



Board Meeting

Wednesday 27 May 2020 at 5.30pm

The meeting will be held through a MS-Team online conference as provided for in article 71 of the Articles of Association. See the Basecamp post for the specific arrangements.

Agenda

- 1) Welcome and apologies
- 2) Declarations of interest
- 3) Minute of the Board meeting of Wednesday 29 April 2020
- 4) Matters arising (paper enclosed)
- 5) Business development
 - a) Hub/office extension update (paper enclosed)
- 6) Housing management activity
 - No additional items
- 7) Property maintenance activity
 - No additional items
- 8) Financial matters
 - No additional items
- 9) Operational matters (paper enclosed)
 - a) Equalities and human rights annual report (enclosed)
- 10) Any other business
 - a) Publication of Board papers
 - b) Date of the next Board meeting – Wednesday 24 June 2020



Board Meeting – Wednesday 27 May 2020

Agenda Item: 3

Subject: Minutes of Board Meeting 29 April 2020

Prepared by: Kirsty Broadfoot

Minute of the Board meeting held on Wednesday 29 April 2020 at 5.30pm via MS Teams

Present:

Tenant Members

Frances Maguire
Kenny George
Georgina Dawson

Community Members

Simon Leslie
Gemma Collins
Bobby Pyper – from end of item 6a – apologies provided
David Porte
Mike Tomlinson

In Attendance

Jim Whiston
Kirsty Broadfoot – Minutes
David McGivern
Alan Park

1. Apologies

Apologies were received from Rhonda Leith, Amanda Bryan, Myra Nicol and Margaret Campbell. Simon asked if we could send a card to Amanda, who had recently had a close family bereavement.¹

2. Declarations of interest

No matters were raised.

3. Minute of the Board meeting held on Wednesday 25 February 2020

These were noted.

4. Matters arising

The Board accepted the Chair's delegated authority in dealing with the various matters in the Board papers.

5. Business Development

¹ Kirsty to organise this

- 5a. Business Plan Review**
The Board noted the review.

6. Housing management activity

6a. Housing Management service - current service arrangements

Simon introduced David. David gave an overview of current service arrangements within the HM and Money Advice teams. He advised that they are focussing on assisting tenants who have experienced severe financial problems, job losses etc following the Covid-19 pandemic. He went on to say that they are working to maximise rental income which is fundamental to keeping the association afloat during this time. The allocations team are continuing to make and hold offers of properties, although most applicants are aware of the current restrictions and are accepting of this. We have received some government guidance on contactless lettings and have seen an increase in some essential (or homeless) lets. We currently have 18 voids including 5 which we have yet to receive keys for. It is hoped we start to get some rental income coming in soon. Maintenance officers are able to go out and inspect and note any repairs until the main contractors are able to attend.

David updated that the team are continuing to deal with antisocial behaviour/neighbour issues with 15 cases being logged in April. David Ported asked if we were signposting tenants to South Ayrshire Lifeline. David McGivern confirmed that this was happening and that Kirsty and the Admin. Team had been assisting Housing Officers by contacting a large number of tenants with general wellbeing calls. Frances enquired how badly hit the association had been in terms of rent. David advised we would have an idea once we saw April's figures, there had been a spike at the end of March of people looking to get assistance with housing benefit. He confirmed there would be an increase in arrears, but most tenants are communicating with us on this.

6b. Lettings Plan 2020/21

David summarised the main points, noting that we continue to provide assistance to South Ayrshire Council in helping homeless people access accommodation. This year's figure of 16.5% is slightly below the target of 25% but up from 7% last year. David advised that SAC decide what category of applicant they nominate for particular properties. The Board agreed the quotas for 2020/21.

6c. Money advice service annual report

David gave an overview of the report. He advised that Jacqueline and Wendy's caseload had become much busier following the outbreak. The value of gains had gone down from £1.2M to £900k, despite new referrals having increased by 72 to 165 current cases. However, this is due to the team having to focus on helping people to set up UC accounts. David pointed out the difficulties the HM and money advice teams have faced in working from home but thanked Alan and our IT support for their quick turnaround in assisting staff to get set up at the start of the pandemic. Simon gave thanks to all the staff for their hard work on behalf of the Board.

6d. Allocations Policy consultation

The Board noted the revised policy.

7. Property maintenance activity

7a. Maintenance service - current service arrangements

David updated the Board on the current provisions, advising that, at present, the association is only able to carry out emergency repairs, although non-emergencies are still being logged. He advised that the gas safety programme has recently been reinstated which was positive news. The ground maintenance programme is also likely to recommence in the near future. The new main contractor, Turners Property Services are hoping to start dealing with void repairs in the near future. David also noted that the close cleaning service had changed in light of the pandemic to include cleaning of door handles etc. Simon enquired about the ability to get materials during the pandemic, David said we hadn't been aware of any issues.

The Board noted the report and Simon thanked David for his input.

8. Financial matters

8a. Management Accounts – year to 31 March 2020

Alan summarised the pertinent points. The KPIs to the end of March 2020 were all within target. Alan referred to the commentary and noted that income and expenditure had exceeded the budget. Void repairs – these are difficult to manage, one void needed £30k but that was an exceptional case. Rent receivable was above budget due to rents from the grant supported open market acquisitions exceeding the rent lost from the late handover of the Peebles Court development. Alan confirmed the cash position was £2.1M more at the end of the year. He referred to the Allia bond, noting that we currently have £6.1M in the bank. Covenants are all within the levels expected.

8b. Allia bond finance

Alan updated the Board on the key points of the bond. The Board noted the report. Simon gave thanks on behalf of the Board to Alan for all his hard work again this year.

9. Operational matters

Health and safety – Jim spoke about the importance of ensuring the safety of staff working from home, highlighting that guidance notes and leave arrangements had been given out at the start of lockdown. We have set up a number of communication tools which have been working well. Jim advised that staff morale is high and we need to maintain this. As we start to plan for a return to Main Street, it is important to retain the flexible working practices we have adopted. Jim confirmed that he was working with senior management in preparing a survey to be given to staff next week. A discussion took place regarding leave. Jim went on to say that the Regulator had been advised of the situation. They are satisfied that are able to maintain a level of service. We need to keep a close eye on the situation regarding gas safety

visits. Jim confirmed that we have been asked to provide a return each month to the SHR.

9a. Board and Director effectiveness

Jim introduced Caroline's comprehensive report and thanked her for her hard work in pulling it together. He thanked the Board for their commitment and hard work. He advised that a new action plan would be produced in June. The training plan is currently out of sync with the Board session so this will be changed and there will be a new training plan from October which will focus on in-house training and briefings with external bodies like VASA and the Energy gency. The outstanding training requirements on chairing skills and financial issues will be dealt with by September. Jim went on to say that we can make more use of remote facilities for some of the standing committees, this should ensure more consistent attendance levels. Finally, Jim advised that we should have a standing Chair for all committees by June 2020. A date is to be claimed for Jim's review.²

9b. Annual Procurement Report

Jim summarised the background to the report. The Board approved the report.

9c. Social Media Policy

The Board approved the policy.

9d. Unacceptable Behaviour Policy

The Board approved the policy.

10. Any other business

10a. Publication of Board papers

10b. Date of next Board meeting

Wednesday 27 May 2020.

There was no further business and the meeting closed at 6.45pm with a vote of thanks to the Chair.

Signed

Dated

² Kirsty to claim a date.



Board Meeting – Wednesday 27 May 2020

Agenda item: 4

Subject: Matters arising including outstanding matters from earlier meetings

Prepared by Jim Whiston

Ref	Date	Subject	Progress	Complete?	Due by Board:
B484	26/2/20	Committee structure	To be discussed as part of the Board development report in April (see agenda item 9a).	Yes	April 2020
B485	25/3/20	Cancelled March meeting	Recommendation to note the February Minute and the content of the papers and the Chair's exercise of his delegated authority in approving the recommendations contained in the papers (eg with regard to amending the Business Plan). It is also recommended that the papers be published in full.	Yes	April 2020
B486	29/4/20	Card to Board member	Sent	Yes	May 2020
B487	29/4/20	Director's Review meeting	Meetings on 13 and 20 May.	Yes	May 2020

Completed Items will be removed from the following month's report. An archive of previous reports is retained for reference within the bound Board papers.



Board Meeting – Wednesday 27 May 2020

Agenda Item: 5a

Subject: Hub/office extension update

Prepared by: Jim Whiston

Recommendation: to accept the works tender.

Introduction

In February 2019, the Board agreed to accept a proposal from JD Thomson to carry out the works within a budget of £500,000 (exclusive of VAT). It was noted that this figure was less than our quantity surveyor's estimate of £590,000.

Unfortunately, JD Thomson ceased trading before the works got fully underway. This necessitated a public tendering process. The cost estimate was revised to £742,106 to take account of the different contractual arrangement and design development. The latter concerned largely greater structural work to connect the two buildings and additional fire protection to maintain access to the flats above.

Tenders were sought from six contractors with a closing date of 20 December. The lowest tender after adjustment was from 3B Construction for £738,627.90.

Given that this was substantially higher than original budget (albeit close to the revised quantity surveyor's figure), we have carried out a design review. Unfortunately, this produced only marginal savings. Obtaining these would have necessitated a new Planning application which would have resulted in a general increase in costs given that the contractor was not bound to hold their price beyond March. 3B has though now agreed to keep their tender open until 31 May 2020. They also accept that the onus is on them to work within any restrictions imposed by the Health and Safety Executive and public health authorities with regard to Coronavirus.

The tender price includes allowances for potential variations of £23,500. Whilst we should be cautious, there is the prospect that some of this will not be needed. Our architect is also looking at further simplifying access to the flats without the need for a new Planning consent. This could produce a saving of £15,000 or so.

We have made a commitment to professional fees for this project of £45,000.

Recommendation

Given the circumstances outlined above, it is recommended that the association accepts the negotiated tender from 3B Construction.



Board Meeting – Wednesday 27 May 2020

Agenda Item: 9

Subject: Operational matters

Prepared by: Jim Whiston

For noting

Coronavirus issues (including health and safety)

The home working arrangements continue to work well. Public health, and health and safety advice is being monitored regularly with the support of EVH. We are though working on the assumption that the current arrangements will remain in place with perhaps some modification of the current restricted office working.

A staff survey is underway covering communication, support and welfare issues. Early indications confirm good levels of morale. A fuller verbal report will be made at the meeting.

The arrangements described last month for housing management and maintenance continue to work well. We have been able to reintroduce repairs work to some voids and, with it, new lettings including to Council referrals.

A monthly report is being made to the Scottish Housing Regulator on the financial and operational impact. These are being circulated separately to the Board. As can be seen arrears have increased but are currently within the fluctuating range that we might see over a more normal year. This area though is subject to regular monitoring.

Board effectiveness and governance

The next quarterly report will be available for the June Board meeting.

Eydent

Nothing to report.

Training opportunities within Ayrshire Housing

This activity is in abeyance for the time being.

Staffing issues

See the note on our Coronavirus response above.

Staff pension schemes

There is nothing to report since the last Human Resources Committee.

Audit Committee

It is recommended that the June meeting is cancelled. All the internal audit items can be covered in an integrated report to the August meeting.

Community engagement and publicity

With regard to community grants, it is suggested that a number of potential recipients be identified in support of community responses on Coronavirus. We are liaising with VASA who have received Scottish Government funding under the Supporting Communities Fund as a community anchor.

The following activities have received press or social media coverage since the last meeting:

We have received good coverage in the specialist press and on social media of our community consultation in Kirkmichael on the proposed new housing.

Notifiable events and disposals

As reported previously, the Scottish Housing Regulator has been informed of our reduced service arrangements. The Regulator is asking us to submit a return each month on the impact of the Coronavirus restrictions. This covers information on arrears, voids and our cash position.

The position on gas safety checks will be carefully monitored to ensure that we are conforming to the advice issued by the Health and Safety Executive and Gas Safe (the registration body for the gas installation industry). The reasons for any failures to maintain a current safety certificate will be carefully recorded with our contractor to ensure that we are taking reasonable steps to comply with the regulations in the current circumstances.

There have been no disposals.

A consolidated report on notifiable events and disposals in 2020 will be given to the Audit Committee in February 2021.

The deadline for the Regulator's various returns has been extended to the end of July. It is recommended that an extra Board meeting is held towards the end of that month to approve their dispatch.

Board Meeting – Wednesday 27 May 2020

Agenda Item: 9a

Subject: Equalities and human rights annual report

Prepared by: Jim Whiston

Recommendation: to approve amendment to the Policy

Introduction

Following an internal audit review, the Board approved a new Policy in June 2019.

The policy provides for an annual report on its implementation. The section below uses the headings outlined in the Policy.

Review

Evidence of compliance

- Equality and human rights impact assessments have been applied to policy reviews in accordance with the Policy.
- Equality information as part of the annual Lettings Plan review.

Examples of good practice

- Engagement with interpreting services as required.
- Further accessibility tools commissioned for the online housing application and mutual exchange services.
- Staff briefings on topics with an equalities dimension (for example on mental and general health issues).
- Provision of donations and grants to support greater equality and quality of life.

Proposed further action including promotion

- Staff awareness of online BSL interpretation services.
- Implementation of the Scottish Housing Regulator's equality data requirements when they are published.
- Engagement with equalities groups to support further staff briefings.

Whether or not the Policy should be amended

- Based on experience to date, it is recommended that the Policy be amended to reference the requirements for impact assessments more fully in the body of the Policy rather than in an attached advice note.

Recommendation

A copy of the proposed revised Policy is attached. It is recommended that this is approved.

EQUALITIES AND HUMAN RIGHTS POLICY

INTRODUCTION

Ayrshire Housing's mission is:

We aim to enhance the wellbeing of our tenants and the wider communities of Ayrshire through high quality housing and related services.

Ayrshire Housing is therefore committed to promoting fair access to its services and to improving the quality of life for all we engage with. We aim to ensure respect and understanding for those we work for and with. We also strive to ensure diversity and eliminate discrimination by providing equality of opportunity for all. Throughout Ayrshire Housing a consistent approach in promoting equality and human rights across all areas is expected.

Ayrshire Housing will ensure that all are treated with fairness and respect and not being discriminated against on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It will also ensure that Board members and employees are not disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance.

BACKGROUND

The main legislative context is provided by the Equality Act, 2010 which consolidated pre-existing anti-discrimination legislation. This policy is intended to ensure compliance with the Act by promoting a culture of dignity and respect for all.

The Human Rights Act 1998 incorporated the European Convention on Human Rights into UK and Scots Law. The right to a family life is a key component of the convention. Ayrshire Housing aims to support this by providing good quality housing and services to help households maintain a secure home environment.

The Equality Act makes unfair treatment in the provision of goods, facilities and services, and in employment unlawful. It also aims to achieve equal opportunity in the workplace and in wider society. The Act brought together a range of existing anti-discrimination legislation to offer protection to people who have what are known as "protected characteristics". These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

In addition, the Act introduced a public sector equality duty consisting of two parts, a **general equality duty** and a **specific equality duty**. Ayrshire Housing is covered by the general equality duty so far as it relates services of a public nature, for example services in connection with the provision of statutory tenancies.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

This general duty requires the association to have due regard to:

- eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act.
- advancing equality of opportunity between people who share a protected characteristic and those that do not.
- fostering good relations between people who share a protected characteristic and those who do not.

Taking a human rights approach will ensure that this duty is addressed in a broad and positive way. It clearly underpins our mission.

DEFINITIONS

Diversity

Is about valuing individual differences. Ayrshire Housing is committed to valuing and managing people's differences to enable all service users, Board members and employees to contribute and realise their full potential. Ayrshire Housing recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit Ayrshire Housing and its customers.

Equality

Is making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way, but recognising that their needs are met in different ways. Equality focuses on those areas covered by the law, and described as Protected Characteristics.

Protected Characteristics

The grounds on which discrimination claims can be made: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Direct Discrimination

Treating someone less favourably than others based on a protected characteristic.

Indirect Discrimination

Is a policy, practice, procedure, provision or criteria that applies to everyone in the same way but might disadvantage a particular protected group, and which cannot be objectively justified in relation to the job.

Harassment

Conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant; it is the impact on the individual which determines whether harassment has taken place.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

Victimisation

Is treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

Positive Action

For example, imbalances in the workforce may be addressed by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets. No quotas will be set by Ayrshire Housing but equality targets may be set to encourage people from a particular group or groups to apply for a vacancy in Ayrshire Housing in comparison to the local community where they are under-represented.

Failure to make Reasonable Adjustments

This is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Associated Discrimination

Discrimination against a person because they have an association with someone with a particular protected characteristic e.g. a non-disabled person is discriminated against because of the action they need to take to care for a disabled dependent.

Perceptive Discrimination

This is discrimination against a person because the discriminator **thinks** the person possesses that characteristic e.g. a person is not short-listed for a job on the basis that the recruiter assumes the applicant does not have the correct VISA to work in the UK as they have a foreign looking name on their application form.

Employees

All permanent, temporary fixed term staff, including all managers and the Director.

Board members

The volunteer directors of the association.

Stakeholders

Contractors, consultants, tenants, customers, service users, partners and outside agency workers

POLICY PRINCIPLES

This Equalities and Human Rights Policy aims to:

- Ensure integration of a human rights approach to increase equality through the association's work, and ensure that Board members, employees and stakeholders are treated with fairness and respect from each other and from members of the public.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

- Require Ayrshire Housing to implement fair and just employment practices ensuring that no job applicant or employee will receive less favourable treatment on any grounds.
- Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.

IMPLEMENTATION OF THE POLICY

The Director is responsible for the policy's day to day implementation.

The Board will be advised whether or not an equalities impact assessment is required before considering any new or substantially amended policy. The Director will ensure that each proposed policy change is scoped for its potential impact in terms of this policy before being taken to the Board. Where an equality and human rights impact assessment is required, it will be in form annexed to this policy.

All key policies will make reference to this Equalities and Human Rights Policy and where appropriate include an equalities impact assessment.

Ayrshire Housing will ensure that all new employees and Board members receive induction and ongoing training on this policy. The policy will be widely promoted and integrated into all relevant policies and procedures within Ayrshire Housing.

This policy applies to everyone in Ayrshire Housing and all have a responsibility to be alert to discriminatory behaviours and practices should they occur. Such unacceptable behaviour and practices should not occur. However, if such a situation arises, it will be dealt with immediately through the relevant channels.

The Board will receive an annual report on the implementation of the policy. This will cover:

- Evidence of compliance;
- Examples of good practice;
- Proposed further action including promotion;
- Whether or not the policy should be amended.

THE PROVISION OF HOUSING AND RELATED SERVICES

The association operates an open applications policy based on a points system relating to objective housing needs characteristics.

Information on the personal characteristics of applicants will only be sought to the extent that it is required to fairly assess their applications. Information on protected characteristics required to assess statutory or regulatory compliance will only be dealt with in an anonymised form.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

The association will endeavour to establish links with local organisations representing equalities groups so as to further equality of access.

The association has a policy on racial harassment for the protection of both tenants and other residents in the neighbourhoods where it has stock.

The association will encourage tenants to participate in its affairs by providing transport to events and assistance with childcare. It will actively encourage tenants interested in becoming Board members.

COMMUNITY MEMBERSHIP

The association seeks to attract new members from across the community. Any refusal to be accepted as a new community member requires a valid explanation to be provided to the Board by the Community Membership Sub-Committee.

The Board will seek through publicity and networking to maximise the breadth of the community membership.

It will provide support for transport and care to encourage participation in the Board by community members.

EMPLOYEE RECRUITMENT AND SELECTION

It is Ayrshire Housing's policy that all recruitment decisions will be based solely on the merits and abilities of candidates. In order to achieve this, equality and human rights practices will be integrated into every stage of the recruitment and selection process. The association will follow the good practice recommended by EVH in all cases.

To highlight Ayrshire Housing's commitment to promoting equality and human rights from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy will state that we are an equal opportunities employer. The information contained in the advertisement and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply Ayrshire Housing will ensure that all applicants have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.

Ayrshire Housing will ensure all staff involved at any stage in the recruitment and selection process will receive equalities awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

TERMS AND CONDITIONS OF EMPLOYMENT

Employee's terms and conditions will be standard for all employees regardless of any of the protected characteristics. Employees will not receive less favourable terms and

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

conditions for any reason other than relating specifically to the job role and the grade it attracts. The same principle will apply to selection for redundancy.

TRAINING & DEVELOPMENT

Equality and human rights will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials foster an ethos of equality of opportunity.

DEALING WITH COMPLAINTS

Complaints by Employees

This procedure is complemented by Ayrshire Housing Dignity at Work policy. For further details, please refer to the policy.

Where an employee feels they have been discriminated against, victimised or harassed by another employee (including managers), the aim should be to deal with it informally in the first instance having due regard to the disciplinary and grievance procedures.

If the complaint warrants an investigation under the disciplinary procedures, this will be done on a consistent and equitable basis.

Complaints made by stakeholders

The right to be treated equally with dignity and respect extends to outside contractors, partners, tenants and other service users, customers and any other agencies that are associated with Ayrshire Housing. Therefore, stakeholders also have a right to have any issues addressed under this policy. Any complaints will be investigated by Ayrshire Housing and appropriate action will be taken.

Where a stakeholder is subject to inappropriate behaviour from an employee of the association, Board member or another stakeholder in connection with the association's business, the stakeholder should raise the issue with their lead contact. The lead contact will then investigate the complaint and deal with it in accordance with the Complaints Handling Procedure or the procedures relevant to the person or body being complained of (depending whether the complaint is against an employee, a Board member, a contractor or a partner, etc.).

If a stakeholder feels that they are being discriminated against by another stakeholder in the course of dealings with Ayrshire Housing, the following procedure should be followed:

Informal Stage:

Where possible, incidents should be dealt with informally. The stakeholder should report the matter to their lead contact within Ayrshire Housing as soon as possible. It may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

The manager will seek to discuss the situation with the individual whom the complaint is against and explain the expected standards of behaviour and the consequences of failing to comply with these. It will be made clear to the individual that continuation of such conduct may result in being refused access to Ayrshire Housing's premises, or services.

Formal Stage:

Where informal action is not appropriate or the matter is of a serious nature the complaint will be dealt with using the formal procedure. Where the formal procedure is instigated a thorough investigation will take place in the first instance. Where it is found that the individual has acted in an inappropriate manner, they and if applicable their employer will be written to by the relevant senior manager informing them that their comments, actions, or behaviours are not acceptable and potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in being refused access to Ayrshire Housing's premises, or contact with its users, employees, and Board members. In serious cases, Ayrshire Housing may end any dealings with an individual or company immediately. In cases of physical violence or serious threats the appropriate manager will notify the police.

Complaints by Board members

Where a Board member feels they have been discriminated against, victimised or harassed, the aim should be to deal with it informally in the first instance.

Informal Stage:

If a Board member feels they are in receipt of inappropriate behaviour from another Board member, an employee or any stakeholder in connection with Ayrshire Housing, they should raise this immediately with the appropriate senior manager. The manager will discuss the issue with whom the complaint is against, explaining the required standards of behaviour and the consequences of failing to comply.

Formal Stage:

Where formal action is the most appropriate, a thorough investigation will take place into the complaint. The complaint will then be dealt with in accordance with the appropriate procedure (depending whether the complaint is against an employee, a Board member, a contractor or a partner, etc.).

Complaints made against a Board member

Where a complaint is made against a Board member, the matter will be investigated in accordance with the Board member's Code of Conduct. If it is found that the inappropriate behaviour occurred, the Board member will be warned and informed of the consequences of failure to comply with the expected standards of behaviour, which may include removal from the Board.

MONITORING AND REVIEW OF THE POLICY

Responsibility for monitoring the application of this policy will rest with the Director.

The policy will be reviewed no less than five-yearly with the amendments being made as appropriate and communicated to all staff and relevant stakeholders.

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

Annex

Ayrshire Housing Equality and Human Rights Impact Assessment (EqHRIA)

Title of Policy	
Relevance to the Business Plan	Explain how the aims of the policy/decision impact on them
Name of Lead Person	
Date EqHRIA completed	
Review date and frequency of reviews	

Scoping

What is the purpose of the proposed policy (or changes to be made to the policy)?	
Who is affected by the policy or who is intended to benefit from the proposed policy and how? (stakeholders)	
What human rights are engaged?	
How will this policy impact on the equal enjoyment of human rights?	
In what way is the Equality Duty engaged?	
How will this policy affect compliance with equality duties?	

Evidence

Given the people potentially affected by this policy, have you gathered information on their diverse needs and/or experiences?

Do you have information on:				
Age	Yes	No	N/a	
Disability	Yes	No	N/a	
Sex (including pregnancy and maternity)	Yes	No	N/a	
Lesbian, Gay, Bisexual & Transgender	Yes	No	N/a	

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024

Race	Yes	No	N/a	
Religion and Belief	Yes	No	N/a	
Staff	Yes	No	N/a	
Tenants	Yes	No	N/a	
Those on the waiting list	Yes	No	N/a	
The local Community	Yes	No	N/a	

Is this information sufficient for the purposes of the assessment? Yes/No

If no, outline when and how it will be sourced to inform a further review. If the information is not relevant explain why there is unlikely to be an impact from the Policy on this group.

Impact

What does the information you have, tell you about how this policy might impact positively and/or negatively on your stakeholders and specific equalities groups?

Please summarise the results of the EqHRIA.

Approved: June 2019 (at Board Meeting)
 Reviewed:
 Current to: June 2024

7. What is your recommended course of action?

Outcome 1: Proceed – no potential for unlawful discrimination, and no adverse impact or breach of human rights articles has been identified.	
Outcome 2: Proceed with adjustments to: address discrimination, remove barriers to the advancement of equality of opportunity and fostering good relations, address breaches of human rights.	
Outcome 3: Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).	
Outcome 4: Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.	

8. Please explain how you will monitor and evaluate this policy to measure progress:

--

9. Who will you share this EqHRIA with?

--

10. How will you share this EqHRIA?

--

AUTHORISATION TO RECOMMEND IMPLEMENT THE POLICY

Authorisation date	
Authorisation Manager	

Approved: June 2019 (at Board Meeting)

Reviewed:

Current to: June 2024