

# Restart Equality, Diversity & Inclusion Policy

## Overview

Saltbox-Restart, as an employer and provider of supported housing services are committed to promoting equality of opportunity and creating a working environment that is inclusive and free from discrimination or harassment.

This policy outlines our commitment to equality diversity and inclusion in employment, service delivery and to supporting our vulnerable residents. The policy is intended to positively engage with all individuals irrespective of their personal characteristics or background.

## Policy Statement

Saltbox-Restart believes that equality, diversity and inclusion are about recognising differences, respecting each other as individuals and tailoring our approach to meet differing needs.

We recognise that many people suffer discrimination and disadvantage that can take a number of forms, including:

- **Direct** – when someone is treated less favourably than another person because of a protected characteristic and also full/part time employment status, fixed term contracts, convictions or offending history
- **Association** – This is direct discrimination against a person because they associate with someone who possesses a protected characteristic
- **Perception** – This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not possess that characteristic
- **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** – unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, even if it is not directed at them
- **Third party harassment** – as above however this specifically refers to such action by individuals who are not the responsibility of Saltbox-Restart
- **Victimisation** – someone is treated badly because they have made/supported a complaint or grievance.

Saltbox-Restart aim to be open, inclusive and diverse and promote an atmosphere where people are valued and respected. The following principles guide our work and govern the operation of this policy.

- Everyone has a right to be treated with dignity, fairness and respect
- Value the diversity and talents of all individuals
- Support and empower people to succeed in our organisation
- Create a diverse workforce and inclusive workplace
- Understand the diverse needs of our occupants
- Promote equality of opportunity in employment and services
- Deliver appropriate, flexible and accessible services
- Be flexible and adaptable to changing needs
- Challenge prejudice discrimination and harassment
- Encourage inclusion and participation of under-represented groups in our workplace, service delivery and programmes
- Promote equality, diversity and inclusion with our employees, occupants, partners, stakeholders and supply chain
- Reflect statutory requirements and best practice to eliminate discrimination, harassment and victimisation

## **Legislative and Regulatory Framework**

Under the Equality Act 2010, we have a responsibility as a social housing provider to promote equality of opportunity. The Act makes discrimination unlawful in relation to the following 'protected characteristics'.

- Age (which may relate to a person's age or age group at any stage of life)
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion and belief (and no belief)
- Gender
- Sexual orientation

Saltbox-Restart will take account of the Equality Duty when delivering services and give due regard to the need to:

- Eliminate discrimination harassment and victimisation
- Advance equality of opportunity
- Foster good relations (tackling prejudice and promoting understanding)

The Social Housing Regulator sets out the Regulatory Standards, which require registered housing providers to respond to the needs of diverse residents.

Registered providers are required to treat all residents with fairness and respect including those with protected characteristics and those with additional support needs.

## **Scope of the Policy**

Saltbox-Restart endeavour to ensure that there is full commitment to this policy for all that are involved in our work and that the principles of equality and diversity apply to all our activities, in particular:

- Meeting housing need
- Access to housing
- Providing housing and related services
- Acquiring new homes
- Appointing contractors, consultants and suppliers
- Recruiting, employing, training and promoting staff.

## **Communication**

All employees, irrespective of their job or seniority, will be given guidance and instruction, through induction and mandatory training, as to their responsibility and role in promoting equality of opportunity, avoiding discrimination and valuing diversity and inclusion.

Residents will be advised about this policy as part of their induction to the service they receive from Saltbox-Restart.

We require all subcontractors to reflect the Saltbox-Restart policy within their own working practices. We will not contract with organisations who do not meet the same standards. Policies and working practices will be reviewed as part of our due diligence activity prior to entering into a commercial relationship.

## **Objectives**

The objectives of this policy are set out in our commitments to those who work with us and to those who we provide services and accommodation.

This policy enables Saltbox-Restart to send out a strong message of commitment, both internally and externally. A commitment to this policy is required from, and made to, all employees (whether part-time, full-time, permanent or temporary), workers and volunteers. It is required of others with whom we may work (for example, partner organisations, contractors, suppliers, consultants). We also expect the same commitment from all those who receive a service from us and will provide this expectation of mutual respect in all our dealings with them.

## **Our commitment as an employer**

Saltbox-Restart seek to promote equality of opportunity in recruitment, employment and volunteering. We are committed to creating a positive and inclusive culture with a well-trained workforce. To help achieve a diverse workforce we monitor recruitment and progression against protected characteristics.

Saltbox-Restart has clear procedures covering recruitment, development, and management of staff, which underpin our approach to equality in this area of our business.

Equality and diversity is included in training for all colleagues and we provide specific training appropriate to roles. In addition to this our aim is:

- To provide a working environment in which everyone feels valued, respected and have their dignity maintained.
- To set clear expectations that all employees will treat people respectfully, politely and in a way that maintains their dignity
- To ensure that employees support and promote Saltbox-Restart's mission and values
- To aim to have a workforce where people from different groups are represented at all levels
- To ensure that our employment practices are non-discriminatory and supportive of employees who may have specific needs
- To ensure that employees understand their role in valuing diversity and how they can contribute to delivering better quality services, thereby reducing inequality
- To act swiftly in dealing with employees who fail to display the positive behaviours we expect which may include formal disciplinary action up to and including dismissal
- To provide fair access to learning and development opportunities, encouraging and supporting employees in fulfilling their potential
- To develop an effective communication strategy that involves and communicates actively with employees
- To provide support to any employees who may experience any form of discrimination or unfair treatment whilst at work and take appropriate action against people involved in discriminatory or unfair practices

### **Our commitment as a Provider of Accommodation and Support Services**

Saltbox-Restart provides accommodation and related support services to individuals from different backgrounds and communities.

Supporting diverse communities is core to our charitable objectives, mission, vision and values. Since our formation, we have helped to break down barriers to increase participation and success across our supported housing and support services.

To ensure equality of opportunity we will:

- Support underrepresented groups and build effective relationships within the wider communities where we operate through networks and partnerships
- Provide clear, meaningful information about service provision in ways that are accessible and meet the diverse needs of our communities
- Use different methods of communication where required
- Provide information in different formats where required
- Provide a safe and welcoming environment
- Ensure our referral process is clear and does not create unnecessary barriers to participation
- Provide access to fair assessment, and provide outreach assessments where required
- Assess individual needs and ensure resources are available to meet these needs, including access to specialist support services to address the needs of different groups e.g. people with health problems, ethnic minority groups, (ex) offenders etc.
- Monitor allocation of properties and evaluate services to ensure they do not discriminate against, or exclude, individuals or people from different groups
- Make reasonable adjustments to ensure residents are able to fully participate and achieve their goals
- Challenge discrimination and negative behaviour and empower others to do so
- Increase feedback and input from existing and potential service-users to improve our understanding of how we can better support those we work with and reach those who we do not
- Consult service users regularly about equality and diversity to ensure that the services we deliver are appropriate to customers' needs and to inform continuous improvement
- Measure participation of underrepresented groups, encourage involvement in resident focus/steering groups and make improvements where required
- Provide appropriate channels for individuals to raise complaints and/or grievances of unfair treatment, personal interaction and/or in the provision of services

- Deal effectively with complaints about the behaviour of people to whom we provide services where this fails to comply with the principles set out in this policy and to involve other agencies where such behaviour is of a serious concern

Saltbox-Restart reserves the right to withdraw services to any service user if that person behaves in a discriminatory, disruptive or abusive manner to any member of staff, volunteer, service user or other person.

Some residents may find it difficult to fully comply with all aspects of our Equality, Diversity & Inclusion policy due to previous or present distress, illness or as a result of social exclusion. Where this is the case, we will challenge inappropriate behaviour while intervening to alter attitudes and behaviour while maintaining support.

## **Access to Housing**

Saltbox-Restart will look to encourage and maintain diversity in our service delivery by recognising the diverse needs of our service users. We will ensure that services are available in a fair and equitable way to people from all groups within our communities. Referrals and allocations are managed in line with our Referral and Allocation Policy.

## **Lettings**

Saltbox-Restart endeavour to be flexible, non-discriminatory and responsive to demand when allocating accommodation in line with our service criteria, while contributing to the need to be inclusive and the need to achieve sustainable communities.

## **Commitment to others**

- To treat all volunteers in line with the principles stated in this policy
- To work with partners, contractors and suppliers to ensure that they understand our commitments, and ensure that their approach will support our aims
- Widely publicise partnership opportunities to engage diverse organisations and promote social inclusion and sustainable development
- Share best practice throughout our supply chain and provide regular updates on equality, diversity & inclusion issues, where appropriate

## **Procurement**

We are committed to achieving best value in procurement while upholding our equality and diversity principles. We endeavour to ensure that all contractors or suppliers working on our behalf reflect this policy and that our principles are maintained in their dealings with residents and colleagues. Where appropriate, we

will use opportunities that arise through procurement to achieve social value and inclusive outcomes.

## **Involvement and Consultation**

Saltbox-Restart believe that developing meaningful relationships with our service users is critical to our long-term success. Our residents have the best insight into how good our homes and services really are, and we value every opportunity to engage with, and listen to them.

We provide a range of involvement activities accessible to our customers at a level they feel comfortable with, without discrimination or prejudice on the grounds of a protected characteristic.

We regularly monitor the profile of our engaged customers and put measures in place to encourage greater involvement from any under-represented groups.

Whilst some of our customers may prefer a more active role, others may choose to engage using reactive services. We understand that not all customers want to consult with us directly and that different methods (online surveys, social media for example) will provide greater opportunities for customers to get involved.

Throughout our engagement activities, we encourage positive and appropriate behaviours by developing terms of reference and codes of conduct where appropriate.

Our engagement activities include:

- Resident Steering Group, where residents can formally review our performance and service provision
- Consultation with involved residents on a periodic basis to review this policy
- Using the views of residents from diverse communities to inform service review
- A clear and personal complaints resolution process
- Surveys seeking views and opinions on specific service areas
- Activities to shape and influence services
- Social media, including comments and feedback
- Local initiatives (community days, breakfast mornings)

Other forms of engagement include:

- Working with partners organisations to share best practice and deliver local projects that support our customer groups and diverse communities
- Publications and information
- Maintaining our website and social media platforms with relevant and up to date community news and information

We use feedback from our engagement activities to continuously improve our service delivery.

## **Complaints**

Where employees, experience any form of discrimination, harassment, bullying or victimisation, they must report this to their line manager or the Operations Manager, and raise a complaint through Saltbox's Grievance Procedure.

For non-employees such as residents, partners, contractors, suppliers etc. they can raise this via the Saltbox-Restart Complaints process. All allegations of unacceptable behaviour or working practice are investigated thoroughly, and dealt with appropriately in line with the Complaints Policy.

If an employee's actions are inconsistent with the policy, we will use appropriate measures to address inequality. If an employee perpetrates any form of discrimination, we will invoke disciplinary procedures.

If an employee, resident, supplier or partner organisation believes they have observed a colleague experiencing or perpetrating any form of discrimination, harassment, bullying or victimisation, they must bring this to the attention of the Saltbox-Restart or the relevant manager who will investigate and take the case forward in line with our Disciplinary & Dismissal Policy.

Saltbox-Restart will monitor and evaluate complaints and compliments for patterns or trends across all groups with a view to tailoring services to meet diverse needs.

## **Data protection**

Saltbox-Restart need to collect, process and store personal information about residents, employees, suppliers, and other business contacts to carry out its business and provide its services.

Data collected from applicants and residents relating to race, disability, gender, age, sexual orientation and religion/belief can identify any barriers to accessing services and inform service improvement.

Information relating to recruitment, training and employment is used as a means to identify inequality.

The use of all personal information will be treated with full regard to data protection legislation. We will ensure data is processed lawfully, accurate, secure, relevant, and retained for the appropriate period in line with our GDPR Policy.

## **Monitoring and Review**

Saltbox-Restart will implement a programme of monitoring to assess the effectiveness of this policy. We routinely collect and analyse information on employees and residents by gender, marital status, ethnic origin, sexual orientation, religion/beliefs.

Information regarding the number of employees and residents who declare themselves as disabled is also maintained.



Our monitoring includes equalities information relating to:

- Applicants for employment
- Employees
- Applicants for housing
- Allocation of housing
- Service users
- Resident steering group
- Resident satisfaction surveys
- Complaints
- Feedback from people leaving our employment, or who stop using our services.

We will monitor and analyse our performance against relevant national and local data to check for areas of under-representation, which may require our attention and/or action.

The Management Team will review this policy on a periodic basis to ensure that all updates to legislation, or advice and guidance from the regulator are reflected and emerging best practice adopted.

## **Responsibility**

Saltbox-Restart expect all staff and delivery partners to adhere to the principles laid down in the policy and to have an individual and collective responsibility to uphold the commitments and ensure application of the policy in practice.

The Chief Executive Officer is responsible for the monitoring and review of this policy.

The Restart Operations Manager is responsible for ensuring the implementation of this policy and supporting procedures for the maintenance of all necessary records on the CRM system to enable the compilation of regular reports on performance and for the monitoring of performance and delivery of our equality Objectives.

The Restart Support Manager and Property Services Manager are responsible for the day-to-day management and oversight of this policy.