "protected characteristics" listed in the Act:

a) Age
b) Disability
c) Marriage and civil partnership
d) Pregnancy and maternity
e) Race
f) Religion or belief
g) Gender (referred to as "sex" in the Act)
h) Gender reassignment
i) Sexual orientation

4.3 **The Human Rights Act 1998** specifies that every individual has 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 regarding any of these rights and could affect many of the housing and other services that Elderpark Housing provides.

4.4 The European Convention on Human Rights contains articles setting out the rights that are protected, while alleged breaches of the articles are heard by the European Court of Human Rights (ECHR). It is likely that the status of the Act and the jurisdiction of the ECHR will change when the UK exits the European Union.

4.5 While equal opportunities is a matter reserved to the UK Parliament, the Scottish Parliament also has powers under the **Scotland Act 1998** to *"encourage and promote"* equal opportunities. Equal opportunities requirements are written in to section 106 of the **Housing (Scotland) Act 2001**, amended by the **Housing (Scotland) Act 2010**, section 39 which states "*Social landlords when performing housing services must act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements of the law for the time being related to equal opportunities".*

4.6 **Regulatory Framework**

The **Scottish Social Housing Charter** came into effect on 2 April 2012.

Outcome 1 addresses **Equalities**, it states

- *"Social landlords perform all aspects of their 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."*

Outcome 2 addresses **Communication**, it states

- *"Social landlords manage their businesses so that: tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides."*

Outcome 10 addresses **Access to Social Housing**, it states

- *"People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed."*

Outcome 11 addresses **Tenancy Sustainment**, it states

- *"tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations*."

4.7 The Regulation of Social Housing Scotland was updated by the Scottish Housing Regulator in February 2025, in the form of the **Regulatory Framework February 2025. Section 3**, Regulatory Requirements requires RSL's to

- "*have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety"*
- *"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".*

4.8 Elderpark Housing must also comply with **Regulatory Standards of Governance and Financial Management** with the following Standards and Guidance being relevant to this policy.

- **Regulatory Standard 1** – "*The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users". Guidance 1.1 "The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users".*
- **Regulatory Standard 2** – *"The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities". Guidance 2.4 "The RSL actively seeks out the needs, priorities, views, concerns and aspirations of tenants, service users and stakeholders. The governing body listens to its tenants and service users and takes account of this information in its strategies, plans and decisions."*
- **Regulatory Standard 5** - *"The Registered Social Landlord (RSL) conducts its affairs with honesty and integrity". Guidance 5.3 "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 governance arrangements".*

5 Types of Discrimination

5.1 The Equalities Act outlines types of discrimination, as well as positive action that organisations can take in certain circumstances.

5.2 The Equalities Act specifically contains seven types of discrimination, and these are outlined below at section 5.3 and in addition a further category of discrimination has been included which is defined as institutionalised discrimination.

5.3 Discrimination

a) Direct Discrimination

This is less favourable treatment of an individual or group, 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) Perceptive Discrimination

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 perceived foreign 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 a policy, practice or procedure that applies to everyone in the same way but might disadvantage a particular group and which cannot be objectively justified in relation to the job.

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

sexist calendar on a wall where this makes the workplace an offensive place to work for any employee. The intention of the perpetrator is irrelevant; it is the impact on the individual that determines whether harassment has taken place.

f) Harassment by a Third Party

As an employer, the association is potentially liable for the harassment of their employees 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 protected characteristic.

5.4 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.

6 Positive Action

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

a) General
b) Recruitment and promotion

6.2 **General** - If the association believes that persons who share a protected characteristic suffer a disadvantage or have different needs because of that characteristic, and then action may be taken to help overcome the disadvantage or address the needs. The Act points out that any action should be proportionate.

6.3 **Recruitment and promotion** - An example could be addressing imbalances in the workforce or management committee by 'positive discrimination' and encouraging persons of underrepresented groups to apply for any advertised vacancies either within the staffing complement or the Management Committee. Positive action may be applicable in setting equality targets aimed at encouraging people from a particular group or groups to apply for a vacancy, but no quotas will be set.

6.4 We will periodically assess the demographic profile and ethnic backgrounds of our employee, management committee and our members to review the level of representation with our tenants and other customers in our work. We will then take positive action to ensure recruitment seeks to address any imbalances.

7 Other Equality Definitions and Considerations

7.1 Equality

Is making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way but recognises that their needs are met in different ways. Equality focuses on those areas covered by the law, and described as the 9 protected characteristics of race, sex, disability, age, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief and sexual orientation.

7.2 Diversity

Is about valuing individual differences. We are committed to valuing and managing people's differences to enable all employees to contribute and realise their full potential. We recognise that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit the association and the communities in which we operate.

7.3 Protected Characteristics

The grounds on which discrimination claims can be made:
Age, disability, gender reassignment, marriage, and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

7.4 Failure to make Reasonable Adjustments

Where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage, e.g. physical environment, attitudes, policies and/or procedures.

7.5 Elderpark Housing recognises the significance of meeting equality and diversity legislation and good practice, and the potential consequences should we fail to adhere to this Equality, Diversity and Inclusion Policy. Failure to implement an effective Equality, Diversity and Inclusion Policy and culture within the organisation could have a significant adverse effect on both the organisation's role and purpose together with affecting the credibility of the service we provide.

7.6 Every employee and Management Committee member must always act in accordance with the Association's core values and ensure that this Policy is applied in practice. Failure to do so may result in disciplinary action.

7.7 The association's complaints and appeals process will be outlined at Section 7 should any perceived breach of this policy have been considered to have occurred.

8 Equality Impact Assessments

8.1 Because equality and diversity issues are fundamental to how Elderpark Housing operates each strategy / policy developed or reviewed by the association will be subject to an Equalities Impact Assessment. This will also apply to changes in services delivery or organisational change. The Equality Impact Assessments 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.

8.2 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 Equality Impact Assessments assist in mainstreaming equality considerations into policy and decision-making.

8.3 All policies subject to an impact assessment will have an individual assessment template completed and this will normally be included within the policy documentation being reviewed for approval.

9 Implementation and Monitoring of the Policy

9.1 Whilst embracing the principles of equality and diversity is something that we take very seriously, it is nonetheless important that there is a system in place to demonstrate that we achieve our objectives (or, perhaps more importantly, to highlight areas where we do not). This policy is therefore supported by our Equalities Strategy which links to our strategic objectives and sets out action plan to achieve our aims and objectives in relation to equality, diversity and inclusion.

9.2 We will conduct a full assessment of the demographic profile and ethnic origin of our employees, management committee and tenants. This will assist us as we strive to be representative and inclusive.

9.3 Elderpark Housing will actively promote equality of opportunity and treatment for all groups in society. Elderpark Housing will be able to gather information to help us assess the degree to which the policies and procedures across all areas of the business inherently contain an equalities and diversity approach.

10 Complaints and Appeals

10.1 Elderpark Housing has a policy of zero tolerance as far as discriminatory practices and breaches of equal opportunities are concerned.

10.2 Any allegations against a member of employees will be investigated thoroughly by the Chief Executive Officer. If the allegation is made against a member of the Management Committee the Chief Executive Officer will report the matter to the Management Committee for them to decide how it will be investigated in line with the Code of Conduct.

10.3 If the allegation relates to or involves the Chief Executive Officer the Chairperson would present details to the Management Committee. The Management Committee will then normally establish a panel of members to oversee this investigation, and thereafter they will report the findings to the Management Committee. The Management Committee may request that the Auditor, Solicitor or another appointed consultant undertake the investigation.

10.4 Before any investigation commences, the association will seek advice from Employers in Voluntary Housing and/or its employment lawyers.

10.5 The member(s) of employees/Management Committee should be advised of the allegations and informed of what action the Elderpark Housing is considering with regards the investigation. The employee(s) or management committee member(s) should be advised of their right to be accompanied as outlined in the terms and conditions of employment or code of conduct.

10.6 A deliberate breach of the Equality and Diversity Policy will be regarded as misconduct and may lead to disciplinary action through the terms and conditions of employment for employees and the code of conduct for Management Committee members. In these situations, it could potentially lead to dismissal from the association.

10.7 We will follow the disciplinary procedures as outlined in the terms and conditions of employment or breach of the code of conduct for employees and Management Committee.

10.8 In the event that our tenant(s) or other customer(s) displays unacceptable behaviour towards employees, Management Committee members or consultants, we will consider initiating appropriate action e.g. taking action against the tenancy under the terms of the tenancy agreement; reporting the matter to Police Scotland; or reviewing communication arrangements with the association in line with our Unacceptable Behaviour Policy.

10.9 In breaches of this policy by consultants, contractors or service providers, we will consider the level and severity of the breach and the potential for any recurrence to inform our decision on what action should be taken. The ultimate sanction would be that we seek to terminate the contract.

10.10 In situations where a member of the Management Committee or Chief Executive Officer is alleged to have breached this policy, this would constitute a notifiable event as outlined by the Scottish Housing Regulator. The notifiable event would be reported to the regulator by the Chief Executive Officer or Chairperson, depending on the person(s) alleged to have breached the policy.

10.11 Where the complaint is from a tenant or service user on any area of service where an issue is raised in relation to equality, diversity and inclusion, this will be handled in line with the SPSO Model Complaints Handling Policy and Procedure.

11 Policy Availability

11.1 The policy will be made available to all employees and Management Committee members. Employees training and Committee training will take place within six months of the policy being approved and employees/Committee Members will be encouraged to raise any queries they have relating to the policy to their line manager/Chairperson.

11.2 The policy will be provided for successful job applicants within their induction.

11.3 Contractors or consultants being used by the association will have details of the policy included within in tender documentation.

11.4 The policy will also be made available publicly on our website.

11.5 One of the ways in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually impaired individual may not be able to read a policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with colleagues / employees. This type of indirect discrimination is even more important to address as it can often be inadvertent and there is perhaps more scope for it to occur.

11.6 To help combat this, we will provide information to employees, management committee or customers in any special formats as required. Special formats may include:

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

11.7 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 5 working days or reasonably practicable. All costs in relation to this will be borne by Elderpark Housing.

11.8 To ensure that this strategy is effective, the availability of documents in other formats will be publicised on our website.

12 Review

12.1 The association will review this policy at least every 5 years. The next review will therefore take place in June 2030 or earlier to take account of:

- Applicable legislation, rules, regulations and guidance.
- Changes in the organisation and community's requirements.
- Developments in best practice.

Appendix 1 - Equality Impact Assessment

Name of Policy to be assessed	Equality, Diversity and Inclusion Policy	**New policy or revision of existing?**	Revision
Person(s) responsible for assessment		Kerry Clayton	
1. Briefly describe the aims, objectives and purpose of the policy.	To ensure the best practice principles of equality diversity and inclusion are fully embedded in all areas of service and all work undertaken, or on behalf of the association.		
2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)	The Policy will benefit all employees, applicants, tenants, committee members, stakeholders and contractors. Ensure the principles of equality and diversity are fully embedded in all areas of service and all work undertaken		
3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)	To eliminate unlawful discrimination harassment and victimisation. Advance equality of opportunity and, foster a good relationship between those who have protected characteristics and those who do not.		
4. Which groups could be affected by the policy? (note all that apply)			
Age	√	**Disability**	√
Gender reassignment	√	**Marriage and Civil Partnership**	√
Pregnancy and Maternity	√	**Race**	√
Religion or Belief	√	**Sex**	√
Sexual Orientation	√		
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
6. Have those affected by the policy / decision been involved?			
This Policy follows the legal and regulatory requirements of the Equality Act 2010.			
7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
		All groups highlighted above will receive a high-quality service which is inclusive and takes into consideration individual needs. Eliminate unlawful discrimination harassment and victimisation. Foster a good relationship between those who have protected characteristics and those who do not.	
8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in		Accessible, inclusive and responsive high-quality services. A range of communication methods, appropriate to the needs of our diverse communities, are used to provide	

place, making adjustments, taking specific action to mitigate any potentially negative impacts)	equality of opportunity. Collect data that will better inform our business decision making processes and inform service delivery. Actions relevant to this policy are set out within the Equalities Strategy Action Plan.

Signed:	Kerry Clayton
Dated:	18th June 2025

Appendix 2 – GDPR Impact Assessment

Name of Policy to be assessed	Equality, Diversity and Inclusion Policy	**New policy or revision of existing?**	Revision
Person(s) responsible for assessment		Fiona Koroma	
Briefly describe the aims, objectives and purpose of the policy.	Ensure the best practice principles of equality and diversity are fully embedded in all areas of service and all work undertaken, or on behalf of the association.		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	The data used within the Policy will span over various categories depending on how it is applied. This will include personal and protected characteristics data at times. Access to data will be restricted to those who need access for the purpose of processing the data and providing service and will not be shared beyond what is required. .		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	To ensure we are compliant with all legal and regulatory requirements and that we collect and handle personal data in-line with UK GDPR legislation and guidance from SHR.		
Which groups could be affected by the policy? (note all that apply)			
Tenants	√	**Committee**	√
Employees	√	**Contractors**	√
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
Have those affected by the policy / decision been involved?			
The Equality Act 2010 is very clear about what it expects organisations to do and consolidated many pieces of anti-discrimination legislation into a single framework.			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
		All groups highlighted above will receive a high-quality service which is inclusive and takes into consideration individual needs. Eliminate unlawful discrimination harassment and victimisation. Foster a good relationship between those who have protected characteristics and those who do not.	
What actions are required to address the impacts arising from this assessment? (This might include:		Accessible, inclusive and responsive high-quality services. A range of communication	

additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	methods, appropriate to the needs of our diverse communities, are used to provide equality of opportunity. Collect data that will better inform our business decision making processes and inform service delivery. Actions relevant to this policy are set out within the Equalities Strategy Action Plan.
Signed:	Kerry Clayton
Dated:	18th June 2025