

# Equality, Diversity & Inclusion Policy



<b>Reference:</b>	HS_POL_HUR EDI_4.0	<b>Author:</b>	AD of People Services/Resident Empowerment Manager
<b>Scope:</b>	Housing Solutions Board Employees Residents Contractors Others working on behalf of Housing Solutions	<b>Approved by:</b>	Board
		<b>Date of approval:</b>	July 2024
		<b>Date of next review:</b>	July 2027
<b>Legislation:</b>	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 Equality Act 2010 Modern Slavery Act 2015 Domestic Abuse Act 2021	<b>Related Policies:</b>	Dignity at Work Policy Disciplinary Policy Employee Code of Conduct Grievance Policy Probity Policy Safeguarding Policy Whistleblowing Policy Equality, Diversity & Inclusion Strategy Resident Engagement Strategy Recruitment Policy MPASS Policy Remuneration Policy Vulnerable Customers Policy
<b>Regulatory/ Governance:</b>	NHF Code of Governance 2020 RSH Consumer Standards		

## Policy Statement

- 1.1** We know valuing diversity and being inclusive benefits residents, employees, partners and the organisation's overall performance. It helps the organisation to attract and retain diverse talent, and for our people to realise their full potential, which helps us deliver effective services and meet the needs and aspirations of the diverse communities we support and serve.
- 1.2** At Housing Solutions we are absolutely committed to promoting diversity, inclusion and a culture where we genuinely value people's needs and differences across every aspect of our work. This means taking proactive, daily steps to ensure our residents can participate fully in our work, and our people can participate fully and authentically at work. It goes beyond ensuring that Housing Solutions residents and colleagues

simply do not experience unfair discrimination or less favourable treatment. Our commitment is ensuring that Housing Solutions acts as a force for good, making a positive difference to people in our local communities and in their careers.

- 1.3** “Inclusion” is one of our corporate values, and therefore is of particular importance for Housing Solutions. In upholding this 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 in all its forms and expression. Housing Solutions is actively working to create a workplace culture in which our employees feel as though they belong and are valued. We recognise that when our people feel safe and that they belong, they are more productive, motivated and engaged. A sense of belonging unites our work by creating a truly inclusive workforce and a workplace which can help deliver effective services for all, through demonstrating inclusive behaviours.
- 1.4** The quality of information entrusted to us about our residents and people, and how we use it, is central to supporting these commitments. We will make effective use of data to understand, and improve, the impact of our services on residents’ experience.

## Scope & Aim

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

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

- 2.2** The aims of this policy are to:

- 2.2.1** Enable every person to give of their best and ensure that discrimination is not tolerated.

- 2.2.2** Value the diversity of our workforce to enable them to excel, be creative and enhance innovation.

- 2.2.3** Provide equality, fairness and respect for everyone employed by and who works with Housing Solutions, whether on a temporary, permanent, part-time or full-time basis.

- 2.2.4** We are fully committed to eliminating all forms of unacceptable

discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents and staff affected by menopause, 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,.

- 2.2.5 Value our residents and staff are valued for their diversity and ensure that they do not suffer unlawful discrimination.
- 2.2.6 Support people’s fundamental right to be treated with dignity and respect and uphold this as a guiding principle when working with residents, neighbours and communities.
- 2.2.7 Promote equal treatment for all colleagues and residents alike regardless of background.
- 2.2.8 Recognise barriers to inclusion and treat people fairly, with transparency and providing equality of opportunity.
- 2.2.9 Provide guidance on best practice and share lessons learnt to make Housing Solutions an inclusive organisation as an employer and provider of services.

### 3. Roles and Responsibilities

Role	Responsibility
Board	Supports the organisation in applying this policy fairly and consistently and in demonstrating a clear and active commitment to achieving equality of opportunity, diversity and inclusion
Executive Team	Supports the organisation in the fair and consistent application of this policy and in demonstrating a clear and active commitment to achieving equality of opportunity, diversity and inclusion in all of the organisation’s activities
Assistant Directors	To lead and role-model a culture of inclusivity and lead on the operational delivery of this policy and its awareness throughout the organisation.
AD of People Services & Resident Empowerment Manager	Responsible for ensuring this policy remains up to date, and for the organisation-wide promotion of this policy.
Managers	Responsible for ensuring their teams are aware of, understand, and abide by the requirements and principles of this policy.  Responsible for ensuring the completion of Equality Impact Assessments for policies or service changes to remove any barriers to equality.
Employees	Responsible for ensuring that they promote equality, inclusion and diversity and conducting themselves in a way

	that promotes inclusion as one of Housing Solutions' values
Inclusion Champions	A designated group responsible for actively promoting a diverse, supportive and inclusive workplace culture. Also responsible for leading by example and promoting this policy.
Involved residents	Comply with the policy through their involvement structure and with the wider residents
Contractors	Responsible for promoting equality, inclusion and diversity, and conducting themselves in a way that promotes inclusion as one of Housing Solutions' core values

#### 4. Definitions

Age	This refers to a person being of a particular age (e.g., 32 year olds) or belonging to a particular age range (e.g. 18-30 year olds)
Contractor	This refers to all and any suppliers of goods and services to Housing Solutions.
Direct discrimination	Treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or sexual orientation .
Disability	A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. This can 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 neurodiversity.
Gender	The 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 includes gender identity. This may or not be a legal process for the person.
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 those 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, who 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, maternity & menopause	Pregnancy is the condition of expecting a baby. Maternity refers to the period before and 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. <b>Menopause</b> is when a woman's menstrual periods stop due to lower hormone levels. It usually affects women between the ages of 45 and 55, but it can happen earlier.
Protected characteristic	Below are the nine protected characteristics set out in s.4, Equality Act 2010. <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• Gender reassignment</li> <li>• Marriage and civil partnership</li> <li>• Pregnancy and maternity</li> <li>• Race</li> <li>• Religion or belief</li> <li>• Sex</li> <li>• Sexual orientation</li> </ul> It is against the law to discriminate against anyone because of one, or more, of these protected characteristics. As a provider of services to our local communities and an employer we are committed to ensuring that no one who comes into contact with our organisation is unfairly discriminated against or receives less favourable treatment on the grounds of their income or social status.
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 (i.e., 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 comply 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 each of these areas and in accordance with the requirements of the Regulator of Social Housing Consumer Standards are set out below:

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

We will:

- Collect and analyse data about our residents which enables us to monitor resident diversity and inclusion across all our diverse residents , to ensure equal access to our services and to drive service improvements.
- For residents with a mental or physical disability, make reasonable adjustments to the way we deliver, or provide access, to our services so that residents are not discriminated against either directly or indirectly;
- For residents for whom English is not their first language, offer translation support as a reasonable adjustment to our services and communications;
- Ensure that residents are not discriminated against in the service they receive by ensuring all our staff are aware of their obligations under this policy and receive regular mandatory training to support it;
- 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, accessible 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 residents;
- Provide information about our services in accordance with communication preferences and in a range of ways that respect and reflect the diverse needs of individuals;
- Ensure that our communications reflect the diverse communities we support and serve;
- Ensure that our offices are open to and can be accessed by all during our hours of operation; 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, including reasonable adjustments, when involving people in planning, developing delivering our services;
- Support residents from ethnic minority communities, LGBTQ+ and other minority group backgrounds in participating fully in 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;
- Source the necessary tools to enable residents from all backgrounds/ disabilities to actively participate in Housing Solutions involvement structures
- Use online platforms to promote digital inclusion;
- Ensure that our website and written material is provided in plain English and that our communications are offered in a range of formats to meet different needs;
- For residents for whom English is not their first language, offer translation support as a reasonable adjustment to our services and communications, and in particular for key operational communications;
- 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 the spirit and requirements of this policy.
- To provide Equality, Diversity and Inclusion training for involved resident panel members

## **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 type, race, age and disability of residents, and other relevant characteristics , and use the information gathered via these activities to improve service delivery and target resources appropriately in accordance with data protection law.

## **6.6 Anti-social behaviour, hate incidents, domestic abuse and harassment**

We will:

- Treat all reports of anti-social behaviour, hate incidents, domestic abuse, harassment and discrimination seriously, and investigate claims and take appropriate action;
- Adopt 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 hate crime 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.
- Monitor ASB cases and outcomes by tenure type, race, age and disability of residents, and other relevant characteristics, and use the information gathered via these activities to improve service delivery and target resources appropriately in accordance with data protection law.

## **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 for membership of the Board and committees to reflect the diverse nature of the communities we support and serve;
- Ensure that the recruitment of Board members to be undertaken through open and approved recruitment procedures and that we actively encourage applicants from ethnic minority communities, LGBTQ+ and other minority group backgrounds;
- Ensure that 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
- Ensure that the Board approves action plans relating to equality and diversity, and monitors progress against such plans.

## **6.9 Staffing and employment.**

We will:

- Value and celebrate 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 our commitment for Housing Solutions be as representative as possible of the residents and communities we serve, setting appropriate benchmarks to monitor progress;
- Encourage the input of equality, diversity and inclusion data and utilise the data to promote diversity in the workplace, encourage creativity and innovation, and tackle any imbalances;
- 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 or of equal value;
- Proactively seek to ensure that we eliminate any differences in pay based on gender;
- Support employees' diverse needs in the workplace, including making reasonable adjustments where required;
- Support employees going through menopause, creating a safe and trusting environment for colleagues to share their experiences and discuss their needs;
- Support employees in pregnancy and new parenthood by being open to considering work-related adjustments and flexible working requests;
- Ensure that we proactively engage with colleagues taking parental leave so that they remain connected to the organisation;
- Facilitate an employee Inclusion Champions group 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 ongoing training to ensure that all staff and Board Members are aware of their responsibilities in actively promoting equality and diversity in the workplace, in management and recruitment practices ensuring that this policy is fully embedded as part of our culture.
- Not unlawfully discriminate, in line with the Equality Act 2010;
- Take any complaints of bullying, harassment or discrimination seriously and deal with them in line with Housing Solutions policies;
- Regularly review employment practices and procedures to ensure fairness and alignment with law.

#### **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 and partners 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.
- Monitor service satisfaction by tenure type, race, age and disability of residents, and other relevant characteristics, and use the information gathered via these activities to improve service delivery and target resources appropriately in accordance with data protection law.

## **7. Breaches of Policy**

- 7.1 Housing Solutions takes complaints of bullying, harassment, victimisation and unlawful discrimination by employees, volunteers, residents, suppliers/contractors, visitors, the public and any others in the course of the organisation's work activities seriously. We take a strict approach to breaches of this policy, which we will be dealt with in accordance with our Disciplinary Policy. Serious cases of deliberate discrimination may amount to gross misconduct, resulting in dismissal without notice.
- 7.2 If an employee believes they have suffered discrimination the matter can be raised through the Grievance Policy or Dignity at Work 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.

## **8.1 Vulnerable Residents**

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

## **9. Consumer Standards**

- 9.1 Equality, diversity and inclusion are central themes within the Regulator of Social Housing Consumer Standards and Housing Ombudsman Complaint Handling Code. We fully support these principles, which are core to 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 and anyone else receiving services from us.

## **11. Equality & Diversity**

- 11.1 Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality, Diversity & Inclusion Policy and Equality Act 2010. We work closely with our community partners to ensure we have a clear understanding of our residents and clear and up-to-date information about our customers.

## **12. Confidentiality**

- 12.1 Under the Data Protection Act 2018, and UK General Data Protection Regulation (UKGDPR), 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 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 every three years 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.