



GENDER EQUALITY POLICY



MARCH 2008

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1 INTRODUCTION

- 1.1 Cosmopolitan Housing Group is committed to eliminating discrimination, promoting equality and celebrating diversity in all activities in which it engages. This Gender Equality Scheme is complementary to the Group's Equalities and Diversity Strategy and central to its approach to ensuring that its services are accessible and inclusive. It is also a key business objective for the Group to 'Champion Equality and Diversity'.
- 1.2 The Gender Equality Scheme has been developed as a "live" scheme that will evolve over time. The Group will monitor progress against its Gender Equality Action Plan and regularly update it to ensure that it remains relevant and in line with the Group's values and objectives.
- 1.3 This Policy sets out how the Group will meet the general and specific duties to promote gender equality as required by the Equality Act 2006, and passed on to housing associations through the Housing Corporation Circular 10/07. It will use this as the platform for promoting gender equality, including those persons that identify themselves as transsexual.

2 BACKGROUND

- 2.1 The Equality Act 2006 amended the Sex Discrimination Act (SDA) to place a statutory duty on all public authorities, when carrying out their functions, to have due regard to the need to:
 - eliminate unlawful discrimination and harassment
 - promote equality of opportunity between men and women
- 2.2 The '**general duty**' applies to all public authorities, including the Housing Corporation, who passes the duty on to housing associations through its Circular 10/07. It covers all activities undertaken by housing associations, including service provision and employment related issues delivered directly and through its agents.
- 2.3 The Group is therefore required to have 'due regard' to the need to eliminate unlawful discrimination and harassment and promote equality of opportunity between men and women in all its activities.
- 2.4 Due regard comprises two linked elements: proportionality and relevance. The weight which a housing association gives to gender equality should be proportionate to its relevance to a particular function. The greater the relevance of a function to gender equality, the greater regard which should be paid to it.

2.5 To support progress in delivering the general duty, there are a series of ‘**specific duties**’ which apply to housing associations. These are set out as follows:

- to prepare and publish a gender equality scheme
- to consider the need to include objectives to address the causes of any gender pay gap
- to gather and use information on how policies and practices affect gender equality in the workforce and in the delivery of services
- to consult stakeholders (i.e. employees, service users and others, including trade unions) and take account of feedback
- to assess the impact of its current and proposed policies and practices on gender equality
- to implement the actions set out in its scheme within three years, unless it is unreasonable and impracticable to do so
- to report against the scheme every year and review the scheme at least every three years

2.6 This Policy and related Action Plan (referred to as the “Scheme”) is the first which has been produced by CHG. The Scheme sets out how CHG intends to fulfil its general and specific duties relating to gender equality and the outcomes that it intends to achieve.

3 POLICY STATEMENT

3.1 Cosmopolitan Housing Group is committed to promoting and upholding the principles of gender equality in all the business activities in which it engages, including customer services, employment, and governance practice in order to bring about an equal housing experience for men, women and transgendered persons in everything that the Group does.

4 POLICY AIMS

4.1 This Scheme takes account of information on the effect of its policies and practices on men and women. The Scheme sets out CHG’s overall objectives in relation to gender equality and seeks to address causes of differences.

4.2 The Scheme identifies the actions CHG will take in the form of an Action Plan, which has the overall aims to:

- gather information on the effects of CHG's policies and practices
- make use of that information
- assess the impact of our policies and practices
- consult our employees and service users
- achieve our objectives

5 POLICY OBJECTIVES

5.1 There are five objectives that the Group intends this Gender Equality Scheme to achieve. They are set out as follows:

- improve the services and / or employment experience for all persons regardless of their gender to ensure that they receive an equal experience when they have contact with the Group
- assess whether there is any gender pay gap, identify the causes of this, and take actions to close this gap where present
- raise awareness of the needs of both men and women and promote services that meet their needs
- seek to actively discourage and eliminate discrimination and harassment that is linked to gender or gender identity
- provide opportunities for all persons to actively engage in and influence decision-making, regardless of their gender, so that they may shape the type and standards of services delivered by the Group

6 DEVELOPING A GENDER EQUALITY SCHEME / CONSULTATION

6.1 The production of this Gender Equality Scheme is within the Group's broader Equality and Diversity Strategy and Action Plan Framework. Indeed, the production of this scheme was a specific action identified within the broader Action Plan.

6.2 As a consequence, this Scheme is an extension of the Group's strategic stance and activities already undertaken within this agenda. The Group acknowledges that it is only possible to develop priorities for action through engagement with staff and service users. This is already part of the Group's on-going activities in this area and a wealth of information has already been collated. However, it is acknowledged that further and continuous feedback is required in order for the

Scheme to operate effectively and remain relevant and in line with the needs and aspirations of both the men and women that the Group serves.

6.3 Examples of information and exercises undertaken to collate relevant information include the following:

- discussions in relation to Gender Equality with the Association's Tenants Forum.
- staff surveys
- a STATUS Survey was undertaken by the Association in 2006. Some key highlights from this survey include the following:
 - The gender breakdown of the tenant population is male – 38.2% and female 61%. 0.8% did not declare, which could include transgendered persons
- a Tenant Census has been undertaken to collate details about the needs of CHA's tenants. This includes details specific to gender. This information allows CHA to proactively identify the needs of disabled persons and provide services that meet these needs accordingly
- service specific feedback is received across a broad range of areas, which includes details of gender
- monitoring of complaints satisfaction levels with regards to gender
- management information, including key performance information

7 CHALLENGES

7.1 The Group has faced a number of challenges in the creation of its Gender Equality Scheme. This means that the level of engagement has not been as extensive as the Group would have wished. Some challenges have included the following:

- limited timescales for scheme completion
- many inequalities may be the result of indirect and broader societal preconceptions about the respective roles of males and females
- some information is unavailable, e.g. analysis of homelessness allocations by gender
- societal stereotypes mean that many transgender people may not be willing to divulge their status as such

- 7.2 A key priority for action for the Group in moving forward is therefore to extend and improve the sophistication of its monitoring information and analysis to enable it to better address the potential and real gender inequalities that exist.
- 7.3 A key challenge for the Group to address is to start to reverse the gender stereotypes that exist and work to combat gender inequalities. For instance, women are frequently disadvantaged by practices that do not recognise their greater caring responsibilities, their different patterns of work and greater vulnerability to gender based violence. Men are often disadvantaged by workplace cultures that do not support their caring responsibilities or by services that assume they have little or no role as parents.

8 GENDER PROFILE

- 8.1 The Group operates over a dispersed geographical area and across a diverse range of service activities.
- 8.2 Through the work of its subsidiary Cosmopolitan Housing Association, CHG has social housing properties across seven local authority areas in the Greater Merseyside area.
- 8.3 Through Cosmopolitan Student Homes, CHG operates schemes that are located in Liverpool, Preston, Manchester, Salford, Ormskirk, Stratford-upon-Avon, and Bradford.

National Profile

Housing

- 8.4 Whilst living arrangements for men and women are broadly similar, differences exist for those persons who are living alone. Some key facts derived from the 2001 Census include the following:
- a higher proportion of single men to single women are owner-occupiers (54%:40%)
 - nine out of ten lone parent families are headed by a woman, and nearly half of lone mothers are single (never married)
 - lone parents are more likely than any other group to be renting social housing, and half of lone mothers with dependent children live in this sector
 - lone mothers are more likely than lone fathers to be living in any sort of rented accommodation

- 890,000 adult resident live in communal establishments, 406,000 are men and 483,000 were women. Student halls formed the largest group in this category, for which there was an equal proportion of men and women
- 8.5 At the end of the third quarter of 2007, analysis of 16,540 acceptances by household type of statutory homeless persons showed that 45% were lone mothers, compared to 19% couples with dependent children and only 4% lone male parents.

Employment

- 8.6 Men and women have been protected from discrimination under legislation such as the Sex Discrimination Act 1975 and the Equal Pay Act 1970 for many years. However, despite this, discrimination still exists. Women still on average earn less than men, are less likely to be employed in senior management positions and are more likely to be responsible for caring for older relatives and children. The new Gender Equality legislation is intended to address these issues.
- 8.7 In particular, “occupational segregation” remains an issue. For example:
- less than 1% of people in plumbing occupations are women
 - only 2% of childcare workers are men
 - white women and ethnic minority women and men are particularly likely to be concentrated in low-paid jobs
 - a high proportion of Chinese and Bangladeshi men work as cooks and waiters
 - a high proportion of White, Pakistani, Black Caribbean and Black African women work as care assistants
 - vocational training remains highly segregated, with the proportion of apprenticeship starts for women in construction and plumbing at 1%, and engineering at 3%. On the other hand, men entering traditionally female dominated trades remains low for early years care and education (3%), hairdressing (9%), health and social care (13%) and business administration (23%)
- 8.8 With regards to pay at a senior level, the Housing Association Salary Survey 2007 showed that the average salary for a female Chief Executive was £79,500 per annum, compared to an average of £108,500 for men.
- 8.9 The *Inside Housing* salary survey in 2007 showed that only 1 of the top 10 top earning Chief Executives was a woman, and at lower levels women were paid between 92% and 99% of the salary for a man at the same level.

Group Profile

Governance

8.10 The table below shows the current gender profiles of the Boards within the Group:

Organisation	Number of Men	Number of Women	% Women
Cosmopolitan Housing Group	6	3	33%
Cosmopolitan Housing Association	6	5	45%
Cosmopolitan Student Homes	6	2	25%
Cosmopolitan Enterprises Limited	6	0	0%
Housing Association – National Average	n/a	n/a	30%

Employment

8.11 A breakdown of the CHG workforce by Department is as follows:

Department	No of Male	No of Female	% Male	% Female
CEO	1	1	50%	50%
CORPORATE SERVICES	3	1	75%	25%
HUMAN RESOURCES	0	6	100%	0%
FINANCE	3	6	33%	67%
HOUSING SERVICES	5	12	29%	71%
DEVELOPMENT	7	10	41%	59%
STUDENT	22	22	50%	50%
TOTAL	44	55	44%	56%

8.12 This compares to a national average of housing association staff being 63% women.

- 8.13 However, it is necessary to look more closely at the breakdown to identify trends associated with occupational segregation.
- 8.14 At senior management level, only one of seven persons is female (14.3%), compared to a national average of 37%.
- 8.15 However, taking all management positions into account, the Group performs much better, with 61% of management positions being held by women compared to 51% nationally. It also means that there is a small over representation of women in management positions across the Group compared to the overall proportion of women employed by the Group.
- 8.16 Other issues identified include the following:
- 100% (2 staff) of persons employed in an IT role are male.
 - 100% (x 15) of persons employed in a Caretaker / Warden role are male.
 - 100% (x 4) of persons employed in a PA / Secretary role are female.
 - 100% of persons employed as cleaners are female
- 8.17 Cosmopolitan Housing Association (CHA) is currently in the process of entering into a 10 year Repairs and Maintenance Partnering Contract with KHT Services. Details of gender breakdowns of contractors employed on CHA related activities are not currently available, although details of this will be a contractual requirement.

9 GENDER EQUALITY FOCUS

- 9.1 In addressing both the general and specific duties created under Gender Equality legislation, the Group will sub-divide its approach to achieving gender equality into three sub-areas as follows:
- Governance
 - Employment
 - Service Delivery
- 9.2 In addition to these areas, the Group also recognises that it has a broader role in contributing to gender equality through its partnership working, its support of local authorities, and its contribution to communities and regeneration.

Governance

- 9.3 Strong governance in relation to gender equality issues is essential to ensure that there is appropriate leadership and controls in place to meet the

commitments of the Group to the Equality and Diversity agenda. Actions include the following:

- all recruitment adverts for Board Members highlights the need for diverse membership. Where applicable, this will include statements encouraging applications from under represented groups, which may include gender where males or females are under-represented. Consideration will also be given to the location of advertisements, and the images and wording which may inadvertently be attracting one group more than another
- the Group seeks to ensure that the constituency of its Boards are reflective of the communities that they serve. This means monitoring the gender make-up of its Boards to seek to ensure that membership is reflective of communities served
- gender targets will be set for the representation at Board level with immediate effect and monitored thereafter
- as part of the wider contribution to the Equality and Diversity agenda, an Equality and Diversity Champion is appointed at Board level
- all Board papers are required to assess the implications of proposals in terms of Equality and Diversity issues

Employment

- 9.4 CHG has an established Equal Opportunities in Employment Statement. It highlights how CHG aims to be an equal opportunity employer and is determined to ensure that no applicant or employee receives less favourable treatment on the grounds of sex, disability, religious belief, marital status, colour, race or ethnic origins, or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.
- 9.5 When a person applies for a job with CHG, equal opportunity monitoring information is collected for each applicant. This is separated from the application form at the point of receipt, in line with best practice, and monitored by the Human Resources department.
- 9.6 In addition, CHG operates a variety of family friendly policies and initiatives such as:
- a flexi-time scheme
 - the right to request flexible working
 - enhanced Maternity Leave
 - paternity Leave

- part-time working for 12 weeks following maternity leave
- provision for parental leave
- provision for special leave including compassionate leave
- potential for home-working

9.7 CHG will also not tolerate any forms of harassment in the workplace, including sexual harassment, and will promote a culture that does not tolerate such practices.

Gender Pay Gap

9.8 The Equal Opportunity Commission (now the Commission for Equalities and Human Rights) state that the main factors that contribute to the gender pay gap are:

- discrimination including pay discrimination (often inadvertently but still illegal)
- women's disproportional share of caring responsibilities which can result in restricted career continuity and progression and women being over represented in part time posts
- the concentration of women in particular occupations characterised by lower levels of pay

9.9 CHG intends to minimise the potential for indirect pay discrimination through the operation of a transparent job spinal column points system, which evaluates the pay scale of each role on its merits. However, in light of this duty, CHG will re-visit its pay levels and undertake equal pay audits to ensure that no indirect discrimination is occurring.

9.10 In addition, CHG will continue to operate its full range of family-friendly policies, particularly for those persons with caring responsibilities. All employees of CHG may request changes to their working arrangements or work patterns to meet their personal needs.

9.11 CHG also operates a well resourced learning and development programme, which is committed to the on-going training and investment in staff, regardless of gender.

Employee Retention

- 9.12 CHG operates a range of family friendly policies that promote employee retention. In addition, part time working is offered to staff returning from maternity leave to assist them back into the workplace.
- 9.13 Moving forward, CHG will monitor the numbers of staff returning from maternity leave, with the intention of achieving a 100% return rate.

Widening Employment Opportunities

- 9.14 As an employer and commissioner of services, CHG has the potential to make a real contribution to addressing occupational segregation issues in its employment practices. Whilst CHG will not engage in illegal positive discrimination practices, it will proactively seek to promote employment opportunities in jobs in which particular genders are traditionally under-represented.
- 9.15 It will do this through a range of approaches, including the following:
- working with its partner KHT Services, who is a member of Fusion 21, to promote opportunities for women to gain employment to the construction sector and train in trades to become plumbers, plasterers, electricians and other similar trades
 - employment advertisements will carry statements encouraging applicants from traditionally under represented groups
 - due regard will be given to the literature and communications utilised by the Group, such as the promotion of positive images that highlight under-represented groups participating in particular activities

Service Delivery

- 9.16 As a provider of social housing, CHG is aware of several issues that highlight the importance of gender equality in the provision of CHG's services. These include the following:
- more women than men live in social housing because it is generally cheaper than private rented or owner-occupation.
 - women generally have a lower income than men. In 2006, the Equal Opportunities Commission (EOC) reported that, on average, women in full-time employment earned 17% less per hour than men. This translates into fewer housing options for women.

- men and women are homeless for different reasons. 16% of families re-housed by local authorities are re-housed because of domestic violence, and a majority of these are women. In 2001/02, 18,000 families lost their homes as a result of domestic violence.
- homeless women are also more likely to stay with friends and family, and are therefore more likely to remain hidden.
- on the other hand, hostel accommodation for men often has no facilities for children to stay or visit.

9.17 A number of key areas of service delivery have been identified as particularly relevant to achieving gender equality. These will be addressed in turn:

Domestic Violence

9.18 CHG has a range of domestic violence policies and procedures in place in relation to its social housing activities. These have been subject to recent review. They apply to both men and women, who are involved in both heterosexual and same sex relationships.

9.19 However, a Best Value Review of CHA's approach to tackling Anti-Social Behaviour is currently underway. This will include re-visiting CHA's approach to tackling domestic violence, and undertaking an Equality Impact Assessment on CHA's current approach.

Harassment

9.20 Whilst Racial Harassment has received greater attention in the post Macpherson period, harassment may be the result of a range of factors, which may include a person's gender or transgender status.

9.21 CHG has a responsibility in raising awareness of harassment based upon the grounds of gender as well as other diverse grounds.

9.22 CHA will also undertake Equality Impact Assessments on its Anti-Social Behaviour policies and procedures as part of the on-going Best Value Review.

Homelessness

9.23 The experiences and outcomes for different groups who find themselves homeless can vary. CHG will endeavour to better understand the circumstances in which people of different genders become homeless so that it can determine if its responses are appropriate and effective. It will commence this monitoring with immediate effect, and undertake regular monitoring to assess if any trends may be identified, and action taken to address any emerging issues.

Access to Affordable Housing

- 9.24 Accessibility to affordable housing can be affected by income which can differ as a result of pay gaps between men and women and occupational segregation, as outlined above.
- 9.25 CHG participates in the provision of low cost home ownership (LCHO) packages that target potential home owners, including key workers, whose lower incomes may be particular barriers to home ownership.
- 9.26 CHG will introduce monitoring in terms of gender of persons accessing such housing provision to examine whether there is any gender stratification occurring within these products to see if gender differences are producing disproportionate outcomes.

Resident Involvement

- 9.27 CHG has made commitments to ensuring that residents are at the heart of its housing association activities. Its overall approach is set out in CHA's Resident Involvement Strategy.
- 9.28 CHA is particularly committed to ensuring that it meets the needs of the diverse communities it serves, and that the persons that it engages with are reflective of these communities. Its approach to resident involvement seeks to promote various forms of engagement in ways that suit different people in areas that matter to them.
- 9.29 This approach includes a particular focus on engaging with vulnerable groups and those that may have particular needs such as disabled people, BME communities and people who have caring responsibilities.
- 9.30 CHA will introduce monitoring of involvement in terms of gender. It will also use this information to inform future ways of delivering resident involvement activities.
- 9.31 Particular attention will be given to persons with caring responsibilities, which includes the following:
- the times that resident involvement activities are held will be sensitive to the needs of persons with caring responsibilities to enable such people to become involved (e.g. avoidance of school start/finish times)
 - where events are held in school holiday periods, provision will be made for dependents where it is feasible to do so (e.g. children's activities)

10 COMMISSIONING AND PROCUREMENT

- 10.1 As set out in CHG's Procurement Strategy, it will be a requirement of all commissioning that contractors operate their own equal opportunities policy and sign up to the commitments of the Group in this area.
- 10.2 In addition, it will be a requirement of all contractors to provide a range of equality and diversity related monitoring information, which will include details of gender balances.

11 IMPACT ASSESSMENTS

- 11.1 CHG now has an established Equality Impact Assessment Methodology. As part of the production and review of policies, all service areas will be required to conduct an impact assessment, which will involve assessing the potential adverse impact of a policy in terms of a person's gender or transgender.
- 11.2 The focus of this approach is to ensure an equality of outcome. Where analysis of intelligence highlights potential unequal outcomes, the policy will be reviewed to rectify this position. Where such a review is necessary, the reviewing officer will also need to establish whether further consultation is required as a result of the review requiring a material change in policy.

12 PERFORMANCE MONITORING

- 12.1 In order to monitor the delivery of the Group's commitments, a set of performance indicators will be developed and monitored upon on an annual basis.
- 12.2 The indicators will be as follows:

Performance Indicator	Target	Responsibility
Customer Services		
% satisfaction of men and women to be equal in STATUS Survey	81%	Director of Corporate Services
% satisfaction of men and women to be equal in service specific areas	Tbc	Director of Housing Services
% of men and women CHA tenants engaged in resident involvement activities to be equal	50%:50%	Director of Housing Services
% new policies subject to Equality Impact Assessment taking gender into account	100%	Director of Corporate Services

% new contractors committed to CHG's Equality and Diversity objectives and possess their own Equal Opportunities policy	100%	Director of Development / Director of Housing Services
Employment		
% of women in management positions to be maintained at current levels	61%	Director of Human Resources
% staff satisfied with CHG as an employer to be equal amongst males and females	tbc	Director of Human Resources
Incidents of employment related sexual harassment	0	Director of Human Resources
Governance		
Female Board Member represented on all Boards across the Group	100%	Director of Corporate Services
Increase in women represented at Board level to be increased on all Boards	Board specific	Director of Corporate Services

13 IMPLEMENTATION

- 13.1 Overall implementation of this Policy is as part of the Group's broader commitments to the Equality and Diversity agenda.
- 13.2 This Policy will be supported by a Gender Equality Action Plan. Following Board approval of these, progress against them will be reported to the Group Board of Management on an annual basis.
- 13.3 A critical aspect of the development and success of the Gender Equality Scheme is the engagement of men, women and transgendered people to influence the shape and monitor the delivery of the Group's commitments in this area. Further consultation with residents, staff and stakeholders will be undertaken, the results of which will be fed into the Action Plan.

14 RESPONSIBILITY

- 14.1 Overall responsibility for the Group's commitments to Gender Equality resides with the Parent Board of Management.

- 14.2 Responsibility at an Executive level for the overall implementation of this Policy and the Gender Equality Scheme resides with the Group Corporate Services Director.
- 14.3 Specific actions identified within the Gender Equality Action Plan attribute responsibility across the Senior Management Team of the Group.
- 14.4 Each Director within the Group is responsible for highlighting and promoting the importance of Gender Equality within their respective teams.
- 14.5 All staff within the Group have a responsibility for the implementation of this policy and ensuring that services are delivered in a manner consistent with the principles and values set out in this policy.

15 CONSULTATION

- 15.1 Consultation is a critical aspect of the development and subsequent on-going implementation of a Gender Equality Scheme. To this extent, consultation has or will take place with the following Groups:
 - Board of Management
 - Senior Management Team
 - All staff members
 - Association Tenants' Forum
 - Residents and stakeholders across the Group's activities

16 REVIEW

- 16.1 The Group will formally review this policy on a 3 year rolling basis, except in as far as an early review is required in order to respond to changes in legislation, regulation or good practice.
- 16.2 The action identified within the Gender Equality Action Plan will be revisited and reported upon on an annual basis.

17 TRAINING

- 17.1 Training on Equality and Diversity issues are provided to staff and Board Members on a regular basis.
- 17.2 It is the responsibility of the relevant departmental Director to ensure that staff are made aware of this policy as appropriate to their duties and that they act in accordance with this policy at all times.

18 ASSOCIATED DOCUMENTS

18.1 Policy documents associated with this policy include the following:

- Group Equality and Diversity Strategy
- Equality and Diversity Action Plan
- Gender Equality Action Plan
- Disability Equality Action Plan
- CHA Vulnerable Tenants Policy
- CHA Adaptations Policy
- CSH Pastoral and Welfare Policy
- CSH Equal Opportunities Policy
- Equal Opportunities in Employment Policy
- Staff Handbook
- Recruitment and Retention Policy
- Board Member Recruitment Policy

19 POLICY REVIEW SUMMARY

Policy Title	Gender Equality Policy
Dated Created	23 rd March 2008
Person Responsible	Group Corporate Services Director
Version	1.2
Date last amended	31 st March 2008
Authorised by	Board of Management
Review Period	3 Years
Review Committee	Board of Management
Date of last review	N/A
Date of next review	April 2011