

Equality, Diversity & Inclusion Policy



Reference:	HS_POL_HUR_EDI_3.0	Author:	Head of HR
Scope:	Housing Solutions Board Employees Residents Contractors Others working on behalf of Housing Solutions.	Approved by:	Board
		Date of approval:	19 May 2021
		Date of next review:	May 2024
Legislation:	Equal Pay Act 1970 Children Act 1989 Protection from Harassment Act 1997 The Human Rights Act 1998 Public Interest Disclosure Act 1998 Data Protection Act 2018 Civil Partnerships Act 2005 Public Sector Equality Duty 2010 (section 149) Modern Slavery Act 2015	Related Policies:	Anti-Bullying and Harassment Policy Disciplinary Policy Employee Code of Conduct Grievance Policy Probity Policy Safeguarding Policy Whistle-blowing Policy Inclusion Strategy Recruitment Policy Parental Leave Policy Remuneration Policy Vulnerable Customer Policy
Regulatory/ Governance:	NHF Code of Governance		

1. Policy Statement

- 1.1 Housing Solutions values diversity and is committed to promoting inclusion, equality and diversity and anti-discriminatory practices in all of its activities. In the environment in which we operate, Housing Solutions will not accept unfair, discrimination or less favourable treatment on the grounds of race, sexual orientation, gender reassignment, disability, religion or belief, marital/civil partnership status, pregnancy and maternity, age or any other characteristic that is protected by law.
- 1.2 Housing Solutions recognises that valuing diversity and being inclusive benefits residents, employees, partners and the organisation's performance. It helps the organisation to attract and retain diverse talent, which helps the organisation to deliver effective services and meet the needs of the diverse communities it serves.
- 1.3 "Inclusion" is one of our corporate values and therefore carries particular importance for Housing Solutions. As part of that value, we will proactively seek to foster inclusion as an every-day way of working. We will strive to ensure we recognise and celebrate diversity. Housing Solutions is actively working to create a workplace culture where our employees feel like they belong. We recognise that when our people feel they

belong they are more productive, motivated and engaged. A sense of belonging unites the efforts of Housing Solutions to create a truly inclusive workforce that can help deliver effective services for all, through demonstrating inclusive behaviours.

2. Scope & Aim

2.1 The Equality and Diversity Policy applies to all Housing Solutions Board members, employees and contractors and all of our services and activities, and any volunteer representatives including:

- Operational service delivery;
- Access to information and advice;
- Resident involvement;
- Resident satisfaction and complaints;
- Dealing with incidents of harassment and anti-social behaviour;
- Procurement and supply chain management;
- Governance;
- Staffing and employment; and
- Asset management, development and regeneration.

2.2 The aim of this policy is to:

2.2.1 Ensure every person is able to give their best and unfair discrimination is not tolerated.

2.2.2 Provide equality, fairness and respect for everyone employed by and that works with Housing Solutions, whether temporary, permanent, part-time or full-time.

2.2.3 We are fully committed to eliminating all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities. It also includes ensuring accessibility of services for residents, making reasonable adjustments, and designing services to be as inclusive as possible,

2.2.4 Ensure that our residents are valued for their diversity and that they do not suffer unlawful discrimination.

2.2.5 Promote equal treatment for all colleagues and residents alike regardless of background.

2.2.6 Recognising barriers to inclusion and treating people fairly, with transparency and providing equality of opportunity.

2.2.7 Provide guidance on best practice to make Housing Solutions an inclusive organisation as an employer and provider of services.

3. Roles and Responsibilities

3.1 The Board, Chief Executive and Executive Team are responsible for demonstrating a

clear and active commitment to achieving equality of opportunity, diversity and inclusion in all of the organisation's activities.

- 3.2 The Director of Corporate Services and Head of HR are responsible for ensuring this policy remains up to date.
- 3.3 All operational service leads are responsible for ensuring their teams are aware of and abide by the wording and the principles set out in this policy.
- 3.4 Every employee should feel confident and able to use the Whistleblowing Policy to highlight any discriminatory behaviour they may see.
- 3.5 Everyone representing Housing Solutions is responsible for ensuring that they promote equality, inclusion and diversity. Inclusion is a corporate value and as such, every employee is expected to conduct themselves in a way that promotes that value wherever possible.

4. Definitions

Age	Where this is referred to, it refers to a person belonging to a particular age (e.g., 32 year olds) or range of ages (e.g. 18-30 year olds)
Contractor	This refers to all and any suppliers of goods and services.
Direct discrimination	treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
Disability	A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. However, this disability definition can also include people with long term progressive illness.
Diversity	Diversity is about difference. It includes core elements of who we are such as our gender, race, sexual orientation and age. It also includes a much wider range of factors including disability, religion, political belief, social background and work styles, for example introvert and extraverts.
Gender	Legal definition is a man or a woman, although gender identify is becoming more fluid
Gender reassignment	The process of transition from one gender to another. This definition can also include trans people and does include Gender identity.
Harassment	this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti Bullying and Harassment Policy.
Inclusion	Inclusion is the extent to which an organisation values and respects individuals and groups who are different from the majority group or those who are perceived to be different. An inclusive work culture is one where different voices are heard and appreciated in equal

	measure, and where colleagues, managers and leaders actively work to raise awareness of personal and group biases.
Indirect Discrimination	a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, when requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
Marriage and civil partnership	Marriage is no longer restricted to a union between a man and a woman, but now includes marriage between same-sex couples. Same-sex couples can also have their relationships legally recognised as civil partnerships. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act)
Pregnancy and maternity	Pregnancy is the condition of expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding
Protected characteristic	These are the list of 9 protected characteristics set out in s.4, Equality Act 2010. These are: <ul style="list-style-type: none"> • Age • Disability • Gender reassignment • Marriage and civil partnership • Pregnancy and maternity • Race • Religion or belief • Sex • Sexual orientation It is against the law to discriminate against anyone because of one of these protected characteristics.
Race	Refers to a group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins. This definition may also include social class discrimination.
Religion or belief	Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs, including lack of belief (e.g., Atheism)
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

5. Legislation

5.1 Housing Solutions will ensure that we remain compliant with the legislation and guidance set out on page 1 of this policy. We will also ensure that we remain up-to-date with any changes in legislation, guidance and best practice.

6. Policy by Area

6.1 The means by which we will deliver these commitments [in the Scope section] in each of these areas are set out below:

6.2 **Service delivery** (including meeting housing need and lettings)

We will:

- collect data about our residents that enables us to monitor resident diversity and inclusion across all our different resident groups;
- for residents with a disability, make reasonable adjustments to the way we deliver our services to ensure that residents are not discriminated against either directly or indirectly;
- ensure that residents are not discriminated against in the service they receive by ensuring our staff aware of their obligations under this policy;
- develop, implement and monitor robust equality and diversity action plans;
- aim to provide services that meet the needs of the communities we serve wherever possible;
- ensure that our policies and procedures help to deliver efficient and effective services by undertaking Equality Impact Assessments, where appropriate, developing improvement plans and monitoring and reviewing progress of improvements; and
- use our resources to support and contribute to economic and social wellbeing and sustainability of the communities in which we work.

6.3 **Access to information and services.**

We will:

- promote equality of access to our services for all eligible residents;
- provide information about our services in a range of ways that respect and reflect the diverse needs of individuals; and
- ensure that our offices are open to and can be accessed by all; and
- for residents with a disability, make reasonable adjustments to facilitate access to our services and offices.

6.4 **Resident involvement.**

We will:

- consider equality and diversity issues when involving people in planning, developing and in the delivery of our services;
- actively encourage residents from ethnic minority communities, LGBTQ+ and other minority group backgrounds to get involved with the planning, development and delivery of our services;
- ensure that meetings are fully accessible, and held at suitable times to maximise involvement of a diverse range of residents;
- ensure that written material is provided in plain English and offered in a range of formats to meet different needs;
- provide translation and/or interpretation services where appropriate;

- use a range of consultative and involvement methods, including the use of digital platforms and social media to ensure residents are heard and encourage the widest possible engagement; and
- expect residents involved in consultation and participation activities to operate within this policy.

6.5 Resident satisfaction and complaints.

We will:

- measure the levels of satisfaction that residents have with our services; and
- monitor satisfaction and complaints by tenure types for residents, and any other relevant distinguishing metric, and use the information gathered via these activities to improve service delivery and target resources appropriately.

6.6 Anti-social behaviour and harassment (including incidents of domestic violence and abuse).

We will:

- treat all reports of anti-social behaviour, harassment and discrimination seriously, and investigate claims and take appropriate action;
- take a zero-tolerance approach to harassment based on a protected characteristic, sometimes called “hate crime” including domestic abuse, and will therefore investigate all instances reported to us;
- work with partners to deter incidents of harassment and use the full extent of the law to deal appropriately with perpetrators;
- not tolerate discrimination and harassment made towards or by any employee;
- act swiftly and effectively to meet the legal requirements, best practice and any regulatory standards that apply; and
- work to promote good relations between different groups of people in the workplace, estates and in the communities we serve.

6.7 Procurement and supply chain management.

We will:

- use fair and open processes for the selection of contractors, consultants, agencies and other suppliers; and
- expect other organisations with whom we work or from whom we procure supplies or services to demonstrate a commitment to equality and diversity.

6.8 Governance.

Empirical evidence suggests that more diverse and inclusive Boards make better decisions and run more successful organisations.

We will aim to ensure that:

- membership of the Board and committees reflects the diverse nature of the communities we serve;
- recruitment of Board members is undertaken through open and approved recruitment procedures and that we actively encourage applicants from ethnic minority communities, LGBTQ+ and other minority group backgrounds;

- equality, diversity and inclusion is effectively monitored within Housing Solutions and all Board Members receive equality and diversity awareness training to assist in this function; and
- the Board approves action plans relating to equality and diversity, and monitors progress against such plans.

6.9 Staffing and employment.

We will:

- value the differences in staff and consider diversity as a resource to help us to achieve our aims;
- work to recruit and retain a workforce which reflects the local community and set benchmarks to enable progress monitoring;
- undertake recruitment in such a way as to encourage applications from all sectors of the community;
- Ensure that we abide by the Recruitment Policy to prevent discrimination and promote fair process in all recruitment activities;
- All application forms will include an optional section for equality and diversity monitoring, which will not be used as part of the selection process. The information will be individually confidential and used for assessing recruitment and advertising practices periodically;
- provide equal pay to people undertaking similar work;
- proactively seek to ensure that we do not perpetuate the gender pay gap;
- support employees' diverse needs in the workplace, including making reasonable adjustments where required;
- support employees going through pregnancy and new parenthood by being open to considering flexible working requests;
- ensure that we proactively engage with colleagues taking parental leave so that they remain connected to the organisation;
- facilitate an employee Diversity Forum where colleagues can contribute to the organisation's approach to promoting equality and diversity across all teams and departments;
- provide training and development opportunities on an equitable basis so that all employees are treated fairly on the basis of their relevant merits and abilities;
- provide mandatory equality, diversity and inclusion training for all employees; and
- provide induction and training to ensure that all staff and Board Members are aware of their responsibilities in promoting equality and diversity in the workplace, in management and recruitment practices.

6.10 Asset management, development and regeneration.

We will:

- build, acquire and improve homes and communal and estate areas so that they meet the diverse needs of the communities;
- establish and maintain up-to-date records of adaptations to homes to help allocate housing appropriately and accommodate the needs of people with disabilities;

- work with local communities to deliver neighbourhood improvements to improve the quality of life for residents and promote community cohesion; and
- engage and consult with our communities on the design of new housing schemes and neighbourhood improvements.

7. Breaches of Policy

- 7.1 Housing Solutions takes complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, volunteers, residents, suppliers, visitors, the public and any others in the course of the organisation's work activities. We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal without notice.
- 7.2 If an employee believes that they have suffered discrimination the matter can be raised through the Grievance Policy or Anti-Bullying and Harassment Policy. Complaints will be treated in confidence and investigated as appropriate. Employees must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

8. Vulnerable Residents

- 8.1 This policy will support the Housing Solutions approach to supporting vulnerable people to participate in services. For further detail, please refer to our Vulnerable Customer Policy.

9. Consumer Standards

- 9.1 Equality, diversity and inclusion runs through all the consumer standards. It is an inherent part about how we deliver our services and value our staff.

10. Communication

- 10.1 This policy will be made available on the Housing Solutions intranet and website for residents.

11. Equality & Diversity

- 11.1 Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality and Diversity Policy, the Human Rights Act 1998, and Equalities Act 2010. Housing Solutions works closely with its partners to ensure it has a clear understanding of its resident community with clear regularly updated service user profiles. Housing Solutions will record, analyse and monitor information on ethnicity, vulnerability and disability.

12. Confidentiality

- 12.1 Under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), all personal and sensitive organisational information, however received, is

treated as confidential. This includes:

- anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff or board member.
- sensitive organisational information.

12.2 Housing Solutions employees will ensure that they only involve other agencies and share information where there is a legal basis for processing the information.

13. Review

13.1 This policy will be reviewed on a 3 yearly basis or more frequently in response to changes in legislation, regulatory guidance, good practice or changes in other relevant Housing Solutions' policy.

13.2 Our performance in relation to the delivery of the services and activities set out in this policy will be monitored on an ongoing basis through our established reporting mechanisms to our Executive Team, Board and associated committees.