Equality, Diversity & Inclusion Policy

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Confidentiality	C1
Distribution list	HSH Operational Staff, HSH Board of Trustees, HSH Tenants
Sign off date / version	20/03/2024 V1

1. Policy Statement

Hawes Street Housing is committed to providing equality of opportunity and freedom from unlawful discrimination on the grounds of age, sex, sexual orientation, disability, race (including colour, nationality, ethnic origin), religion or beliefs, gender reassignment, pregnancy and maternity status, marital or civil partnership status.

We will:

- Actively oppose all forms of discrimination and unfair or discriminatory practices;
- Value and harness the diversity of our employees, customers, suppliers, partner organisations and local communities;
- Create an environment within which all individuals are treated with fairness and respect, promoting our Dignity & Respect values;
- Tackle prejudice and promote understanding between different groups of people to create a harmonious and respectful workplace and society;
- Take positive action to encourage inclusion and participation of under-represented groups in our workplace and our programmes;
- Embed the concept of British Values within our equality and diversity practices;
- Fully implement the Equality Act 2010 and associated legislation to eliminate discrimination, harassment and victimisation.

Many people suffer discrimination and disadvantage based on their social or economic position e.g. through education, employment status and history, undiagnosed mental health issues, caring responsibility, their housing situation, or a criminal record. Hawes Street Housing regularly comes into contact with customers/clients who face one or more of these challenges and who need support to achieve equality of opportunity, to challenge barriers to participation, achievement and social inclusion.

Through our policy, we aim to support our staff, customers and others we work with to access opportunities that enable them to achieve the best of their ability and create strong, stable and sustainable communities. This policy applies in our employment and personnel practices, and across all areas of our business – in our own service delivery, in our role as a supply chain partner, and as an active member of the communities in which we live and work.

While the overall responsibility for achieving, promoting and providing equality of opportunity rests with Hawes Street Housing, all of our employees, partners, customers and other stakeholders are expected to conduct

themselves in a way that supports and promotes this policy, including freelance and temporary workers, work experience students and apprentices, consultants and contractors.

2. Legal & Regulatory Framework

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3. 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.

We require all subcontractors to reflect the Hawes Street Housing 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.

Any breach of this policy could lead to action under Saltbox's Disciplinary & Dismissal Policy and Procedures for employees.

4. Equality in the Workplace

Equality in the workplace means:

- Having trained staff who understand equality, diversion and inclusion issues (and proactively promote them);
- Having staff who support the company mission and values (and proactively promote them);
- Having staff who reflect the population (and proactively promote it);
- Having staff that will provide services fairly and effectively (and proactively promote them).

Hawes Street Housing has clear procedures covering recruitment, development, and management of staff, which underpin our approach to equality in this area of our business. We will:

- Operate a fair and open recruitment policy.
- Publicise our Equality, Diversity & Inclusion Policy through job specifications and adverts.
- Avoid including discriminatory or restrictive requirements within person specifications.
- Make decisions concerning recruitment, selection, training and development, and career progression of our employees in a fair and unbiased manner, solely on the basis of objective criteria, individual merit and ability.
- Monitor wherever practicable, the age, race, disability, gender, religion or belief or sexual orientation of job applicants and use this information to monitor the effectiveness of our policies.
- Take positive action to ensure the demographic of our workforce reflects the diversity of the community in which they work.
- Take positive action to attract under-represented groups through targeted marketing activity.
- Make reasonable adjustments to meet the needs of disabled and non-disabled job applicants and employees.
- Interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities.
- Discuss with disabled employees annually through the annual appraisal process what we can do to make sure they develop and use their abilities.

- Make every effort when employees become disabled to make sure they stay in employment.
- Provide flexible working arrangements for staff.
- Monitor provision of training and development opportunities for staff to ensure equal access.
- Rigorously address concerns about bullying, harassment or victimisation through our Grievance, Disciplinary & Dismissal policies.
- Ensure that terms and conditions of employment, procedures for redundancy and dismissal are free from all forms of direct or indirect discrimination.

5. Rights of Disabled People

Hawes Street Housing attaches importance to the needs of disabled people. Under the terms of this policy, managers are required to:

- Make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice from external agencies to maintain disabled people in employment);
- Never exclude disabled people from training/development programmes;
- Give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their aptitudes and abilities to allow them to be able to do the job.

6. Complaints

Where employees, customers or partners experience any form of discrimination, harassment, bullying or victimisation, they must report this to their line manager or Service Director, and raise a complaint through Saltbox's Grievance Procedure (for staff) or Hawes Street Housing Complaints process (for customers/clients). If it is not appropriate to do so, they must contact the Finance Director who will support them in taking forward their complaint. All allegations of unacceptable behaviour or working practice will be investigated thoroughly and dealt with appropriately.

If an employee, customer/client, 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 their manager or Service Director who will investigate and take the case forward in line with Saltbox Disciplinary & Dismissal Policy.

7. Personnel Responsibilities

All staff and delivery partners have a responsibility to uphold the commitments in this policy. Specific responsibilities are as follows:

- Chief Executive – responsible for ensuring that sufficient resources are available to facilitate the effective implementation and maintenance of this policy; incorporating the promotion of equality into corporate planning;

- Senior Management Team – responsible for implementing this policy throughout the business:
    - Ensuring all corporate processes and practices (including recruitment, development and other personnel practices) promote fair and equal treatment;
    - Conducting impact assessments, where necessary, for their contract areas;
    - Delivering on our equality objectives;

    - Providing advice and support on equality, diversity & inclusion issues to their managers;
    - Undertaking monitoring activities to ensure the effective implementation of the policy

- All employees – responsible for complying with this policy in all of their dealings with customers/clients, suppliers, partner organisations, local communities, and with each other.

8. Monitoring & Review

Saltbox will implement a programme of monitoring to assess the effectiveness of this policy.

- The HR Manager will monitor on an annual basis recruitment, selection, learning and development activity against protected characteristics to assess the equality of opportunity afforded to staff, and the diversity balance achieved in our workforce.
- Service Directors will monitor customer satisfaction relating to equality, diversity & inclusion and to the service received on a periodic basis via customer surveys and focus groups. Monitoring will be by demographic breakdown where possible to assess whether there is any difference in the service being received by different groups of people.
- Saltbox routinely collects and analyses information on employees and customers by gender, marital status, ethnic origin, sexual orientation, religion/beliefs, grade and length of service in current grade. Information regarding the number of staff and customers who declare themselves as disabled is also maintained.
- Data on customer recruitment, retention and achievement will be analysed and evaluated by demographic breakdown on a periodic basis to consider the parity of starts, outcomes and retention between different groups.

The SMT will review this policy on a periodic basis to ensure that all updates to legislation are reflected, and emerging best practice adopted, and will report back to the Board of Trustees on the effectiveness of the policy to inform the agreement of new objectives and general recommendations for improvement if required.

9. Responsibilities

It is the responsibility of the Board of Trustees to approve this Policy.

The Company Secretary is responsible for the monitoring and review of this policy.

The Hawes Street Housing 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.

The Housing Officer of Hawes Street Housing is responsible for the day-to-day management and oversight of this policy.

10. Legal & Regulatory Requirements

Saltbox-HSH fully accepts its responsibilities and adheres to all UK equality legislation including but not limited to:

- Equality Act 2010
- Rehabilitation of Offenders Act 1974

- Protection from Harassment Act 1997
- Human Rights Act 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Racial and Religious Hatred Act 2006
- any Codes of Practice issued by the Equality & Human Rights Commission
- any amendments to the above legislation

In reference to the above, for more information, please refer to Saltbox's Legal Register.

11. Definitions

British Values:

The Ofsted definition of British Values in education are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.

Direct Discrimination: where one person is treated less favourably than others because of a protected characteristic.

Direct Discrimination by Association: treating someone less favourably than another person because they are associated with a person who has a protected characteristic.

Indirect Discrimination: the application of a policy, criterion or practice which is discriminatory in relation to a protected characteristic and:

a. it isn't applied to someone with whom the individual doesn't share the characteristic
b. it puts, or would put, that group at a particular disadvantage compared to those who don't have the characteristic
c. it is not a proportionate means of achieving a legitimate aim.

Positive Action: where members of a protected group are under-represented, action can be taken to encourage people belonging to that group to take advantage of opportunities for training or work experience, or encourage them to apply for a particular job.

Diversity: the full range of individual values, attitudes, cultural perspectives, beliefs, ethnic background, sexual orientation, skills, knowledge and life experience in any given group of people. Valuing diversity means recognising, understanding, and appreciating these differences and developing an environment that enhances their value.

Reasonable Adjustments: Discrimination occurs when an organisation fails to:

- Take reasonable steps to avoid a provision, criterion or practice puts a disabled person at a substantial disadvantage compared to people who are not disabled; this includes formal and informal policies, rules, practices, arrangements or qualification including one-off decisions and actions.
- Remove or alter a physical features or provider a reasonable means of avoiding a feature e.g. building design, access, fixture/fitting, furniture or equipment where it puts a disabled person at a substantial disadvantage compared to people who are not disabled;

- Provide auxiliary aids or services where this is the only thing that would put the disabled person at a substantial disadvantage;
- Provide information in an accessible format.

Harassment: unwanted behaviour related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment.

Victimisation: treating someone unfavourably because they have taken some form of action relating to the Equality Act e.g. made a complaint under the Act or supported somebody who is doing so, such as appearing as a witness.