

Equality and Diversity Policy

1.0 SCOPE

Purpose

- 1.1 We recognise that the diversity of our colleagues, partners and customers is one of our greatest assets. This Policy sets out how we comply with relevant legislation and regulatory requirements. It also reinforces our commitment to embedding and celebrating equality and diversity as an employer and service provider.

Definitions

- 1.2 For the purposes of this Policy, we define the following terms as:
- *Equality* - Individuals or groups of individuals have the right to equal access to opportunities. It is the **opportunity** that is equal, not the route or the outcome of the opportunity.
 - *Diversity* - Everybody is different. Celebrating diversity acknowledges and respects differences within and between groups of people.
 - *Inclusion* - Everyone is included. Giving everyone equal access to the same opportunities without bias is fundamental to the principles of equality and diversity.
 - *Protected Characteristics* - These are elements of a person's characteristics that are protected from discrimination under the Equality Act 2010.

Applies to

- 1.3 This Policy applies to all colleagues directly employed by the Group and to customers. Contractors and partners are expected to have their own Equality and Diversity Policy, or alternatively, abide by the relevant principles of this Policy.



2.0 POLICY STATEMENT

- 2.1 We are committed to equality, diversity, and inclusion in principle and practice. We value and respect people regardless of background, culture or lifestyle, whether as part of our workforce, partners or the diverse communities we serve.
- 2.2 We will act in accordance with the requirements of the Equality Act 2010 and the Modern Slavery Act 2015. We are committed to the following actions:
- elimination of unlawful discrimination and harassment;
 - promotion of equality of opportunity in service delivery and employment practice;
 - promotion of good relations between different groups of people;
 - publication of the organisation's gender pay differential (as of April 2018); and
 - publication of an anti-trafficking and slavery statement on the organisation's website.
- 2.3 We will adhere to the Social Housing Regulator's Tenant Involvement and Empowerment Standard that requires us to understand and respond to the diverse needs of our customers. We will:
- treat all customers with fairness and respect;
 - demonstrate that we understand the different needs of our customers, including in relation to the equality strands and customers with additional support needs; and
 - demonstrate how we respond to customers' needs in the way we provide services and communicate with customers.
- 2.4 We actively promote and practice equality of opportunity throughout all of our activities including:
- providing access to, and delivering our services;
 - recruiting, developing and supporting our colleagues;
 - consulting with our customers and communities; and
 - working with partners, and procuring services and contracts.
- 2.5 We will not tolerate discrimination, harassment or victimisation of any kind. We have a legal and moral duty to protect individuals from discrimination on the grounds of the nine protected characteristics, which are:
- age;
 - disability;
 - gender;
 - gender reassignment;
 - marriage and civil partnership;
 - pregnancy and maternity;



- race, ethnicity and nationality;
- religion or belief including non belief; and
- sexual orientation.

2.6 We will provide a range of services to customers with additional support needs, which include:

- an independent living service;
- tenancy support services;
- young person's accommodation scheme;
- older person's service;
- hate crime reporting;
- domestic abuse support;
- aids and adaptations; and
- engaging emerging communities project.

Implementation

2.7 Corporate Directors are responsible for the overall implementation of this Policy with delegated responsibility to the Corporate Director of People and Learning.

2.8 The Diversity and Inclusion Lead holds specific responsibility for ensuring this Policy is understood and implemented at all levels within the organisation and for monitoring appropriate statistical and diversity information.

2.9 All colleagues, contractors, involved customers and third party service providers are expected to ensure that their actions and behaviours comply with equality legislation.

2.10 All colleagues, Board and committee members will be provided with appropriate equality and diversity training.

3.0 PERFORMANCE MEASURES

3.1 To help us achieve better equality outcomes, and assist in the delivery of our equality duty, we subscribe to the five key steps recommended by the Equality and Human Rights Commission. These are:

- gathering information on how our work affects different racial groups, disabled people and men and women, including transsexual men and women;
- consulting with colleagues, customers, trade unions, other stakeholders and involving disabled people;
- assessing the impact of our policies and practices;



- in light of this evidence, deciding what our priorities for taking action should be; and
- taking the action that will deliver the best outcomes in race, disability and gender equality.

Board Diversity Report

- 3.2 Progress against equality and diversity objectives will be reported to the whg Board on an annual basis by means of a Board Diversity Report and will include the following diversity profiles:
- customers;
 - customer retention;
 - customer satisfaction;
 - complaints;
 - access to services;
 - colleagues; and
 - Board and committee members.

Single Equality Scheme (SES) and Action Plan

- 3.3 The SES details our commitment and approach to equality and diversity. Our Scheme is our public commitment of how we plan to meet the duties placed upon us by the equality legislation, and pulls together in one place, our organisational response to the Equality Act 2010.
- 3.4 An SES Action Plan is developed annually taking into account recommendations from the Board Diversity Report and any other relevant equality objectives from across the organisation.

Equality Analysis

- 3.5 We will make use of an equality analysis process to evaluate our key customer-facing policies and programmes for any unintended discriminatory impact on any of the protected characteristics. Analysis will also be undertaken on key Human Resource policies.

4.0 MONITOR AND REVIEW

- 4.1 The Customer Services Committee will monitor progress against the customer elements of the SES Action Plan.
- 4.2 The Group Executive Team will monitor progress against the colleague elements of the SES Action Plan.



- 4.2 This Policy and the SES will be frequently reviewed in line with changes in legislation and best practice. This will be done at a minimum of every three years.

5.0 ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES

- 5.1
- Human Rights Act 1998
 - Equality Act 2010
 - Modern Slavery Act 2015 and whg's Modern Slavery Act Statement
 - Tenant Involvement and Empowerment Standard 2017, Social Housing Regulator
 - whg Single Equality Scheme 2016-19
 - CIH Equality and Diversity Charter
 - whg Code of Conduct
 - whg Human Resources policies and procedures

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Corporate Aim	<ul style="list-style-type: none"> • Be an exceptional place to work that attracts, develops and retains talent. • Deliver high quality homes and services for our customers.
Changes made	<ul style="list-style-type: none"> • Updated legislative duties (Gender pay gap and modern slavery) and regulatory requirements (from the Tenant Involvement and Empowerment Standard 2017) • Included whg support services