

# Equality, Diversity and Inclusion Policy

---

<b>1.0</b>	<b>SCOPE</b>
	<b>Purpose</b>
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.
	<b>Definitions</b>
1.2.	<p>For the purposes of this Policy, we define the following terms as:</p> <ul style="list-style-type: none"> <li>• <i>Equality</i> - Individuals or groups of individuals have the right to equal access to opportunities. It is the <b>opportunity</b> that is equal, not the route or the outcome of the opportunity.</li> <li>• <i>Diversity</i> - Everybody is different. Celebrating diversity acknowledges and respects differences within and between groups of people.</li> <li>• <i>Inclusion</i> - Everyone is included. Giving everyone equal access to the same opportunities without bias is fundamental to the principles of equality and diversity.</li> <li>• <i>Protected Characteristics</i> - These are elements of a person's characteristics that are protected from discrimination under the Equality Act 2010.</li> </ul>
	<b>Applies to</b>
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.
<b>2.0</b>	<b>POLICY STATEMENT</b>

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.	<p>We are committed to an inclusive culture that values difference and encourages people to be their authentic selves. We want every colleague, customer and stakeholder to feel respected and valued. This aligns with our whg values:</p> <ul style="list-style-type: none"> <li>• <b>Accountable</b> – we take responsibility</li> <li>• <b>Courageous</b> – we try new things</li> <li>• <b>Trustworthy</b> – we are honest in everything we do</li> <li>• <b>One Team</b> – we achieve great things by working together</li> <li>• <b>Excellent</b> – we strive to be the best</li> </ul>
2.3.	<p>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:</p> <ul style="list-style-type: none"> <li>• elimination of unlawful discrimination and harassment:</li> <li>• promotion of equality of opportunity in service delivery and employment practice:</li> <li>• promotion of good relations between different groups of people;</li> <li>• publication of the organisation's gender pay differential (as of April 2018); and</li> <li>• publication of an anti-trafficking and slavery statement on the organisation's website.</li> </ul>
2.4.	<p>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:</p> <ul style="list-style-type: none"> <li>• treat all customers with fairness and respect;</li> <li>• demonstrate that we understand the different needs of our customers, including in relation to the equality strands and customers with additional support needs; and</li> <li>• demonstrate how we respond to customers' needs in the way we provide services and communicate with customers.</li> </ul>
2.5.	<p>We actively promote and practice equality of opportunity throughout all of our activities including:</p> <ul style="list-style-type: none"> <li>• providing access to, and delivering our services;</li> <li>• recruiting, developing and supporting our colleagues;</li> <li>• consulting with our customers and communities; and</li> <li>• working with partners, and procuring services and contracts.</li> </ul>
2.6.	<p>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:</p> <ul style="list-style-type: none"> <li>• age;</li> <li>• disability;</li> </ul>

	<ul style="list-style-type: none"> <li>• sex;</li> <li>• gender reassignment;</li> <li>• marriage and civil partnership;</li> <li>• pregnancy and maternity;</li> <li>• race, ethnicity and nationality;</li> <li>• religion or belief including non-belief; and</li> <li>• sexual orientation.</li> </ul>
2.7.	<p>As a Registered Provider of Social Housing, we are also mindful of our duties under the Public Sector Equality Duty (PSED), within the Equality Act 2010.</p> <p>The PSED requires organisations to:</p> <ul style="list-style-type: none"> <li>a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;</li> <li>b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and</li> <li>c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</li> </ul>
2.8.	<p>We will provide a range of services to customers with additional support needs, which include:</p> <ul style="list-style-type: none"> <li>• Employment and Skills</li> <li>• Money Advice</li> <li>• Community Housing</li> <li>• Wellbeing</li> <li>• Social Prescribing</li> </ul>
2.9.	<p>We will complete an Equality Impact Assessment (EIA) for every new policy or significant work activity.</p>
	<p><b>Implementation</b></p>
2.10.	<p>Corporate Directors are responsible for the overall implementation of this Policy with delegated responsibility to the Corporate Director of People and Learning.</p>
2.11.	<p>The Head of Inclusion and Organisational Culture 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.</p>
2.12.	<p>All colleagues, contractors, involved customers and third-party service providers are expected to ensure that their actions and behaviours comply with equality legislation.</p>
2.13.	<p>All colleagues, Board and committee members will be provided with appropriate equality and diversity training.</p>

<b>3.0</b>	<b>PERFORMANCE MEASURES</b>
	<b>Board Diversity Report</b>
3.1.	<p>Progress against equality and diversity objectives for customers 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:</p> <ul style="list-style-type: none"> <li>• Customer demographics;</li> <li>• customer satisfaction;</li> <li>• complaints;</li> </ul>
	<b>Equality Impact Assessment</b>
3.2.	We will make use of an Equality Impact Assessment (EIA) to evaluate our key customer-facing policies and programmes for any unintended discriminatory impact on any of the protected characteristics.
3.3.	Progress against equality and diversity indicators for colleagues will be reported to the People and Governance Committee via a bi-annual People and Culture Dashboard.
<b>4.0</b>	<b>EQUALITY AND DIVERSITY</b>
4.1	An Equality Impact Assessment has been completed for this Policy and consultation with relevant stakeholders has also been carried out.
<b>5.0</b>	<b>TRAINING AND DISSEMINATION</b>
5.1.	This Policy will be published on our website and intranet.
5.2.	EDI awareness training forms part of our induction and all new colleagues will be made aware of this Policy. The Policy will be published on the intranet.
5.3.	We are committed to ensuring all colleagues receive appropriate EDI training on a regular basis and must complete a refresher of the full awareness training every three years. This expectation will be reiterated through the Performance Management Framework.
<b>6.0</b>	<b>MONITOR AND REVIEW</b>
6.1.	whg Board will monitor progress against customer equality and diversity objectives via the Board Diversity Report.

6.2.	The Group Executive Team and People and Governance Committee will monitor progress against colleague equality and diversity metrics via the People and Culture Dashboard.
6.3.	This Policy is reviewed and monitored by the Corporate Director of People and Learning and reviewed every three years by Policy Group and People and Governance Committee.
<b>7.0</b>	<b>ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES</b>
7.1	<ul style="list-style-type: none"> <li>• Human Rights Act 1998</li> <li>• Equality Act 2010</li> <li>• Modern Slavery Act 2015 and whg's Modern Slavery Act Statement</li> <li>• Tenant Involvement and Empowerment Standard 2017, Social Housing Regulator</li> <li>• Colleague Code of Conduct</li> <li>• Disciplinary Policy and Procedure</li> <li>• Grievance Policy and Procedure</li> <li>• Whistleblowing Policy</li> <li>• Customer Voice Strategy</li> <li>• whg guidance on PSEDs and EIAs</li> </ul>

<b>Document author</b>	Head of Inclusion and Organisational Culture Assistant Director of People
<b>Document owner</b>	Corporate Director of People and Learning
<b>Legal advice</b>	Housing Diversity Network
<b>Consultation</b>	EDI Network; Assistant Director of Governance and Legal; Assistant Director of People; Legal Services Manager; Trade Unions; Colleague Voice EDI Advisory Group.
<b>Approved by</b>	GEXEC: May 2023 Policy Group: May 2023 People and Governance Committee: June 2023
<b>Review Date</b>	October 2024
<b>Corporate Plan aim</b>	Be an exceptional place to work that attracts, develops and retains talent.
<b>Equality Assessment</b>	25 January 2022 (reviewed May 2023)
<b>Key changes made</b>	Update and review of changes to legislation and guidance