

Equality and Human Rights Policy

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1. Introduction and Purpose

1.1 Rosehill is committed to being an Employer, Landlord, Service Provider, Factor and Partner which promotes and supports Equality and Human Rights and delivers on associated objectives.

1.2 We also have a legal and regulatory duty to ensure we promote Equality and Human Rights in all aspects of our work.

1.3 Equality is about treating everyone fairly and ensuring they are given fair chances. It is **not** about treating everyone in the same way, but recognising there are difference in life situations, in experience and ensuring there is equality of opportunity for all which takes people's specific needs into account and makes appropriate reasonable adjustments.

1.4 Our main Policy objective is:

To ensure our committee members, staff, tenants, other customers, contractors and anyone who has dealings with Rosehill are treated equally and fairly.

1.5 To support and deliver this objective we will:

- Ensure our Management Committee and Senior Staff are accountable for embedding the principles of Equality and Human Rights at Rosehill and monitoring our performance;
- Ensure everyone who works for, or with us, abides by this policy;
- Not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation;
- Comply with all legal and regulatory requirements which apply to the protected characteristics of race, religion or belief, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, sexual orientation, disability and age;
- Develop good quality information about our customer base and individual customers, and use this information to ensure our services are accessible and responsive to all. We will also develop systems to periodically update this information;
- Encourage our tenants, other services users and our staff to engage with us to shape Rosehill and its services;
- Ensure that the Equality and Human Rights' principles are reflected in our Policies and Procedures.

2. Our Vision, Strategic Objectives and Values

2.1 Our vision is to “...provide excellent quality, affordable and efficient homes in neighbourhoods that are well managed and maintained; we will contribute to sustaining communities where people feel safe and want to live by providing housing and other services and working with our voluntary and statutory partners.”

2.2 Key to realising our Vision is through the delivery of our seven Strategic Objectives:

1. Provide high quality affordable homes
2. Engage effectively with our tenants and service users
3. Deliver value for money
4. Be innovative and risk aware
5. Build and contribute to effective partnerships
6. Use resources efficiently and effectively
7. Achieve the highest standards in all that we do

2.3 The delivery of our Vision and Strategic Objectives is underpinned by our Core Values:

We will

- Invest and Support

We will be

- Engaged and Responsive
- Accountable and Compliant
- Fair and Approachable
- Efficient and Responsible
- Excellent and Committed

3. Legal and Regulatory Context

3.1 This Policy is developed, reviewed and implemented in accordance with legal, regulatory and best practice requirements, including (but not limited to):

- a) The Equality Act 2010
- b) The Housing (Scotland) Act 2014
- c) The Scottish Housing Regulator's "Regulation of Social housing in Scotland" framework published in February 2019
- d) The Scottish Housing Regulator's: "Collecting Equality information: National Guidance for Scottish Social Landlords" (revised April 2022). This will be referred to as 'SHR data collection guidance' throughout the rest of this policy
- e) The Scottish Social Housing Charter (including Outcome 1: Equalities)
- f) The Scottish Housing Regulator's "Standards of Governance and Financial Management" and in particular Section 5.3 of the Standards
- g) Human Rights Act 1998
- h) The Equality and Human Rights Commission "Human Rights at Home" guidance for social housing providers

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

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

3.4 The objective of this policy is to ensure Rosehill actively promotes equality of opportunity as an employer and provider of services, and complies with various legislative and regulatory requirements including:

- The Housing (Scotland) Act 2010
- The Scottish Social Housing Charter
- The Equality Act 2010
- The Scottish Housing Regulatory Framework
- Human Rights Act 1999

3.5 This policy will discuss each of these in turn.

3.6 The Housing (Scotland) Act 2010 & Scottish Social Housing Charter

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

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

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

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

3.6.4 The Scottish Social Housing Charter’s Equalities Outcome sets out the Scottish Government’s expectation that:

“Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.”

3.7 The Equality Act 2010

3.7.1 The Equality Act 2010 was developed by the UK government to deliver two key objectives which were:

- To harmonise discrimination law by consolidating nine major pieces of legislation (e.g. the Sex Discrimination Act 1975, the Race Relations Act 1976, the Disability Discrimination Act 1995, etc.) into a single Act, and
- To address issues of inequality experienced by various groups within society.

3.7.2 The Act, which applies to both Rosehill staff and its customers centres on two key elements, which are:

1. The identification of nine “protected characteristics” who require additional protection.

2. The identification of “unlawful behaviour” not allowed under the act.

3.7.3 Protected Characteristics

3.7.3.1 The act identified the following protected characteristics:

- Age
- Disability
- Gender Reassignment
- Marriage, and Civil Partnership
- Pregnancy & Maternity
- Race
- Religion or Belief
- Sex (Gender) and
- Sexual Orientation

3.7.3.2 Definitions of each of these characteristics is available in the Scottish Housing Regulator’s: “Collecting Equality information: National Guidance for Scottish Social Landlords”.

3.7.4 Unlawful behaviour

3.7.4.1 The key elements of unlawful behaviour, which should be avoided as both an employer and a provider of services, as set out within the act are defined below:

Direct Discrimination – Is treating someone less favourably than others based on a protected characteristic,
e.g. refusing to give housing advice to someone because of their sexual orientation **or** not hiring someone because of their religion

Associated Discrimination – Discrimination against a person, because they have an association with someone with a particular protected characteristic,
e.g. someone not appointed to a position, despite them being the best candidate, due to having a disabled dependent.

Perceptive Discrimination – Discrimination against a person because the discriminator thinks the person possesses a characteristic,
e.g. not shortlisting a person for interview as the recruiter assumes the applicant will not have the correct VISA to work in the UK as they have a foreign looking name **or** two people of the same sex suffering homophobic abuse because they share a house even though they are straight.

Indirect Discrimination – A policy, practice, procedure or criteria that applies to everyone, but might disadvantage a particular protected group, and cannot be objectively justified,
e.g. not letting properties to people under a certain age, because it is believed as a group, they generally act in an anti-social way.

Harassment – Conduct that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant; it is the impact on the individual which determines if harassment has taken place,
e.g. insulting or degrading comments made about a staff member due to a protected characteristic

The Co-operative must also be aware of their responsibility with respect to “Harassment by a Third Party”. As an employer, the Co-op is potentially liable for the harassment of their staff or customers by people they do not directly employ,
e.g. if a tenant with additional support needs is frequently called offensive names by a neighbour, a consultant or contractor treating a Rosehill tenant inappropriately

Victimisation – Treating someone less favourably because they have pursued or intend to complain about the behaviour of someone harassing them or giving evidence to support someone else’s discrimination complaint,
e.g. a member of staff making an allegation of discrimination about a fellow member of staff leads to other staff members no longer talking to them **or** someone being given all of the worst shifts due to making a complaint against a manager

Institutionalised Discrimination – This was first defined in the context of racism 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.”

3.7.4.2 The Equality Act challenges organisations to be as diverse as possible, and to have the principle of equality at their heart. Rosehill is fully committed to meeting these challenges and to that end has defined Diversity and Equality as follows:

Diversity

Is about valuing individual differences. Rosehill is committed to valuing and managing people's differences to enable all employees, committee members, tenants, etc. to contribute and realise their full potential. Rosehill recognises people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit Rosehill and its tenants.

Equality

Is making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way, but recognising people's different needs are met in different ways.

Other important terms

Positive Action

The Equality Act (2010) allows organisations to address imbalances in the workforce or in service provision. An example of this would be encouraging members of underrepresented groups to apply for jobs or apply to join the committee.

Failure to make Reasonable Adjustments

Where arrangements disadvantage an individual with a disability and reasonable adjustments are not made to overcome this. Under the Equality Act (2010) Rosehill are expected to make reasonable adjustments to help staff with disabilities gain employment or stay in their role, and help customers access Rosehill's stock and services.

3.8 The Scottish Housing Regulatory Framework

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

3.8.2 Section 3 of the framework outlines the SHR's expectations that every RSL should:

"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.”

3.8.3 These expectations are reflected in this policy and the Rosehill’s action plan, and will be amended as required to reflect any future changes to the Regulatory Framework.

3.9 Data Collection and monitoring

Data collection

3.9.1 Rosehill is committed to promoting Equality and Human Rights in all aspects of its business and ensure discrimination is avoided as an employer and a landlord / provider of services. Rosehill feels the collection of equality data as outlined in the ‘SHR data collection guidance’ “... is integral to a social landlord’s equality strategy” as is using “Equality data to deliver quality services to tenants and other customers”.

3.9.2 Accordingly Rosehill developed an equality monitoring form based on the model equalities monitoring form in the ‘SHR data collection guidance’ and decided to collect data anonymously from all five groups outlined in the guidance (housing applicants, tenants, job applicants, staff and committee members) as opposed to linking information to individuals. In addition, Rosehill also decided to collect information from our factored owners to help ensure our services, communication, etc. reflect the needs of the community the co-operative serve.

3.9.3 The decision to collect data anonymously was a carefully considered one based on clear evidence. This included the committee’s opinion that anonymous collection would lead to a higher return rate and limit the amount of staff time and resources involved in collecting data. The committee also felt collecting linked data would have significant data protection implications.

3.9.4 Rosehill’s committee will periodically review how equality data is collected and if it feels linking information to individuals would be more beneficial to the Co-op then our approach to data collection would be amended.

3.9.5 Rosehill’s approach to data collection is outlined within our action plan, which is attached to this policy. Rosehill will treat all personal data in line with its obligations under current data protection regulations and our Data Protection Policy.

Data monitoring

3.9.6 In accordance with the Scottish Social Housing Charter and the 'SHR data collection guidance' the committee will regular reports regarding the nine protected characteristics identified in the Equality Act (2010), in relation to:

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

3.9.7 These reports will allow the committee to identify any emerging trends, and where reports reveal particular issues (e.g. under representation) appropriate action will be agreed by the committee / senior staff.

3.10 The Human Rights Act (HRA) (1998)

3.10.1 The HRA's development followed World War 2. To avoid atrocities seen during the war nations agreed everyone should enjoy basic rights, like the right to life and the right to be free from torture. This led to a series of agreements called international 'treaties' or 'conventions' being established to outline the basic levels of treatment all individuals deserve, and the UK signed up to the European Convention on Human Rights (ECHR).

3.10.2 The Human Rights Act 1998 incorporates the rights set out in the European Convention on Human Rights into domestic British law and came into force in the UK in October 2000. The act contains 16 articles which cover a range of rights with a basic aim to ensure everyone be treated fairly, with dignity and respect.

3.10.3 In 2012, the Equality and Human Rights commission produced "Human Rights at Home" guidance for social housing. Rosehill recommends its staff refer to this guidance if they have any questions regarding the HRA. This guidance recommends that staff play particular attention to articles 6, 8 and 14 when providing services, developing policies and procedures, etc.

3.10.4 This policy will discuss each of these articles in turn.

Article 6: Right to a Fair Trial

3.10.5 Everyone has the right to a fair hearing (trial) meaning people should be given the opportunity to participate effectively in any hearing of their case. People should also be able to present their case in conditions

which do not place them at a substantial disadvantage when compared with the other party in the case

e.g. a person who is subject to a decision-making process in relation to a possible eviction should have access to an interpreter, if necessary. Staff should also ensure that any important decisions i.e. allocations, evictions, etc. should be given with reasons.

Article 8: Right to Respect for Private Life, Family Life and the Home

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

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

Article 14: Prohibition of Discrimination

3.10.7 This means everyone must have equal access to a RSLs housing and services, regardless of their race, religion, gender, sexual orientation, disability, etc.,
e.g. a gay couple must be treated in the same ways as a heterosexual couple in relation to the right to succeed to a tenancy.

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

4. Responsibilities

- 4.1 The Management Committee is responsible for approving the policy and monitoring its effectiveness by way of an annual report, and periodic reports on the delivery of action plan aims.
- 4.2 The Director has overall responsibility for the implementation of the policy, and ensuring the committee is kept informed of progress in achieving Action Plan objectives and address other relevant Equality and Human Rights issues (supported by other senior staff).
- 4.3 Line Managers are responsible for communicating Rosehill's values and Equality and Human Rights policy to their teams and new employees at induction training and ensuring the successful implementation of the policy. Similarly, the committee's chair and senior staff members will ensure the association's Equality and Human Rights commitments are part of all new committee member's inductions.
- 4.4 Each member of our staff has a personal responsibility for the implementation of this policy and for ensuring they treat others with respect and dignity in both employment and service delivery.
- 4.5 All employees have a responsibility to be alert and to challenge behaviours and practices which result in unfair discrimination when they occur. Where a member of staff believes such behaviour is occurring, they must draw the matter to the attention of their Line Manager to ensure the matter is dealt with as soon as possible.
- 4.6 Rosehill will seek to ensure all contractors and consultants it appoints have an equalities policy, which is acceptable to the Co-operative. Confirmation of such a policy will be required, in writing, for contractors / consultants to remain on any "approved" list. In addition, we will ensure there is no discrimination in terms of allocation of work to contractors and consultants or in purchasing from suppliers.
- 4.7 When working with organisations employing less than ten people, it will be acceptable for the organisation to confirm its willingness to operate in accordance with the Rosehill's Equality & Human Rights policy, and with any additional requirements Rosehill specify for a particular contract.
- 4.8 Rosehill expect contractors, consultants, etc. to treat our customers, employees and committee members with courtesy and respect at all times and will not tolerate any form of discrimination or harassment.

5. Committee Membership

- 5.1 This policy applies to the recruitment and development of Committee Members. All Committee Members are required to be aware of our commitment to Equality and Human Rights and must comply with this policy in carrying out their duties.
- 5.2 Within our Management Committee and Management Team we will ensure we have a diverse range of skills and expertise to lead the organisation.

6. Membership of Rosehill

- 6.1 All applications for membership will be treated equally and considered in line with our Rules, Allocations Policy and Membership Policy.

7. Service Provision

- 7.1 We provide services to tenants, housing applicants, members of the local community and factored owners. We are committed to ensuring good practice with regard to equalities across all services we provide.

Access to Services

- 7.2 Being aware of the needs and the diversity of customers will ensure that we are able to provide the right services and meet the right needs. We aim to have services that are accessible to all our customers and to identify and remove any barriers that would prevent this, e.g. communication barriers due to disabilities, where English is not the first language, etc. and / or physical barriers by taking steps, as far as practical and reasonable, to make our offices and other venues we use as accessible as possible.
- 7.3 All in accordance with our legal duties under Equalities and Mental Health legislation.

Supporting our customers

- 7.4 From the outset of dealing with a customer for any of our services, we will establish if additional support is needed. Examples of some of the support we can provide are:
- arranging interpretation and / or translation services if required;
 - producing information in various formats e.g. large print, audio, braille, etc.;

- helping customers access independent advocacy (the Scottish Independent Advocacy Alliance website has information about local advocacy organisations).
- 7.5 Rosehill feels it is important to highlight 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 three days. All reasonable costs in relation to this will be borne by the Co-operative.
- 7.6 Anyone who has a “mental disorder” under the Mental Health (Care & Treatment) (Scotland) Act 2003 has the right to access independent advocacy. They help people to know and understand their rights, make informed decisions and have a voice.
- 7.7 In general we will support any vulnerable customer to access our services and will assist them with accessing independent advice, support and advocacy where necessary.

Housing Allocations

- 7.8 We will ensure anyone applying for housing is dealt with fairly and without discrimination. We will adhere to our Allocations policy and monitor it and continue to review and improve the service we give to our tenants and applicants.

Customer Service Standards

- 7.9 We aim to meet the needs of our customers and stakeholders by:
- creating a work culture which values diversity, inclusiveness and respect, and empowers our employees to reflect those values in their dealings with people who use our service and all other stakeholders;
 - ensuring we provide an accessible service to all of our customers;
 - providing clear, meaningful information about what we do and how we do it to our customers, potential customers and other stakeholders, in ways that best suit their individual needs as far as is reasonable and practical;
 - identifying as early as possible any individual requirements that may need to be met in order for a customer to fully access our service; and
 - being responsive to changing needs and requirements.

Communication and Translations

- 7.10 We will ensure all written material is clear, simple and jargon free where possible. The content will be open and inclusive and will not discriminate against any group or individual. Our website will be easily accessible to all our service users and stakeholders.
- 7.11 Information can be provided in various formats: Braille, CD, Large Font and different languages. We will communicate regularly to current service users, tenants, and stakeholders through newsletters, our annual performance report, our web-site, social media and ad-hoc publications.

Customer Engagement

- 7.12 We recognise the value of customer engagement in shaping and delivering the services we provide, and will seek to actively involve tenants in the management of their homes and our services at a variety of levels.

Development Programme

- 7.13 We are committed to building homes which are accessible, relevant and of use to the individuals and communities where we work.

8. Employment

- 8.1 We demonstrate our commitment to Equality and Human Rights in all aspects of employment, including recruitment, training, performance and development management processes and pay.

- 8.2 We operate a comprehensive Recruitment and Selection Policy to ensure fair and just employment practices are in place and people are recruited solely on the basis of their own merit, experience, ability and potential. All vacancies will be advertised in ways that do not discourage traditionally disadvantaged or under-represented groups from applying. Specific qualifications or experience will only be asked for where we decide they are essential to the post. All applicants with disabilities who meet the minimum requirements for a suitable job will be considered for interview. Rosehill is a “disability confident committed” organisation.

8.3 Positive Action

- 8.3.1 The composition of job applicants and the workforce will be monitored. Should inequalities become apparent and where appropriate and

permissible under legislation, positive action will be taken to redress the imbalance by encouraging under-represented groups to apply for posts.

8.4 Terms and Conditions of Employment

8.4.1 All contracts of employment will be issued in accordance with the job roles and not the job holder. Terms and conditions will be standard across all employees and employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and grade it attracts. We have comprehensive conditions of service which are accessible to all employees.

8.5 Disability Arising During Employment

8.5.1 We are committed to ensuring equality of opportunity for those members of staff who are disabled or become disabled for the purposes of the Equality Act 2010 during their employment with us. If you are disabled or become disabled, we encourage you to tell us so we may support you as appropriate.

8.6 Religious Observance Needs

8.6.1 Some employees and job applicants may have particular religious observance needs. Whenever it is practicable to do so, we will endeavour to meet such needs through unpaid leave. If it is not practicable to grant a request (e.g. because of pressing work commitments) a reasoned explanation will be provided, in writing on request. We recognise that the list of public and general holidays set out in our Conditions of Service does include some Christian festivals, but not those of other religions. If an employee asks for paid time off to honour other religious festivals, we will normally allow this, and the days will be deducted from the employee's normal annual leave entitlement.

9. Equality Impact Assessments

9.1 When developing and reviewing policies and services we will carry out Equality Impact Assessments (EIA). The purpose of which is to identify possible impacts (negative or positive) of our decisions on our committee members, employees, tenants and others with protected characteristics and to take necessary steps to address any issues.

9.2 The EIA will be accompanied by guidance for staff on how to use the tool, and any staff member using the tool for the first time will receive training and be supported by their Line Manager.

9.3 Where, following an EIA, there is a need for follow-up action, the tasks and timeframe for achieving them shall be noted in the Equality and Human Rights Action Plan to ensure they are addressed.

10. Monitoring and Evaluation

10.1 We monitor applicants for jobs and current employees against all protected characteristics and will review our practices in accordance with the results shown by the monitoring where possible.

10.2 Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018 and General Data Protection Regulations.

10.3 We ask our tenants and applicants to advise us of their needs and record, where it is provided, the diversity characteristics, communication preferences and any other specific needs to enable us to tailor our services appropriately.

10.4 We assess all our policies against this policy and ensure all relevant policies have an Equality Impact Assessment attached to them. This fully assesses the positive or negative impact our policies have on all the protected characteristics and what mitigations will be put in place to ensure equality.

11. Equalities Training

11.1 It is important that our committee members and employees undertake periodic training in relation to Equalities and Diversity. The training can be delivered in a variety of ways:

- In-house
- External delivery
- Virtual Sessions
- On-line modules

11.2 Training will be tailored to the roles and responsibilities within the organisation. Training can be provided on a group or individual basis. However, as a minimum committee members and employees will undertake refresher training every 2 years.

11.3 The need for training will also be triggered by any significant changes in legal or regulatory requirements.

11.4 Equalities training forms part of the induction process for both new committee members and employees.

12. Breaches of the Policy

12.1 Rosehill does not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation.

12.2 Allegations of such breaches against a staff member will be investigated and if deemed necessary, the disciplinary process will be invoked. Employees should be aware that if the breach is sufficiently serious it will be viewed as gross misconduct and may lead to dismissal.

12.3 Any such complaints made against the Director will be dealt with in accordance with our Procedure for Dealing with Serious Complaints Against the Director.

12.4 Complaints against a member of the committee will be dealt with in accordance with the Committee Code of Conduct and the associated Protocol for Dealing with a Breach of the Code of Conduct.

12.5 Complaints against our tenants will be dealt using various Housing Management processes. Depending on the seriousness of the complaint the matter may also be referred to Police Scotland.

12.6 Complaints against our contractors or consultants will be dealt with in accordance with their contract conditions by the appropriate Manager / Director.

13. Tenant Participation

13.1 We are a tenant focussed organisation and as such we are committed to involving tenants in all aspects of our work and ensuring tenants are included, informed and consulted about decisions that have an impact on the way their homes are managed.

13.2 As part of this commitment we will involve our tenants in the development of our policies and seek feedback where appropriate. We will ensure any significant changes to this Policy and other Policies which will affect our tenants will be the subject of consultation.

14. Risk Management

14.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our

strategic risks which are regularly monitored by our Management Team and Audit Sub-Committee and reviewed by the Management Committee on a quarterly basis.

- 14.2 Key to the mitigation of the risks associated with Equalities and Human Rights' issues is having a comprehensive policy in place to govern the prevention of any such issues arising.
- 14.3 To ensure we continue to manage the associated risks we will periodically review this policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.
- 14.4 Rosehill recognises the potential risks should we fail to adhere to the Equality and Human Rights Policy and / or the accompanying Action Plan. To address this, Section 12 of this policy outlines how any potential breaches to the code will be investigated.

15. Complaints Procedure

- 15.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things can go wrong and some tenants or other customers may be unhappy with the service provided.
- 15.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. Our Complaints Leaflet for Customers is issued to all new tenants as part of the signing up pack.
- 15.3 In response, to the Scottish Public Services Ombudsman (SPSO) revising its model complaints handling procedure (in March 2021) the co-operative updated its complaints handling policy. The model policy highlighted the importance of ensuring the complaints process is accessible for all, when it stated that it:

"... should take into account individual requirements, e.g. disabled people, people with learning difficulties, people who are deaf or hard of hearing (including British Sign Language users), people with a visual impairment and people whose first language is not English. Where appropriate, suitable arrangements should be made for the specific needs of those who wish to complain, including provision of interpreting services, access to support or advocacy, and information in a variety of formats and languages, at suitable venues, and at suitable times."
- 15.4 The need to ensure complaints procedures is as accessible as possible was also highlighted in 'SHR data collection guidance'. The co-

operative will therefore ensure its complaints process is accessible as possible and easily available in a variety of places and formats.

- 15.5 In accordance with SPSO expectations the co-operative will ensure the committee receive quarterly complaints' reports, which separate complaints related to equality issues from general complaints.

16. Data Protection

- 16.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the General Data Protection Regulation (GDPR). Following the UK's exit from the EU, and the end of the transition period which followed, the GDPR formed part of the retained EU law and became the UK GDPR which together with the Data Protection Act 2018 constitute the UK's data protection legislation.

17. Publicising Our Equality and Human Rights Policy

- 17.1 Rosehill will publicise this policy in a number of ways, including:

- Consulting with tenants during community events;
- On our website, within newsletters, on social media, at our reception area and by integrating this policy into other policies and procedures where appropriate;
- All employees, and contractors will be notified of the existence of our Policy and asked to familiarise themselves with it;
- Copies of the policy will be provided to new staff members as part of their induction, and to contractors and suppliers as part of their appointment process;
- Copies of the policy will be provided to new committee members as part of their induction;
- Committee members and staff will continue to receive on-going equality and human rights training. All committee members and staff will be encouraged to keep up to date with developments in the area of good practice in Equality and Human Rights.

18. Policy Review

- 18.1 This Policy will be reviewed at least every three years or sooner to ensure it continues to reflect current thinking and practice and to comply with legislative requirements and regulatory guidance.
- 18.2 As an operational document, the Equality and Human Rights Action Plan will be reviewed by the Management Committee annually in April/May. Individual objectives will be periodically updated according to the timescales identified in the action plan.