

**EQUALITY and DIVERSITY POLICY**

**Policy statement**

The Co-operative Development Society Ltd (t/a CDS Co-operatives) recognises that groups and individuals have suffered, and continue to suffer from discrimination, that is direct [whether intentional or unintentional], indirect and institutionalised.

The Society recognises the need for equality of opportunity and the management of diversity in all aspects of its operations including the provision of housing and employment. It is our intention to ensure that nobody receives less favourable treatment from us or agents acting on our behalf on the grounds of gender, race, colour, ethnic or national origin, marital status, responsibility for dependants, sexual orientation, disability, age, gender reassignment, social status, political, cultural or religious beliefs.

In working to eliminate discrimination, unfairness, inequality and disadvantage we will take practical action developing initiatives and interventions to promote and value diversity at all levels of the organisation. As an organisation we actively recognise and manage diversity in the workplace in a strategic way, looking at innovative ways of changing the organisational culture and empowering the workforce.

As all forms of discrimination and harassment are totally unacceptable to us in our role as housing provider and employer, we have adopted the following equality and diversity policy which should be read in tandem with other relevant policies including the Society's equality and diversity strategy and action plan, the Society's recruitment policy and harassment policy. We seek to value diversity by going beyond just fighting discrimination.

We will ensure that all our staff and members of the board of management and its sub-committees are fully aware of their responsibilities towards the promotion of equal opportunities and valuing diversity that they are properly equipped to take account of the different and special needs of particular groups and thus make provision for those groups working positively towards the overall goal of the organisation.

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## **EQUALITY AND DIVERSITY POLICY**

### **1. Legislation and best practice**

1.1 CDS Co-operatives believes that it is essential to eliminate discrimination and to promote good relations, equality of opportunity and valuing diversity in all areas of our operations. We accept and endorse our legal responsibilities as laid out in a variety of legislation which includes, amongst others:

- The Equal Pay Act 1970 & 1983.
- the Sex Discrimination Act 1975,
- the Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2002,
- the Disability Discrimination Act 1995, as amended by the DDA Act 2004.
- the Human Rights Act 1998,
- Protection from Harassment Act 1997,
- the Sex Discrimination (Gender Reassignment) Regulations 1999,
- Employment Equality (Sexual Orientation) Regulations 2003,
- Employment Equality (Religion or Belief) Regulations 2003, and
- Employment Equality (Age) Regulations 2006.

Our policy, however, goes further than the law, as it currently stands. It accepts our moral responsibility for promoting and working towards ensuring equality of opportunity and equity for all. It accepts our social responsibility to be an employer of first choice by valuing and respecting differences in people within the organisation. It accepts our business responsibility to work towards meeting the overall objectives and goals of the organisation in a holistic way.

1.2 In addition to our legal responsibilities we value the guidance provided through regulatory guidance and best practice which includes, amongst others:

- Housing Corporation Regulatory Code
  - Housing Corporation good practice notes 4 & 8
  - CRE Code of Practice on Racial Equality in Housing
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- Audit Commission Key Lines of Enquiry (KLOEs)

1.3. We are committed to being an equal opportunities organisation which values diversity and to the following practices:

- a) In the employment of staff and provision of services we will seek to actively promote equality of opportunity and valuing diversity.
- b) No person or groups of people applying for employment or housing with CDS Co-operatives, or serving on our board of management or its sub-committees, will be treated less favourably because of their gender, race, colour, ethnic or national origin, marital status, responsibility for dependants, sexual orientation, disability, age, gender reassignment, social status, political, cultural or religious beliefs.

#### ***External organisations***

- c) In hiring contractors, consultants and other agencies, we will be mindful of our commitments to equality of opportunity and valuing diversity so will only employ those whose equality and diversity policies and practices are commensurate with ours.
- d) We will expect those organisations with which we enter into agency agreements, for the provision of services, to adopt equality and diversity policies and practices commensurate with ours.

## **2. Equality and diversity strategy and action plan**

2.1 To ensure that the Society delivers its policy objectives we have adopted an equality and diversity strategy. As part of the strategy, we shall draw up an equality and diversity action plan, which will set in place targets and priorities and will be reviewed and updated on an annual basis by the board of management. In light of the Macpherson Report and consistent with specific Housing Corporation regulatory requirements relating to BME matters this strategy and action plan will focus on addressing BME issues but will not be limited to these issues.

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### **3. CDS Co-operatives board of management**

- 3.1 The Society's board of management is democratically elected by the members of the Society.
- 3.2 If the democratic process fails to achieve an appropriate balance of members to reflect the make-up of the communities in which the Society operates, the Board will give consideration to using the provision within its rules to co-opt up to three additional Board Members in order to redress the balance.

### **4. CDS Co-operatives as employer**

The Society is committed to:

#### ***Recruitment, Selection and Employment***

- 4.1 ensuring the recruitment of the best possible staff to provide, manage and administer the organisations services.
  - 4.2 ensuring that recruitment to all vacancies for permanent positions is carried out in accordance with our recruitment policy.
  - 4.3 ensuring that the recruitment agencies that we use on our preferred supplier list have adopted equality and diversity policies and practices that are consistent with our own.
  - 4.4 ensuring that, if posts are advertised, all advertisements are clear and unambiguous so that applicants will be able to determine their own suitability for employment.
  - 4.5 ensuring that all advertisements make clear our commitment to equal opportunities and valuing diversity in the workplace by stating that: "We are committed to equality of opportunity and valuing diversity so positively welcome applications from all sections of the community."
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- 4.6 ensuring that recruitment does not artificially restrict the number of applicants from any particular group, encouraging applications from previously under-represented groups.
- 4.7 ensuring that every post has a job description and person specification, as required by our recruitment policy and to ensure that all criteria are strictly justifiable requirements for the post.
- 4.8 ensuring that the criteria for shortlisting are consistently applied to all applicants and that the short-listing panel do not have access to data on candidates collected purely for monitoring purposes.
- 4.9 ensuring that the application process is not used to test literacy unless this is a genuine requirement of the job; to avoid using general academic qualifications as criteria for selection and that where specific professional qualifications are one of the criteria for initial selection, these shall be geared to the requirements of the particular job, and not be made artificially high. Equivalent qualifications gained in other countries will be acceptable where they are relevant. Individuals are selected on their relevant merits and abilities.
- 4.10 ensuring that in determining whether or not to accept or reject a candidate, interviewers will only consider factors relevant to the job; the criteria applied to the selection of successful candidates shall be only those listed in the job description and person specification.

### ***Discrimination***

- 4.11 ensuring that staff and board and sub-committee members are aware that the use of sexist, racist, homophobic or ageist language, as well as general derogatory comments about a person's physical appearance, is unacceptable and the use of such language will be considered a disciplinary offence for staff and a breach of the code of conduct for board and sub-committee members.
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4.12 avoiding positive discrimination except where this is specifically permitted under Section 48 of the Sex Discrimination Act 1975 and/or Section 5(2)(D) of the Race Relations Act 1976.

4.13 that we will not discriminate in favour of or against a particular ethnic group or in favour of or against women or men except where this is permitted as a genuine occupational qualification under Section 7 of the Sex Discrimination Act 1975 and/or Section 5 of the Race Relations Act 1976. We will also adhere to the Commission for Race Equality's Code of Practice.

### ***Disability***

4.14 undertaking to make reasonable adjustments to working environment and specific job functions in order to enable a disabled person to be able to undertake a particular job function.

### ***Training and Development***

4.15 ensuring that diversity issues are covered as part of the induction programme for all new members of staff.

4.16 ensuring that any staff and board members involved in recruitment have satisfactorily attended and completed training in equality and diversity issues in relation to recruitment and, recruitment policy and practice.

4.17 ensuring that all staff and board and sub-committee members are given training on equal opportunities issues, diversity, diversity awareness and diversity management.

4.18 In keeping with our awareness that training is essential in maximising economy, efficiency and effectiveness of the workforce, we will ensure that all employees and Board Members have equal access to available training facilities. We also aim to give training opportunities that will allow employees to develop skills appropriate to their

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jobs and their career development and for board members to fully develop their role as a member of the board of management.

- 4.19 ensuring good employment and staff management practices are adopted which promote the ownership and understanding of diversity throughout the organisation.

## **5. CDS Co-operatives as a housing provider and managing agent**

The Society is committed to:

- 5.1 ensuring that issues of equal opportunities and valuing diversity are considered and included in all policies and procedures.
- 5.2 ensuring that any person who applies for housing or any person or organisation which uses our services or approaches us for assistance receives equal treatment.
- 5.3 ensuring that all independent co-operatives with which we have an agency relationship have equality and diversity policies which are actively implemented.

### ***Allocation***

- 5.4 ensuring that all property is let strictly in accordance with the Society's, or independent co-operative's, allocations policy.
- 5.5 adopting the Commission for Racial Equality code of practice in the allocation of housing and other aspects of service delivery and to ensure that independent co-operatives for whom we provide services also adopt the code of practice.
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### ***Training and Development***

- 5.6 ensuring that all training for tenants includes equal opportunities training, diversity training, valuing diversity training and that any agreement with the co-operatives supports equal opportunities obligations including the valuing of diversity.

### ***External Organisations***

- 5.7 ensuring that contractors, consultants and other bodies who work for us are committed to equal opportunities, valuing diversity and good practice through the implementation of our Respect for People strategy and contractual requirements, where appropriate, to promote equality and diversity
- 5.8 ensuring that ethnic minority groups and women who are under represented on our list of approved contractors are encouraged to become approved contractors. To maintain membership of the London Equal Opportunities Federation or a similar organisation that is dedicated to increasing the representation of contractors run by women, ethnic minorities and disabled people on approved contractors' lists.

### ***Disability***

- 5.9 ensuring that it meets its responsibilities under the Disability Discrimination Act 1995 and that it follows the codes of good practice for employment, premises and services.
- 5.10 ensuring that our offices meet DDA requirements and that external meetings with tenants are held in premises that are properly accessible to all residents.
- 5.11 ensuring that applicants for housing who are physically disabled are not treated less favourably than others because of their disability or for a reason relating to it. We will maintain records of all suitably adapted properties that we own or manage to ensure
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that such information is made available to the relevant referral agencies when available for letting. We will assist, where possible, in the adaptation of homes to meet the needs of disabled applicants who apply for housing with us. Where adaptation is not possible we will seek to assist such applicants through practical working relationships with other agencies.

## **6. Complaints**

- 6.1 Complaints concerning breaches of the Society's commitment to equality and diversity will be treated seriously by the Society and properly investigated and reported to the board of management.
- 6.2 Members of staff should use the grievance procedure contained within their contract of employment to raise any complaints.
- 6.3 Tenants, client co-operatives and members of the general public (including applicants for employment) should raise their complaints using the Society's formal complaints procedures.
- 6.4 Tenant suffered from bullying, victimisation or harassment should use the Society's harassment policy to ensure that the matter is thoroughly and promptly dealt with.

## **7 Monitoring and auditing**

- 7.1 People are an organisation's most valued asset. Procedures and practices throughout CDS Co-operatives are regularly reviewed to ensure that no group is put at a disadvantage, either directly or indirectly (intentional or unintentional), deliberately or inadvertently.
  - 7.2 The board of management has overall responsibility for ensuring that this policy is implemented. This policy will be reviewed periodically (at least every three years) following consultation with staff and clients on proposed changes.
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- 7.3 The Equal Opportunities Commission, the Commission for Racial Equality and the Chartered Institute of Personnel and Development all recommend monitoring. To aid us in this process, we will collect appropriate data in order to monitor the effectiveness of our equality and diversity policy in the following areas:
1. People applying for, short listed for and appointed to employment vacancies.
  2. Those on our waiting list for housing.
  3. Those nominated to us for housing by any outside agency.
  4. Those housed by us.
  5. Members of the board of management.
  6. Those organisations providing services to us, such as contractors, suppliers, consultants and other bodies.
- 7.4 Appropriate monitoring reports will be submitted to the senior management team and the board of management at least annually. Data will be monitored against appropriate comparison data – such as the 2001 census data, ethnic profile information of local authority waiting lists etc. These reports will also be formally forwarded to the union so that relevant issues can be raised and discussed at the JCC.
- 7.5 The Board will review the monitoring data and set targets for improvement as appropriate. The findings of the monitoring will indicate the extent to which our equality and diversity policy is being achieved and if our claim to diversity holds true. We can establish whether or not we are meeting our targets in service provision and employment for both clients and employees. We recognise that we can better work towards our business objectives and goals by gathering diversity data and utilising best practice to bring about comprehensive continual improvement.
- 7.5 The Society's annual report will include summary monitoring data on equality and diversity issues.
- 7.7 Much of the equality and diversity monitoring data that may be collected will be classified as "sensitive personal data" under the provisions of the data protection act.
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The Society will ensure such data is handled in compliance with the provisions of the act and our own data protection policy.

## **7. CONCLUSIONS**

- 7.1 CDS Co-operatives is committed to ensuring that our equality and diversity policy is effectively implemented. Allegations of discrimination or harassment by or about members of staff or contractors, consultants working on our behalf will be taken seriously and be fully investigated. If found proven, appropriate action will be taken under the terms of the relevant contract.
- 7.2 CDS Co-operatives is committed to providing equality of opportunity and valuing diversity of all individuals and groups. However the broader aims of this policy take precedence over any specific views of individuals or groups. The Society will not allow an individual or group to claim the protection of this policy to justify their discriminatory actions or behaviour against others.

**Stephen Brown**

**Society Secretary**

APPROVED FOLLOWING MINOR REVISIONS BY THE BOARD OF MANAGEMENT 23  
OCTOBER 2006

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