



<b>STRATEGIC EQUALITY ACTION PLAN</b>	
<b>Procedure Number</b>	GCS 2.3.1 Version 1
<b>Prepared by</b>	CR/SA
<b>Date</b>	July 2020
<b>Approved by Housing and Corporate Services Committees</b>	August 2020
<b>Date of Next Review</b>	August 2023

We can provide this document in different formats, for example, in larger print, Braille or audio-format; the document can also be translated into specific languages, as appropriate.

## 1. Background

Osprey Group will use our equality action plan (the plan) to implement our equality policy objectives into practice. This action plan is, therefore, critical to mainstreaming of equality throughout our employment and housing services.

Our action plan will use our internally developed equality procedures in order to achieve equality mainstreaming objectives throughout the organisation. For example, we will use our equality data collection procedure to determine how and why we gather equality data and we will use our equality impact assessment procedure to assess internal policy and procedural documentation; this is central to eliminating unlawful (and unfair) forms of discrimination, as well as promoting equality matters.

Finally, we will use our language guide to promote respect for other people through appropriate and positive use of language in relation to the protected characteristics.

This equality plan describes the range of activities that we are implementing from the period October 2020 to end of March 2022. It is practical in nature and amended on an ongoing basis as individual activities are completed and/or updated to include new activities. It also takes into account a number of organisational factors, namely our size, resources and strategic policy commitments.

## 2. How we have developed the Equality Action Plan

We have developed the plan based on research that demonstrates how effective rights implementation depends on:

- applying a sound theoretical approach; and
- identifying a range of key organisational factors that must be included if rights are to be implemented effectively

(Source: Montgomery, 2001).

We can summarise our method by reference to two theoretical perspectives that are incorporated into the development of the plan.

**Perspective 1** - We use basic principles from systems theory which recognises the inter-dependence of all organisational activities. In applying this approach, for example, we recognise that all organisational activities are inter-dependent and require, therefore, a holistic approach to be taken. By understanding this point, we recognise that failing to implement any specific activity will have a negative impact on effective rights implementation.

**Perspective 2** -We apply principles of essentialism as applied to social landlords as public sector organisations. In line with this theoretical approach that recognises that things have natures, it is apparent that the nature of housing associations is to comply with law and promote good practice. This does not mean, of course, that natures are unchanging as housing associations – Osprey Housing Group included – must change our practices as law and guidance evolve.

By using these perspectives, we will ensure that we focus on key issues relating to effective equality rights implementation and apply a framework that covers organisational services comprehensively.

### **3. Our Activities**

The plan recognises that equality mainstreaming can only be progressed and/or achieved through including it in all activities. An effective equality rights strategy must take account of key organisational elements and these elements should be developed in a logical manner.

We have, therefore, incorporated this method into our equality action plan. Our core activities are as follows:

- equality data;
- equality policy and procedural documentation;
- equality impact assessments (internal documentation);
- equality impact assessments (public documentation and IT systems);
- access audit (office premises);
- performance management;
- staff and committee development;
- partnership working;

- our positive action programmes; and
- consultation, including tenant participation.

## 4. Action Plan Template

In order to ensure organisational commitment at senior organisational levels, the plan will be monitored by the Corporate Services Committee.

Attached as Appendix 1 is our Equality Action Plan. The plan is structured to enable easy organisational usage and regular updating as activities unfold. Key procedural points are as follows:

- Each action is prefaced with an explanation of its purpose in promoting the overall equality strategy.
- Each service action is linked to a list of activities.
- Each activity is noted along with those persons responsible for implementing and/or co-ordinating implementation, a list of outcomes with scope for making comments too.
- We also specify time scales and/or targets for completion; these are for internal guidance only and may be altered depending on other organisational priorities.

The reasoning for including each specific action is outlined below in Section 4.

### 4.1 Equality Data

We will process equality data in line with the General Data Protection Regulations, 2016, and relevant data protection law; most of the equality data that we gather is known as “special category” data. In order to process such data, we must use one or more specified grounds in addition to the main lawfulness processing grounds. In terms of meeting this condition, we use other reasons than “express consent” for processing special category data. With respect to gathering equality data, we implement legal requirements through our equality data collection policy and procedure.

The collection of equality data is critical to the implementation of the plan as it is used for various purposes, including the provision of appropriate services that are tailored to addressing individual needs. For instance, by gathering information about disabled people, we can then make

reasonable adjustments to address their needs. Again, we will use data to monitor service delivery to identify and address any form of unlawful or unfair discrimination.

Given the central role that equality data plays in addressing the needs of individual people, it is the first action listed in the equality action plan. The equality data that we gather is subject to ongoing change and will be, therefore, updated in line with our data collection policy and internal procedures such as our data retention schedule.

## **4.2 Equality Policy and Procedural Documentation**

We recognise that effective mainstreaming of equality requires the establishment of a range of equality procedures. These procedures are necessary for the effective implementation of equality objectives set out in our equality policy.

This action is, therefore, prominent in the plan as these are new policies and procedures as we develop our equality strategy.

## **4.3 Equality Impact Assessments (Internal Documentation)**

We will evaluate all our internal documentation to promote our equality objectives. Internal documentation refers to our organisational plans, policies and procedures. We will do this using our comprehensive equality impact assessment procedure. This procedure follows a robust theoretical approach that assesses the documentation itself as well as the effects of that documentation in:

- eliminating unlawful and unfair discrimination; and
- promoting equality objectives.

In short, we will use our equality impact assessment procedure to promote compliance with law, in particular meeting the public sector equality duty.

Our organisational categorisation of Action 3 activities are listed below. We will equality impact assess the documentation in relation to each using our agreed EQI procedure.

- development;
- finance;

- administration;
- governance;
- housing management;
- human resources; and
- repairs and maintenance (asset management).

An example of how we will do this is shown below:

<b>Activity</b>	<b>Responsible Person</b>	<b>Timescale</b>	<b>Outcome</b>	<b>Comments</b>
Allocation Policy				
etc				

#### **4.4 Equality Impact Assessments (Public Documentation and IT Systems)**

We will carry out an EIA of public documentation, as well as assessing the accessibility of our website. This area will cover a broad range of documentation, including documentation supplied to us by external organisations. We will use more detailed standards of assessment for this action as public documentation differs from policy and procedural documentation. For example, we might assess issues such as colour contrast that we use within newsletters and/or tenant handbooks.

In respect of IT systems we take account of the legislative guidance produced for public authorities. This covers important issues such as design and layout of systems, including their accessibility to disabled people.

#### **4.5 Access Audit (Office Premises)**

This action involves carrying out an access audit of our office premises to evaluate if they meet quality accessibility standards. This is critical to address and/or meet the interests of disabled people (staff, governing body members, tenants and other customers). This is very important to demonstrate compliance with the statutory duty to make reasonable adjustments in respect of disabled people.

## **4.6 Performance Management**

This action includes managing our performance to assess how effectively we are implementing our equality objectives. Critically, this Action must ensure that we meet regulatory requirements in respect of equality issues. It is, therefore, clearly linked to Action 1 that focusses on equality data collection.

This section seeks to establish measures that enable us to “test” how well we are meeting organisational equality objectives. This will include both quantitative and qualitative measures of performance management.

As well as regulatory data, we also develop our performance management system through time so that our policies contain specific performance indicators, as appropriate. This will be assessed as part of our equality impact assessment process, another example of how action plan activities are inter-dependent.

## **4.7 Staff and Governing Body Member Development**

Training is a key action to ensure effective implementation of equality rights. It is reasonable to argue that mainstreaming of equality objectives cannot be achieved without a comprehensive training programme. This approach, it is stressed, will be more robust by making equality training mandatory for all staff and Governing Body members.

The plan recognises, too, that there is no such thing as all encompassing “equality training.” In reality, there are only different forms of equality training involving a range of topics.

As noted in our equality policy, we link training activities to our comprehensive training need assessments through our staff development review process. These assessments are linked to job and/or Governing Body roles.

Finally, we also use the “Training Cycle” to distinguish a variety of training elements. This is very important as this enables us to structure equality training courses into inter-dependent stages. And each of these stages must be dealt with comprehensively if quality training is to be delivered.

Although this section deals only with equality specific training. As part of our mainstreaming of equality position, we also include equality themes within other training courses.

## **4.8 Partnership Working**

This section of the plan will describe the agencies and organisations we work in partnership with to:

- eliminate unlawful and unfair forms of discrimination; and
- promote equality matters into practice.

Our partner bodies are described in alphabetical order and split into national and local levels.

### 4.8.1 Partners we work with at national level

To be completed

### 4.8.2 Partner organisations we work with at local level

To be completed

## **4.9 Our Positive Action Programmes**

Positive action measures are encouraged in law and good practice and are used to address previous historic patterns of disadvantage experienced by certain groups. We will develop such programmes linked to our equality objectives in order to ensure they promote equality matters.

This section will describe the programmes that we are implementing.

We will also evaluate equality information that we gather through our equality data collection activities to establish innovative positive action programmes, as appropriate. These initiatives may include employment and services related programmes.

Our first initiative will be developing this new equality strategy and range of equality procedures to ensure a robust theoretical foundation for effective implementation of equality rights.



## 4.10 Consultation and Tenant Participation

We will consult with our staff, tenants and other customers regarding our equality strategy and our equality objectives.

Details of the consultation processes that we use are described in our tenant participation strategy.

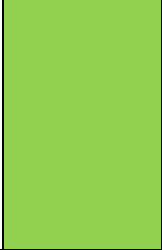
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**Appendix 1  
Equality Action Plan 2020 to 2022**

ACTIONS	HOW WILL WE DO THIS	LEAD	TARGET	CURRENT STATUS	Notes
<b>1. Equality Data</b>					
A comprehensive data collection procedure that meets regulatory requirements in place	Process equality data in line with the General Data Protection Regulation, 2016, and relevant data protection law	CSM/HSM	Nov-21		
	Use "business need" as our main reason for processing special category data.	SLT	Apr-21		Completed
<b>2 Equality Policy and Procedural Documentation</b>					
Equality Policy	Policy updated to reflect new strategy	HSM/CSM	Feb-21		Approved at May Board
Equality Action plan	Mainstream equality into all of our business areas	SLT	Apr-21		Approved at February Board
Equality Impact Assessment Procedure	Develop an EQIA process based on best practice	HSM/CSM	Nov -21		
	Promote the effective use of EQIA	SLT	Nov-21		
Appropriate Language Guide	Develop a critical awareness of the role of language in promoting equality and supporting EQIA	SLT	Apr-21		Included in Policy. Training to take place
	Train staff in this area	CSM	Aug-21		
Update Dignity at Work Policy	Update the current policy to ensure best practice	CSM	Aug-21		
	Include a section in anti-Social Behaviour policy	HSM	Aug-21		
	Review employment procedures	CSM	Aug-21		

<b>3. Equality Impact Assessment</b>					
<b>Evaluate all our internal documentation to promote our equality objectives</b>	<b>Use our EQI procedure to promote compliance with law, in particular meeting the public sector equality duty.</b>	<b>HSM/CSM</b>	<b>Apr-22</b>		
	<b>Access the range and type of documentation held</b>	<b>HSM/CSM</b>	<b>Apr-22</b>		
	<b>EQIA the documentation</b>	<b>HSM/CSM</b>	<b>Apr-22</b>		
<b>4. Appropriate Language Guide</b>					
<b>Carry out an EIA of public documentation</b>	<b>Assess accessibility of our website</b>	<b>CSM</b>	<b>Dec-21</b>		
	<b>Assess the range and type of documentation held</b>	<b>HSM</b>	<b>Dec-21</b>		
	<b>Assess the allocation summary policy</b>	<b>HSM</b>	<b>Aug-21</b>		
	<b>Assess standard newsletters</b>	<b>CSM/HSM</b>	<b>Aug-21</b>		
	<b>Assess tenants handbook</b>	<b>HSM</b>	<b>Aug-21</b>		
	<b>EQIA the documentation</b>	<b>HSM/CSM</b>	<b>Apr-22</b>		
<b>5. Access Audit (Office Premises)</b>					
<b>Carry out an access audit of our office premises to evaluate if they meet quality accessibility standards</b>	<b>Audit of Westhill and Moray offices to be carried out by an external disability organisation</b>	<b>AM</b>	<b>Apr-22</b>		
	<b>Demonstrate compliance with the statutory duty to make reasonable adjustments in respect of disabled people</b>	<b>SLT</b>	<b>Apr-22</b>		

6. Performance Management					
Managing our performance to assess how effectively we are implementing our equality objectives	Development and use of robust equality reports outlining equality data monitoring to inform organisational service improvements	CSM	Aug-21		
	Develop specific KPIs in functional policies to promote equality mainstreaming	SLT	Apr-22		
7. Staff and Board Member Development					
Develop a comprehensive training programme to address gaps in staff and GBM knowledge	Make equality training mandatory for all staff and GBMs in the following areas: <ul style="list-style-type: none"> <li>• appropriate language guide</li> <li>• equality data collection</li> <li>• equality impact assessment</li> <li>• harassment procedures</li> </ul>	SLT	Jul-21		Boards Members received in May 21 Staff planned July/Aug 21
	Link equality training activities to our comprehensive training need assessments through our staff appraisal process	SLT	Apr-22		
	Include equality themes within other training courses	SLT	Feb-22		
8. Partnership Working					
Work in partnership with our stakeholders to eliminate unlawful and unfair forms of discrimination; and promote equality matters into practice	To be further developed	SLT	2022		
9. Positive Action Programmes					

<p><b>Implement positive action programmes which are linked to our equality objectives in that they are used to promoting equality matters.</b></p>	<p><b>Develop a new equality strategy and range of equality procedures to ensure a robust theoretical foundation for effective implementation of equality rights</b></p>	<p><b>SLT</b></p>	<p><b>Jul-22</b></p>		
<p><b>10. Consultation and Tenant Participation</b></p>					
<p><b>Consult with our staff, tenants and other customers regarding our equality strategy and our equality objectives.</b></p>	<p><b>To be further developed through review of our Tenant Participation Strategy due in 2021</b></p>	<p><b>HSM</b></p>	<p><b>2021</b></p>	