

April 2025

Sanctuary Scotland Housing Association Limited

Mapping Exercise for Assurance Statement – Equality and Human Rights

The purpose of this document is to provide the Board of Management of Sanctuary Scotland Housing Association Limited with assurance that the organisation complies with the requirements of Chapter Three of the Regulation of Social Housing in Scotland in relation to Equality and Human Rights. The compliance requirements are defined, the evidence and practice to support compliance is described and additional information or further action defined.

EQUALITY AND HUMAN RIGHTS – Chapter Three of the Regulation in Social Housing framework states: Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies and in its day to day service delivery To comply with these duties landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. Local authorities must also collect data on protected characteristics for people who apply to them as homeless. Landlords who provide Gypsy/Traveller sites must collect data on protected characteristics for these service users.		
Evidence	Compliant	Action required/commentary
<p><u>Assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies and in its day to day service delivery</u></p> <p><i>Group Strategies and Statements</i></p> <p>Equality and Diversity Group policy statement which supports and promotes equality and diversity and human rights matters.</p> <ul style="list-style-type: none"> Inclusion for All 2024-2026 – This strategy sets out aims and objectives in this respect and clearly sets out how we will meet the requirements of the Equality Act 2010 and the general duty that came into force in April 2011. It also contains: <ul style="list-style-type: none"> Defining terms – EDI Six guiding principles 	YES	<ul style="list-style-type: none"> Diversity and inclusion Scotland action plan and Group-wide action plans led by business area champions EDI & EDWG champions Modern slavery and Human Trafficking statement.

<ul style="list-style-type: none"> ○ Our FOUR strategic equality objectives • There is a Group Equality and Diversity Working Group (EDWG) to advocate the promotion of Equality and Diversity in the organisation; most recently this has included all staff awareness sessions on disability and a session led by the chairs of the staff EDI networks. • Modern slavery and Human Trafficking statement. 		
<p><u>Policies and Procedures</u></p> <ul style="list-style-type: none"> • Policies undergo cyclical review not only for legal compliance but also to ensure they remain responsive to emerging equality trends, feedback from tenants and staff, and sector best practice. • All policies and procedures contain appropriate practice and references to diversity, equality and human rights. • Group Safeguarding strategies and procedures; to provide services that are safe and to give choice to our customers as per the Adult. Learning and Development staff training and mandatory level 2 safeguarding training for local operational staff. Relevant legislation that underpins our actions in Scotland: The Adult Support and Protection Act 2007 gives greater protection to adults at risk of harm or neglect. The Act defines adults at risk as those aged 16 years and over who: are unable to safeguard their own wellbeing, property, rights or other interests and are at risk of harm and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected. It places a duty on local councils to inquire and investigate cases where harm is known or suspected. • Procedures and practices designed to be 'barrier free' to accessing services. 	YES	<ul style="list-style-type: none"> • Policy templates • Adults, Children and Young People, and Group strategy (currently being written by Group Safeguarding Lead)

<p><u>Equality Impact Assessments</u></p> <ul style="list-style-type: none"> Equality impact assessments are carried out on policy, procedure, practice as appropriate e.g. the Letting Policy – the Equality and Human Rights Commission (the enforcement body for these duties) encourages other bodies to take on board the principle of these duties and prepare equality impact assessments where appropriate. 	<p>YES</p>	<ul style="list-style-type: none"> Accessible information standards. Example of referring to meeting peoples needs/access to services and tailoring our approach to ensure there are no 'barriers' Tenant Participation Strategy (item 13) Equality Impact Assessment: Recent years this has included: <ul style="list-style-type: none"> Physical disability Sensory impairment Mental Health Universal credit and diversity data (2020)
<p><u>Antisocial Behaviour, Harassment and Domestic Abuse</u></p> <ul style="list-style-type: none"> Tolerating antisocial behaviour and domestic abuse is a violation of fundamental human rights – damaging to health, wellbeing, limit's peoples' freedom and potential. Therefore working in partnership with: CIH – Make a Stand; White Ribbon, DAHA and other partners to raise awareness of the prevalence of domestic abuse and support staff to address suspected/alleged/actual allegations. We take reports of antisocial behaviour seriously and record and manage cases, making appropriate referrals to specialist agencies or advice providers and working with the police where necessary. These policies and procedures also help to ensure that we comply with the Human Rights Act 1998 which confers rights and freedoms granted by the European Convention on Human Rights. The rights protected by the Act include the right to: <ul style="list-style-type: none"> life; respect for private and family life, home and correspondence; freedom of religion or belief; freedom of expression; and peaceful enjoyment of your possessions. Sanctuary's safeguarding approach includes regular review of referral pathways to ensure timely, supportive action aligned with the Human Rights Act. 	<p>YES</p>	<ul style="list-style-type: none"> Antisocial behaviour and harassment policy and procedure Domestic Abuse policy and procedure

<p><u><i>The Right to Housing - Allocations</i></u></p> <ul style="list-style-type: none"> • The right to housing is a human right enshrined in international law, therefore we have an obligation to protect and promote people's right to adequate housing – through offering different ways to access housing (direct applicant, transfer, mutual exchange, local authority, housing options assessments). • Allocations procedures actively consider the impact on protected groups, guided by equality data. • In its General Comment No. 4, the UN Committee on Economic, Social and Cultural Rights provides an authoritative interpretation of the right to adequate housing, which must be accessible, affordable, habitable, and culturally adequate, and provide access to infrastructure, facilities and services. 	<p>YES</p>	<ul style="list-style-type: none"> • See Lettings Policy - Scotland • Accessible housing – design regulations to make properties physically accessible or adapted at design stage (see aids and adaptations policy and procedure or physical disability Equality Impact Assessment). Information made available on access to housing in office, on website, over the phone, in person, in literature. • Affordable – complete rent consultation • Habitable – complete Lettings check to meet the Lettings Standards, and part of our tenancy agreements to define our obligations to ensure homes are wind and watertight • Culturally adequate – sensitivity with design of internal and external building features, and part of our lettings policy is to create balanced communities by allocating homes to people with different levels of priority and application circumstances. • Location: Adequate housing must be in a location that is not polluted (environmental standards i.e. not building on contaminated land and trying to create green spaces and low-emission zones/green transport) and allows access to health care, childcare, schools, employment options and other possible social facilities. • Legal security of tenure: Adequate housing must guarantee specific legal protection, such as protection against harassment, forced eviction and other possible threats • Availability of services, materials, facilities and infrastructure: Adequate housing has to provide the occupants with 'sustainable access to natural and common resources, safe drinking water, energy for cooking, heating and lighting,
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		sanitation and washing facilities, means of food storage, refuse disposal, site drainage and emergency services.
<p><u>Governing Body Reports</u></p> <p>All reports written contain an assessment on the impact on diversity and demonstrate consideration of how proposed changes could affect diverse stakeholder groups.</p>	YES	<ul style="list-style-type: none"> Report template
<p><u>Membership of Associations and Campaigns</u></p> <ul style="list-style-type: none"> Time to Change – employer and employee pledge to end stigma around mental health. Stonewall Diversity Champions – Sanctuary is a member of this programme to support the aim of creating a diverse and inclusive environment achieving sexual orientation and gender identity equality. As part of this there is a focus group called the Equality Inclusion Zone (EIZ) and a LGBT support community across Sanctuary Group. Other efforts and activities include Group Support for Pride events and Sanctuary's LGBT+ role models and allies. Don't be a bystander campaign – this reminds all staff to report any language or abuse which is felt to be homophobic, sexist, racist, ageist, disablist or offensive. White Ribbon and Make a Stand campaigns – these are two campaigns that Sanctuary has signed up to, to raise awareness of domestic abuse. White Ribbon is focused on men taking a stand against gender based violence in all forms. Make a Stand was developed by the Chartered Institute of Housing and as a signatory Sanctuary has promised to support those affected by violence in the home by raising awareness. Business Disability Forum – in 2016 the Group registered to become a disability confident employer and participate in a national disability forum. We are also a Disability Confident Employer. 	YES	<ul style="list-style-type: none"> Time to Talk Pulse page Time to Talk Day 2025 Stonewall and EIZ Business Disability Forum <p>Sanctuary is a Disability Confident Employer, registered with the Government as a organisation which recognises that many disabled people have the skills, talents and experience that we are looking for.</p> <ul style="list-style-type: none"> Disability Network Stonewall Diversity Champions <p>The Diversity Champions programme is the leading employers' programme for ensuring all LGBT staff are accepted without exception in the workplace.</p> <ul style="list-style-type: none"> Disability Confident Employer Don't be a bystander pages: Don't be a Bystander White Ribbon Pulse pages: Commitments Race Equality Network (REN): Race Equality Network Black History Month pages: Black History Month PRISM Network The Parent Network for peer support and

<ul style="list-style-type: none"> • Black History Month (BHM) is a time in the year when we can all play a part in celebrating and understanding black and brown history and culture. • Business case presented on pursuing accreditation by DAHA. • Impact of these campaigns is tracked through employee engagement metrics, feedback loops, and changes to internal practice. 		<p>inclusion in decision making processes that affect parents and carers working for Sanctuary.</p> <ul style="list-style-type: none"> • Trans Inclusion • Women into Construction • Women in Technology: signed both the Tech Talent Charter and the PwC Tech She Can Charter
<p><u>Accessible services</u></p> <ul style="list-style-type: none"> • Pulse contains a page for staff that is dedicated to Translation Services – answering questions on how to access these and provision of alternative formats etc. • Google Translate is available for frontline staff to download to work mobile devices. • Inclusive by design technology project (2020): investment in technology to promote ability to home-work and join meetings virtually or on the phone reducing the need to travel and potentially allowing for more flexible working environments that could reduce barriers for working parents and those who identify as disabled. • Sanctuary’s accessibility toolkit includes multilingual formats, BSL support, and remote access solutions designed to serve diverse communication preferences. 	YES	<ul style="list-style-type: none"> • Translation services Translation and interpretation services • British Sign Language support • Group Communications Procedure • Translation, Interpretation Services, and Accessibility - Group Procedure • Evidence of improvements in technology to be provided when this is available.
<p><u>Data collection existing tenants, new tenants, applicants on waiting list, governing body members and staff</u></p> <ul style="list-style-type: none"> • Data is collected for all categories listed above and reported in the Annual Return on the Charter. • Sanctuary Scotland also undertakes exercises to analyse this data to better understand how representative (or not) our population of tenants are in comparison to the national demographic patterns. • The Group also make the ‘What’s it got to do with you’ leaflet which lists ten reasons to complete monitoring forms, explains how the data is used and gives reassurances that it is anonymous. 	YES	<ul style="list-style-type: none"> • Equalities Monitoring Equality monitoring • Example project of tenant diversity 2020: • What’s it got to do with you leaflet

<ul style="list-style-type: none"> Data collection mechanisms that comply with the SFHA guidance issued in 2021 are being progressed. A new resident profile form is being tested and training for staff has been developed. 		
<p><u>Complaints Analysis and scrutiny</u></p> <ul style="list-style-type: none"> Sanctuary's complaints procedure is modelled on the SPSO model complaints handling process which recognised vulnerable groups and commits to ensuring that the complaints handling process is accessible, and that our approach to complaints is tailored where relevant and reasonable. Sanctuary has made arrangements to comply with new complaints reporting as outlined by SPSO in revised guidance. Reports will be quarterly, commencing end of June 2022. Scrutinising services to ensure peoples' needs are met and that Sanctuary delivers positive outcomes for customers through the National Residents Review Panel and offering other forms of Tenant Participation. 	<p>YES</p>	<ul style="list-style-type: none"> The National Residents Review Panel were consulted on this Assurance Statement in July 2020. A new section on complaints was suggested to demonstrate our commitment to providing equal access to services, and how we respond to complaints that are specifically related to equality and diversity. SPSO guidance on Vulnerable Groups Tenant Participation Strategy (item 13)

<p><u>Community Investment – empowering individuals and communities</u></p> <ul style="list-style-type: none"> • Building social capital • Our Community Investment work starts from the point of believing that everyone is capable of contributing to life in their community and our role is to support them to find the opportunities to do so. We believe that everyone is an asset, with skills, aspirations and abilities, and by building relationships in communities, these become stronger and better connected, supporting active citizenship for all. • We work to create a focus of cohesion and empowerment within the community, listening to what people have to say and helping them find the power inside them to live the life they want to. We aim to work with each person in a way that promotes core values such as respect, dignity, equality and independence. 	YES	<ul style="list-style-type: none"> • Community Investment • Social impact report • Housing and Community Connector impact report • National Volunteers' Week
<p><u>Staff training</u></p> <ul style="list-style-type: none"> • Mandatory equality and diversity training for all staff • Mandatory equality and diversity training for all line managers. • Housing Webinar - Adverse Childhood Experiences (ACEs) and Trauma Awareness for all staff • Safeguarding up to Level 2 for Housing Officers is core training. • Domestic Abuse awareness training is provided by the Learning Academy. • Senior staff have been trained in Mental Health First Aid and office Mental Health Champions are ASIST (suicide prevention) trained. • Training content is tailored by job role to ensure relevance and effectiveness. Equality competencies are tracked through performance reviews, and staff feedback informs evolution of training modules. 	YES	<ul style="list-style-type: none"> • SuccessFactors • Learning Academy - Sanctuary Learning Academy facilitates learning and development across Sanctuary, covering an extensive range of subject areas and our Apprenticeship and Graduate Development programmes.

<p><u><i>A human rights-based approach</i></u></p> <p>There are a set of five commonly used underlying principles which are important in applying a human rights-based approach in practice, known as 'PANEL':²⁹</p> <p>Participation: People should be involved in decisions that affect their rights</p> <p>Accountability: There should be monitoring of how people's rights are being affected as well as remedies when things go wrong</p> <p>Non-discrimination and equality: All forms of discrimination must be prohibited, prevented and eliminated, and people who face the biggest barriers to realising their rights should be prioritised</p> <p>Empowerment: Everyone should understand their rights and be fully supported to take part in developing policy and practices which affect them.</p> <p>Legality: Approaches should be grounded in the legal rights that are set out in domestic and international laws.</p>	<p>Lived experience – Housing and Communities connectors are supporting people to sustain their tenancies and access services that they need to live well and contribute to their communities. Empowerment, working closely with the community investment team. The new Community Investment strategy will also have a commitment to working in a trauma-informed way, setting out the key principles to this.</p> <p>Tenant participation strategy – opportunities for participation and engagement through different means. Resident App review, NRRP.</p> <p>Accountability and non-discrimination – completing equalities impact assessments like UC claimants and disproportionate trends, SMT approved recommendations to do further research and engagement on this.</p> <p>Inclusion for All – team meeting briefings and promotion/participation in the Equalities Networks – like Parents Network.</p> <p>Legality – the relevant domestic and international laws that we must comply to are referenced in all relevant policies and procedures to acknowledge and comply with the regulatory/legislative framework that we must work within.</p>
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<p><u>Resilience – building</u></p> <p><u>Climate change/sustainability</u></p> <p><u>Addressing inequalities</u></p> <p><u>Healthy environment</u></p> <p><u>Development – Equality, Diversity and Inclusion projects on accessible standards</u></p> <p><u>Access to justice and knowing rights, to exercise them- information we give people/when. Informing and empowering. Involved in policy decisions, processes and involve stakeholder in co-design.</u></p> <p><u>A range of housing options</u></p> <p><u>Digital connectivity</u></p> <p><u>Collecting, analysing and monitoring data.</u></p> <p><u>Fuel and food poverty mitigation</u></p>	<p>Resilience building: Community Investment team working closely with Housing Team and the Housing and Communities Connector. Providing and sourcing funding for small and large scale projects that will deliver this.</p> <p>Climate change/sustainability – New Group Sustainability and Climate change strategy launched, commitment to a range of solutions and innovations such as energy efficiency solutions and low-carbon impact developments.</p> <p>Addressing inequalities – Inclusion for All and business-specific projects with Group-wide benefits such as communication needs (tools) review, and improving quality of E&D data.</p> <p>Healthy environment – securing funding for health and wellbeing projects like Cycling Scotland, Donside. Promote healthy working lives in the workplace.</p> <p>Development – new build designs incorporating outside spaces and play areas.</p> <p>Access to justice and knowing rights – staff training, welfare rights support, materials such as NOP and court leaflets which explain legal processes and helping people make informed decisions. NRRP and tenant participation – involving people in decision making. Rent increase consultation.</p> <p>Housing options: choice of social and affordable housing options ranging from social rented, MMR and shared ownership. Housing for older people, sheltered schemes, mutual exchanges, transfers, lodgers, subletting.</p>
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		<p>Digital connectivity – access to broadband or Wi-Fi in schemes being rolled out on a priority basis.</p> <p>Digital support from We Are Digital project (community investment partners). Laptop library in Toryglen.</p> <p>Collecting, analysing and monitoring data – EDI information collected at point of application, sign up, tenancy change and ad-hoc to collate info on tenant demographic, to use for meaningful analysis.</p> <p>Fuel and food poverty mitigation – access to grant funding for fuel allowance and investing in insulation/fuel efficiency for older properties (sustainability strategy). Preferred providers with vulnerability support options at tenancy start. Partnerships with local food banks and investing money in food-related services with community groups such as Breakfast Club, Noble Art free dinners.</p>
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