



SHA Equality and Diversity Policy

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1. Introduction

- 1.1 Southside Housing Association (SHA) want everyone to have the same opportunities, irrespective of their background. We are committed to ensuring that anyone who wants to access the services we provide are able to do so by removing any barriers or obstacles which may prevent them accessing or obtaining the full benefit of our services
- 1.2 We want to ensure that our tenants, other customers, our employees and volunteers and anyone who provides or receives a service from SHA are treated fairly and with dignity and respect.
- 1.3 We also want to eliminate any discrimination, either directly or indirectly, against any individual on the grounds of sex, race, disability, age, religion or belief, gender reassignment, sexual orientation, pregnancy and maternity, or marriage and civil partnership.
- 1.4 As a key and visible organisation within the communities that we serve we want to promote Equality and Diversity and anti-discrimination in everything that we do. This includes in our service delivery, the influence we have with stakeholders, partners and contractors, and in our recruitment and retention of our employees.
- 1.5 As an organisation involved in public procurement, we also want to use our spending power to promote equality and good relations between protected characteristics in the way we procure services and contractors.

2. Purpose of this Policy

- 2.1 This Policy describes how Southside Housing Association (SHA) will promote equality and diversity in our service delivery and in the management of our organisation.
- 2.2 It also aims to ensure that an understanding of equalities is integrated into every aspect of SHA's work and ensure that tenants and other customers, employees, volunteers, contractors and other partners are treated with fairness and respect, and treat others with fairness and respect.
- 2.3 The Policy addresses the legal and regulatory requirements we must meet, and how we will translate our own mission and values into tangible outcomes that will benefit our customers, communities and employees.
- 2.4 Through this policy we also want to promote and sustain a culture of dignity, fairness and equality of opportunity both in terms of the services we provide and the working environment our employees operate in. We recognise that people work best in, and are attracted to organisations ,both as employees and customers, which allow them to be comfortable being who they are.

3. Key Definitions

3.1 **Equality –** Equality is not about treating everybody in the same way, but recognises that their needs are met in different ways. Equality focuses on those areas covered by

law and described in the Equality Act 2010 as 'Protected Characteristics' which are set out below.

- 3.2 Diversity Diversity is about valuing individual differences to allow everybody to contribute and realise their potential. Diversity is also about recognising that individuals from a wide and varied range of backgrounds can bring different experiences, perspectives, and skills can contribute new or fresh ideas. Diversity is also about being able to be comfortable in being yourself.
- 3.3 **Protected Characteristics –** The Equality Act 2010 introduced a range of characteristics which have special protection under Equality law. Every individual has at least one or more of these Protected Characteristics. The Nine Protected Characteristics set out in the Equality Act 2010 are:
 - Age
 - Disability
 - Gender Reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
 - Race
 - Religion and Belief
 - Sex
 - Sexual Orientation

3.4 **Discrimination**

- 3.4.1 Direct Discrimination Less favourable treatment of an individual or group, on account of a protected characteristic. An example of direct discrimination may be where an employer refuses to employ someone because they have an impairment which had not relevance to the job which they have applied for.
- 3.4.2 Indirect Discrimination When an apparently neutral requirement or condition impacts adversely or has a disproportionate effect on a particular group. An example of this could be a policy practice or procedure that applies to everyone in the same way but might disadvantage a particular group and which cannot be objectively justified in relation to it.
- 3.4.2 Associated Discrimination 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 have care responsibilities with regard to a disabled person.

3.5 Harassment

3.5.1 When a person engages in unwanted conduct, which is related to a protected characteristic and which has the purpose or effect of i) violating the dignity of another person, or ii) creating for that person an environment an intimidating, hostile, degrading, humiliating or offensive environment. An example of harassment might be displaying a sexist calendar on a wall where this makes the workplace an offensive place to work for an employee. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

- 3.5.2 Harassment by a third party An employer is potentially liable for the harassment of their staff or customers by people they do not themselves employ e.g. a contractor or consultant.
- 3.6 **Victimisation –** Occurs when someone faces discrimination because she or he has made an allegation of unlawful discrimination or because of assisting or supporting a complainant. An example of victimisation may be refusing to consider someone for a promotion because they gave evidence on behalf of a colleague who had made a complaint of unlawful race discrimination.
- 3.7 **Positive Action –** The Equality Act 2010 sets out two types of Positive Action which in certain circumstances are permissible.
- 3.7.1 General Where 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 Equality Act sets out that any action must be proportionate.
- 3.7.2 Recruitment and Promotion In this context an example may be addressing imbalances in the workforce or Governing Body by 'positive discrimination' to encourage individuals from underrepresented groups to apply for employment or positions on the Governing Body. 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 not to set a quota.
- 3.8 **Reasonable Adjustments –** A positive change to remove or reduce the effect of an employee's disability to do their job in the employment context. Reasonable adjustments relate more generally to positive changes to remove or mitigate barriers to customers accessing a service.

4. Legal and Regulatory Requirements

- 4.1 There are a number of key pieces of legislation in relation to Equality and Diversity and which inform this policy. SHA will meet all of its legal obligations as set out in the following legislation:
 - The Equality Act 2010
 - The Human Rights Act 1998
 - The Scotland Act 1998
 - The Housing (Scotland) Acts 2001 and 2010
- **4.2 Appendix 1** provides a commentary on each piece of legislation and what it means for SHA. This section of the Policy provides a brief overview of the Equality Act 2010 which is the key piece of equality law in the United Kingdom.

The Equality Act 2010

- 4.3 The Equality Act 2010 sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. There are nine "protected characteristics" listed in the Act:
 - Age

- Disability
- Gender
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- · Religion or belief
- Sexual orientation
- 4.4 It is unlawful to discriminate against, harass or victimise a person because they have one or more of the protected characteristics. When carrying out "public functions" this term covers just about all of the services SHA provides SHA must also comply with the **general equality duty** set out in section 149 of the Equality Act. The duty means that SHA must:
 - **Eliminate unlawful discrimination** (including direct and indirect discrimination and discrimination arising from disability), as well as harassment and victimisation.
 - Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
 - **Foster good relations** between people who share a protected characteristic and people who do not share it.
- 4.5 The Public Sector Equality General Duty also places a number of requirements on employers which apply in situations where a disabled person is placed at a substantial disadvantage compared with people who are nor disabled. These duties are called Reasonable Adjustments. The three requirements are:
 - Changing the way things are done where a disabled worker is out at a substantial disadvantage by a provision, criterion or practice of their employer;
 - Making changes to overcome barriers crated by the physical features of a workplace;
 and.
 - Providing extra equipment (auxiliary aids) or otherwise providing an auxiliary service/s to assist.

Regulatory Standards on Equality

- 4.5 The Scottish Social Housing Charter contains an Equalities outcomes as one of the Charter's sixteen outcomes which social landlords must meet. The Equalities Outcome 1 of the Charter states that:
 - "Social landlords perform all aspects of their housing 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."
- 4.6 The Scottish Housing Regulator's (SHR) *Regulation of Social Housing in Scotland: Our Approach* (The Regulatory Framework) sets out the Standards of Governance and Financial Management and other Regulatory Requirements for social landlords in Scotland.
- 4.6.1 Regulatory Standard 5.3 sets out that:
 - The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.

- 4.6.2 Regulatory Requirement EH1 and EH2 also set out requirements and standards in relation to Equalities and Human Rights which social landlords must meet:
 - EH1 Each landlord must 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.
 - EH2 To comply with these duties, landlords must collect data relation to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff.
- 4.7 The Care Inspectorate set National Care Standards for Housing Support and these include

Equality and diversity

Your right to:

- live an independent life, rich in purpose, meaning and personal fulfilment;
- be valued for your ethnic background, language, culture, and faith;
- be treated equally and to live in an environment which is free from bullying, harassment and discrimination; and
- be able to complain effectively without fear of victimisation.

5. Our Equality Objectives

- 5.1 As part of our policy aims set out at section 2 of this policy and to illustrate SHA's commitment to embedding Equality and Diversity into everything that we do, we have established the following set of SHA's Equality Objectives:
 - To eliminate discrimination and advance equality of opportunity for all, in our role as a housing provider and employer.
 - To treat all of our customers and employees fairly and with dignity and respect.
 - To value and respond appropriately to diversity in our communities and in our individual customers and staff members.
 - To show zero tolerance of harassment and hate crime.
 - To promote tolerance and community cohesion in our neighbourhoods.
 - To comply with legislation and seek to meet best practice standards.
 - To encourage our contractors and suppliers to promote equality, respect diversity and prevent discrimination.
- 5.2 To help us meet these objectives, SHA will:
 - Require all of our staff and members of the Management Committee and Neighbourhood Committees, and the Board of our subsidiary SFARS Ltd, to show a positive commitment to equality and diversity.

- Develop good quality information about our customer base and individual customers, so that our services are accessible and responsive to all.
- Tailor our service delivery to meet the circumstances of individual customers, so that we provide equal outcomes and opportunities for all.
- Engage with, and seek feedback from, all sections of the community when we are developing or reviewing our services.
- Seek to ensure that our governance, management and workforce are broadly representative of the communities we serve.
- 5.3 The individual actions which we will take to deliver our Equality Objectives will be set out in our Equality and Diversity Action Plan for 2021 -2024.

6. Gathering and Using Information about our Customers and Staff

- 6.1 In delivering the objectives of this policy it is important that we know who our tenants and other customers, employees and volunteers are. Effective systems for collecting information and monitoring performance are a key part of this Policy, since good quality, accurate data helps us to achieve our objectives, identify gaps and barriers to equality and inform our service delivery to target our services where they are required and where they will bring the greatest benefit.
- 6.2 The Scottish Housing Regulator's thematic inquiry "Use of Equality and Diversity Information by Scottish Social Landlords" recommends that social landlords should take the following actions:
 - Review their data collection for the equality elements of the ARC (ethnicity and disability), so that submissions are complete as far as reasonably possible and minimise the number of "unknowns";
 - Use equalities data to help inform their understanding of the individual needs of their tenants and other service users;

 - Use equalities data to tailor and target their approach to communicating with tenants and other service users.
- 6.3 SHA will address and go beyond these recommendations. SHA's data collection systems will seek information about **all nine protected characteristics**, for the following groups:
 - Membership of the Association
 - Management Committee members
 - Staff members
 - Existing Social Housing Tenants
 - Applications and appointment of staff and volunteers
 - Applicants for Social Housing
 - New lets or re-lets of Social Housing
 - Housing support service users

- Participation in wider role activities.
- 6.4 We will collect information from customers at the following stages:

Members of the Association

Through the application process for membership

Governing Body Members

Through annual equalities profiling of Governing Body members

• Employees and Volunteers

Through successful applications from employment and an annual employee and volunteer equalities information return.

Housing Applicants and New Tenants

Housing application (failing which housing offer or tenancy sign up, failing which settling-in visit)

Existing Tenants

- Programmed bi-annual visits to all tenants
- Housing support service users
- Individual Housing Support Plans and service user profile reports to funders and Care Inspectorate.

Wider Role and Community Initiatives Activities

- From participation survey forms

Advice Service Customers

- A critical opportunity to use detailed case management to develop customised data on individual customers
- 6.5 In asking for co-operation, we will make clear that the customer can choose not to provide some or all of the information requested. We will also explain clearly the reasons for asking for the information and how it will be used, i.e. the data collected will help SHA to:
 - Understand the needs of individual customers, so that we can provide a better service that meets the customer's needs.
 - Identify any areas of possible discrimination and plan our services in a way that meets our equality and diversity objectives.
 - Meet our legal duties to prevent discrimination and promote equality.
- 6.6 As part of our Action Plan, we will review the effectiveness of our systems for collecting and analysing equalities information. This will include consideration of what improvements are possible as part of our commissioning of new software systems for housing management.

7 Policy Implementation and Responsibilities

7.1 The Management Committee is responsible for approving this Policy, and for overseeing its implementation including monitoring the progress of the Equalities Action Plan.

- 7.2 The Director and Senior Management Team have operational responsibility for policy implementation, and for reporting to the Management Committee the outcomes SHA is achieving, equality related trends in customer complaints, and any changes in SHA's legal obligations.
- 7.2 Every employee and volunteer must always act in accordance with the Association's core values and ensure that this Policy is applied in practice. Failure to do so may result in disciplinary action.
- 7.3 Equality and Diversity awareness training will be delivered to all employees and volunteers as part of the SHA induction process, and refresher training will be delivered in a programmed basis.
- 7.4 SHA as an organisation will reflect our equality and diversity objectives in everything that we do, as set out at section 2 of this policy.
- 7.5 SHA will produce an Equalities Action Plan to deliver the objectives of this policy, normally covering a period of three years. This will:
 - State our top priorities for development or improvement.
 - Describe how these priorities will be implemented, and how success will be measured (recognising that this will involve a mix of statistical and qualitative information).
 - Be reviewed annually by Management Committee, to assess the progress that has been made.

8. Assessing and Monitoring Equality Impacts

- 8.1 In line with our commitment and legal obligation to ensure we are delivering our services as a landlord and an employer equally and fairly, we will measure and monitor the impacts, both positive and negative, of our policies, procedures and services.
- 8.2 Regulatory Requirement EH1 in the SHR's Regulatory Framework places a requirement on social landlords to consider equality and human rights issues properly when making decisions, in the design and review of internal and external policies and in its day-to-day service delivery

- 8.3 SHA will measure the impact of our key policies, procedures and services upon protected characteristics through carrying out an Equality Impact Assessment (EqIA) as part of SHA's policy or service development and/or review programme.
- 8.4 Although the Public Sector Equality General Duty does not make an EqIA mandatory, an EqIA however is a very effective tool in measuring the positive or negative impact of our policies, services or other major proposals. This is important in recognising where our policies or services may directly or inadvertently adversely impact a protected characteristic group or have unintended negative impacts.
- 8.4 Through this process SHA will decide whether to continue with a policy, service or proposal, or present mitigating actions to address any inequality or adverse impact found through the EqIA process.
- 8.5 SHA employees involved in developing or reviewing policies or services will have responsibility for completing an EqIA in relation to a particular policy, service or proposal.
- 8.6 Consideration and approval of the EqIA will normally be the responsibility of Management Committee or a Sub-Committee or other body with delegated authority to approve polices, services or proposals.
- 8.7 A specimen SHA EqlA template document is included at Appendix 2. Of this policy.

9. Publicising Our Equality and Diversity Policy

- 9.1 In meeting our duties to promote equality we will ensure that this policy is widely publicised to tenants, other customers, employees, volunteers, contractors, partners and other stakeholders though our website, intranet and social media platforms and in our day-to-day business activities.
- 9.2 A copy of this policy will be included in induction packs for new employees and volunteers and be made visible and available to visitors to our offices and on request.
- 9.3 Through this policy our commitments and expectations will also be communicated to contractors providing a service on behalf of SHA, and through our competitive procurement processes.

9.4 Communication

- 9.4.1 We are committed to removing barriers to customer accessing this and other corporate documents, whether those barriers are as a result of language, sensory impairments or other barriers to access.
- 9.4.2 We will consider providing documents in different formats on request, this includes in a different language, audio format, large type, easy read or other formats
- 9.4.3 We will provide access to translation and interpretation services where an individual whose main language is not English requests this and where an individual does not have the

- translation or interpretation assistance of family or friends or it is not appropriate for them to do so.
- 9.4.4 We will not use children under the age of sixteen years as interpreters for family members when sensitive issues such as rent arrears, court proceedings or domestic violence are being discussed.
- 9.4.5 We will use our profiling data which we collect to inform how we communicate with our customers in the way they tell us they prefer.

10. Data Protection

- 10.1 Collection of personal data and equalities information about individuals employed by or receiving a service from SHA is a key commitment of this policy in informing our service delivery and ensuring that we are treating everyone fairly and not discriminating against any person with a protected characteristic.
- 10.2 Equalities data will often involve the collection and storage of sensitive personal data. This will be collected and processed in line with our obligations in terms of the UK Data Protection Act 2018, the SHA Privacy Policy and our Fair Processing Notice. We will only collect and process sensitive personal data with the consent of the individual and another legal basis for processing.
- 10.3 In monitoring equalities data wherever possible this data will be used in an anonymised aggregated way. Access to any individual's sensitive personal data will be strictly controlled and stored in a secure way as set out in the SHA Fair Processing Notice. This also sets out how and why we may share data and who we may share it with.
- 10.4 The SHA Data Retention Schedule sets out how long we will retain equalities data.

Reference: MC/ 2021/ Month 03/ Agenda Item xx

Appendix 1

Key Legislation Relating to Equality, Diversity and Inclusion

The Equality Act 2010

- 1.1. The Equality Act sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. It replaces previous "stand alone" legislation on issues such as sex discrimination, equal pay, and disability discrimination and race relations to provide a single legal framework. The UK-wide Equality and Human Rights Commission (EHRC) publishes a range of statutory codes of practice as well as non-statutory guidance, to help ensure the Act is put into practice effectively.
- 1.2. The Equality Act uses the term "**protected characteristics**" to describe the groups that have legal protection from discrimination. The protected characteristics listed in the Equality Act are as follows, along with a brief description of each:

Age

Refers to a person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).

Disability

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment

The process of transitioning from one gender to another.

Marriage and civil partnership

Marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race

Refers to the protected characteristic of Race. It refers to a group of people defined

by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex

A man or a woman.

Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

- 1.3. Under the Act, it is unlawful to discriminate against, harass or victimise another person because they have one or more of the protected characteristics. This applies to:
 - How SHA as an employer treats our staff and people seeking employment with us, and
 - How SHA as a provider of housing and related services treats anyone who
 receives or seeks access to our properties and services.
- 1.4. SHA must also comply with the **general equality duty** in Section 149 of the Equality Act. The duty applies to housing associations if they are carrying out what the Act terms "public functions". The public functions carried out by SHA and other RSLs include matters such as the allocation of housing, transfer and exchange of properties, setting rent levels, complaints procedures, tenant participation, consulting and informing tenants, setting the terms of tenancies, the termination of tenancies, and dealing with antisocial behaviour.
- 1.5. When carrying out public functions, SHA has a legal obligation to:
 - **Eliminate unlawful discrimination** (including direct and indirect indiscrimination and discrimination arising from disability), as well as harassment and victimisation
 - Advance equality of opportunity between people who share a protected characteristic and people who do not share it
 - Foster good relations between people who share a protected characteristic and people who do not share it
- 1.6. The Equality Act is supported by the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. RSLs are not listed authorities under the Regulations,

so do not have an obligation to comply with them. There are a number of good practice areas that SHA will reflect in its policies and working practices where this can be achieved in a proportionate way, such as:

- Publishing this Policy and the associated Equalities Plan
- Assessing the impact of key policies and practices on different equalities groups
- Gathering and using information about the profile of job applicants and of our staff in relation to development and retention.

Human Rights Act 1998

- 1.7. Good housing is a basic human need. It supports good health and opportunities for individuals and contributes to sustainable places and quality of life for communities.
- 1.8. The Human Rights Act 1998 provides for an individual to have the right to own and enjoy the ownership of property; the right to respect for private life; the right to respect for family life; and the right to respect for their home. The Act provides protection against discrimination with regard to any of these rights.
- 1.9. There are many aspects of SHA's role in providing housing and housing services that could be affected by the Human Rights Act. For example:
 - Housing allocations
 - Tenancy agreements
 - Housing conditions
 - Aids and adaptations
 - Rent arrears and other breaches of tenancy conditions
 - Anti-social behaviour
 - Relationship breakdown
 - Tenancy termination, successions and evictions
- 1.10. The Equality and Human Rights Commission has published a guide for social landlords on complying with the Human Rights Act. Our housing services team will refer to the guide, as required.

Scotland Act 1998 and Housing (Scotland) Act 2001

- 1.11. Although Equal Opportunities is reserved to the UK Parliament, the Scottish Parliament and Government also have powers to "encourage and promote" equal opportunities under the Scotland Act 1998. This is notable for two reasons:
 - Firstly, the Scotland Act uses a different (and in some respects wider) definition of equal opportunities than UK legislation

The Act refers to "the prevention, elimination or regulation of discrimination between persons on grounds of sex or marital status, on racial grounds or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes including beliefs or opinions such as religious beliefs or political opinions."

• Secondly, equal opportunities duties for RSLs are written into Scottish housing legislation

Section 106 of the Housing (Scotland) Act 2001 states that when providing housing and related services, "registered social landlords must act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements" set out in the Scotland Act.

Housing (Scotland) Act 2010: Scottish Social Housing Charter

- 1.12. The Scottish Government, through the Scottish Social Housing Charter (the Charter), sets standards and outcomes that all social landlords should aim to achieve when performing their housing activities.
- 1.13. The Charter took effect from 1 April 2012 and was revised in April 2017. It states the following obligations relating to equalities that all social landlords must meet:
 - Performing all aspects of their housing 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.
 - Complying with equalities legislation.
 - Understanding the needs of different customers and delivering services that recognise and meet these needs.

Section 1

Equalities Impact Assessment

Business Area:	Completed by (Lead):	Date of Initial Assessment:
Policy/Function/Service to be assessed:		
Is this an existing Policy/Service/Function or a new one?		
Describe the aims, objectives or purposes of the Policy/Function/Service, and		
who it is intended to benefit.		
Section 2		
What Evidence has been used to in	nform the assessment of the Policy	/Service or Function?
Section 3		
	uding individuals or representative	groups staff and other
stakeholders? Please provide deta		groups, start and other

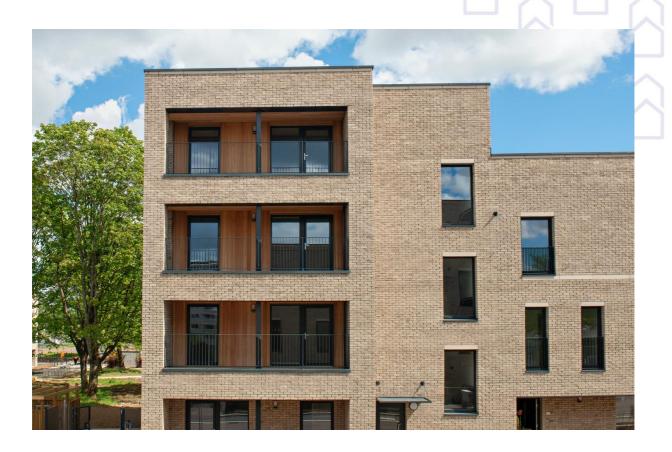
Section 4				
The Public Sector Equality Duty (PSED) requires SHA to have due regard to:		What is the level of impact of the	Identify any positive impact/s that could result	Identify any negative impact/s that could result
Eliminate unlawful discrimination, harassment and victimisation		Policy/Service/Fun ction on each protected characteristic	for each of the protected characteristic	for each of the protected characteristic
2. Advance equality of opportunity between different groups; and		group in terms of the three aims of the PSED?	groups.	groups.
3. Foster good relat different groups	ions between	Please indicate high (H), medium (M), low (L) or no impact (N) for each.		
	Age			
S	Disability			
Protected Characteristics	Gender Reassignment			
	Marriage & Civil Partnership			
	Race			
	Religion/Belief			
	Pregnancy and Maternity			
5	Sex			
<u> </u>	Sexual Orientation			

Section 5					
What action/s will be taken to reduce/address any disproportionately negative impact?					
Protected	Action/s	Intended	Responsible	Implementation	
Characteristic		Outcome/s	Officer	Date	
Age					
Disability					
Gender					
Reassignment					
Marriage & Civil					
Partnership					
Pregnancy &					
Maternity					
Race					
Sex					
Sexual					
Orientation					

Section 6				
Based on the information in sections 1-5, select which of the following apply to this				
Policy/Service/Function				
1. No major change				
2. Continue the Policy/Function	n/Service			
3. Amend or change the				
Policy/Function/Service				
4. Stop the Policy/Function/Service				
Lead Officer signature:	Approved by:		Date Approved:	







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