

Centrepoint Policy and Procedure Manual

A6 Equality and Diversity Policy for young people & learners

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Related policies and/or procedures:	<ul style="list-style-type: none"> • A3 - Centrepoint Service Promise • CP7 - Complaints & feedback policy • A5 - Participation policy • B2 - Safeguarding children & adults at risk policy • B4 - Relationship violence policy • B5 - Anti-social behaviour policy • B6 - Managing and reporting incidents policy • B11 - Move on policy • HR F3 - Equal opportunity policy (staff) • HR A2 – Recruitment & selection policy • Equality and diversity strategy • SE7 – Special considerations and reasonable adjustments policy
What laws or legislation impact on this policy	<ul style="list-style-type: none"> • The Equality Act 2010
Next review date due:	June 2020

1. Centrepoint policy

- 1.1 Centrepoint is committed to the promotion of diversity and inclusion in all areas of our work. We will ensure that young people, learners, staff, volunteers, visitors and others are able to achieve their full potential in an atmosphere which is free from prejudice, discriminatory behaviour or fear of harassment.

- 1.2 In fulfilling our role as a supported housing provider, training organisation, campaigning organisation and an employer, Centrepoint ensures that we treat people fairly under all equality strands regardless of age, disability, race, colour, nationality, ethnic origin, immigration status, socio-economic background, ability, caring/dependents status, age, gender, gender identity, gender reassignment, sex, sexual orientation, religion or beliefs/lack of religion or beliefs, pregnancy and maternity, marital status, appearance, HIV or AIDS

status, offending background, or any other matter which causes a person to be treated with injustice.

- 1.3 No individual will receive less favourable treatment on the grounds of their personal or social characteristics, and we will take steps to identify and proactively challenge any form of discrimination.
- 1.4 Centrepoint proactively seeks to understand and respond to the needs of all young people and learners we support and work with, through assessment of needs and risk. This incorporates the views and priorities of the young people and learners.
- 1.5 Centrepoint Skills & Employability Directorate is committed to removing barriers to accessing learning. If any young person has a disability or any other circumstance which makes it difficult for them to undertake study-related tasks, they will receive additional support, so that they are not disadvantaged.
- 1.6 We endeavour to foster and promote mutual respect and appreciation of diversity in our community. Centrepoint operates a zero tolerance approach to all forms of harassment,
- 1.7 We outline the expected standards of behaviour within our services to all staff, young people, learners, volunteers and visitors.
- 1.8 Centrepoint is committed to continuous improvement so all equality issues are addressed and practice is reviewed to prevent re-occurrence.
- 1.9 The Equality and Diversity policy, and others if requested, will be available in different formats, such as languages, large print and recorded upon reasonable request.

2. Purpose

- 2.1 This policy and the accompanying procedures will;
 - 2.1.1 Outline our equality values and practice in our direct work with young homeless people
 - 2.1.2 Meet our duties as a registered provider of social housing and training
 - 2.1.3 Help staff to understand the diverse needs of young people and learners, helping them to tailor any required support appropriately
- 2.2 Centrepoint complies with relevant regulations and codes of practice, and this policy has been devised referencing the requirements of funding agencies, awarding bodies and quality standards e.g. The matrix standard, also including:
 - 2.2.1 Homes and Communities Agency – Regulatory Framework
 - 2.2.2 Equality and Human Rights Commission – Equality Act Codes of Practice and Technical Guidance
 - 2.2.3 Supporting People – QAF Core Objective 1.4 Fair Access, Diversity and Inclusion

3. Scope

- 3.1 This policy is aimed at all members of the Centrepoint community; however it is specifically relevant to staff and volunteers working directly with young people and learners.
- 3.2 This policy complements Centrepoint's Equal Opportunity Policy, primarily covering employment requirements.
- 3.3 Our Equality and diversity strategy supports this policy, associated procedures and covers all areas of Centrepoint's work.

4. Definitions

- 4.1 **Equality and diversity:** The recognition that individuals have the right to equality (of treatment, access to services, and so on) and respecting and appreciating the diverse nature of our communities.

(Adapted from guidance from the Equality and Human Rights Commission) **Disability:** "A physical or mental impairment" which has "a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities"

(The Equality Act 2010)

- 4.2 **Direct discrimination:** Occurs when a person is treated less favourably than another person in comparable circumstances is, or would be, treated because of their difference (i.e. age, disability, gender, ethnicity etc.). *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.3 **Indirect discrimination:** This means that a condition or practice is applied that adversely affects a considerably larger proportion of one group than the others and it is not justifiable to apply that condition or practice. *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.4 **Harassment:** Participating in, allowing or encouraging behavior that offends someone or creates a hostile atmosphere e.g. the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. *(Adapted from the Equality Act 2010: What do I need to know? A summary guide for voluntary and community sector service providers)*
- 4.5 **Victimisation:** This means treating someone less favourably than others because they have, for instance, complained of discrimination or they have assisted someone else to do so.

5. Risk factors

The primary risks of not managing equality matters effectively are;

5.1 Risks to young people and learners:

- 5.1.1 A lack of understanding and respect of equality and diversity amongst young people and learners, leading to conflict.

5.1.2 Long-term effects on health and well-being as a result of abuse, discrimination or harassment

5.1.3 Barriers to young people and learners, resulting in a lack of fair access to services, education and equal opportunity to benefit from these.

5.2 **Risks to staff and volunteers:**

We expect front line staff and volunteers to proactively challenge any form of discriminatory behaviour, regardless of their own personal beliefs. Failure to do so could result in discriminatory practice, leading to disciplinary action and or prosecution.

5.3 **Risks to the organisation**

As a housing and support provider and a training organisation, Centrepont has statutory, regulatory and legal duties to comply with the Equalities Act 2010. Failure to do so could result in damaging outcomes for the organisation including;

5.3.1 Allegations of Discrimination

5.3.2 Reputational and financial damage

5.3.3 Loss of contracts and/or funding, which would ultimately lead to the closure of services.

6. Participation statement

6.1 Centrepont is committed to involving young people, learners and key stakeholders in how we manage and improve our direct services. When this policy or procedure is reviewed, we will endeavour to consult and involve young people, learners and stakeholders to consider their views.

7. Commitment to review

7.1 This policy, its accompanying procedures and any supporting documents will be reviewed annually or sooner where any changing legislation has an impact.

B Accompanying Procedures

Procedures title:	Equality and Diversity Procedures
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Date of last full review:	April 2016
Date of last minor update:	June 2019
Approved by:	Director of Housing & Support and Director of People, Skills & Employability
Supporting documents:	<ul style="list-style-type: none"> • Equality and human rights commission guidance Equality and diversity leaflet (A6 SD1) • Equality & diversity strategy • Equality Impact assessment
Training that supports the application of these procedures:	<ul style="list-style-type: none"> • Equality and Diversity • Equality and Diversity for managers • Domestic violence • Safeguarding awareness • Safeguarding designated persons
Next review date due:	June 2020

1.	Key Responsibilities
2.1	Anti-discriminatory practice
2.2	Educating & Supporting young people about equality & diversity
2.3	Equality planning, target setting & monitoring
2.4	Fair access – referrals & acceptance; access to information & advice; fair exit
2.5	Participation
2.6	Service Delivery
2.7	Managing & monitoring Incidents
2.8	Complaints & Feedback
2.9	Procurement
2.10	Asset Management
3.	Recruitment & training requirements

1. Key responsibilities

1.1 **All staff** are responsible for:

- Having an awareness of and being trained in equality and diversity practice (mandatory)
- Adhering to all equality and diversity legislation and complying with regulatory requirements
- Challenging and preventing any discrimination, harassment or inappropriate behaviour within services

1.2 In addition, **all managers** are responsible for:

- Recruiting and training staff to work within equality and diversity legislation and regulatory requirements
- Planning and monitoring services in line with equality & diversity practice

- Reviewing equalities data and setting targets to address gaps or weaknesses and monitor performance against these e.g. targeting under-represented groups
 - Recording and monitoring equalities data on successful and unsuccessful service referrals, service use and service outcomes.
 - Setting and monitoring performance against equality access targets for under-represented groups as identified by the Equalities Action Plan.
- 1.3 In addition, **all senior managers** and the **Senior Executive Team** are responsible for:
- Management oversight of equality and diversity practice in Centrepont
 - Taking action to ensure anomalies are addressed
- 1.4 The **Centrepont Board** are responsible for:
- Overall monitoring and assessment of equality and diversity practice within Centrepont, and ensuring compliance with required standards

2. Detailed procedures for Equality and diversity

The following gives an overview of guidance for operating within some key business areas.

2.1 Anti-Discriminatory practice

2.1.1 Centrepont is opposed to all forms of discrimination, victimisation and harassment. To this end we consider, amongst other things, the following to be unacceptable and will address them if they arise:

- The use of verbal comments, innuendo or humour which may give rise to insult or offence
- Offensive gestures
- Bringing onto the premises and/or distributing materials, which may incite discrimination
- The use of social networking sites, email or text messages to convey verbal abuse or display offensive images
- Any displays of offensive items, posters or other images or text
- Written comments including graffiti liable to offend or insult others
- Making threats against individuals or groups
- Inappropriate and/or unwelcome physical contact
- Any form of relationship violence/abuse

2.1.2 Centrepont will treat any incidents of discrimination and harassment with a zero-tolerance approach and will deal with them using appropriate policies by:

- Offering an immediate response, including sanctions such as warnings or evictions (depending on the severity/frequency of the incident)
- Offering mediation between victims and perpetrators to educate each other about feelings and promote acceptance and understanding to enable more harmonious relationships going forward

- Enforcing compulsory attendance on Equality and diversity and/or Sex and sexuality Lifewise courses
- Supporting victims in dealing with the complaint, including reporting to the police and accessing victim support
- Involve relevant external specialist organisations in educating perpetrators and supporting victims of discrimination/harassment
- Maintaining full records of all such incidents, regularly reviewing them and taking action to prevent reoccurrence
- Seeking to develop good practice to eliminate further occurrences
- Working in partnership with local organisations such as the police, Safer Neighbourhoods Teams and Hate Crime units to develop strategies to reduce further occurrences

2.1.3 Where an incident is witnessed, examples of appropriate policies to use are:

- Anti-social behaviour policy (provides guidance on how to report incidents of harassment and appropriate actions to take)
- Relationship violence policy (if the behaviour is within a relationship)
- Warnings and evictions policy (to be used if the behaviour warrants such sanctions)
- Complaints & feedback policy (which is explicit in how to report discrimination and should be offered to victims if they wish to formally report their experience)
- Managing and reporting incidents policy (all incidents of discrimination, harassment etc. should be recorded and reported at all times)

2.1.4 Some simple equality and diversity measures for colleagues to consider might include;

- When arranging events for young people and learners – is the event inclusive and are there any special dietary needs?
- When young people and learners are referred to Centrepoint – is the process inclusive and fair to all who come into contact with the service?
- When young people and learners begin using a service, either give them a Welcome Handbook (if it is accommodation), or other service information to let young people and learners know what they can expect from us and what is expected of them whilst using a Centrepoint service. Ask the young person or learner if they want it in another format or language.

2.2 **Educating and supporting young people about equality & diversity**

2.2.1 Centrepoint supports young people and learners to understand equality and diversity issues through our support model and through Lifewise.

2.2.2 The Welcome Handbook has a statement on equality and diversity for young people and those in our accommodation services are asked to sign the Support Agreement, which states that they agree to follow the equality and diversity statement in the Welcome Handbook.

2.2.3 A range of information on equality and diversity is available in services, including posters on equality and diversity, harassment and anti-social behaviour and an **Equality & Diversity leaflet** (A6 SD1), which can be given to young people and learners.

2.2.4 Colleagues should develop and use partnership working with a range of external organisations and services (for example, domestic violence/abuse support, LGBT support, religious and cultural agencies, hate crime organisations, young carers support, etc.), to offer specialised learning and support for equality and diversity issues and promote mutual respect amongst the community.

2.2.5 Young people and learners are encouraged to feedback any concerns they have on equality and diversity issues to staff.

2.2.6 Equality and diversity education is available to all young people through Lifewise and various cultural activities organised across services (such as Black History Month and Refugee week)

2.3 **Equality planning, target setting and monitoring**

Managers should lead their services to;

- Be familiar with QAF core objective 1.4 Fair access, diversity and inclusion and comply with the standards defined within this
- Set annual KPI targets and monitor the diversity of young people using our services to ensure equality of opportunity
- Consult young people and learners on equality issues and include equality improvement actions in their annual work plans and review progress quarterly
- Include equality and diversity on team meeting agendas
- Target 'hard to reach groups' in the local area.

2.4 **Fair Access – referrals & acceptance; access to information and advice; and fair exit**

2.4.1 **Referrals and Acceptance** - We want to ensure that:

- Referrals to our services and subsequent acceptance into the services are proportionate to the profiles of homeless people within the local area.
- The method of referral or way of presenting the service does not raise barriers to accessing the service
- We find out the most relevant communication methods for each young person and these are used at every stage of the referral and assessment process. Examples of preferred communication methods would include:
 - Verbal communication
 - Use of an interpreter
 - Sign language
 - Documents in BRAILLE
 - Documents in large font
- The assessment processes are outlined in our documentation and procedures, and all young people are made aware of them. Staff must ensure that all young people are informed of the appeals process and there is a fact sheet provided to help young people understand this, which should be used at all times.
- Young people and learners must be informed that they can request an interpreter.

2.4.2 **Access to information and advice**

- All young people should receive a Welcome handbook or service information, which is written in plain English and sets out both what they can expect from the service and what the expectations are. Alternative formats can be offered to young people according to their needs (e.g. translation or BRAILLE).
- Posters in services can also be translated and a variety of these already exist (see Translations library)
- In addition, the subject matter should be sensitive to the target audience. For example, information on domestic violence support should be made available in such a way that a perpetrator is unable to restrict the access.
- In all cases, colleagues can offer translation and interpretation services to any young person where required.

2.4.3 Fair exit from a service

- All young people should be made aware of the grounds Centrepont uses for terminating a service through the Welcome handbook, service information, occupancy agreement and various policies.
- When terminating a service, for whatever reason, staff should follow these policies and procedures as appropriate:
 - Rent arrears
 - Warnings and evictions
 - Possession proceedings
 - Abandonment
 - Leaving a service
 - Moving on
 - Anti-social behaviour
- All young people and learners should be made aware of the appeals procedure if they are unhappy with the process.
- When terminating a service, staff should inform young people and learners of how to access advice and other services in the community. Standard templates are to be used when issuing warnings, evictions and rent arrears letters.
- Move on from accommodation services should be addressed with each young person early on through the Move on plan, completed as part of My Goals. The process should be explained to young people at the assessment, and translation is to be made available where necessary.

2.5 Participation

2.5.1 Participation activities should represent, reflect and appeal to the diversity of young people in Centrepont services. Young people and learners should be encouraged to participate in all aspects of their service and efforts should be made to remove any barriers that may prevent particular groups from doing so.

2.5.2 A range of consultative methods should be employed, such as online/paper surveys, meetings, forums, focus groups and telephone interviews. This will ensure as many young people are consulted as possible and will take into account preferred methods of communication, literacy or language needs, caring responsibilities, religious sensitivities or any other matter that may place a barrier to involvement.

2.5.3 Young people and learners should be consulted on the best ways to target specific communities/groups and ensure their voices are heard.

2.6 Service delivery

2.6.1 **Celebrating diversity:** Resources are made available to support a range of equality and diversity activities such as Black History Month, and Refugee Week. Opportunities for community and social activities should be provided for young people to make friends and share common experiences, for example women's or LGBT groups.

2.6.2 **Religious/cultural customs:** Services should provide dedicated spaces for young people to observe religious/cultural customs, for example, space for prayer.

2.6.3 **Meeting cultural/religious/social need:** Young people and learners should be supported to meet their cultural, religious or social needs. Colleagues should explore with each young person what these may be and ensure young people have access to a range of mechanisms to do so. For example, through linking in with local agencies or community services, accessing learning opportunities or organising specific activities within Centrepont. These should be well advertised.

2.6.4 **Considering adaptations:** Staff should consider what changes they may need to make to the delivery of the service to give those with disabilities an equal advantage

2.6.5 **Employment, training and education:** Here at Centrepont, we aim to bring down barriers to education, and every young person and learner is welcomed and is respected as individuals. We recognise the importance of providing tailored, quality support to all our young people, embracing their differences.

2.7 Managing and Monitoring Incidents

2.7.1 All incidents involving discriminatory behaviour, harassment or victimisation should be recorded and reported in line with the managing and reporting incidents policy, to ensure that they are dealt with effectively.

2.7.2 Managers should monitor incidents of harassment, bullying, and relationship violence closely to ensure any emerging trends are identified and addressed.

2.8 Complaints & Feedback

2.8.1 Young people and learners are entitled to complain to a service where they perceive unfair or discriminatory treatment. All complaints are investigated and responded to in line with our Complaints & Feedback policy (CP7).

2.8.2 Managers should monitor complaints, and pay attention to demographics to protect particular groups of young people (e.g. gay, lesbian, BME, disabled or any other equality strand)

2.9 Procurement

2.9.1 Centrepont works with a range of external companies and individuals, for example contractors, suppliers and consultants, some of whom come into contact with our young people. They are expected to share and comply with Centrepont's commitment to equality and diversity. To this end, all contractors, suppliers and consultants should be:

- Made aware of our equality and diversity practice and demonstrate their commitment to this
- Challenged where they do not adhere to this (and if necessary cease contracts etc.)

2.10 Asset management

2.10.1 Centrepoint services should be accessible for young people and learners with disabilities. To this end, Disability Discrimination Act assessments are to be carried out to identify access requirements, which can then be met through reasonable adjustments to properties, including communal areas. This should also be factored into planned maintenance and redevelopment programmes.

2.10.2 Accurate and up to date records of adapted properties are to be kept to ensure that housing is allocated appropriately in future.

3. Recruitment and training requirements

3.1 Centrepoint aims to have a workforce that reflects the diversity of the environment within which it operates. Our website and recruitment adverts outline our equality statement.

3.2 All employees are expected to share and commit to equal opportunities and the value of diversity and we equip them with guidance and training

3.3 In addition, Centrepoint strives to ensure our Board represents and reflects the diversity of the community we serve, and possess the range of skills, knowledge and experience to effectively govern the organisation and ensure it meets its Equality and diversity objectives.

3.4 Once recruited, all staff must receive equality and diversity training as part of their induction.