



## **Equality, Diversity & Inclusion Policy**

### **Contents**

- 1. Policy Statement**
- 2. Purpose and Scope**
- 3. The Definition of Equality, Diversity and Inclusion**
- 4. Forms of Discrimination**
- 5. Legislative and Regulatory Context**
- 6. Implementation**
- 7. Policy Responsibility**
- 8. Recruitment and Selection**
- 9. Review of Recruitment Practices**
- 10. Record Keeping**
- 11. Promotion**
- 12. Training**
- 13. Raising a Complaint of Discrimination**
- 14. Consultation**
- 15. Review and Monitoring**
- 16. Related Policies and Procedures**
- 17. Policy Approval**

### 1. Policy Statement

- 1.1 Ekaya Housing Association (the Association) is committed to developing an organisational culture, which values people from all sections of the community and the contribution each individual can make to the Association's work. The Association is also committed to promoting equality and eliminating unfair discrimination from all aspects of its operations.
- 1.2 Recognising our duties under all relevant legislation, including Human Rights, the protected characteristics in the Equality Act 2010, related Codes of Practice and regulatory requirements, we ensure that our commitment to equality, diversity and inclusion underpins everything we do.
- 1.3 This Policy outlines the approach taken by the Association to embed equality, diversity and inclusion across the Association and how the Association will endeavour to deal with equality, diversity and inclusion issues in delivering its services. The Association will endeavour to develop a culture where people from all sections of the community are valued and respected.
- 1.4 The Association will seek to achieve equality of treatment for all its customers without discrimination or prejudice on the grounds of a person's race, ethnic origin, nationality, religion or belief, gender, sexual orientation, HIV/AIDS status, age, gender reassignment, marriage or civil partnership, pregnancy or disability.
- 1.5 The Association will endeavour to oppose any form of discrimination in service delivery and actively promote opportunities for participation and involvement, and recognise that equality and diversity issues are just as relevant to the staff it employs. The Association aims to be an equal opportunity employer and to promote good relations between people of different groups.
- 1.6 As a provider of housing services, the Association aims to ensure all its customers are dealt with fairly and equitably. Equality, diversity and inclusion is integral to all of the Association's activities, thus our services need to be flexible and adaptable to all our staff, tenants, contractors and stakeholders' needs, so that no one is unfairly disadvantaged.
- 1.7 The Association's Equality, Diversity & Inclusion Policy therefore aims to:-
  - Identify and eliminate unlawful discrimination;
  - Promote equal opportunity in all of the Association's activities;
  - Provide practical and responsive services to victims of discrimination;
  - Manage diversity in people through recognising the differences between them;
  - Recognise that everyone is entitled to be treated fairly, with integrity and respect;
  - To achieve the highest standards of performance; and
  - Ensure that records are kept to monitor the impact of this policy.
- 1.8 The Association will endeavour to ensure that the principles of equality, diversity and inclusion are applied to all its activities and in particular: -
  - Shareholders' membership
  - Appointments to the Board
  - Recruitment, employment and training
  - Meeting housing need
  - Access to housing
  - Providing housing and related services
  - Developing new homes
  - Appointing contractors, consultants and suppliers
  - Recruiting, employing and training staff

### **2. Purpose and Scope**

- 2.1 The purpose of this policy is to ensure that everything the Association does promotes diversity, inclusion and equality of opportunity, eliminates discrimination and brings about positive changes for those experiencing disadvantages.
- 2.2 This Policy applies to all staff, irrespective of their length of service, status, or number of hours worked, and includes those on temporary or fixed term contracts, and to all job applicants regarding recruitment. The Policy will be applied fairly, consistently and in good faith throughout the Association.
- 2.3 The Association recognises that it has the power to reduce discrimination and the disadvantages that people experience by making its services more accessible and responsive to the needs of the communities with whom we work, and individuals using our services as customers, employees, contractors or consultants.
- 2.4 Where the Association's services are provided by external contractors or third parties on the basis of a specification set by the Association, these contractors or third parties and their workmen are responsible for adhering to the Association's Equality, Diversity & Inclusion Policy whilst providing services on behalf of the Association.
- 2.5 The Equality, Diversity & Inclusion Policy is to ensure we meet our moral, social and legal obligations and that we see equality as a fundamental part of everything we do.

We will:

- Apply a fair and consistent approach to all we do;
  - Ensure that a staff member or contractor is not treated less favourably than anyone else;
  - Ensure our staff reflect diversity in our local community through the services they provide;
  - Ensure we recruit from the widest possible talent pool;
  - Ensure we create a workforce which reflects our customer base/local area;
  - Not discriminate against any of our visitors, tenants and contractors. Equally, we expect our visitors, tenants and contractors not to discriminate against our staff and we will take appropriate action against any visitor, tenants and contractors found to have done so.
- 2.6 The Association will endeavour to ensure that there is full commitment to the Policy for all that are involved in the Association's work. Guidance and training will be provided to both Board Members and staff, so that they are fully aware of their responsibility for promoting equal opportunities, are equipped to take account of the different needs of groups and individuals and are able to make provision for these needs.
  - 2.7 The Association considers that diversity means understanding that each individual is unique and recognising our individual differences. These can be factors such as race, ethnicity, gender, sexual orientation, socio economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies. It is the exploration of these differences in a safe, positive, and nurturing environment. It is about understanding each other and moving beyond simple tolerance to embracing and celebrating the rich dimensions of diversity contained within each individual.

### **3. Definition of Equality, Diversity and Inclusion**

- 3.1 Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment, and to goods and services; the basis of which is supported and protected by legislation.

- 3.2 Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions, which is beneficial not only for the individual but for the Association.
- 3.3 Inclusion is the state of including or of being included within a group or structure. It means that all people, regardless of their abilities, disabilities, or health care needs, have the right to be respected and appreciated as valuable members of the Association, their teams and communities. Inclusion makes employees feel valued, welcome, integrated and included in the workforce instead of isolated.
- 3.4 Equality and diversity are inter-dependent, as they both support an inclusive culture.

### 4. Forms of Discrimination

The Association recognises that discrimination can take several forms: -

- Direct Discrimination – where a person is treated less favourably than others are or would be treated in the same circumstances;
- Indirect – where a requirement has been applied which, intentionally or not, has a disproportionately adverse effect on a particular group of people which cannot be justified;
- Harassment – where a person feels that there has been interference, either verbal or physical, with their comfort or safety;
- Victimisation – where a person is treated less favourably because they have pursued or it is suspected that they will pursue their rights under this Policy.

### 5. Legislative and Regulatory Context

#### 5.1 Legislative Context

EHA will abide by the Equality Act 2010 and all relevant legislation to ensure that opportunities for discrimination are eliminated.

#### 5.2 Regulatory Context

The policy meets the Homes England and the Regulator of Social Housing Regulatory Code and the Race & Housing Inquiry Challenge Report – Code of Practice.

### 6. Implementation

The Association will pursue the following actions in implementing this policy: -

#### 6.1 Staffing and Employment

6.1.1 The Association will recruit and aim to retain competent staff at all levels who uphold the Association's vision, values and principles and who represent the communities that it serves.

6.1.2 As part of the induction process, all new staff will be made aware of this policy and all staff will receive regular training on equality and diversity issues.

- 6.1.3 The Association will take appropriate disciplinary action against any employee whose conduct or actions are inconsistent with the Association's commitment to equal opportunities.
- 6.1.4 The Association will maintain records in recruitment, training and employment and report and use this information as a means of identifying inequality.
- 6.1.5 The Association will develop and implement a Dignity at Work Policy for the protection of staff.

### **6.2 Access to Housing**

- 6.2.1 The Association will endeavour to make its homes and services available to people from all groups within its communities in a fair and equitable way.
- 6.2.2 The Association will actively find out more about the neighbourhoods, stakeholders and communities it serves.

### **6.3 Lettings**

- 6.3.1 The Association will monitor performance against set targets for lettings which reflect the BME make-up of the community.
- 6.3.2 The Association will set targets for lettings and report performance against targets to the Board.

### **6.4 Performance Monitoring and Evaluation**

- 6.4.1 The Association will closely monitor the provision of services to ensure that no inequalities exist in this area, and will use equality impact assessment, where it is considered necessary.
- 6.4.2 The Association will involve staff and tenants in setting standards of service delivery and explore ongoing involvement in monitoring performance.

### **6.5 Access to Services and Information**

- 6.5.1 The Association will endeavour to provide services, which are fully appropriate to the diverse needs of different individuals in the communities which the Association serves.
- 6.5.2 The Association will adhere to robust procedures for tackling and resolving harassment and nuisance, in accordance with its Anti-Social Behaviour and Harassment Policies, which ensure that prompt action is taken and complies with the requirements of the Equality Act 2010.
- 6.5.3 The Association will endeavour to ensure that all its tenants, residents, Board Members and prospective tenants are aware of its Equality, Diversity and Inclusion Policy and will endeavor, where practicable, to provide the document in a range of formats and languages as required.

6.5.4 The Association will endeavor, where practicable, to make all key information available in a range of formats and languages following a thorough assessment of what are needed locally and by individual tenants and residents.

### 6.6 Customer Satisfaction

6.6.1 The Association will promote equality, diversity and inclusion with our customers, and will seek to know and understand our customers and tailor our services to meet their diverse needs.

6.6.2 The Association will undertake regular Equality Impact Assessments when reviewing any existing policy or procedure to ensure that any changes made meet the needs of all our customers, and do not unfairly disadvantage any particular groups or individuals.

### 6.7 Working with contractors and other partners

6.7.1 As far as it is permitted to, by the requirements of the EU Procurement Regulations, the Association will actively encourage and ensure fair consideration of applications for contracting opportunities from small and/or local contractors, consultants, suppliers and agencies, including those from under-represented minority groups.

6.7.2 The Association will advise contractors, consultants and any other agency working for the Association, of its commitment to equal opportunities so that they will abide by it in all their working practices when engaged by the Association. The Association will request details of the contractors' own equal opportunities policies and practices and this will form part of any selection process for new contractors.

6.7.3 The Association will only work with partners who adopt good equality, diversity and inclusion policies and who support the Association's principles when they deliver services on its behalf.

## 7. Policy Responsibility

7.1 Whilst all staff have a collective responsibility to ensure this Policy is successfully implemented, there are also specific responsibilities within this.

7.2 The Board, Chief Executive and the Senior Management Team are responsible for:

- Providing leadership on the equality, diversity and inclusion policy, acting as overall champions to ensure the policy is implemented;
- Ensuring the effective implementation of this Policy;
- Communicating the strategy and policy, internally and externally;
- Ensuring that all staff receive guidance and training on the Policy and any related Legislative and Regulatory requirements;
- Ensuring monitoring records are collected in accordance with the Association's policies and procedures;
- Ensuring customers are aware of the Association's Equality, Diversity and Inclusion Policy;
- Ensuring disciplinary procedures are invoked against employees whose actions are inconsistent with the Policy;
- Ensuring that this Policy underpins all aspects of the Association's work.

7.3 Managers at all levels are responsible for:

- Implementing the policy as part of their day-to day management of staff and in applying

employment policies and practices in a fair and equitable way;

- Ensuring equality, diversity and inclusion issues are addressed in performance;
- Ensuring all staff act in accordance with this Policy, providing necessary support and direction;
- Effectively managing and acting promptly when investigating issues relating to potential discrimination, including those matters concerning members of the general public who visit the Association;
- Ensuring all policy or service decisions that will change provisions, practices or policies and affect the workforce are Equality Impact Assessed in line with this Policy, as required.

7.4 Each member of staff is responsible for:

- Implementing the policy in their day-to-day work and their dealings with colleagues, customers, contractors, stakeholders and visitors to the Association;
- Ensuring their behaviour is appropriate to this Policy and that they treat people with respect and dignity;
- Not discriminating against other colleagues, customers, service providers or visitors;
- Notifying their line manager of any concerns with regard to the conduct of other members of staff, customers, contractors, stakeholders and visitors to the Association.

7.5 The Association's Human Resources Officer is responsible for:-

- Developing employment policy on equality, diversity and inclusion;
- Providing guidance to line managers and staff;
- Supporting managers in investigating issues relating to potential discrimination, including those matters concerning our staff, customers, contractors, stakeholders and visitors to the Association;
- Monitoring employment policies and practices;
- Facilitating training and development initiatives on equality, diversity and inclusion, both at corporate and Board level.

7.6 All of the Association's Board Members, Senior Management Team, staff and contractors will have a responsibility to fully familiarise themselves with the Policy. They will be expected to adhere to the principles outlined in the Policy and have an individual and collective responsibility to ensure that the Policy is applied in practice. They will also be expected to inform the Chief Executive, Senior Management Team and/or Human Resources Officer where it is apparent that this Policy is not being adhered to.

## 8. Recruitment and Selection

The Association welcomes diversity amongst its employees and seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job, having regard to experience and qualifications where necessary.

As an employer committed to the principle of equality of opportunity, the Association will adhere to the following procedure for recruiting and selecting individuals for all positions:-

### 8.1 Selection Criteria

8.1.1 The selection process will be carried out consistently for all jobs at all levels. Selection criteria for all positions will be clearly defined and will include details of the Association's commitment to equality of opportunity.



8.1.2 Job qualifications or requirements, which would have the effect of inhibiting applications from members of particular groups, such as those of one sex, persons of a particular religion, marital status or sexual orientation, persons of a particular racial group, persons within a certain age bracket or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done.

### 8.2 Advertising

8.2.1 1 Job advertisements will be widely publicised to encourage applications from all suitably qualified and experienced people. In order to attract applications from all sections of the community, the Association will endeavour to ensure that advertisements are not restricted to areas or publications, which would exclude or disproportionately reduce applications from a particular gender, religion, age group or racial group and should avoid prescribing requirements as to marital status or age.

8.2.2 2 All job advertisements placed on behalf of the Association will state the Association's commitment to equality of opportunity.

### 8.3 Selection Methods

8.3.1 The selection process will be carried out consistently for all jobs at all levels. All those handling applications and conducting interviews must be aware of the principles of the Equality Act 2010 and other relevant legislation.

8.3.2 The selection of new employees will be based on job requirements and the individual's suitability and ability to do the job and information sought from candidates will relate only to the qualifications for or requirements of the job.

### 8.4 Interviews

8.4.1 1 The staff responsible for shortlisting, interviewing and making or recommending an appointment will be clearly informed of the selection criteria and the need for consistency.

8.4.2 2 Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria. No questions will be based on age, assumptions about roles in the home and the family or the assumed suitability of different ethnic groups for the post in question. Where it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves irregular hours or extensive travel), this will be discussed objectively and will be asked equally of all candidates.

8.4.3 3 In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) should be offered to enable candidates to compete on an equal basis.

## 9. Review of Recruitment Practices

Recruitment procedures and practices will be kept under review so as to ensure that this policy is being adhered to and to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful discrimination.

## 10. Record Keeping

10.1 Details of candidates and selection decisions (including the rationale for selection or rejection)



## Ekaya Housing Association Equality, Diversity & Inclusion Policy

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will be kept for at least six months after an appointment has been made in case they are required as evidence by an employment tribunal or for other proceedings.

- 10.2 The Association will keep records of the sex, ethnic group, age and any disability of its employees and of all candidates shortlisted and appointed. Records may be used to determine whether members of one sex or persons of a certain racial group, religion or age bracket or those with a disability, do not apply for employment or apply in smaller numbers than might be expected or are shortlisted or appointed in a lower proportion than their application rate, or are concentrated in certain jobs.

### 11. Promotion

When considering candidates for promotion, general ability will be the main requirement and no employee will be discriminated against on the grounds of race, religion or belief, colour, age, national origin, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, sex or sexual orientation.

### 12. Training

- 12.1 To help meet the objectives of this Policy, the Association will train all managers and those responsible for recruitment and its entire staff on understanding and avoiding discrimination.

- 12.2 We will increase awareness of the prevalence and harmfulness of discrimination and prejudice on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation, and the needs and abilities of people with disabilities or other disadvantages.

### 13. Raising a Complaint of Discrimination

- 13.1 Every member of staff has a duty to report instances regarding the unfair or negative treatment and acts of discrimination, either direct or indirect, by any colleague(s), either to themselves or to others. This can be achieved informally by speaking with, or writing to, your line manager, Human Resources or a member of the Senior Management Team.

- 13.2 Any employee who feels that this policy has been breached can use the Association's grievance procedure. In the event that service users, tenants or other stakeholders feel that we have not lived up to this policy they should make a complaint via our complaints procedure, more information on which is available on our website, [www.ekaya.co.uk](http://www.ekaya.co.uk)

- 13.3 If, having raised a complaint, you feel that it has not been adequately resolved, you can formalise your complaint by following the Association's *Grievance Procedure*. If you believe there has been any bullying or harassment then you should raise the matter through the Association's *Dignity at Work Policy*. The procedure to be followed will be dependent on the Policy adopted.

- 13.4 All allegations of discrimination on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation will be dealt with seriously, promptly and confidentially.

- 13.5 Allegations of potential breaches of this Policy will be seriously and promptly dealt with. Staff, customers and contractors who make such allegations in good faith will not be victimised or treated less favourably as a result.

- 13.6 False accusations can have a serious effect on innocent individuals. You consequently have a responsibility not to make false allegations.

- 13.7 The Association will not tolerate any behaviour from staff which breaches our Equality, Diversity

## Ekaya Housing Association Equality, Diversity & Inclusion Policy

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and Inclusion Policy. Any such breaches will be regarded as misconduct except for serious offences such as discrimination on the basis of the protected characteristics / grounds. Serious offences including harassment, bullying, or victimisation will be treated as gross misconduct and may lead to disciplinary action including dismissal from employment without notice.

- 13.8 The protected characteristics as outlined by the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (includes colour, nationality and ethnic origins), religion and or belief, sex and sexual orientation.

### 14. Consultation

Views from staff and customers will be used to inform service reviews from which appropriate targets will be set. Any consultation with customers will be conducted in accordance with the Association's Resident & Tenants Customer Panel.

### 15. Review and Monitoring

- 15.1 The Equality, Diversity and Inclusion Policy will be monitored by the Chief Executive and Senior Management Team through the Business Improvement Plan and Key Performance Indicators.
- 15.2 Targets will be set for ethnic monitoring data on lettings and other key areas of service delivery on an annual basis. Progress against these targets will be monitored on a regular basis and appropriate action will be taken to aim to achieve continuous improvement.
- 15.3 The Policy will be reviewed regularly taking into account the information contained in the above reports, as well as any change in legislation or advice and guidance from the Homes England and the Regulator of Social Housing or the Equality and Human Rights Commission.
- 15.4 All members of staff have a duty to comply with this policy to ensure equal opportunities and to prevent discrimination. Staff must not harass or intimidate other employees on any of the protected grounds and must not victimise or retaliate against employees who make such allegations.
- 15.5 Disciplinary action will be taken against any member of staff who breaches this policy and serious breaches will be treated as gross misconduct.
- 15.6 All queries and requests for advice on this Policy should however be referred to Human Resources.

### 16. Related Policies and Procedures

This policy is the Association's overarching policy statement on Equality, Diversity and Inclusion. All employment and training policies and procedures are developed to be consistent with the statements in this Policy. As such, all employment policies and procedures are related to this Policy. All the Association's Policies and Procedures can be located on the Association's Intranet.

### 17. Policy Approval

**Approval date:**

**Approved by:**

**Policy owner:**

**Review gateway:**

**Staff consultation completed:**

**Next review date:**

*Policy & Performance Committee*

*Corporate Services Manager/Company Secretary*

*Policy & Performance Committee*

**October 2023**

**Nov 23** (this policy is subject to review and the organisation reserves the right to amend this policy without prior notice)