

Equality, Diversity & Inclusion Policy

EQUALITY, DIVERSITY & INCLUSION POLICY	
Purpose	To outline Harrison Housing's approach to Equality, Diversity and Inclusion.
Applies to	All staff (Including temporary/agency workers), job applicants, contractors, and any volunteers (Visitors) and Trustees, and residents.
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CONSEQUENTIAL AMENDMENTS (made prior to full policy revision)		
Amendment Date	Nature of Amendment	Revised by

VERSION HISTORY			
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CURRENT POLICY REVISION	
Date revised	March 2025
Revised by	Chief Executive
LT approval date	March 2025
Board of Trustees Approval date	April 2025
Next revision due	March 2028

1. Policy Statement

- 1.1 Harrison Housing is committed to promoting equality of opportunity for all and creating a working and living environment that is inclusive and free from discrimination. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We aim to create a living environment where residents can live free from discrimination or harassment due to their actual or perceived differences.
- 1.2 The aim of this policy is to ensure that we meet our equality, diversity and inclusion commitments and work within the requirements of the Equality Act 2010. We do this by promoting a culture that values differences and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and across our resident community. We also encourage actively challenging discrimination. In doing so, we promote equality through our actions that actively support inclusion.
- 1.3 Harrison Housing staff (including temporary workers), contractors, Trustees and volunteers (visitors) are expected to maintain an appropriate standard of behaviour in accordance with this policy. Managers of staff are expected to lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equality, diversity and inclusion.
- 1.4 Residents are also expected to behave in accordance with the intentions of this policy during interactions with each other and Harrison Housing staff (including temporary workers), contractors, Trustees and volunteers (visitors).

2. Policy Principles, Definitions and Legislation

- 2.1 The Equality Act 2010 gives individuals protection from discrimination in the workplace and sets a standard for those providing services. The implementation of this policy will help ensure we comply with the general duty of the Act and are able to demonstrate how we will:
 - Eliminate unlawful discrimination, harassment victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
 - Promote equality of opportunity and treating everyone with dignity and respect.

2.2 While promoting equality for all we will ensure fair treatment regardless of someone's protected characteristics (as set out in the Equality Act 2010 and defined in Appendix 1):

- Age
- Disability
- Ethnicity / Race
- Sex
- Sexual orientation
- Religion or belief
- Gender reassignment status
- Marital and civil partnership status
- Pregnancy and maternity status

Due to the nature of our charitable work we also believe it is important to include a tenth characteristic, not yet defined in the Equality Act, Socio-economic status.

2.3 Key terms & definitions:

- **Equality** is about fair and equal access, ensuring that our staff and residents have the same opportunities, regardless of their protected characteristics or socio-economic status. Whilst equality sets out the foundations to ensure fair and equal access, within this policy we also recognise the importance of equity. Equity is about ensuring that our staff and residents have what they need to achieve equal outcomes. Put simply, equity means understanding that not everyone starts out in the same place and that adjustments may need to be made to ensure fairness, based on someone's individual needs.
- **Diversity** is about celebrating the rich diversity of our staff and residents, recognising and valuing our differences and harnessing these differences to create a more inclusive, effective, productive organisation.
- **Inclusion** means actively working to meet the needs of our staff and residents, taking action to remove any barriers to participation and creating an environment where everyone feels valued and respected and able to be themselves.

2.4 Under the Equality Act, there are various types of discrimination. The main types are:

- **Direct Discrimination** - this is where one person is treated less favourably than another because of a protected characteristic. Other types of Direct Discrimination are:
 - **Associative Discrimination** – direct discrimination against someone because they associate with another person who possesses a

protected characteristic, for example someone is friends with a person who is from a different ethnic group.

- **Perceptive Discrimination** – direct discrimination against someone because others think (mistakenly or otherwise) they possess a particular characteristic, for example someone is believed to be gay.
- **Indirect Discrimination** – this is when a criterion, requirement or condition is applied which is disproportionate to achieve a legitimate aim. This is the case when a criterion, requirement or condition is applied to all people, but creates a disadvantage for people who possess a protected characteristic when compared to people without that characteristic. For example, a workplace dress code which is inappropriate for one ethnic or religious group.

2.5 Other relevant terms & definitions:

- **Victimisation** is where a person is treated less favourably than others because they have been involved with a discrimination or harassment complaint.
- **Harassment** covers a wide range of behaviours of an offensive nature, which is intended to demean, humiliate and/or intimidate another person. These behaviours can be disturbing, upsetting, or threatening.
- **Positive Action** refers to measures taken to assist participants and groups who have been under-represented in specific areas, to reach a level of confidence, knowledge and achievement that is comparable with their peers. These measures would normally take the form of additional training, positive recruitment amongst certain groups and making the public commitment to redressing any imbalance in participation and challenge historical barriers.

- 2.6 We will make a strong and visible commitment to equality, diversity and inclusion, underpinned by a clear strategy and action plan, effective leadership, and fit-for purpose governance. These will be published on our website following an annual review by Trustees.
- 2.7 We will encourage and facilitate the involvement of our residents in shaping the design and delivery of high quality, accessible services.
- 2.8 We will tackle inequality and prejudice when we see it and promote understanding between people from different groups.
- 2.9 Decisions will be based on the facts and will be taken in a way that avoids direct or indirect discrimination. We will also make sure individual needs are considered through our employment practices or when we are delivering a service.

3. Implementation

- 3.1 All staff will be made aware of this policy through Harrison Housing's internal communication channels, including email.
- 3.2 All staff will be required to read this policy, and to confirm that they have read and understood it.
- 3.3 This policy will be published on our website.
- 3.4 A copy of the policy will be included in the Residents Information Pack that is issued to new residents at sign-up. For current residents, we include updates in the Residents Newsletter.
- 3.5 We will monitor our performance in relation to ED&I to help us improve the experience of our residents and staff, and the services and support we offer. We will publish an annual ED&I improvement summary based on staff and resident feedback in our annual report.
- 3.6 Harrison Housing welcomes feedback and opportunities to improve in all areas of the business. All staff are responsible for feeding back any improvements that could be made to this policy or problems they have found while trying to implement it. Residents are also encouraged to feedback on any element of this policy so improvements can be made.
- 3.7 Staff feedback can be provided through a line manager or directly to the CEO. Residents can feedback through their Scheme Manager or the Head of Operations. We also welcome emails to info@harrisonhousing.org.uk
- 3.8 Changes to this policy will be communicated to all staff and residents and will be published on our website.

4. Related Policies

- 4.1 This policy should be used in conjunction with the following policies:
 - Anti-Social Behaviour policy
 - Staff Handbook
 - Managers Handbook

5. Responsibility

- 5.1 The National Housing Federation Code of Governance 2020 requires boards to demonstrate a clear and active commitment to achieving equality, diversity and inclusion in their organisation's activities.

- 5.2 The Regulator of Social Housing's Tenant Involvement and Empowerment Standard requires Harrison Housing to provide choices, information and communication that are appropriate to the diverse needs of our residents, and to treat residents with fairness and respect.
- 5.3 The Board of Trustees are responsible for:
- Ensuring that ED&I is integrated into the policies and culture.
 - Ensuring that the ED&I policy is up to date and organisationally ED&I can adequately be monitored. Ensuring that the agreed method of monitoring should be able to be presented in accordance with the timetable in the forward planner and in the annual report.
 - Ensuring the Trustee recruitment has an ED&I focus and Trustees reflect the diversity of our residents where possible.
- 5.4 The CEO and leadership team are responsible for:
- Ensuring the principles of managing ED&I are applied to all operations and that they demonstrate a commitment to ED&I when agreeing policies and processes.
 - Ensuring that the commitment to ED&I is communicated to all staff and promoting a professional and positive work environment.
 - Leading by example, developing and promoting an organisational culture that is positively anti-discriminatory.
 - The policy is applied while recruiting and onboarding new employees.
 - Managing diversity and the principles of equality of opportunity, with their direct reports and acting as a role model for them. As well as developing their personal skills in order to resolve issues relating to discrimination and harassment.
 - The policy is applied when reviewing applicants for housing.
- 5.5 All staff are responsible for:
- The application of this policy.
 - Participating in mandatory ED&I training, with annual refresher training.
 - Conducting themselves in a way that demonstrates the organisational commitment to provide equal opportunities in employment and housing, and prevent bullying, harassment, victimisation and unlawful discrimination.
- 5.6 All staff and residents should understand that they can personally be held liable for acts of bullying, harassment, victimisation and unlawful discrimination. This could be against staff, residents, suppliers or the public. Everyone should ensure they are aware of their responsibilities, challenge inappropriate behaviour when safe to do so, and always report inappropriate behaviour to an appropriate manager in the business.

- 5.7 If a member of staff feels that they have been discriminated against or bullied victimised or harassed, or if they are aware of any other practice or behaviour which is in breach of this policy, they have a responsibility to report it to an appropriate manager or to the CEO. In cases where a member of staff feels that the leadership team is complicit, then the member of staff should approach the Chair of the Board of Trustees. Depending on the nature of the incident, incidences of discrimination, bullying victimisation or harassment may be dealt with in accordance with the Grievance Policy and Procedure or reported to the police.

6. The use of data and tools

- 6.1 Diversity data collection enables us to measure and report on our performance and progress towards our ED&I goals. The purpose of collecting diversity data is to look for differences between groups, identify trends over periods of time, investigate the reasons for these differences and put appropriate actions in place.
- 6.2 We will collect diversity data in a variety of ways. This will include collecting data by protected characteristic for our staff and residents. We will explain why we collect this data and how we will use it to understand how fair and inclusive our organisational practices are.

7. How ED&I applies to our staff, volunteers and Trustees

- 7.1 We will recruit for the skills, experience and knowledge of a diverse workforce and realise the benefits of a strong organisational commitment to equality diversity and inclusion in all that we do. We recognise that everyone brings a unique perspective shaped by their background, identity and experience. ED&I is not just one-off training, it is part of our daily decisions, policies, and behaviours.
- 7.2 We are committed to having recruitment processes that is fair and unbiased. We ask candidates to complete an ED&I questionnaire, but this is not an obligation. The recruiting manager is not given access to this data, it is used for monitoring the diversity of applicants so we can improve processes to make sure our recruitment practices are as inclusive as possible.
- 7.3 We are a Disability Confident employer. This means we will guarantee to interview all job applicants with a disability who meet the requirements of a role set out in the Job Description and Skills/Person Specification.
- 7.4 All staff will have fair access to learning and development opportunities, regardless of their protected characteristic.
- 7.5 Having an awareness of ED&I issues, and how they may impact those around them, will be a requirement for all staff, volunteers and Trustees and we will provide this through equality, diversity and inclusion training.

- 7.6 Trustees will also receive training on their roles and responsibilities in relation to ED&I.
- 7.7 We will provide channels for staff to have their voices heard. Our 121 and year end appraisal templates provide an opportunity to give feedback on our workplace practices and suggest improvements. We will also discuss issues through team meetings and staff engagement surveys.
- 7.8 Due to our size we do not legally need to report on gender pay gaps, however we believe in transparency and we will regularly review if there is a gender and/or ethnicity pay gap and report the findings to Trustees. This will be supported through an independent salary benchmarking exercise every three years.
- 7.9 We will make tailored adjustments to support our staff that have a disability or health condition and provide reasonable adjustments where required.
- 7.10 We will provide staff with opportunities to work flexibly and in ways that best meets their needs, including hybrid and flexible working.
- 7.11 We will expect all staff to use appropriate inclusive language and behave in a way that upholds the dignity of other members of staff, residents and other stakeholders. Staff will receive guidance on what constitutes inclusive language through their ED&I training.

8. How ED&I applies to our residents

- 8.1 We will treat all residents fairly and with respect at all times. Our residents' voices matter. We are committed to listening, adapting, and making our services work for everyone, regardless of age, ability, ethnicity, language, or background.
- 8.2 We will consult with residents to meet the needs of the diverse communities we serve to help us to provide services that are accessible inclusive and non-discriminatory.
- 8.3 We will listen to residents' needs and use their feedback to help shape the services we provide. We will also make our resident engagement activities open to all and do all we can to remove any barriers that may prevent people participating, i.e. making spaces available for wheelchairs, or printing posters in large print.
- 8.4 We will analyse how residents are using and accessing our services, and their opinions about our services, to ensure different groups are treated fairly.
- 8.5 Due to the age and style of Harrison Housing's buildings accessibility can be a challenge. Harrison Housing will make reasonable adjustments for residents where we can and will work with residents with access issues to understand a way forward.

- 8.6 We will make residents aware that we can make reasonable adjustments for them by advertising this on our website and through our regular communications. When providing new services to residents we will also ask them if they require any adjustments to make the service accessible.
- 8.7 We will make sure all our resident communication is accessible with the use of alternative formats where they are needed. Any pictures used will reflect the diversity of the communities that we work in.
- 8.8 We will make it clear to our residents how to request information or communication in alternative formats, such as other languages or large print.
- 8.9 All of our website pages will be accessible and we will make sure that our content can be accessed on the widest possible range of browsers and devices.
- 8.10 Where needed, translations can be provided by a residents' advocate such as a family member or support worker with the resident's consent. For legal or sensitive issues, we will always use a professional translation service if needed. We will also translate written documents on request where it is practical and cost effective. If we're unable to provide the residents preferred method or format, we will make sure they understand the information provided by using an alternative where needed, such as audio format.
- 8.11 We will treat all residents fairly and with respect and we will expect residents to have the same respect for our staff, volunteers, Trustees and other residents. We will take action against any resident who abuses or discriminates in line with our Antisocial Behaviour Policy and, if serious, may report it to the police.

9. How ED&I applies to Partners, Contractors & Suppliers

- 9.1 We will expect our suppliers, contractors and partners to share our commitment to equality, diversity and inclusion and our procurement processes will make sure their approach to ED&I is aligned with ours.

Appendix 1 - Equality Act 2010 Protected Characteristics

The Equality Act 2010 Protected Characteristics are:

Age – the Act protects people of all ages. However, different treatment because of age is not unlawful. For example, direct or indirect discrimination can be justified if it can be demonstrated that it is a proportionate means of meeting a legitimate aim.

Disability (mental and physical) – the Act makes it easier for a person to show that they are disabled and therefore protected from disability discrimination. Under the Act a person is disabled if they have a mental or physical impairment which has a substantial and long-term adverse effect on their ability to carry out day to day activities, such as using public transport, answering telephones etc.

Gender Reassignment – the Act provides protection for someone who proposes to, starts, or has completed a process to change their gender. Time taken to undertake appointments relating to gender reassignment is also covered by the Act.

Marital or Civil Partnership Status - The Act protects those who are married or in a civil partnership against discrimination.

Pregnancy or Maternity – The Act protects a woman against discrimination on the grounds of pregnancy and maternity. Any absence due to pregnancy related illness must be considered when making employment-related decisions.

Race – The Act protects individuals against discrimination on the grounds of their race. This includes colour, nationality and ethnic or national origins.

Religion or Belief – The Act protects individuals against discrimination on the grounds of their religion. This also includes an individual who has no religion. A religion must have a clear structure and belief system to be protected by the Act. Belief also means a clear and structured belief as well as no belief. Political or scientific beliefs are not covered by the Act.

Sex - both men and women are protected under the Act.

Sexual Orientation - the Act protects bisexual, gay, heterosexual and lesbian people from discrimination.