

July 2020

Sanctuary Scotland Housing Association Limited

Mapping Exercise for Assurance Statement - Equality and Human Rights

The purpose of this document is to provide the Board of Management of Sanctuary Scotland Housing Association Limited with assurance that the organisation complies with the requirements of Chapter Three of the Regulation of Social Housing in Scotland in relation to Equality and Human Rights. The compliance requirements are defined, the evidence and practice to support compliance is described and additional information or further action defined.

EQUALITY AND HUMAN RIGHTS - Chapter Three of the Regulation in Social Housing framework states:
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. Local authorities must also collect data on protected characteristics for people who apply to them as homeless. Landlords who provide Gypsy/Traveller sites must collect data on protected characteristics for these service users.


Evidence	Compliant	Action required/commentary
<p><u>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</u></p> <p><i>Group Strategies and Statements</i></p> <p>Equality and Diversity Group policy statement which supports and promotes equality and diversity and human rights matters.</p> <ul style="list-style-type: none"> • Fairness for All - this is our equality and diversity scheme that sets out aims and objectives in this respect and clearly sets out how we will meet the requirements of the Equality Act 2010 and the general duty that came into force in April 2011. It also contains <ul style="list-style-type: none"> ○ Information about the Group 	<p>YES</p>	<ul style="list-style-type: none"> • Fairness for All • Fairness for all action plan • Example of EDWG minutes

<ul style="list-style-type: none"> ○ Our Mission and Values ○ How Fairness for all was developed ○ Legislative and regulatory requirements ○ Best practice ○ What we do ○ How we will monitor progress ○ What we will achieve ○ Our three strategic equality objectives <p>Fairness for all is supported by an action plan</p> <ul style="list-style-type: none"> • There is a Group Equality and Diversity Working Group (EDWG) to advocate the promotion of Equality and Diversity in the organisation; most recently this has included the establishment of a parent/carer network for working parents and carers, a focus group to promote inclusion and listening on how to become an anti-racist ally. • Modern slavery and Human Trafficking statement. 		<ul style="list-style-type: none"> • Modern slavery and Human Trafficking statement.
<p><u>Policies and Procedures</u></p> <ul style="list-style-type: none"> • All policies and procedures contain appropriate practice and references to diversity, equality and human rights. • Group Safeguarding strategies and procedures; to provide services that are safe and to give choice to our customers as per the Adult. Learning and Development staff training and mandatory level 2 safeguarding training for local operational staff. Relevant legislation that underpins our actions in Scotland: The Adult Support and Protection Act 2007 gives greater protection to adults at risk of harm or neglect. The Act defines adults at risk as those aged 16 years and over who: are unable to safeguard their own wellbeing, property, rights or other interests and are at risk of harm and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected. It places a duty on local councils to inquire and investigate cases where harm is known or suspected. • Procedures and practices designed to be ‘barrier free’ to accessing services 	<p>YES</p>	<ul style="list-style-type: none"> • Policy templates • Adults, Children and Young People, and Group strategy (currently being written by Group Safeguarding Lead)

<p><u>Equality Impact Assessments</u></p> <ul style="list-style-type: none"> Equality impact assessments are carried out on policy, procedure, practice as appropriate e.g. the Letting Policy – the Equality and Human Rights Commission (the enforcement body for these duties) encourages other bodies to take on board the principle of these duties and prepare equality impact assessments where appropriate. 	<p>YES</p>	<ul style="list-style-type: none"> Accessible information standards. Example of referring to meeting peoples needs/access to services and tailoring our approach to ensure there are no ‘barriers’ Tenant Participation Strategy Equality Impact Assessment: Recent years this has included: Physical disability Sensory impairment Mental Health Universal credit and diversity data (2020)
<p><u>Antisocial Behaviour, Harassment and Domestic Abuse</u></p> <ul style="list-style-type: none"> Tolerating antisocial behaviour and domestic abuse is a violation of fundamental human rights – damaging to health, wellbeing, limit’s peoples’ freedom and potential. Therefore working in partnership with: CIH – Make a Stand; White Ribbon and other partners to raise awareness of the prevalence of domestic abuse and support staff to address suspected/alleged/actual allegations. We take reports of antisocial behaviour seriously and record and manage cases, making appropriate referrals to specialist agencies or advice providers and working with the police where necessary. These policies and procedures also help to ensure that we comply with the Human Rights Act 1998 which confers rights and freedoms granted by the European Convention on Human Rights. The rights protected by the Act include the right to: <ul style="list-style-type: none"> life; respect for private and family life, home and correspondence; freedom of religion or belief; freedom of expression; and peaceful enjoyment of your possessions. 	<p>YES</p>	<ul style="list-style-type: none"> Antisocial behaviour and harassment policy and procedure Domestic Abuse policy and procedure

<p><u>The Right to Housing - Allocations</u></p> <ul style="list-style-type: none"> • The right to housing is a human right enshrined in international law, therefore we have an obligation to protect and promote people’s right to adequate housing – through offering different ways to access housing (direct applicant, transfer, mutual exchange, local authority, housing options assessments). • In its General Comment No. 4, the UN Committee on Economic, Social and Cultural Rights provides an authoritative interpretation of the right to adequate housing, which must be accessible, affordable, habitable, and culturally adequate, and provide access to infrastructure, facilities and services. 	<p>YES</p>	<ul style="list-style-type: none"> • See Lettings Policy - Scotland • Accessible housing – design regulations to make properties physically accessible or adapted at design stage (see aids and adaptations policy and procedure or physical disability Equality Impact Assessment). Information made available on access to housing in office, on website, over the phone, in person, in literature. • Affordable – complete rent consultation • Habitable – complete Lettings check to meet the Lettings Standards, and part of our tenancy agreements to define our obligations to ensure homes are wind and watertight • Culturally adequate – sensitivity with design of internal and external building features, and part of our lettings policy is to create balanced communities by allocating homes to people with different levels of priority and application circumstances. • Infrastructure, facilities and services – design guides • S:\Scotland\Sanctuary in Scotland\Equality and Diversity
<p><u>Governing Body Reports</u> All reports written contain an assessment on the impact on diversity.</p>	<p>YES</p>	<ul style="list-style-type: none"> • Report template here/ example of Tenant Participation Strategy – see items 13, 13a and 13b S:\Scotland\Sanctuary in Scotland\Governing Body reports\Sanctuary Scotland\North East Area Committee\2019\3. 190829

<p><u>Membership of Associations and Campaigns</u></p> <ul style="list-style-type: none"> • Time to Change – employer and employee pledge to end stigma around mental health • Stonewall Diversity Champions – Sanctuary is a member of this programme to support the aim of creating a diverse and inclusive environment achieving sexual orientation and gender identity equality. As part of this there is a focus group called the Equality Inclusion Zone (EIZ) and a LGBT support community across Sanctuary Group. Other efforts and activities include Group Support for Pride events and Sanctuary’s LGBT+ role models and allies. • Don’t be a bystander campaign – this reminds all staff to report any language or abuse which is felt to be homophobic, sexist, racist, ageist, disablist or offensive • White Ribbon and Make a Stand campaigns – these are two campaigns that Sanctuary has signed up to, to raise awareness of domestic abuse. White Ribbon is focused on men taking a stand against gender based violence in all forms. Make a Stand was developed by the Chartered Institute of Housing and as a signatory Sanctuary has promised to support those affected by violence in the home by raising awareness. • Business Disability Forum – in 2016 the Group registered to become a disability confident employer and participate in a national disability forum. We are also a Disability Confident Employer. • Statement in support of Black Lives Matter 	<p>YES</p>	<ul style="list-style-type: none"> • Time to change solis page https://solis/SG/health-wellbeing/Pages/Time-to-change.aspx • Stonewall and EIZ https://solis/Diversity/Pages/The-Equality-Inclusion-Zone.aspx https://solis/Diversity/Pages/stonewall-diversity-champions.aspx • Don’t be a bystander https://solis/Diversity/Pages/Don%27t-be-a-Bystander.aspx • White Ribbon Solis pages: https://solis/Diversity/Pages/White-Ribbon-and-Make-a-Stand.aspx • Black Lives Matter: 19th June and 26th June and message from Group Chair and self-education resource library is being collated. • New Parent-Carer Network for peer support and • inclusion in decision making processes that affect parents and carers working for Sanctuary. • Trans Inclusion • Women into Construction • Women in Technology: signed both the Tech Talent Charter and the PwC Tech She Can Charter
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<p><u>Accessible services</u></p> <ul style="list-style-type: none"> • Solis contains a page for staff that is dedicated to Translation Services – answering questions on how to access these and provision of alternative formats etc. • Inclusive by design technology project (2020): investment in technology to promote ability to home-work and join meetings virtually or on the phone reducing the need to travel and potentially allowing for more flexible working environments that could reduce barriers for working parents and those who identify as disabled. 	<p>YES</p>	<ul style="list-style-type: none"> • Translation services https://solis/SG/PServices/goods-services-suppliers/Pages/Translation%20Services.aspx • Group Communications Policy • Evidence of improvements in technology to be provided when this is available.
<p><u>Data collection existing tenants, new tenants, applicants on waiting list, governing body members and staff</u></p> <ul style="list-style-type: none"> • Data is collected for all categories listed above and reported in the Annual Return on the Charter. • Sanctuary Scotland also undertakes exercises to analyse this data to better understand how representative (or not) our population of tenants are in comparison to the national demographic patterns. • The Group also make the 'What's it got to do with you' leaflet which lists ten reasons to complete monitoring forms, explains how the data is used and gives reassurances that it is anonymous. 	<p>YES</p>	<ul style="list-style-type: none"> • Equalities Monitoring https://solis/Diversity/Pages/EqualityMonitoring.aspx • Example project of tenant diversity 2020:  E and D data analysis SMT April 2020.docx • What's it got to do with you leaflet: https://solis/Diversity/Pages/Don%27t-be-a-Bystander.aspx

<p><u>Complaints Analysis and scrutiny</u></p> <ul style="list-style-type: none"> Sanctuary’s complaints procedure is modelled on the SPSO model complaints handling process which recognised vulnerable groups and commits to ensuring that the complaints handling process is accessible, and that our approach to complaints is tailored where relevant and reasonable. Scrutinising services to ensure peoples’ needs are met and that Sanctuary delivers positive outcomes for customers through the National Residents Review Panel and offering other forms of Tenant Participation. 	<p>YES</p>	<ul style="list-style-type: none"> The National Residents Review Panel were consulted on this Assurance Statement in July 2020. A new section on complaints was suggested to demonstrate our commitment to providing equal access to services, and how we respond to complaints that are specifically related to equality and diversity. SPSO guidance on Vulnerable Groups Tenant Participation Strategy
<p><u>Community Investment – empowering individuals and communities</u></p> <ul style="list-style-type: none"> Building social capital Our Community Investment work starts from the point of believing that everyone is capable of contributing to life in their community and our role is to support them to find the opportunities to do so. We believe that everyone is an asset, with skills, aspirations and abilities, and by building relationships in communities, these become stronger and better connected, supporting active citizenship for all. We work to create a focus of cohesion and empowerment within the community, listening to what people have to say and helping them find the power inside them to live the life they want to. We aim to work with each person in a way that promotes core values such as respect, dignity, equality and independence. 	<p>YES</p>	<ul style="list-style-type: none"> https://www.sanctuary-group.co.uk/sites/default/files/quick_media/sanctuary-group-our-impact-report-2018-2019.pdf pg21 case study on the Breakfast Club in Priesthill.

<p><u>Staff training</u></p> <ul style="list-style-type: none"> • Mandatory equality and diversity training for all staff • Mandatory equality and diversity training for all line managers • Adverse Childhood Experiences awareness training is being rolled out in Scotland from August. • Safeguarding up to Level 2 for Housing Officers is core training • Domestic Abuse awareness training is provided by the Learning Academy. • Senior staff have been trained in Mental Health First Aid and office Mental Health Champions are ASIST (suicide prevention) trained. <p><u>Please note that further guidance is to be issued by the SHR in respect of future data collection, compliance in this requirement will not be measure by the SHR until April 2021.</u></p>	<p>YES</p>	<p>The Learning Directory</p>
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