Peter Bedford Housing Association

Equality, Diversity and Human Rights Policy & Action Plan

July 2009
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EQUALITY, DIVERSITY AND HUMAN RIGHTS POLICY

1. STATEMENT OF INTENT

1.1 Equality, diversity and human rights are integral to the work of Peter Bedford, and form a key part of our vision and mission. Our principles of participation, respect, inclusion, diversity and empowerment reflect the importance of and our commitment to respecting people equally, valuing the contributions of all, and treating everyone with fairness and dignity.

1.2 It is our mission to support those with long experience of social exclusion to take control over their lives and shape a brighter future. We support people’s aspirations to increased social, educational and economic inclusion and our services are designed and delivered to this end.

1.3 Peter Bedford will always observe and promote equality, diversity and human rights in all our work.

1.4 We are positively committed to challenging direct and indirect unfair discrimination, harassment or victimisation against anyone on the grounds of gender, race, colour, ethnic or national origin, physical or mental health, disability, social class, age, political or religious beliefs, offending history, HIV status, trade union activity, marital status, sexual identity or orientation, caring responsibilities or immigration status (henceforth referred to as ‘equality strands’).

1.5 We strive to ensure that our commitment to equal opportunities and anti-discriminatory practice is reflected in all that we do, including the way we assess, allocate and provide housing, support and services; employ, manage and train staff; work with contractors, suppliers and agencies and recruit Board members.

1.6 As part of our commitment to promoting equalities and good relations, Peter Bedford takes and creates opportunities to celebrate difference and diversity, including Black History Month, World Mental Health Day, International Women’s Day, Lesbian, Gay, Bi-sexual and Transgender Pride.

2 IMPLEMENTATION

2.1 The Law

2.1.1 We act in accordance with all relevant equalities legislation and regulations, including:

- Civil Partnerships Act 2004
- Disability Discrimination Act 1995
- Disability Discrimination Amendment Act 2005
- Employment Equality (Age) Regulation 2006
- Employment Equality (Religion or Belief) Regulation 2003
- The Employment Equality (Sex Discrimination) Regulations 2005
• Employment Equality (Sexual Orientation) Regulation 2003
• Equal Pay Act 1970
• Equal Pay Act 1970 (Amendment) Regulations 2003
• Equality Act 2006
• Human Rights Act 1998
• Race Relations Act 1976
• Race Relations Amendment Act 2000
• Race Relations Act 1976 (Amendment) Regulation 2003
• Rehabilitation of Offenders Act 1974
• Sex Discrimination Act 1975
• Sex Discrimination (Gender Reassignment) Regulations 1999

2.2 Good practice

2.2.1 In addition to upholding the law, we support the provisions of the Equality and Human Rights Commission Codes of Practice in the provision of housing, services and employment.

2.2.2 We implement, monitor and keep under review detailed operational policies and procedures which ensure we adhere to good equal opportunities and anti-discriminatory practice and the requirements of this policy. These include:

• Carers and childcare leave policy
• Codes of conduct (staff, volunteers and Board)
• Disciplinary Procedure
• Flexible Working Arrangements
• Grievance Procedure
• The Harassment Policy
• The Nuisance Policy
• The Race Strategy
• Recruitment, Allocations and Lettings Policy
• Recruitment of Ex-offenders Contract of engagement in training for workschemes
• Guidelines on Recruitment and Selection
• Redundancy Procedure
• Retirement Policy
• Ring fencing paid opportunities for tenants and participants
• Staff Training and Development Policy
• Guidance on supervisory and development opportunities
• Working and Living Together
• Work-Life Balance Policy

3 RESPONSIBILITIES

3.1 The Board takes primary legal and moral responsibility for ensuring Peter Bedford operates in an anti-discriminatory way in accordance with best equal opportunities, diversity and human rights practice.
3.2 The **Equal Opportunities and Diversity Committee** is a sub committee of the Board. It comprises Board members, staff, tenants and participants. It is chaired by a Board member and serviced by the Chief Executive. Its role is to:
review the Association’s compliance with legislation and regulation, its performance against targets and its strategies and policies relating to equal opportunities and diversity. The agenda for the meetings are set by a working group of tenants and participants who meet with the Chief Executive in advance.

3.3 The **Chief Executive** has overall responsibility for the implementation, management, monitoring and review of all relevant policies and procedures. **Senior and middle managers** are charged with promoting this policy.

3.4 In addition, all **staff, volunteers and cover participants** have an individual responsibility to:
- act in accordance with equal opportunities and anti discrimination policies, procedures and good practice in everything they do
- pro-actively implement the Harassment Policy and Complaints Procedure, including supporting colleagues, tenants and participants where appropriate to challenge any discriminatory behaviour
- be aware of the disciplinary consequences of not abiding by equal opportunities policies and procedures.

3.5 All **tenants and participants** are encouraged and supported to behave in accordance with anti-discriminatory principles and are made aware of the Harassment Policy including the consequences of not abiding by it. The Chief Executive oversees all formally reported harassment allegations.

3.6 All **agents and contractors** providing services to Peter Bedford are made aware of this policy and all Invitations to Tender released by Peter Bedford require bidders to make a statement that they agree to abide by it.

4 **PROVISION OF HOUSING AND SERVICES**

4.1 We seek to identify the needs of disadvantaged groups within our areas of operation and actively assist them to benefit from our housing and services.

4.2 We take appropriate action to ensure our activities are widely known and that applications are welcome from all sections of the community.

4.3 We ensure that anyone applying for housing or services is dealt with fairly without discrimination.

4.4 We seek to ensure that the housing, services and support that people receive are relevant to their individual needs and aspirations in a culturally sensitive and anti-discriminatory manner.

4.5 Where appropriate we provide or enable access to services to meet the specific needs and aspirations of particular groups.
5 EMPLOYMENT

5.1 We ensure that the widest range of applicants are made aware of job vacancies and ensure that the job requirements are the minimum necessary.

5.2 We ensure staff are selected, trained, promoted and managed in a fair and equitable way consistent with their skills, aptitudes and abilities, with a view to ensuring the workforce reflects at all levels the communities and areas we work in.

5.3 We take positive action on the employment of disabled people, provide a Guaranteed Interview Scheme and are holders of the two ticks symbol. From time to time, we take positive action within the law on the recruitment of other groups of people if they are under-represented in the workforce.

6 BULLYING, HARASSMENT AND VICTIMISATION

6.1 We make every effort to provide a living and working environment free from all forms of bullying, harassment, and victimisation.

6.2 We deal quickly, firmly and sensitively with all forms of discriminatory behaviour in accordance with our Harassment Policy.

6.3 Disciplinary and Grievance Procedures apply to all employees of Peter Bedford and are applied to tackle misconduct and breaches of policy and codes of practice.

6.4 We are committed to the protection of vulnerable adults (POVA) from bullying, harassment, victimisation and any form of coercion or exploitation. We comply with local statutory requirements regarding POVA and the reporting of incidents.

6.5 Peter Bedford subscribes to an advocacy service where tenants and participants can seek confidential support and advice on issues that may include bullying, harassment and victimisation.

7 MONITORING AND REVIEW

7.1 Key Performance Indicators relating to equalities and diversity are monitored and evaluated on a quarterly basis by Management Group and reported to the Board.

7.2 The Equal Opportunities and Diversity Committee meets three times a year to set policy and review the performance of the organisation. The Board reviews and re-sets Key Performance Indicators based on the recommendations of the Equal Opportunities and Diversity Committee.
Peter Bedford believing strongly in service user feedback and consultation regarding the effectiveness of service provision.

8 COMMITMENTS AND UNDERTAKINGS

8.1 We seek and recognise the value of a diverse workforce across the organisation and in all of our services. We know that people from all equality strands have an equal right to our services and to make a positive contribution to Peter Bedford. We provide staff training and development on the basis of need and do not consider any other factor. We undertake to fulfil all the legal duties required by the legislation and regulation detailed in 2.1.1, including Equality and Diversity training for all staff.

8.2 We do not tolerate abuse, bullying, harassment or victimisation amongst or between our workforce, tenants and participants, or in our housing or services, and will deal with incidences under complaints, harassment, disciplinary and grievance procedures as appropriate. We are signed up to the National Housing Federation initiative iN Business for neighbourhoods and take seriously our legal and moral obligations as a landlord for tackling racial harassment and/or racial and religious hatred in the community.

8.3 We actively promote mutual understanding and good relations between people across all equality strands. We actively exercise our rights and obligations as a Landlord to the fullest extent of the law in order to tackle perpetrators of hatred in local communities.

8.4 We set positive action targets in new lettings to improve diversity and be representative of the geographical areas in which we work. From time to time we may advertise posts to a specific group (where there is a genuine occupational requirement) or offer specific services to specific groups in order to address the balance of participation or meet particular needs. We actively seek to employ tenants and participants, and certain posts are ring-fenced in order to meet our commitment in tackling inequalities within the labour market and supporting those furthest away from employment.

8.5 We subscribe to the Social Model of Disability that it is not impairment but the barriers created by society that disable people. We understand that this phenomenon is not restricted to disability, but can affect people from all equality strands. As such, we constantly strive to reduce and eliminate barriers that may exist in Peter Bedford in the built environment, information, policies and practices, attitudes and expectations to ensure that as representative a group of people as possible are included in all aspects of our work and services.

8.6 We are holders of the two ticks symbol ‘Positive about disabled people’ and offer a Guaranteed Interview Scheme for all disabled job applicants who meet the essential criteria in the Person Specification. We welcome applications for adjustments and review and implement reasonable adjustments throughout our recruitment and employment processes.
8.7 We offer a range of flexible working arrangements and work life balance measures, enhanced maternity, paternity and adoption terms to help all employees meet their caring and home requirements. In the aforementioned policies, and our dependants and compassionate leave arrangements, we ensure that all employees share the same employment terms and conditions, and therefore include recognition of partners regardless of gender or marital status. We provide a supportive environment for carers and support carers to successfully manage the balance of work and caring responsibilities.

8.8 All staff have access to a support line offering financial, legal, professional, consumer, childcare and management advice and counselling.

8.9 We ensure that anyone returning to the organisation after a period of extended leave has the opportunity to take part in a programme of re-induction or re-training.

8.10 Ex-offenders are a specific target group for Peter Bedford and we are committed to supporting ex-offenders to rehabilitate into the community. As tenants and participants, ex-offenders have the same rights and obligations as other tenants and participants.

8.11 In addition, we are positive about the employment of ex-offenders and having a criminal record will not necessarily bar someone from being employed by Peter Bedford. We abide by the provisions of the Rehabilitation of Offenders Act 1974, including claiming exemption regarding the declaration of unspent convictions because of our work with vulnerable adults. CRB disclosures are assessed at the relevant level and treated confidentially and sensitively. Relevant spent and unspent convictions are considered in relation to the particular post applied for, and the circumstances and background of the offence/s are taken into account.
EQUALITY, DIVERSITY AND HUMAN RIGHTS ACTION PLAN

1. INTRODUCTION

1.1 Peter Bedford is committed to Equality, Diversity and Human Rights in all of our work. Our core values of Participation, Respect, Inclusion, Diversity and Empowerment demonstrate this commitment to staff, tenants and participants and the outside world. But we should never be complacent about our commitment. We must constantly take the right steps to improve our performance in terms of Equality, Diversity and Human Rights. With this in mind, the following action plan lays out the steps that we are committed to taking over the next three years.

1.2 This is Peter Bedford’s first single equality action plan. That means that we do not have different documents requiring us to take action in different equality areas. Instead this one document details one set of commitments and one way of working. According to the Equality and Human Rights Commission’s work, there are six different equality strands. These are:
  - Race
  - Gender
  - Disability
  - Sexual Orientation
  - Age
  - Religion and Belief

1.3 The six equality strands are a simple list, but their simplicity betrays the complex reasons that someone may be discriminated against or be treated with injustice. It is therefore important to be aware of specific factors that may impact on individuals. It is difficult to develop a complete list, but factors to be aware of are:
  - Appearance
  - Gender identity or reassignment
  - Pregnancy, maternity, paternity or adoption
  - Responsibility for dependants
  - Marital or civil partnership status
  - Ethnic or national origin
  - Colour
  - Political affiliation
  - Part time workers
  - Class
  - Health issues
  - Criminal activities

1.4 Peter Bedford has decided to develop a single equality action plan. This is because we recognise that people do not fit into just one of these categories and it is not helpful to label people according to their differences or similarities. To do so can be unhelpful in terms of people’s self-esteem and can stop us working with tenants, participants and staff as individuals with individual needs and aspirations.
1.5 Additionally, there is currently an Equality Bill before Parliament that takes the single equality approach. It brings together all the different legislation detailed in 2.1.1 of the Equality, Diversity and Human Rights Policy and will replace it with just one law that covers all aspects of equal opportunities and diversity. This Bill is likely to pass into law early in 2010.

1.6 The 2009-2012 Action Plan is divided into three sections, in accordance with the Diversity, Equality and Human Rights Policy. They are:

- Provision of Housing & Services
- Employment
- Bullying, Harassment & Victimisation

1.7 The Equality, Diversity and Human Rights Policy and Action Plan will be reviewed and updated annually in October by the Equal Opportunities and Diversity Sub-Committee.
## 2 PROVISION OF HOUSING & SERVICES

<table>
<thead>
<tr>
<th>Action</th>
<th>Outcome</th>
<th>Lead</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undertake a tenant and participant developed and led audit of Peter Bedford’s housing and services.</td>
<td>That PB understands the views about current provision and ideas for new services and ways of working from our diverse group of tenants and participants, and whether we are meeting the needs of specific groups.</td>
<td>Maggie Lay</td>
<td>Aug 2009</td>
</tr>
<tr>
<td>Analysis of and MG response to the audit. Incorporating ideas into strategy.</td>
<td>That the 5-year strategy and development of better and new provision meets needs and aspirations of all tenants and participants.</td>
<td>Chris Brace</td>
<td>Dec 2009</td>
</tr>
<tr>
<td>Propose a model to roll out the audit to become an annual or bi-annual event.</td>
<td>That detailed analysis of tenants and participants views is embedded as part of PB’s annual or bi-annual cycle of work.</td>
<td>Priya Dey-Ghatak</td>
<td>Mar 2010</td>
</tr>
<tr>
<td>Complete a review of all aspects of participation at PB, ensuring that we enable everyone to participate and that we measure the diversity of participation.</td>
<td>That there is better understanding of who participates and why, and how they want to be communicated with and how they want to contribute to PB. That PB has accessible ways of seeking tenants and participants’ views. That participation is measured according to each equality strand so that representative participation is achieved.</td>
<td>Andrew Tyers</td>
<td>Review and plan by Dec 2009. Full implementation by Dec 2010</td>
</tr>
<tr>
<td>Reviews referrals system for both Housing &amp; VCS to ensure that it is fair and open to people from all the equality strands. To include an proposal for how PB can take tenants with higher support needs.</td>
<td>That there is no inadvertent or indirect discrimination in the referrals process, so that we are meeting the need of our client group and remain representative of the local population.</td>
<td>Icilma Warner-Johnson / Pam Frost</td>
<td>Review and plan by Mar 2010. Full implementation by Dec 2010</td>
</tr>
<tr>
<td>Review communications across PB, ensure that we have asked all tenants and participants how</td>
<td>That accessible communications are mainstreamed so that all tenants and</td>
<td>Angela Murray</td>
<td>Review and plan following</td>
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<tr>
<td><strong>Activity</strong></td>
<td><strong>Details</strong></td>
<td><strong>Expected Dates</strong></td>
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<tr>
<td><strong>Develop a strapline about people being able to access different communication formats and put on PB letterhead, rent statements and all other written communications.</strong></td>
<td>That everyone that PB communicates with has the opportunity to request an accessible format if they cannot access the one they have been sent</td>
<td>Angela Murray</td>
<td>Mar 2010</td>
</tr>
<tr>
<td><strong>Review tenants accessibility requirements and adapt properties or re-house tenants where required. Include information about adapted properties on QLx so that tenants with accessibility requirements can be matched appropriately.</strong></td>
<td>That PB meets accessibility requirements so that tenants can live in their homes safely and for longer.</td>
<td>Nicole Smith supported by Icilma Warner-Johnson</td>
<td>Start Apr 2010, end Mar 2012</td>
</tr>
<tr>
<td><strong>Require all contractors to make a statement of equal opportunities and follow equal opportunities policies in their work.</strong></td>
<td>That respect for diversity and understanding of equal opportunities is followed by contract staff who are representing PB when they visit tenants' homes and therefore contribute to their views of PB as an organisation.</td>
<td>Nicole Smith</td>
<td>Mar 2010</td>
</tr>
<tr>
<td><strong>Complaints are welcomed and are dealt with in the specified timescales and with positive outcomes for complainants and for PB services.</strong></td>
<td>That complaints are seen as a way of learning about service provision and improving services for our diverse range of tenants and participants.</td>
<td>Keith Forder</td>
<td>Ongoing</td>
</tr>
<tr>
<td><strong>Complaints reviewed annually at Equal Opportunities and Diversity Sub-Committee.</strong></td>
<td>That complaints are analysed according to equality strands to ensure there is representation from a diverse range of tenants and participants.</td>
<td>Chris Brace</td>
<td>Oct 2009, Oct 2010, Oct 2011</td>
</tr>
<tr>
<td><strong>Annual review of newly developed KPIs with full Board. Development of more detailed KPIs for Equal Opportunities and Diversity Sub-Committee.</strong></td>
<td>That the Board has the information it requires to analyse performance on Equal Opportunities and Diversity and that the Sub-Committee has a more detailed set of figures that give a greater level of relevant detail.</td>
<td>Chris Brace</td>
<td>Sub-Committee review Jan 2010. Annual reviews in Mar 2010, Mar 2011 and Mar 2012</td>
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## 3 EMPLOYMENT

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<tr>
<td>Review of the recruitment policy and process from inception to completion and the recruitment and selection training.</td>
<td>That recruitment is open to the widest range of applicants, and that applications from different groups are positively welcomed. That the process is inclusive of all groups and that accessibility and reasonable adjustments are considered from advert and application through to job offer and start. The ringfencing of posts for certain groups will also be reviewed, ensuring there is no indirect or inadvertent discrimination inherent in this practice.</td>
<td>Angela Murray/ Elizabeth Boonman-Salgado</td>
<td>June 2010</td>
</tr>
<tr>
<td>An annual report on staffing is submitted to the Board, analysing the diversity of existing staff, leaving staff and new staff and reports on take up of training opportunities and career progression, and any grievances or complaints.</td>
<td>That PB understands how it is behaving as an equal opportunities employer and how policies and processes may positively or negatively impact on employees from different equality strands and rectifies this accordingly.</td>
<td>Elizabeth Boonman-Salgado</td>
<td>May 2010, May 2011, May 2012</td>
</tr>
<tr>
<td>Performance Management structures are in place for all staff and are understood and followed by line managers in supervision and appraisal providing support and advice to line managers and staff where necessary.</td>
<td>That all staff understand their objectives and targets and how they will be required to evidence their completion. That all staff receive a structure supervision session monthly and appraisal annually. That any requirements, support needs or reasonable adjustments are regularly and openly invited and put in place to enable staff to do their jobs to their full ability.</td>
<td>Chris Brace</td>
<td>Dec 2010</td>
</tr>
<tr>
<td>Develop a programme to enable tenants and participants to undertake work, work experience and training opportunities in all departments across PB.</td>
<td>That all departments contribute to the development and increased employability of tenants and participants and thereby demonstrate our commitment to equal opportunities, diversity, our vision, mission and values.</td>
<td>Chris Brace supported by MG</td>
<td>Start Jan 2010, programme fully implemented by Mar 2012</td>
</tr>
<tr>
<td>Implement the plan for site move/development in accordance with best practice on accessibility.</td>
<td>That PB offices are open, accessible and barrier-free to all staff, tenants and participants regardless of their accessibility requirements.</td>
<td>Chris Brace supported by MG</td>
<td>Apr 2010 and ongoing</td>
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<tr>
<td>Review take-up of flexible working policies and ensure consistent application. Consider all flexible working policies individually and prioritise those that are required from an accessibility point of view.</td>
<td>That flexible working policies are implemented fairly for different groups, which may mean treated disabled people more favourably in terms of flexible working requests arising from reasonable adjustment requirements.</td>
<td>Elizabeth Boonman-Salgado supported by Chris Brace</td>
<td>Dec 2010</td>
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<tr>
<td><strong>4 BULLYING, HARASSMENT AND VICTIMISATION</strong></td>
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<tr>
<td>Actively encourage reporting of any incidences of bullying, harassment or victimisation in the wide variety of different communications with tenants.</td>
<td>That tenants and participants understand that PB openly seeks to know about incidences and will deal with them quickly and effectively.</td>
<td>Iclima Warner-Johnson, Pam Frost</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Include questions about bullying, harassment and victimisation in the tenant satisfaction survey.</td>
<td>That PB develops an understanding of prevalence beyond that which is officially reported and can analyse information according to equality strands to examine and tackle any trends that develop.</td>
<td>Andrew Tyers</td>
<td>Feb 2010, Feb 2011, Feb 2012</td>
</tr>
<tr>
<td>Submit an annual report to the Equal Opportunities and Diversity Sub-Committee on Bullying, Harassment and Victimisation, including an analysis of the impact on different groups, prevalence of reporting and details of any exclusions.</td>
<td>That the Sub-Committee has oversight of bullying, harassment and victimisation and can examine and tackle any trends that develop.</td>
<td>Andrew Tyers</td>
<td>Oct 2010, Oct 2011</td>
</tr>
</tbody>
</table>
Appendix One

Summary of Equalities Legislation

**Civil Partnerships Act 2004**
Provides legal recognition and parity of treatment for same-sex couples and married couples, including employment benefits and pension rights.

**Disability Discrimination Act 1995**
Outlaws the discrimination of disabled people in employment, the provision of goods, facilities and services or the administration or management of premises.

**Disability Discrimination Amendment Act 2005**
Introduces a positive duty on public bodies to promote equality for disabled people.

**Employment Equality (Age) Regulation 2006**
Protects against discrimination on grounds of age in employment and vocational training. Prohibits direct and indirect discrimination, victimisation, harassment and instructions to discriminate.

**Employment Equality (Religion or Belief) Regulation 2003**
The directive protects against discrimination on the grounds of religion and belief in employment, vocational training, promotion and working conditions.

**The Employment Equality (Sex Discrimination) Regulations 2005**
Introduces new definitions of indirect discrimination and harassment, explicitly prohibits discrimination on the grounds of pregnancy or maternity leave, sets out the extent to which it is discriminatory to pay a woman less than she would otherwise have been paid due to pregnancy or maternity issues.

**Employment Equality (Sexual Orientation) Regulation 2003**
The directive protects against discrimination on the grounds of sexual orientation in employment, vocational training, promotion, and working conditions.

**Equal Pay Act 1970 (Amended)**
This gives an individual a right to the same contractual pay and benefits as a person of the opposite sex in the same employment, where the man and the woman are doing: like work; work rated as equivalent under an analytical job evaluation study; or work that is proved to be of equal value.

**Equality Act 2006**
Establishes a single Commission for Equality and Human Rights by 2007 that replaces the three existing commissions. Introduces a positive duty on public sector bodies to promote equality of opportunity between women and men and eliminate sex discrimination. Protects access discrimination on the grounds of religion or belief in terms of access to good facilities and services.

**Gender Recognition Act 2004**
The purpose of the Act is to provide transsexual people with legal recognition in their
acquired gender. Legal recognition follows from the issue of a full gender recognition certificate by a gender recognition panel.

**Race Relations Act 1976**
The Act prohibits discrimination on racial grounds in the areas of employment, education, and the provision of goods, facilities, services and premises.

**Race Relations Amendment Act 2000**
Places a statutory duty on all public bodies to promote equal opportunity, eliminate racial discrimination and promote good relations between different racial groups.

**Race Relations Act 1976 (Amendment) Regulation 2003**
Introduced new definitions of indirect discrimination and harassment, new burden of proof requirements, continuing protection after employment ceases, new exemption for a determinate job requirement and the removal of certain other exemptions.

**Racial and Religious Hatred Act 2006**
The Act seeks to stop people from intentionally using threatening words or behaviour to stir up hatred against somebody because of what they believe.

**Sex Discrimination Act 1975**
The Act makes it unlawful to discriminate on the grounds of sex. Sex discrimination is unlawful in employment, education, advertising or when providing housing, goods, services or facilities. It is unlawful to discriminate because someone is married, in employment or advertisements for jobs.
Appendix 2

Monitoring inclusion and performance

We monitor the following areas of activity from an equal opportunities and diversity perspective:

- access to housing and services (including lettings, housing allocations and VCS allocations)
- service satisfaction and complaints
- service outcomes (including positive moves, evictions, qualifications, jobs)
- participation and user involvement
- staff recruitment and selection
- staff supervisory and development opportunities
- staff training

From time to time, particular groups of people may be designated an equal opportunities or inclusion target group for reasons of positive action, specific funding initiatives etc.