



Somer Housing Group

Gender Equality Scheme

April 2008



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Appendix 1 – Gender Equality Action Plan

1. Introduction

It is with great pleasure that I present to you our Gender Equality Scheme, the first for Somer Housing Group. It demonstrates our commitment to eliminate discrimination and to promote equality of opportunity between men and women. The Scheme details the steps we intend to take over the next three years to achieve this.

Although there is a regulatory requirement to produce this scheme, we have been addressing equality issues through our Group-wide Strategy for a number of years now; gender being one of our six identified strands of diversity. We have already made considerable progress in providing gender equality in all areas of our business, and the priorities and actions outlined in our scheme will provide an added impetus to this work.

The scheme forms part of our long-term strategy to embed equality into our work, and we will continue to strive to create a culture that respects and welcomes diversity, providing an environment in which our staff can develop to their full potential and a service to our customers which meets their individual needs.

Somer Housing Group's Boards and management are committed to overseeing the implementation of the Gender Equality Scheme, ensuring that equality and diversity remains at the heart of who we are and what we do.



Steve Watson
Chief Executive, Somer Housing Group

2. The Legal Context

Sex Discrimination Legislation

The **Sex Discrimination Act 1975** (SDA) applies to both men and women and makes sex discrimination unlawful in:

- Employment and vocational training;
- Education;
- The provision and sale of goods, facilities and services and premises.

In employment and vocational training, it is also unlawful to discriminate against someone on the grounds of being married or a civil partner or on grounds of gender reassignment.

From December 2007, it is unlawful to discriminate on grounds of gender reassignment in the provision and sale of goods, facilities and services.

The **Equal Pay Act 1970** makes it unlawful for employers to discriminate between men and women in terms of their pay and conditions where they are doing the same or similar work, work rated as equivalent or work of equal value.

Types of Discrimination

There are three types of discrimination for which protection is provided by the SDA:

- Direct Sex Discrimination occurs where a person of one sex is treated less favourably on grounds of sex than a person of the opposite sex would have been treated in the same circumstances. Direct discrimination includes sexual harassment.

Sexual Harassment is defined as unwanted conduct on the grounds of a person's sex or unwanted conduct of a sexual nature where that conduct has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them. If an employer treats a member of staff less favourably because they have rejected, or submitted to, either form of harassment described above, this also counts as sexual harassment.

- Indirect Sex Discrimination occurs when a requirement or condition is applied which, on the face of it, appears to apply equally to men and women, but which in practice can be met by far fewer people of one gender than the other and this condition or requirement cannot be justified.
- Victimisation occurs when individuals are discriminated against because they have exercised their rights under the Act.

Positive Action

The term 'positive action' refers to a variety of measures designed to counteract the effects of past discrimination and to help eliminate gender stereotyping.

Positive action is frequently confused with positive discrimination. Positive discrimination generally means employing someone because they come from a disadvantaged group, regardless of whether they have the relevant skills and qualifications, and this is unlawful.

Positive action in terms of the Sex Discrimination Act permits special single sex training initiatives either to equip people to work in jobs where their gender is underrepresented or to return to work after a period at home looking after children or other dependents. The Sex Discrimination Act also permits special encouragement to the under-represented gender in job advertisements.

The Equality Act 2006

The Equality Act 2006 amends the Sex Discrimination Act 1975 and places a statutory duty on public authorities, to promote gender equality and eliminate sex discrimination.

The Gender Equality Duty

The aim of the gender equality duty is to make gender equality central to the way that public authorities work. It is intended to address the fact that, despite 30 years of individual legal rights to sex equality through the Sex Discrimination Act 1975, there is still widespread discrimination (sometimes intentional and sometimes unintentional) and persistent gender inequality in the UK. Policies and practices that appear to be neutral can often have a significantly different impact on women and on men.

We must identify and tackle discrimination, prevent harassment and ensure that our work promotes equality between men and women. Gender equality should be built into our core business thinking and processes.

The duty is different from previous sex equality legislation in that organisations must now take action rather than waiting for individuals to make a complaint. We are also required by this legislation to promote equality and not just avoid discrimination.

3. The Regulatory Context

As a registered social landlord we are not considered a public authority. However, the Housing Corporation is subject to the Gender Equality Duty and has transferred the essence and theme of the duty to housing associations.

The Housing Corporation expects housing associations as a minimum requirement to produce a gender equality action plan by April 2008. However, it recognises that the most effective way of demonstrating the association's commitment to gender equality is by developing a Gender Equality Scheme and action plan together.

Somer Housing Group has chosen to develop a Scheme and action plan.

Gender Equality Scheme

From April 2008, Somer Housing Group must have due regard for the need to:

- Eliminate unlawful discrimination and harassment
- Promote equality of opportunity between men and women.

The term 'due regard' means taking into account the gender issues, proportionate to their relevance.

Gender equality does not mean that men and women must always be treated in the same way, but that they should be treated appropriately and according to their needs.

Specific Duties

In order to comply with the General Duty, Somer Housing Group must:

- prepare and publish a Gender Equality Scheme
- consider the need to include objectives to address the causes of any gender pay gap
- gather and use information on how our policies and practices affect gender equality in the workforce and in the delivery of services
- consult stakeholders (i.e. staff, service users and others, including trade unions) and take account of relevant information
- assess the impact of our current and proposed policies and procedures
- implement the actions set out in our scheme
- report against the scheme every year and review it every three years.

4. Our Approach to the Scheme

Somer Housing Group reviewed its Group-wide Equality & Diversity Strategy in 2007. One of the objectives of the review was to consider the Group's approach to and performance in gender equality.

The review produced a series of recommendations which have been incorporated into the new strategy. An early priority of the new strategy was to produce the Group's gender equality scheme. It is noted that the relevant elements of the new strategy have been drawn into the GES.

Extract from the Strategy:

"The overall goal...is to achieve equality of opportunity for an increasingly diverse customer and employee population and to provide excellent services that meet the needs and preferences of the individual."

This is our first Gender Equality Scheme and action plan and is intended to be a document that co-ordinates the work of the Group in relation to gender. It sits within the Group's over-arching Equality & Diversity Framework and the resulting action plan will be delivered within each member organisation.

The development of the GES follows the same model as our Disability Equality Scheme (published December 2007) and the guidelines published by the Housing Corporation in Good Practice Note 8, and Circular 10/07.

The Group's Quality & Performance Manager has led the process with involvement from other key members of staff, customers and stakeholders.

5. Where are we now?

As part of our drive to achieve service excellence, we have developed a number of action plans from a self-assessment of the Audit Commission's Key Lines of Enquiry (KLOEs). With particular reference to **KLOE 31-Diversity**, we are already improving our approach to ensure our organisation offers a service that is equal and diverse to all.

We have developed an **Equalities Impact Assessment** process which allows gender issues to be considered alongside all other equality issues. Using a toolkit, assessments are being carried out on new policies and services as they are developed.

We have a policy on the **Prevention of Harassment at Work**. The policy makes explicit reference to sexual harassment, complaints on the basis of which are monitored.

We have a **Public Interest Disclosure or “whistle blowing” policy**, which extends the protection for employees who want to report bad practice without fear of being victimised as a result.

We have a **Recruitment and Selection** process to ensure candidates and potential candidates are treated fairly and consistently throughout the process. This is supplemented by a training course as part of the training programme.

We have a **Maternity, Maternity Support, Paternity and Adoption Pay and Leave Policy** which exceeds statutory requirements and meets best practice. We are committed to supporting Maternity, Maternity Support, Paternity and Adoption pay and leave to enhance the work/life balance enjoyed by our staff.

We have a **Parental Leave Policy** which permits parents to take a period of time off to look after a child or make arrangements for the child's welfare.

We operate a **Working from Home policy** which recognise that a more flexible working arrangement improves the work-life balance for staff and can increase productivity for us.

As part of **Workplus**, our employee rewards and benefits' scheme, we offer childcare assistance. This scheme which is operated by Bath and North East Somerset Council allows staff to sacrifice part of their salary for childcare vouchers at a saving of up to 10%.

Both Somer Community Housing Trust and Redland Housing Association has a **Domestic Violence Policy** which states our commitment to offering assistance to any of our residents who are suffering from domestic violence or threats of violence. We are committed to raising awareness of domestic violence and abuse as a serious crime.

Employee Profile

As at 17 March 2008 Somer Housing Group employed 340 staff.

The gender breakdown is as follows:

Staff	Number of Females	Number of Males	Percentage Female	Percentage Male	Total
All staff	173	167	50.9%	49.1%	340
Group Executive (Director level)	3	3	50%	50%	6
Leadership Team/Supervisory	33	28	54.1%	45.9%	61

Board Member Profile

As at 17 March 2008, Somer Housing Group had 41 Board Members.

The gender breakdown is as follows:

Board	Number of Females	Number of Males	Percentage Female	Percentage Male	Total
All Board Members	18	23	43.9%	56.1%	41
Somer Housing Group	4	5	44.4%	55.6%	9
Somer Community Housing Trust	7	5	58.3%	41.7%	12
Redland Housing Association	4	6	40%	60%	10
Bath Self Help	3	7	30%	70%	10
Chairs	1	3	25%	75%	4

6. How we developed this Scheme – Consultation & Involvement

Somer Housing Group is committed to reviewing its services in consultation with its customers to identify needs that are not being met and any real or perceived barriers to service access. In addition, there is a commitment to analyse the workforce and develop strategies to match it to the diverse community it serves and to provide a working environment in which staff can develop to their full potential.

In order to produce an effective Gender Equality Scheme, which will achieve real and relevant advances in our working practices; we consulted with our staff and customers.

Staff

Somer Housing Group recognises that our employees will only be able to perform at their best if they know their duties, obligations and rights and have an opportunity of making their views and concerns known to management on issues that affect them. Good communications and consultation are central to the management process and assume critical importance when dealing with changes in working practices and procedures.

In the development of our GES, we consulted with our staff to assist in identifying our priorities in terms of employment issues.

As part of the internal consultation process, a questionnaire was issued to all staff (340). 103 responses were received, a response rate of 30.3%

This was broken down as follows:

Female	Male	Transgender	Not specified
63	36	1	3

Headline results

97% of respondents believe that Somer Housing Group has an inclusive culture.

91% of respondents cannot think of an occasion where they feel they were treated less favourably or discriminated against due to their gender

- Of the 9% of respondents who feel they have been treated less favourably, 55.6% were female and 44% male.
- Issues for female employees were predominantly around sexist behaviour/attitudes of male colleagues
- Issues for male employees were predominantly around lack of flexible working opportunities for men

94% of respondents cannot think of an occasion at work where they feel they were harassed or bullied due to their gender.

- Of the 6% of respondents who feel they have been harassed or bullied, 50% were female and 50% were male.
- Comments weren't provided as to the circumstances or issues.

91% of respondents don't think there are any policies or practices that inadvertently discriminate against customers on the basis of their gender.

85% of respondents do not think there are any policies or practices that could be changed to improve access to our services by men or women

Staff were asked to indicate whether they feel men, women and transgender people at Somer Housing Group are treated equally in key business areas.

Respondents identified the following as being main areas for concern, feeling that the different genders are not treated equally in:

Remuneration

- **8.6%** of respondents felt that females were not treated equally in remuneration. All of these respondents were female.

Family-friendly policies

- **14%** of respondents felt that the genders were not treated equally in family-friendly policies.
- 5.4% of male respondents felt that **males** were not treated equally.
- 3.2% of female respondents felt that **males** were not treated equally.
- 3.2% of female respondents felt that **females** were not treated equally.
- 2.1% of female respondents felt that **transgender people** were not treated equally.

Flexible Working

- 9.5% of respondents felt that the genders were not treated equally in flexible working.
- 6% of male respondents felt that males were not treated equally

Respondents felt there was some inequality with:

- Recruitment and selection
- Appraisal/Performance Management
- Training & Development
- Promotion Opportunities
- Office facilities

Respondents felt there was no inequality with:

- Information and Communication Technology
- Departmental facilities/support
- Policies and procedures e.g. grievance and disciplinary

Customers

As part of the development of our GES, we carried out consultation with the Redland Residents' Panel to get a snapshot of views from our residents. The questionnaire was sent to 51 residents, and we received 12 returns (a 24% response rate.)

Overall the questionnaire returned very positive results about gender and service delivery.

The majority of Redland's residents feel that services are sensitive to the different needs and concerns of men, women and transgender persons.

Many respondents felt that Redland are doing all they can to ensure that all customers are treated equally, regardless of gender.

Only one respondent felt that a member of staff or a specific service had discriminated against them because of gender.

Suggestions for improvement:

- Better awareness raising
- Satisfaction monitoring by gender
- Less about gender – more about the individual needs of the customer.

7. Developing the Action Plan

The Gender Equality Scheme is accompanied by an action plan for improvement.

Based on our consultation the action plan needs to focus in the first instance on:

- Staff Remuneration/Equal Pay
- Flexible Working
- Family Friendly Policies
- Awareness raising
- Monitoring

8. Monitoring and review

Critical to the success of the scheme is our commitment to regularly review progress against the objectives established in the action plan and to plan for further improvements. The Quality & Performance Manager will be responsible for reporting progress on a quarterly basis to the Group Executive via the existing quarterly equality and diversity progress report.

Progress will be published to customers and staff on our website and through newsletters. There will be an initial review after six months where we will have completed a number of actions and developed further actions.

The most effective way of monitoring the impact and success of the GES is through feedback from customers, including complaints. In order to achieve this, a wide range of feedback methods needs to be available and for the feedback to be monitored by gender. The implementation of a satisfaction framework is a priority for the action plan.

9. Conclusion

We would like to thank our customers, staff, Board members and other stakeholders who helped develop Somer Housing Group's first GES. We hope that it goes some way to demonstrate how important we regard gender equality and what our role is in achieving it.

10. Further information

If you have any comments or questions about Somer Housing Group's Gender Equality Scheme, please contact the Quality & Performance Manager on 01225 366022 or email enquiries@somer.org.uk

A full copy of the consultation results is available on request.

If you would like this document in an alternative format, please contact Rebecca Wright, Communications Administrator on 01225 366040 or email rebecca_wright@somer.org.uk

Useful websites:

www.equalityhumanrights.com – Equality and Human Rights Commission
www.equalities.gov.uk/ - Government Equalities Office (Women and Equality Unit)
www.equalitysouthwest.org.uk – Equality South West
www.womensaid.org.uk/ - Women's Aid