

# Diversity and Inclusion Policy

<b>1.0</b>	<b>SCOPE</b>
1.1	<p>We recognise that the diversity of our colleagues, partners and customers is one of our greatest assets.</p> <p>Our <b>Diversity and Inclusion (D&amp;I) Strategy 2024 to 2027</b> sets out whg’s ambition to achieve positive experiences and outcomes for colleagues and customers, now and in the future.</p> <p>This policy outlines our commitment to creating and maintaining an inclusive, diverse and equitable workplace and customer experience. It sets out how we comply with relevant legislation and regulatory requirements.</p>
1.2	This policy applies to all Board and Committee members, colleagues, contractors, customers and any individual engaged in our organisation or accessing our services.
1.3	This policy should be read together with the Diversity and Inclusion Strategy 2024-2027 and the Diversity and Inclusion action plan.
	<b>Legal and regulatory framework:</b>
1.4	<p>We will act in accordance with the requirements of the Equality Act 2010 (as amended by the Worker Protection Act 2023) and 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 whg’s gender and ethnicity pay differential (as of April 2018); and</li> <li>• publication of an anti-trafficking and slavery statement on whg’s website.</li> </ul>
1.5	<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>• eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; and</li> <li>• advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</li> </ul>
1.6	We comply with whg’s regulator, the Regulator of Social Housing’s Transparency,

	<p>Influence and Accountability Standard: In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants:</p> <ul style="list-style-type: none"> <li>Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.</li> <li>Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.</li> <li>Registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.</li> </ul>
1.7	<p>For the purposes of this policy, we use defined terms as follows:</p> <ul style="list-style-type: none"> <li><b>Equality:</b> ensuring that every individual has an equal opportunity to make the most of their lives and talents, and believing that no one should have poorer life chances because of where, what or whom they were born, or because of other characteristics. Equality recognises that certain groups of people with particular characteristics have and continue to experience, discrimination.</li> <li><b>Equity:</b> fair treatment for all while striving to identify and eliminate inequities and barriers.</li> <li><b>Diversity:</b> recognising that everyone is different in a variety of visible and nonvisible ways, and that those differences are to be recognised, respected and valued.</li> <li><b>Inclusion:</b> the active creation of a learning, working and social environment that is welcoming, which recognises and celebrates difference, and is reflected in structures, practices and attitudes. Inclusion means that everyone is included, visible, heard and considered.</li> <li><b>Protected characteristic:</b> a term used in the Equality Act 2010 to describe the characteristics that people have in relation to which they are protected against discrimination and harassment.</li> </ul> <p>In addition, a glossary of terms associated with diversity and inclusion is attached as Appendix 1 that is published for colleagues and customers.</p>
2.0	<p><b>POLICY STATEMENT</b></p>
2.1	<p>whg are committed to 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.</p>

2.2	<p>Our culture at whg is built upon our strong values, with diversity, inclusivity and support for customers at the heart of our work. These are our core beliefs which inform our decision-making and help shape our organisation. We recognise that we are continually improving our approach by listening to our colleagues and customers. We use insight to have a data led approach to identify opportunities to continually improve the overall experience relating to diversity and inclusion.</p> <p>This aligns with our values:</p> <ul style="list-style-type: none"> <li>• Trustworthy; you can rely on us. We are honest in everything we do.</li> <li>• Respectful; valuing people and treating everyone with empathy and fairness.</li> <li>• Accountable; taking responsibility for our actions and owning the delivery of our promises.</li> <li>• Collaborative; achieving great things by working together.</li> <li>• Excellent; striving to be the best and delivering the best outcomes for customers and the organisation.</li> </ul>
2.3	<p>We do 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 Protected Characteristics:</p> <ul style="list-style-type: none"> <li>• age;</li> <li>• disability;</li> <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;</li> <li>• sexual orientation.</li> </ul> <p>In addition, we also include socio-economic status to measure the impact of our policy and practice.</p>
2.4	<p>We actively promote equity in our practice relating to diversity and inclusion throughout all 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;</li> <li>• working with partners;</li> <li>• advocating at Board and Committees;</li> <li>• procuring services and contracts.</li> </ul>
	<p><b>Colleagues</b></p>
2.5	<p>We have a range of policies and practice to support the diversity of our colleagues and review these on a regular basis to reflect best practice and legal obligations. We regularly seek out opportunities to consult with the Colleague Voice Network and Joint Negotiating Committee to improve our internal practices. This helps to shape and</p>

	influence policies and strategies that impact on the colleague experience through a diversity and inclusion lens.
2.6	We regularly review the mechanisms and the personal data that we collect from our colleagues, which helps identify opportunities to improve the diversity of our colleagues at all levels. This also improves the colleague experience. This personal data is held in line with data protection laws.
2.7	whg ensures access to and delivers training to all colleagues to the understanding and management of diversity, equity and inclusion including the use of Equality Impact Assessments.
2.8	To maintain an inclusive work culture, we measure the impact of our work on colleagues, striving to enhance access and opportunities for underrepresented groups: <ul style="list-style-type: none"> <li>• we build equity into our colleague voice programme and are committed to giving all colleagues a voice through a flexible Colleague Voice Programme;</li> <li>• we encourage colleagues to share feedback. This helps us understand and improve their Diversity and Inclusion experience;</li> <li>• we develop Diversity and Inclusion Champions to amplify the shared understanding and impact of Diversity and Inclusion in the workplace;</li> <li>• we celebrate the diversity of our organisation by actively promoting events and opportunities. We share our personal experiences through regular colleague events and lunch and learns;</li> <li>• we offer training and education for colleagues to increase awareness of diversity and inclusion at all levels in the organisation; and</li> <li>• we actively seek out opportunities to collaborate with partner organisations that will support our ambitions in diversity and inclusion practice.</li> </ul>
2.9	Any breaches of this policy will be dealt with in accordance with our Disciplinary Policy and procedure, and may lead to sanctions up to and including dismissal.
	<b>Customers</b>
2.10	We have a range of policies and practice to support the diversity of our customer base and review these on a regular basis to reflect best practice and legal obligations.
2.11	We seek out opportunities to consult with customers in our Diversity and Inclusion Network, to shape and influence policies and strategies that impact the customer experience.
2.12	We regularly review the mechanisms for collection, the range and completed personal data that we collect from our customers to identify opportunities to improve the customer experience. We use this data to understand how our services are accessed.
2.13	We support our customers in every aspect of their tenancy where requested and provide a range of services that support customers to thrive in their community, including:

	<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> <li>• adjustments in accessing the home maintenance service;</li> <li>• aids and adaptations;</li> <li>• customer voice programme; and</li> <li>• accessible communications.</li> </ul>
2.14	We track and monitor the diversity of customers engaged in our customer voice programme. We aim to identify gaps and act where customers are underrepresented. We have a diversity and inclusion network of customers who are engaged in shaping and influencing our services through diversity lens.
2.15	We promote diversity and inclusion through a range of customer engagement events that reflect and celebrate the diversity of our customers.
2.16	We complete an Equality Impact Assessment (EIA) for every new customer facing policy or significant work activity to understand any impact on the customer experience through a diversity lens.
	<b>Implementation</b>
2.17	Corporate Directors and Directors are responsible for the overall implementation of this policy with delegated responsibility from the Corporate Director of People and Culture.
2.18	The Head of Inclusion and Organisational Culture holds specific responsibility for ensuring this policy is understood and implemented at all levels within the organisation. They are also responsible for monitoring the appropriate statistical and diversity information.
2.19	All colleagues, contractors, involved customers and third-party service providers are expected to ensure that their actions and behaviours comply with this policy and equality legislation.
2.20	All colleagues, Board members and Committee members will be provided with appropriate equality and diversity training.
<b>3.0</b>	<b>PERFORMANCE MEASURES</b>
	<b>Committee Diversity Report</b>
3.1	Progress against and diversity and inclusion objectives for customers will be reported to the whg Board on an annual basis by way of a Diversity Report to Committees. This includes the following diversity profiles for customers to the Customer Services Oversight Committee and for colleagues to the People and Governance Committee to

	<p>identify opportunities for improvement:</p> <ul style="list-style-type: none"> <li>• diversity demographics;</li> <li>• customer and colleague satisfaction; and</li> <li>• access to services.</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 and including socio economic status and caring responsibilities.
3.3	Progress against our diversity and inclusion indicators for colleagues is reported to the People and Governance Committee via a bi-annual People and Culture Dashboard.
3.4	Progress against our diversity and inclusion indicators for customers is reported to the Customer Services Oversight Committee on an annual basis.
3.5	We have regular audits regarding our approach to diversity and inclusion.
<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	Diversity and Inclusion awareness training forms part of our induction and all new colleagues will be made aware of this policy.
5.3	We are committed to ensuring all colleagues receive appropriate Diversity and Inclusion 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.
5.4	Managers will be given appropriate training on recognising and avoiding discrimination, harassment, victimisation, unconscious bias and promoting equality of opportunity and diversity in the areas of recruitment, development and promotion.
<b>6.0</b>	<b>MONITOR AND REVIEW</b>
6.1	We monitor and review actions identified in Equality Impact Assessments on a regular basis.

6.2	The Customer Services Oversight Committee will monitor progress against customer equality and diversity objectives via the annual Diversity Report.
6.3	The Group Executive Team and People and Governance Committee will monitor progress against colleague equality and diversity metrics via the People and Culture Dashboard.
6.4	This policy is reviewed and monitored by the Corporate Director of People and Culture and reviewed every three years by the People and Governance Committee. Where review is necessary due to legislative change, this will happen as soon as possible.
7.0	<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>• RSH Transparency, Influence and Accountability Standard;</li> <li>• Worker Protection Act 2023;</li> <li>• Bullying and Harassment Policy ;</li> <li>• Hate Crime Policy;</li> <li>• Acceptable Behaviour Policy;</li> <li>• Colleague Code of Conduct;</li> <li>• Disciplinary Policy and Procedure;</li> <li>• Grievance Policy and Procedure;</li> <li>• Whistleblowing Policy;</li> <li>• D&amp;I Strategy;</li> <li>• People Strategy;</li> <li>• Colleague Development Strategy;</li> <li>• Customer Voice Strategy; and</li> <li>• whg guidance on PSEDs and EIAs.</li> </ul>
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<b>Our 2030 Plan</b>	Work and workplace of the future Social justice – transforming lives
<b>Equality Assessment</b>	October 2024
<b>Key changes made</b>	Update and review of changes to Diversity and Inclusion Strategy 2024-27