



Drumchapel Housing

Co-operative Limited

EQUALITY & HUMAN RIGHTS POLICY

If you have difficulty with sight or hearing, or if you require this document translated, please contact us and we will be happy to provide this information in a format that suits your needs.

Date Approved by Management Board:
Interim Review Approved by Management Board
Due for Review:

13 April 2021
24 October 2023
April 2024

Drumchapel Housing Equality and Human Rights Policy

CONTENTS

- 1. Introduction
- 2. Legal, Regulatory and Good Practice
- 3. Policy Statement, General Principles and Protected Characteristics
- 4. Types of Discrimination
- 5. Positive Action
- 6. Equality Impact Assessment
- 7. Risk Management
- 8. Communications in Alternative Formats
- 9. Publicising the Equality and Human Rights Policy
- 10. Target Setting – Gender, Race, Age and Disability
- 11. Identifying Problems and Taking Remedial Action
- 12. Staff and Board Responsibilities
- 13. Dissemination of Key Targets and Performance
- 14. Breaches of the Equality and Human Rights Policy
- 15. Policy Review
- 16. UK GDPR Privacy Statement

1. Introduction

- 1.1 This document outlines the Co-operative's Equality and Human Rights Policy. It updates the previous "Equal and Diversity Policy" which was approved by the Management Board April 2017. It has been developed in collaboration with both staff and Board members and consideration of changes to recommended practice since the 2017 review.
- 1.2 The Policy addresses the legal and regulatory requirements the Co-operative must meet, and how we will translate into tangible outcomes that will benefit our customers, communities, employees, Management Board members and external stakeholders.

The Co-operative is committed to ensuring our people and the tenants and residents in our communities do not face discrimination, victimisation, harassment or social exclusion due to any of the following protected characteristics (identified in the Equality Act 2010): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

The Policy applies to all of the Co-operative's services and activities, including:

- *Membership and governance*
- *Services to tenants and other service users*
- *Tenant participation and consultation*
- *Community regeneration*
- *Employment*
- *Contracts with external companies and organisations*

The Co-operative opposes all forms of discrimination, and we will take action to ensure that all of our policies and procedures encourage equality and opportunity. Some key policies include:

- Membership policy
- Tenant Participation policy
- Recruitment and Selection policy
- Choice Based Lettings Allocation policy
- Data collection methods - Explicit consent
- Rent Arrears policy
- Repair and Maintenance policy
- Procurement policy

- Racial Harassment policy
 - Customer Service Standards policy
 - Construction Design and Management policy (Compliance with the Co-operative's policy)
- 1.3 The Policy is supported by an action plan which sets out what the Co-operative will do on a day-to-day basis to help ensure that the policy's objectives are achieved, and that the Co-operative can be proactive in its work in Equality and Human Rights. The action plan which is a separate document is set by the Management Board on an annual basis and monitored on a quarterly basis.
- 1.4 To help us ensure that those wishing to use our services, which includes the general public, tenants, and contractors as well as our employees, are clear about our commitment to equality of opportunity, the Co-operative will:
- a) Place a notice in the interview rooms publicising the policy's existence and that it is available in a variety of formats
 - b) Feature the new Policy in the next newsletter and outline the main elements of the action plan on our website, www.drumchapelhc.org.uk
 - c) Continue to ensure staff and Board receive appropriate training in the area of Equality and Human Rights – we will conduct appropriate training at regular intervals in accordance with regulatory guidance and good practice.

2. Legal, regulatory and good practice

- 2.1 This Policy takes account of legal, regulatory and good practice requirements, including (but not limited to):
- a) The Equality Act 2010
 - b) Human Rights Act 1998
 - c) The Housing (Scotland) Act 2010
 - d) Regulation of Social Housing in Scotland
 - e) The Scottish Social Housing Charter Outcome Number 1
 - f) Section 5.3 of the Regulatory Standards of Governance and Financial Management
 - g) Getting the Balance Right (published by the Scottish Federation of Housing Associations in 2011)
 - h) The Equality and Human Rights Commission “Human Rights at Home” guidance for social housing providers
 - i) 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’ within the rest of this policy
- 2.2 The Scottish Government published the Scottish Social Housing Charter on 2 April 2012. The Government’s commitment to ensuring that RSLs behave in away that promotes equality and eliminate discrimination is characterised by the fact that Outcome 1 states:
- “Social landlords perform all aspects of their services so 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.”*
- 2.3 Section 5 of the Standards of Governance and Financial Management requires all RSLs to “conduct their affairs with honesty and integrity and, within this, RS5.3 requires RSLs to pay “due regard to the need to eliminate discrimination, advance equality diversity and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements”.
- 2.4 This Policy also takes account of the revised Regulatory Framework (Regulation of Social Housing in Scotland) which came into effect on the 1 April 2019, which stated:

“Equality and Human Rights”

- 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.”

2.5 The Management Board wishes to be clear, however, that its work in equalities and human rights is motivated by a belief and commitment to ensuring equal opportunities for all and stressed “we are doing it because we want to and not because we have to.” Whilst the Policy refers to legal, regulatory and best practice requirements to ensure that we are not placing the Co-operative at risk of a legal or regulatory breach, our main motivation in reviewing the Policy is because we want to continue to improve our approach in this area.

2.6 Compliance with the Policy is expected from all staff, board members, tenants and others with whom the co-operative may work (e.g., contractors, consultants, suppliers, etc.).

The Co-operative will seek to ensure all external suppliers of goods or services comply with equality legislation and have adequate policies and procedures in this area. Accordingly, information will be issued with all tender documents stipulating’s expectations in respect of equal opportunities, and tendering organisations will be required to submit details of their own equal opportunities policies as part any tendering process. However, when working with organisations employing less than ten people, it will be acceptable for those organisations to confirm their willingness to operate in accordance with the co-operative’s Equality and Human Rights Policy.

2.7 **The Equality Act 2010** (referred throughout this Policy as the Act) is the main piece of UK legislation relating to equalities. The Act 2010 consolidates much of the previous equality’s legislation into one single Act. It replaces, for example, the Sex Discrimination Act 1975, the Race Relations Act 1976 and the Disability Discrimination Act 1995.

The act had two key principles which were to:

- Identify groups who needed additional protection due to their “protected characteristics”
- Identify “unlawful behaviour” which should be avoided by RSLs as landlords and as employers of staff

These key principles will be discussed in sections three and four.

2.8 **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 2020. The act contains 16 articles which cover a range of rights with a basic aim is to ensure that everyone should be treated fairly, with dignity and respect. Both the UK government and the Scottish government are committed to the Human Rights act and its key principles.

In 2012, the Equality and Human Rights commission produced “Human Rights at Home” guidance for social housing. The Co-operative recommends its staff refer to this guidance if they have any questions regarding the human rights act. This can be accessed by clicking on the link below or on demand from The Co-operative.

[Human Rights at Home Guidance](#)

This guidance recommends staff pay particular attention to articles 6, 8 and 14 when providing services, developing policies and procedures, etc. Each of these three articles will be discussed in turn:

Article 6: Right to a fair trial

Everyone has the right to a fair hearing (trial). This means people should be given the opportunity to participate effectively in any hearing of their case, and present their case in conditions which do not place them at a substantial disadvantage to any 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 for the decision.

Article 8: Right to respect for private life, family life and the home

Everyone has the right to respect for their private and family life, their home and correspondence. It is important to emphasise that the right to respect for a person's home is not a right to be given any extra priority to be housed by an association, but is a person's right to access, and live in their home without intrusion or interference. For associations 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 Associations taking positive steps to prevent others seriously undermining a person's home or private life, for example, through anti-social behaviour

Article 14: Prohibition of discrimination

This means that everyone must have equal access to an association's housing and services, regardless of their race, religion, gender, sexual orientation, disability, or any other personal characteristic. For example, a gay couple must be treated in the same way as a heterosexual couple in relation to the right to succeed to a tenancy.

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 for example an association providing sheltered housing to people over a certain age in accordance with its rules and procedures.

- 2.9 **Scotland specific legislation** 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, section 39 states:

"Social landlords when performing housing services must act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements of the law for the time being related to equal opportunities".

3. Policy statement, general principles and protected characteristics

3.1 The Policy has two main aims:

- to ensure that no person, group of persons or organisation who deal with the Co-operative in any way or who requires a service, assistance or advice from the Co-operative, or who is employed by (or serves) in any capacity by the Co-operative¹, is treated less favourably than any other person, group of persons or organisation – put more simply, anyone who has any sort of contact with Drumchapel Housing Co-operative Limited.
- To promote the Policy so that anyone dealing with the Co-operative in any capacity is made aware that the Co-operative has a Policy and that there is a zero tolerance of any act which contravenes the Policy / policy principles in any way.

3.2 We will seek to promote and achieve equality of treatment and opportunity for all groups in society without discrimination or prejudice on any grounds. The Equality Act introduced the term “protected characteristics” to describe groups against whom any sort of discrimination is unlawful. Section 4 of the Act specifies nine protected characteristics:

- Age
- Disability
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Gender reassignment
- Sexual orientation

¹ This includes Board members, contractors, consultants, agents and anyone attending in a voluntary capacity for work experience.

3.3 The Co-operative is keen to emphasise that it will not tolerate any sort of unfair treatment or discrimination on any grounds. In addition to the above, our zero tolerance will be broadened (but not confined) to the following:

- National origin
- Cultural background (i.e., if a specific group of tenants or prospective tenants have a specific need, custom or practice)
- Ethnic Origin (i.e., any significant percentages of tenants or prospective tenants from a specific country)
- Tenure
- Issues relating to literacy or numeracy
- Employment status
- Domestic circumstances
- Gender (i.e., if the gender pronoun a resident identifies themselves by is different from their 'assigned' gender at birth)

This list is not exhaustive and may be changed to reflect legislative or regulatory changes.

3.4 To help achieve the main aims as outlined in section 3.1, the Co-operative has devised the following six statements, which will form the basis of the separate action plan.

- a) ensure that no one is discriminated against on the basis of any of the nine protected or seven other characteristics noted above
- b) ensure equality of opportunity and treatment for all people in relation to the provision of housing and non-housing services
- c) actively assist disadvantaged minority groups within the local community to benefit from its housing services
- d) ensure equality of opportunity and treatment for all people in relation to the employment of staff
- e) ensure that all staff are aware of the Co-operative's commitment to, and obligations in relation to, equality and Human Rights
- f) be mindful of its equality's commitments in relation both to the procurement of contractors/consultants and to the composition and operation of the Management Board

Please note staff and board training should highlight these six statements and their importance to the Co-operative.

4. Types of discrimination

4.1 The Act highlights seven types of discrimination (which it identifies as unlawful behaviour) which RSLs must avoid in how they deliver their services and how they act as an employer of staff. The Co-operative have added an eighth category, institutionalised discrimination, for the purposes of this Policy and this is outlined as 4.2.

4.2 Discrimination

a) Direct Discrimination

This is less favourable treatment of an individual or group compared to others, and this treatment is because of a protected characteristic. An example of this would be to refuse to employ somebody because they had an impairment, which had no relevance to their ability to carry out the job they had applied for.

b) Associated Discrimination

This is direct discrimination against someone because they are associated with another person who possesses a protected characteristic. For example, a non-disabled person is discriminated against because they need to take care of disabled dependent.

c) Discrimination by Perception

This is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to. For example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name on their application form.

d) Indirect Discrimination

This is when an apparently neutral requirement or condition impacts adversely, or has a disproportionate effect, on a particular equality group. An example of this could be holding meetings at times which are inconvenient for people with childcare responsibilities and not providing crèche facilities.

e) Harassment

This occurs when a person engages in unwanted conduct which is related to a protected characteristic, and which has the purpose or the effect of (i) violating the dignity of another person or (ii) creating for that person an intimidating, hostile, degrading, humiliating or offensive environment. An example might be displaying a topless calendar on a wall where this makes the workplace an offensive place to work for any employee.

f) Harassment by a Third Party

As an employer, the Co-operative is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant.

g) Victimisation

This occurs when someone faces discrimination because they have made an allegation of unlawful discrimination or because of assisting or supporting a complainant. An example might be refusing to consider someone for a promotion because they gave evidence on behalf of a colleague who made a complaint of unlawful race discrimination.

h) Institutionalised Discrimination

This was first defined in the context of racism and exemplified 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.”

The Co-operative extends the above to cover all actions where these are related to a protected characteristic.

5. Positive action

- 5.1 The Act outlines two types of positive action which, in certain circumstances, are permissible:
- General
 - Recruitment and Promotion
- 5.2 General - If the Co-operative believes that persons who share a protected characteristic suffer a disadvantage or have different needs because of that characteristic, then action may be taken to help overcome the disadvantage or address the needs. The Act points out that any action should be proportionate.
- 5.3 Recruitment and Promotion - An example could be addressing imbalances in the workforce by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets aimed at encouraging people from a particular group or groups to apply for a vacancy, but no quotas will be set.
- 5.4 The Co-operative will periodically assess the demographic profile and ethnic backgrounds of our employees, board members and our members to review the level of representation with our tenants and other customers in our work. The Co-operative will take positive action to ensure recruitment seeks to address any imbalances. This will take account of SHR data collection guidance.

6. Equality Impact Assessments

- 6.1 Because equality and Human Rights issues are fundamental to how the Co-operative operates each policy developed or reviewed by the Co-operative will be subject to an Equalities Impact Assessment (EIA). EIAs allow the Co-operative to take proactive steps to identify and remove potential discrimination or, in some cases, the relevant action will be to adapt a policy or practice to better advance equality. It is important to recognise that providing the same service in the same way to everyone can sometimes create a disadvantage.

- 6.2 The Equality and Human Rights Commission in Scotland states that a policy or practice, which proactively considers equality, particularly using relevant evidence and consultation or involvement, is likely to be a better-quality policy in terms of it being more responsive to the needs of those affected. It further recognises that EIAs assist in mainstreaming equality considerations into policy and decision-making.
- 6.3 The Co-operative's action plan will confirm the Co-operative is reviewing its current EIA tool, and once the new tool has been developed, they will train relevant staff in its use.

7. Risk management

- 7.1 The Co-operative recognises the potential risks should we fail to adhere to the Equality and Human Rights Policy and/or the accompanying Action Plan. It is not only the Co-operative's credibility that would be compromised, but that of the Management Board should there be a major deviation from the Policy, and possibly even the sector as a whole. In order to combat this, Section 14 of this Policy outlines the method of investigation that would be adopted should any allegation of a breach be made.

8. Communications in alternative formats

- 8.1 One way in which people can be indirectly discriminated against is by information sometimes being inaccessible. For example, a visually impaired service user may not be able to read the allocation policy in the print size usually available. Similarly, someone whose first language is not English may not be able to communicate effectively with staff. This type of indirect discrimination is important to address as it can often be inadvertent and there is perhaps more scope for it to occur.
- 8.2 To help combat this, the Co-operative will provide information to customers in any special formats, which may include:
- Large print
 - CD
 - Translations into community languages
 - Use of language or sign interpreters
 - Braille

Please note that it is impractical to have all possible formats available immediately. The Co-operative's commitment therefore relates to the ability and willingness to produce documents in the formats required (or an interpreter if requested) within a period of five working days or as soon as reasonably practicable. All reasonable costs will be borne by the Co-operative.

- 8.3 To ensure that this strategy is effective, the availability of documents in other formats will be publicised on our website, on documents / policies and on the notice board within the interview rooms.

9. Publicising the Equality and Human Rights policy

- 9.1 It is absolutely critical that the Policy is publicised if it is to stand any chance of being successfully implemented. The level of interest in the Policy will vary from one person to another depending on a whole range of factors. To help respond to this, we will publicise the policy in the following ways:

- a) we will publicise the Policy review and the Co-operative's work in relation to promoting equality of opportunity in the next newsletter
- b) We will ensure that all new tenants are made aware of the Co-operative's commitment to equality and Human Rights as part of the sign-up process.
- c) The Policy will also be available on the Co-operative's website.

9.2 All employees, applicants for employment and contractors will be notified of the existence of the Policy and will be asked to familiarise themselves with it within a week of it being approved, or within five days or returning to work for anyone who is absent when the Policy is reviewed (the Director will send an email to all staff informing them that it has been approved and signposting them to the copy on the common drive).

9.3

Staff training will take place within three months of the Policy being approved and staff will be encouraged to raise any queries they have relating to the Policy to their line manager in the first instance.

- 9.4 Copies of the Policy will automatically be provided for successful job applicants within their Induction and Staff handbook.

- 9.5 Board members will continue to receive on-going equality and Human Rights training and will be involved in approving the final document. All members will be encouraged to keep up to date with development in the area and will receive period reports on the delivery of the Co-operative's action plan objectives.

10. Target setting

- 10.1 Whilst embracing the principles of equality and Human Rights is something that the Co-operative takes very seriously, it is nonetheless important that there is some system in place to demonstrate that we actually achieve our objectives (or, perhaps more importantly, to highlight areas where we do not). In other words, we must ensure that this Policy statement is not used merely to pay lip service to equality and Human Rights. The most up-to-date Census information relates to the 2011 figures. It is widely accepted that demographics are constantly changing, and the Census information is therefore increasingly unreliable for the purposes of equality action planning. Whilst we will take cognisance of the Census, we will also make use of other information that may be available, such as that from our own housing lists and those of the other local RSLs.
- 10.2 The Co-operative is committed to promoting an environment of respect, understanding, where diversity is encouraged, and discrimination avoided as both an employer and a landlord / provider of services. The Co-operative feels the collection of equality data as outlined in the 'SHR data collection guidance' "is integral to a social landlord's equality strategy" and is committed to ensuring it uses "Equality data to deliver quality services to tenants and other customers".

This led to the Co-operative developing an equality monitoring form based on the model equalities monitoring form contained within 'SHR data collection guidance' and deciding equality data should be collected from all five groups outlined in the guidance (housing applicants, tenants, job applicants, staff and board members) and that this data should be linked to specific individuals (i.e. information will have tenants' names and addresses attached).

The decision to link data was a carefully considered one based on clear evidence, which can be made available on request. This included the board's opinion that linked information collection would allow the Co-operative to tailor the services and support it provides to take account

of the needs of individual tenants, and others (i.e. providing information in alternative formats, making adaptations to properties, sign-posting to support agencies, working with support agencies / mediators, etc.). In addition, the linked information will allow the Co-operative to make any reasonable adjustments required to support staff and / or board members to carry-out their duties (i.e. making adjustments to office layouts to support staff / board members with specific disabilities, supporting staff members with long-term conditions / diseases to attend hospital appointments, etc.)

The Co-operative can confirm it will process the equality data collected strictly in line with data protection law and the General Data Protection Regulation (GDPR). This includes processing equality data securely on the Co-operative's electronic systems; restricting access only to relevant staff members; retaining equality information only as long as necessary in line with the timescales set out in our Data Retention Schedule; sharing data only as lawfully permitted and destroying data securely in line with our Data Retention Policy, etc.

The Co-operative can further confirm its equalities monitoring forms asked anyone providing linked data to give their explicit consent for the Co-operative to use the information provided to tailored support based on their needs. This explicit consent was given by requiring the tenant / board / staff member to sign and date the equality monitoring form they returned to the Co-operative.

The management board will be asked to periodically review how the Co-operative collects equality data including a review one year after this data was collected for the first time. If this review recommends that collecting this information anonymously would be more beneficial to the Co-operative, then the approach to data collection would be amended.

11. Identifying problems and taking remedial action

As the Co-operative reviews progress against the Equality and Human Rights Action Plan on an annual basis, areas where there may be problems will be flagged up so that remedial action can be taken. In addition, each of the action plan's objectives will have specific delivery dates and progress against each objective will be reported periodically to the Board.

- 11.1 It is not possible to be prescriptive about how the Co-operative should identify problems and take appropriate action in this Policy statement as there are too many potential outcomes, all different from each other. The general process to be followed by staff is:
- a) Advise the Board of the underachievement
 - b) Outline action(s) already taken to achieve the objective
 - c) Make suggestions for further action(s), in consultation with other RSLs who may have solved similar problems
 - d) Agree refinements to the Equality and Human Rights Action Plan's objectives and implement these
- 11.2 Realistically, it may emerge that some tasks are difficult to achieve, and this is something that the Co-operative recognises. This does not mean, however, that we will cease trying to achieve these. The Co-operative will do all that is possible and reasonable to ensure that equality and Human Rights targets are met.
- 11.3 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 SPSO 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, for example 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."

The need to ensure complaints procedures to be as accessible as possible was also highlighted in 'SHR data collection guidance'. The Co-operative will therefore ensure its complaints process is as accessible as possible and easily available in a variety of places and formats.

In accordance with SPSO expectations the Co-operative will ensure the board receive quarterly complaints' reports, which separate complaints related to equality issues from general complaints. These reports will provide a range of information including the frequency, volume, type of complaint, outcome, etc. of complaints as well as confirming complaints were dealt with appropriately and within the timescales set out in the Co-operative's policy.

12. Staff and Board responsibilities

- 12.1 Ultimate responsibility for ensuring that the Co-operative conforms to the principles outlined in this Policy and strives to achieve the targets set lies with the Management Board.
- 12.2 Responsibility for ensuring the Board is kept adequately informed of progress and alerted to any areas of underachievement lies with the Co-operative's Management Team. It will therefore be the Management Team's responsibility to ensure the quality and completeness of information and recommendations being presented to the Board.

13. Dissemination of key targets and performance

- 13.1 The Board will consider an annual report on equality and Human Rights at its April or May meeting. This will be produced by the Management Team and will be based on the outturn figures to the end of March.
- 13.2 In May or June, this performance will be summarised in the "Annual Statement on Equality and Human Rights". This will be distributed to all tenants and members by way of a newsletter and posted on the website.
- 13.3 The Co-operative will report clearly on its performance, and this will include highlighting areas where targets have not been met.

14. Breaches of the Equality and Human Rights policy

- 14.1 The Co-operative has a policy of zero tolerance to discriminatory practices and breaches of equal opportunities are concerned.
- 14.2 Any allegations against a member of staff or Board will be investigated thoroughly by the Co-operative's Director. If the allegation is made against the Director, the investigation will be conducted by the Chairperson and the Director will not be directly involved.
- 14.3 Before any investigation begins, the Co-operative will seek advice from Employers in Voluntary Housing (EVH). Unless there is very good reason not to, the advice of EVH will be followed. It is also advisable to contact the Co-operative's solicitor.
- 14.4 The member(s) of staff / board should be advised of the allegations and informed of what action the Co-operative is planning to take by way of investigation. They should also be advised to contact an independent representative, such as a solicitor or Trade Union representative.
- 14.5 The Co-operative's disciplinary procedures should then be followed as appropriate.
- 14.6 If the allegation is against a tenant of the Co-operative, the Director should ensure the Co-operative's solicitor is contacted for advice (as there may be tenancy implications under certain circumstances).

15. Policy review

- 15.1 As a strategic document, the Co-operative's Equality and Human Rights Policy will be reviewed at least every three years. The next review will therefore take place in April 2024 or earlier to take account of changes to applicable legislation, regulation or developments in good practice.
- 15.2 As an operational document, the Equality and Human Rights Action Plan will be reviewed by the Management Board annually.

16. UK GDPR Privacy Statement

16.1 The Co-operative will gather and use certain information about individuals in accordance with UK GDPR and DPA 2018. Staff members have a responsibility to ensure compliance with the terms of the privacy policy and to collect, handle and store personal information in accordance with relevant legislation. The Fair Processing Notice (FPN) details how personal data is held and processed.

