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|  | <b>Equality, Diversity &amp; Inclusion (EDI) Policy</b> |
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| 1          | New Policy             | A Malik-Ahad | N/A        | Board       | 22/05/22      | 22/05/22  | 22/05/24    |
| 2          | Existing Policy Review | P Latham     | 30/07/24   | Board       | 21/08/24      | 21/08/24  | 21/08/27    |
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## 1. Introduction

Eldonian Community Based Housing Association (ECBHA) is committed to promoting equality, diversity, and inclusion in everything it does from its employment practices through to the services it provides to its customers.

This Policy sets out how ECBHA seeks to meet or exceed its legal requirements as outlined primarily in the Equality Act 2010 and the Human Rights Act 1998. It also demonstrates how ECBHA will work in the spirit of the additional Public Sector Equality Duties as a matter of good practice rather than as a legal obligation.

The application of this Policy supports compliance with the Regulator of Social Housing (RSH) Regulatory Standards, particularly the revised Consumer Standards.

## 2. Access and Communication

ECBHA is committed to ensuring that our services are accessible to everyone. ECBHA will seek all alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for ECBHA or use its services.

## 3. Equality, Diversity and Human Rights

ECBHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation and Religion and/or Belief, Civil Partnership, Marriage, Pregnancy and Maternity.

ECBHA also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

ECBHA will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom we work, will adhere to the central principles of the Human Rights Act (1998).

#### **4. Statement of Intent**

ECBHA has a mission statement to 'provide good quality affordable homes and excellent landlord services that meet the needs of our customers and exceed the aspirations of stakeholders'.

ECBHA will achieve this by being fair and consistent in its practices, ensuring there are no real or perceived barriers that would prevent or deter any group with protected characteristics from working with ECBHA. ECBHA will ensure it meets or exceeds all legal requirements in its practices and in the provision of services.

ECBHA will work in partnership with other service providers and through its community development activities to promote and foster good relations with all groups with protected characteristics to create safe and sustainable neighbourhoods.

ECBHA will take a zero-tolerance approach to all forms of bullying and harassment including behaviour from or directed to its staff. It will also take swift and effective action for any incidents of hate crime involving its customers and will work with other agencies on finding lasting solutions wherever it occurs.

ECBHA collates a range of 'equalities monitoring information' on a voluntary basis. ECBHA uses this information to:

- Gain an understanding of the 'make-up' of its stakeholders and identify any under-represented groups.
- Work towards ensure all support needs are being met.
- Create a culture of openness and honesty enabling people to be their true selves at work.

##### **4.1 Reasonable Adjustments**

ECBHA will meet the requirements of the Equality Act 2010 when considering any 'reasonable requests' for adjustments to ensure disabled people are not put at a substantial disadvantage. This may include:

- Removing or altering physical features
- Providing auxiliary aids and equipment
- Altering practices or the location where services and/or work takes place.

#### **5. EDI Employer Policy Positions**

##### **5.1 Recruitment Practices**

When new vacancies become available as part of the 'review process' for the post, ECBHA will assess all job descriptions and roles to ensure:

- The role does not lead to direct or in direct discrimination (whereby a person is treated less favourably than another person because of a protected characteristic – as defined by the Equalities Act 2010)
- The job descriptions, personal specifications and adverts do not contain any language or inferences that would put a person with a protected characteristic at a disadvantage.

- Job descriptions and personal specifications accurately reflect the requirements of the role.

ECBHA will, however, consider the need to objectively justify roles on a case-by-case basis and will amend its recruitment practices accordingly.

As per the requirements of the Equality Act 2010, ECBHA will not ask any pre-employment health questions on any 'on-line' or 'hard copy' application forms.

ECBHA will collect data separately from the application regarding protected characteristics to support analysis of the applicant profile as part of ensuring fair and accessible recruitment. When collected, this data will be anonymised and kept separate from applications and recruitment processes.

Applicants will be given opportunity to reference disabilities within the application to assist in operating the 'disability confident' scheme, whereby all disabled applicants that meet the minimum job criteria will be guaranteed an interview and to make 'reasonable adjustments' to the recruitment process and / or interview as appropriate.

ECBHA will take 'positive action' where it is recognised that there is a lack of applicants from certain groups with protected characteristics. This will involve reviewing its job advertising procedures to encourage greater take up of applications from under-represented groups including targeted advertising in specialist publications or making support and advocacy groups aware of vacancies.

This will include being mindful of not using any discriminatory language or lines of questioning whilst interviewing or undertaking assessment centres and ensuring all decisions on successful candidates are consistent and are recorded.

Any request for references will only be made once a decision by the recruitment panel has been made to ensure objectivity.

## **5.2 Staffing Practices**

ECBHA values its staff as its greatest asset and strives to ensure that whilst working for ECBHA they obtain job satisfaction and reach their full potential. Central to achieving this is ensuring that ECBHA staffing related policies and procedures:

- Ensure all staff, regardless of protected characteristics are treated fairly and consistently.
- Ensure ECBHA meets all legal requirements in employment practices.
- Ensure staff are aware of their employment rights including any company enhancements that exist with improved terms and conditions.
- Ensure staff know the options that are available to them to take remedial action and receive support if they believe any of their employment rights have been breached in any way (including those relating to equalities legislation)

## **5.3 Provisions for Transgender Employees**

ECBHA will ensure that it provides a working environment where transgender employees are supported and do not suffer any forms of bullying, harassment, or detriment as a result of being transgender or the transitioning process (where steps are taken by an individual in order to live

in the gender they identify as). ECBHA appreciates there are many different routes that individuals may take to transition and will offer support to all staff undergoing or considering this process (both those that choose to undergo medical procedures and treatments and those that do not). An employee seeking to initiate transition can speak to their line manager in confidence and mutually agree a personalised plan. ECBHA will provide specialist training for any line manager whose reportees are transitioning.

Where individuals require time off during the transitioning process e.g., to attend medical appointments they will be entitled to company and / or statutory sick pay and leave provisions, as outlined in ECBHA policy and as appropriate, according to length of service.

#### **5.4 Staff Experiencing Domestic Abuse**

In addition to the support that ECBHA provides to its customers that may be experiencing domestic abuse through dedicated policies ECBHA also seeks to support staff members that may be in this situation.

If employees feel able to, they should make their line manager aware of any situations where they believe they are suffering domestic abuse, so that the appropriate support can be offered. This may include consideration for reasonable adjustments in duties, hours of work or work location and approval of unpaid leave on a discretionary basis. Line managers will uphold confidentiality and seek to support staff to establish a personalised plan for dealing with the domestic abuse they are experiencing. ECBHA will facilitate contact with local, external advocacy groups that provide support for victims of domestic abuse and will make referrals to these agencies in consent with staff members, where appropriate.

If ECBHA believes a staff member is a victim of domestic abuse and has experienced or is at a risk of harm but has not disclosed the issue to the organisation (and is working on a managed response) it may be duty bound to make safeguarding alerts, as appropriate, following the procedures outlined in the Safeguarding Policy.

### **6 EDI – Other Policy Positions**

#### **6.1 Equality, Diversity, and Inclusion Training**

In order to ensure that all staff understand the importance of equality, diversity and inclusion in achieving ECBHA's vision, mission and that it is in keeping with its values, mandatory equality diversity and inclusion training will be provided. Training will seek to cover:

- Exploring personal understanding of equality and diversity
- Effects of unfair treatment
- Exploring perceptions and stereotyping
- Challenging inappropriate behaviours
- Behaviour and language in the workplace
- Dealing with conflicting views

#### **6.2 Links to Corporate Social Responsibility**

To ensure equality, diversity and inclusion remains central to strategic planning and operational delivery of services, ECBHA will be:

- Reviewing customer insight information and exceptions reporting on any issues that impact on groups with protected characteristics in differential and adverse ways and suggesting remedial actions.
- Planning and organising equality, diversity and inclusion events and activities including cultural awareness raising.
- Review the impact of new legislation on ECBHA activities.
- Set and review progress on achieving equality, diversity, and inclusion objectives.

### **6.3 Business Practices**

ECBHA are keen to work with 'like-minded businesses' and to spread good practice in equality, diversity and inclusion throughout its supply chain and in sub-contractor selection. Through its procurement and contractor selection processes, ECBHA will ensure others it chooses to work with meet the standards it expects in this area by:

- Giving preferential weighting in procurement selection procedures to organisations that can demonstrate a strong commitment to equality and diversity in their employment and service delivery practices.
- Ensuring organisations have their own policies and procedures for equality or are willing to abide by the principles outlined in ECBHA documents.
- ECBHA expects all staff and visitors to its buildings and customers homes to demonstrate appropriate behaviours and to show respect for others and will not tolerate any behaviour which could be interpreted as being discriminatory, which causes harassment or offence in any way.

### **6.4 Modern Day Slavery Act**

ECBHA is committed to ensuring that all business activities are delivered in compliance with the Modern Slavery Act 2015. ECBHA will monitor any arrangements it has with contractors and supply chains to ensure they act in accordance with the Modern Slavery Act when doing business with us.

### **6.5 Service Provision**

ECBHA has a proven track record of delivering excellent customer services that are tailored to individual needs. To ensure this level of service provision continues, ECBHA collects 'customer profile' information on a voluntary basis for lead tenants about: Age, Gender, Religion, Ethnicity, Sexual Orientation, Disability, Gender Identity / Gender Expression and Race. ECBHA supplements this data with other external data sources to drive the inclusivity of its service delivery and service access. ECBHA also uses this information to provide personalised services including:

- Sending communications in alternative formats
- Provision of additional support where it is required e.g. for elderly or disabled customers.
- Respect for religious customs when visiting properties.

ECBHA will attempt to update profile information via its programme of tenancy audit visits, targeting priority properties where they have been referred by other agencies or stakeholders.

To ensure the needs of disabled customers are met, ECBHA provides an Aids and Adaptations Policy.

Similar to the stance taken with employees, ECBHA promotes a zero-tolerance approach to all forms of 'hate crime, domestic abuse and harassment' involving its customers. This involves:

- Investigation of any allegations of hate crime, domestic abuse or harassment and take appropriate actions depending on the circumstances involved (including the full range of legal remedies).
- Coding within SDM for recording, evidence gathering and tracking all reported cases.
- Engagement with local agencies including the Police and Multi Agency Risk Assessment Conferences (MARAC) as appropriate.

Reference should be made to other ECBHA policies for further details on ECBHA's provisions to deal with incidents of this nature.

## **7 Implementation**

All ECBHA staff have a responsibility for the effective operation of the ECBHA Equality, Diversity, and Inclusion Policy.

The policy will be considered live from the date it is approved.

## **8 Performance**

ECBHA Board will receive reports on the analysis of EDI related data, progress with the implementation of agreed actions to further this plan and any serious EDI compliance related incidents that Board needs to be made aware of with the Board Exceptions Report.

## **9 Review**

The ECBHA Equality, Diversity and Inclusion Policy will be reviewed at least every 3 years and approved by the Board.