

EQUALITY POLICY

JANUARY 2026



LANARKSHIRE
HOUSING ASSOCIATION LTD



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EQUALITY POLICY

(*Note Lanarkshire Housing Association hereinafter referred to as LHA)

1.0 INTRODUCTION AND OBJECTIVES

1.1 Introduction

We recognise that Equality is not a standalone issue and seek to embed this concept into all our strategic planning activities and day-to-day services. The policy is to ensure that LHA achieves its Equality objectives and fully addresses current legal and regulatory requirements.

1.2 Our Mission and Values

Our Mission is:

“Providing quality, affordable homes to benefit our communities”

Our core Values encourage us all to be:

- Mindful
- Connected
- Inclusive
- Accountable

1.3 Aims of the Equality Policy

In our commitment to this policy, our specific Equality, Diversity and Human Rights objectives are to:

- Positively promote equal opportunities and human rights for all our customers and employees
- Ensure equality of opportunity underpins all our policies, procedures and processes
- Embrace diversity and eliminate any direct or indirect discrimination that we encounter

2.0 THE STATUTORY AND REGULATORY FRAMEWORK

2.1 The Equality Act 2010 (the Act) legally protects people in the workplace and in wider society. It replaced the previous anti-discrimination legislation and strengthens protection, whilst making the law easier to understand.

2.2 Under section 149 of the Act, parties who exercise public functions are subject to the general equality duty and they must seek to understand

the effects of their activities on the specified nine groups with protected characteristics.

- 2.3 To comply with this legislation, we must have 'due regard' to (i.e. actively consider as part of the decision-making process) the need to address the Act's three aims:
 1. To eliminate unlawful discrimination, harassment and victimisation
 2. To advance equality of opportunity between people who share a protected characteristic and people who do not share it
 3. To foster good relations between people who share a protected characteristic and people who do not share it
- 2.4 Prior to the Act's introduction, the emphasis of equality legislation was on rectifying discrimination after it occurred, however, in relation to the second aim i.e. to advance equality of opportunity between different groups; this places an obligation to positively promote equalities by:
 - removing or minimising disadvantages suffered by people due to their protected characteristic
 - meeting the needs of people with protected characteristics and
 - encouraging participation from people with protected characteristics
- 2.5 In addition to the Act, other relevant legislation includes the Human Rights Act 1998 which prohibits discrimination, and the Housing (Scotland) Acts of 2001 and 2010; which place legal obligations on housing associations to promote equal opportunities.
- 2.6 Besides legislation, we will also comply with the Scottish Housing Regulator's Regulatory Framework in relation to the performance of tenant services, financial well-being and standards of governance.
- 2.7 As part of this process, LHA is required to confirm through its Annual Assurance Statement that it meets the requirements around equality and human rights, including the equalities outcome in the Scottish Government's Social Housing Charter.
- 2.8 LHA processes data in accordance with UK GDPR and the Data Protection Act 2018, and because equality data is collected on a purely anonymous basis and not linked to an individual; this is not classed as personal data and data protection considerations do not apply.

3.0 HOW WE WILL ADDRESS OUR OBJECTIVES

- 3.1 We will address our objectives in our capacity as a Service Provider, an Employer and through Working with Others.

3.2 **As a Service Provider we will:**

- Deliver appropriate services that are equally accessible to all who use them and treat customers with respect, whilst tailoring services to their individual needs
- Ensure that Equality and Human Rights issues are at the core of the policies and procedures that guide our actions
 - To do this, we will assess the impact of our new or reviewed policies for any discriminatory effect, by carrying out an Equality Impact Assessment
- Find ways to identify and address any unmet needs, aspirations and disproportionately low levels of engagement with people sharing protected characteristics.
 - This will involve liaising with customers and community organisations that may represent their interests. Enhancing participation will allow us to better understand and meet the changing needs in our communities
- Remove physical barriers to housing by providing appropriate new build that meets 'Housing for Varying Needs' standards. Thereafter, carry out general adaptations to meet customers' individual needs, wherever feasible

3.3 **As an Employer:**

Recruitment – We will ensure that employment opportunities are equally accessible to all sections of the population, so that we encourage an inclusive and diverse workforce. All recruitment decisions, following from our Recruitment Policy, will be fair and based entirely on the merits of the candidate.

Conditions of Employment – Our employment practices are unbiased and will create an environment where everyone is encouraged to realise their full potential. Family-friendly initiatives, such as the Flexible Working Policy, have been developed and we have policy statements on Dignity at Work, including related policy and procedures to deal with harassment and bullying in the workplace.

Workplace – We will carry out an annual assessment of the workplace in relation to parties with disabilities, to ascertain whether any 'reasonable adjustments' are required in accordance with the Act.

Our people – We will ensure that Employees and Governing Body Members are aware of this policy and receive appropriate guidance and training on their associated responsibilities. Our people must also alert a member of the Leadership Team or an Office Bearer of any situation or practice which appears to be contrary to the principles of this Policy.

3.4 Whilst Working with Others we will:

- Liaise with agencies, including Police Scotland and local residents' groups, in an effort to promote harmony in the community, eradicate discrimination and ensure our tenants enjoy their tenancies free from harassment
- Take appropriate action to combat any unlawful discrimination, including enforcing our Anti-Social Behaviour Strategy, pursuing legal remedies against perpetrators and providing or assisting in the provision of support for victims of such harassment
- Ensure that those we work with and parties we commission or procure services from, such as contractors and consultants, also have appropriate equality policies and practices

4.0 HOW WE WILL ACHIEVE OUR OBJECTIVES

4.1 Collecting Equalities Information

Under the general equality duty, we are required to analyse the effects of our functions in relation to the protected characteristics. To meet this, we will build a sound evidence base, by collating suitable equality data.

Data will be collected in relation to this policy using the model equality monitoring form (anonymous version) included within the Equality data collection: National guidance for Scottish social landlords, updated June 2022 and produced by the SFHA, Scottish Housing Regulator and others.

Information will be collected for the following key areas of activity:

- Applications for housing
- Existing tenancies (tenant/joint tenants only)
- New tenancies (tenants/joint tenants only)
- General membership
- Governing body membership
- Job applications
- LHA employees

We will ensure that the collected data can be returned anonymously and not linked to an individual, with paper copies being issued along with a confidential envelope.

To keep the information current, forms for housing applicants, existing tenancies and general membership will be re-issued every three years and information for the other groups will be collected annually.

4.2 The Protected Characteristics

We will collect equalities information from the above key areas, on a voluntary basis, in relation to the protected characteristics as outlined in the Act. These are age, disability, gender reassignment, marriage & civil partnership status, pregnancy & maternity (excluded from the monitoring process), race, religion or belief, gender and sexual orientation.

These protected characteristics can be further described as follows:

1. **AGE**

This refers to being a particular age or age group and includes all ages. As a protected characteristic, age can affect the way people access services and employment.

2. **DISABILITY**

A disabled person is someone who has a physical or mental impairment that can have a substantial and lasting adverse effect on their ability to carry out normal daily activities. The Act explicitly recognises that disabled people's needs are different and public bodies need to take account of impairments when making decisions about policies or services.

3. **GENDER REASSIGNMENT**

A trans/transgender is a person whose gender identity does not correspond with the sex registered for them at birth.

4. **MARRIAGE & CIVIL PARTNERSHIP STATUS**

A person has this protected characteristic if they are in a marriage or civil partnership. (The Equality and Human Rights Commission has indicated that this is only in relation to employment and LHA therefore has flexibility on whether it collects this data for tenants and applicants).

5. **PREGNANCY & MATERNITY**

This prohibits less favourable treatment on grounds of pregnancy, birth and breastfeeding. We ask our housing applicants if a member of their household is pregnant and take this into account when allocating properties. We also have policies that clarify our employees' maternity and paternity rights. This information is of a transitory nature and is not collected for monitoring purposes.

6. **RACE**

This refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origin.

7. **RELIGION OR BELIEF**

Religion means any religion, and belief is any religious or philosophical belief. A reference to religion includes a lack of religion and reference to belief also includes a lack of belief.

8. **GENDER** (referred to as 'sex' in the Act)

This means a man or a woman.

9. **SEXUAL ORIENTATION**

This relates to a person's sexual orientation and can be:

- towards persons of the same sex (lesbians and gay men)
- towards persons of the opposite sex (heterosexual)
- towards persons of either sex (bisexual)

4.3 **Analysing Equalities Information**

Assessing the impact of our actions involves carrying out effective analysis of the gathered equality information.

The collected data will be analysed to enable us to:

- Profile our Key Areas of Activity base in relation to the protected characteristics and, where appropriate, compare it with relevant statistical data (i.e. census information or other suitable figures)
- Identify any shortfalls or imbalances in equality information between our Key Areas of Activity and relevant statistical data for the local community
- Identify any key changes or trends in our data and use this to inform service provision and strategic direction
- Identify and pursue any required action, such as setting equalities objectives and targets or undertaking positive action initiatives (i.e. lawfully treating some people more favourably than others to overcome or minimise disadvantages that those who share a protected characteristic have experienced, or to meet their different needs) in accordance with equality law
- Monitor progress in relation to objectives and targets

An Equality Action Plan will be compiled by the Chief Executive, or other party they delegate, annually which will assess LHA's equality arrangements in respect of governance, recruitment practices, employee personal development, people policies, performance management, service provision, and relationships with agent/s contractors.

5.0 COMPLAINTS AND GRIEVANCES RELATING TO THIS POLICY

- 5.1 LHA implements a Complaints Handling Procedure to ensure that all complaints, including those relating to equalities issues, are thoroughly investigated in a fair and thorough manner.
- 5.2 Any person who considers that they have not been afforded an equal opportunity in line with this policy may pursue a complaint through the Complaints Handling Procedure.
- 5.3 This will be recorded as an equality issue complaint for the purposes of reporting to the Scottish Housing Regulator. This process can be accessed from our website or by approaching the Association.
- 5.4 Employment concerns may be raised through the Grievance Procedure and employees are also able to report appropriate concerns through the policy for dealing with Whistleblowers.
- 5.5 Swift action will be taken, in accordance with the Complaints Handling Procedure and if the conduct of an Employee or Governing Body Member is found to be contrary to this policy; it will be considered a serious disciplinary matter and may lead to dismissal from employment or removal from the Management Committee.

6.0 COMMUNICATION OF THE POLICY

- 6.1 LHA will always seek to provide appropriate communications to customers and ensure equal access to information, regardless of disability or impairment. We offer to interpret and translate through a translation service and make communications available in alternative suitable formats (braille, large print, mini loop etc).
- 6.2 To maximise awareness of this policy; it will be communicated to employees, Governing Body Members, tenants, customers and contractors & consultants employed by the Association. It will also be available on request, free of charge, to any member of the public.
- 6.3 LHA will report its equality monitoring to tenants and other customers on an annual basis through its Newsletter or other communication.

7.0 RESPONSIBILITY FOR THE POLICY

- 7.1 The Governing Body has ultimate responsibility for ensuring that the Association complies with the principles of this policy in all its activities.

7.2 The day-to-day responsibility for implementing the policy is delegated to the Leadership Team; with the Chief Executive retaining the overall responsibility for the policy's operation. A report on the Equality Action Plan will also be submitted annually to the Management Committee.

8.0 REVIEW

8.1 This policy will be subject to review by the Management Committee on a yearly basis; unless a change in legislation, or similar, requires an earlier revision.