

EQUALITY, DIVERSITY & INCLUSION POLICY



MONITORING INFORMATION:

POLICY/PROCEDURE/STRATEGY:	EQUALITY, DIVERSITY & INCLUSION POLICY
DATE APPROVED:	SEPTEMBER 2023
EXPIRY DATE:	SEPTEMBER 2026
OWNER:	HUMAN RESOURCES L&D ADVISOR
APPROVAL ROUTE:	EXECUTIVE MANAGEMENT TEAM

Equality, Diversity & Inclusion Policy

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1. Our Vision

- 1.1. Teign Housing and Templer HomeBuild are committed to providing all our stakeholders with an environment that is diverse, inclusive, and fair in accordance with the Equalities Act 2010.
- 1.2. We are committed to working with our tenants and partners to provide opportunities and develop thriving communities in our local area in accordance with our organisational values:
 - **Respectful**
 - **Resourceful**
 - **Ethical**
- 1.3. We are committed to providing fair and equal treatment to all our staff, tenants, and contractors. We do not discriminate against any person, or group on the grounds of any of their protected characteristics. Promoting and supporting EDI is everyone's responsibility regardless of job role or seniority.
- 1.4. We will eliminate discrimination, harassment, and victimisation through greater knowledge, understanding and appreciation of the differences between us. We will:
 - Ensure our policies and procedures reflect our approach to equality and diversity.
 - Ensure that we clearly communicate our approach to our stakeholders and provide information in plain English and in Braille, large print, audio format or in different languages when required
 - Embed our approach with staff by including this policy in our new starter inductions and through regular training
 - Provide fair services that everyone can access by making reasonable adjustments
 - Operate fair recruitment and employment practises
 - Set targets and objectives for EDI within our Corporate Plan

2. Legislation

2.1. This policy has been written in line with the Equalities Act 2010, the Human Rights Act 1998, the Health and Safety at Work Act 1974, and the Social Housing Regulation Act 2023. The Equalities Act places accountability on organisations to ensure that access to services is made available equally, diversely, and inclusively to all. The Act stipulates that any form of discrimination based on the grounds of a Protected Characteristic is illegal.

2.2. The nine Protected Characteristics are:

1. **Age**
2. **Disability**
3. **Gender Reassignment**
4. **Marriage & Civil Partnership**
5. **Pregnancy and Maternity**
6. **Race**
7. **Religion or Beliefs**
8. **Sex**
9. **Sexual Orientation**

2.3. As a registered social housing provider and charitable organisation, we must also fulfil the requirements set by our Regulator through the Consumer Standards and the Charter for Social Housing Residents to:

- Treat our tenants with fairness and respect
- Treat all employees with fairness and respect
- Demonstrate that we understand the diverse needs of our customers
- Ensure tenants are listened to, engaged with, and treated with empathy and dignity
- Ensure that our services are transparent, open and fair

3. Discrimination and Bias Defined

- 3.1. Direct discrimination is defined as: when a person is treated less favourably and is disadvantaged because of a protected characteristic they have.
- 3.2. Indirect discrimination is when: a person is unjustifiably treated less favourably or disadvantaged due to an activity, policy, procedure, or practise which is indirectly discriminatory in relation to a protected characteristic, or if a person is treated less favourably due to an association with someone else with a protected characteristic.
- 3.3. Unconscious bias is: when immediate assumptions are made about someone else that leads to stereotyping, prejudice, and unreasonable actions or behaviours towards that person, usually due to a protected characteristic.

4. Bullying and Harassment

- 4.1. Bullying can be defined as: "Seeking to harm, intimidate, or coerce someone perceived as being vulnerable". (Oxford English Dictionary, 2019)
- 4.2. Harassment can be defined as: "Aggressive pressure or intimidation". (Oxford English Dictionary, 2019).
- 4.3. We support the right of all people to be treated with dignity and respect at work. We recognise that workplace bullying has a detrimental effect on people and their work, and we will ensure a working environment to support the dignity of staff and customers which is free from bullying and any forms of harassment.
- 4.4. All staff will be made aware of this policy and will be expected to comply with it. Appropriate action may be taken against anyone who violates this policy. All staff will help to create a workplace where bullying is unacceptable, and everyone has a duty to refrain from such behaviour. Managers have a responsibility to raise awareness, respond to complaints and challenge unacceptable behaviour in the workplace.

- 4.5. We recognise our responsibility to protect staff from bullying at work by members of the public or by our customers. Staff have the right to be treated with respect by the people who receive the services that we provide. The bullying or harassment of staff by people outside the organisation will be considered under Teign Housing's Anti-Social Behaviour and Contact Management Policies.
- 4.6. The bullying and harassment policy has both a formal and informal approach in order that complaints can be dealt with appropriately. All counts of bullying or harassment must be reported and actioned appropriately. We encourage complaints to be resolved informally in the first instance, although all complaints of a formal nature will be responded to as quickly as possible in strict confidence.
- 4.7. Under the Health and Safety at Work Act 1997, we have legal duties to ensure the physical and psychological health, safety, and welfare of employees at work. This includes assessing the causes of stress at work and introducing measures to reduce or prevent stress. Teign Housing provides support services for staff in the form of in-house Mental Health First Aiders, Occupational Health referrals, and an Employee Assistance Programme for colleagues experiencing mental health conditions.
- 4.8. Under the Equality Act 2010, members of staff may be legally liable for harassment of colleagues or third parties [including customers] and may be ordered to pay compensation by a court or employment tribunal.
- 4.9. Examples of bullying and harassment that contravene this policy, and may be subject to disciplinary action, include (but are not limited to):
- Unfair treatment
 - Exclusion or victimisation
 - Spreading rumours
 - Making threats
 - Verbal and Physical Abuse
 - Sexual harassment
 - Discrimination against a protected characteristic

- 4.10. We recognise our responsibility to ensure that no members of staff are discriminated against because of their protected characteristics. This could include during recruitment and promotion activities. We also have a duty to protect our customers from discrimination when accessing our services and to promote equal opportunities to all.
- 4.11. We appreciate that a high proportion of our residents live with disabilities or other protected characteristics and vulnerabilities, so we will ensure as far as reasonably possible to tailor our products and services to cater to our diverse customer base.
- 4.12. As an amendment to the Equality Act, the Worker Protection Act places increased accountability on employers to safeguard employees from unsolicited sexual harassment in the workplace. The Act requires employers to take all reasonable steps to prevent and manage cases of sexual harassment. Reasonable steps include senior management support and buy-in, and fostering an organisational culture of respect and dignity, robust reporting processes, risk assessments, and regular staff training.
- 4.13. Teign Housing has a dedicated Sexual Harassment Policy, outlining our approach to deterring sexual harassment at work, and outlining our internal reporting procedures. We will also deliver annual staff training on raising awareness of sexual harassment at work, and which reinforces our internal policies and procedures.

5. Equality Impact Assessments (EIAs)

- 5.1. To promote equality, diversity, and inclusion throughout everything we do, Teign Housing conducts Equality Impact Assessments (EIAs) on all new policies, procedures, strategies or projects that are likely to have implications on our stakeholders.
- 5.2. The EIA template is available on SharePoint and encourages the author to assess the extent to which equality, diversity and inclusion has been considered in the project and to highlight areas where EDI could be further embedded and promoted, and to evaluate all possible steps to eradicate potential discrimination. All completed EIAs are peer reviewed and approved by the Respect for People Panel. The EIA will help us to ensure that:

- we understand the potential effects of the policy by assessing the impacts on different groups both external and internal to the organisation
- any adverse impacts are identified, and actions agreed to remove or mitigate them
- decisions are transparent and based on evidence and clear reasoning

5.3. When procuring new suppliers, staff are required to obtain a copy of the supplier's own Equality and Diversity Policy, or where such a policy doesn't exist for smaller suppliers, they are sent this policy and asked to agree to the principles of Teign Housing's policy. This is to ensure that equality, diversity, and inclusion is embedded into our supply chains. All supplier E&D policies are vetted by the Respect for People Panel.

5.4. Where appropriate, EIAs should consider any reasonable adjustments that can be made to lessen the impact of any accessibility barriers faced by customers or colleagues.

5.5. A reasonable adjustment involves making a change to the way that we do things to enable people to access the services we provide. There is no prescribed list of reasonable adjustments as this will depend on the individual needs. In terms of what is 'reasonable', the Equality and Human Rights Commission suggests that the most relevant considerations are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the individual
- The practicality for us to make the relevant adjustment(s)
- The availability of our resources including external assistance and finance
- Any disruption to the service that making the relevant adjustment may cause

5.6. Not only do we have a legal duty to do this, but we also need to ensure no one is at a disadvantage, for example, because of their disability or vulnerability.

6. The Respect for People Panel

- 6.1. The Respect for People Panel is our internal Equality & Diversity body, with a remit to plan, oversee and monitor key organisational activity in all aspects of equality, diversity, and inclusion. The Group will produce an action plan/tracker to monitor and assess key activities.
- 6.2. The panel consists of staff representatives from each department to ensure that there is a consistent approach at all levels of the business, including representation from our subsidiary company Templer HomeBuild.
- 6.3. The panel meet regularly to oversee and monitor organisational activities to ensure that they remain compliant to the Equalities Act 2010 and promote fairness and diversity. The group will also lead on organisational training and awareness campaigns as well as providing feedback on Equality Impact Assessments from across the organisation. The panel exists as an advisory body to the organisation, and to ensure that best practise is adhered to across all our services.
- 6.4. The group meets bi-monthly, and reports into the Customer Experience Committee to provide operational updates to the committee members on how we are continuing to support our customers and colleagues from an equality and diversity perspective.

7. Recruitment & Disability Confident

- 7.1. We operate fair recruitment and employment practices that are managed by our Human Resources team (this is managed by Ian Williams for Templer HomeBuild staff). They write and monitor our recruitment policies which consider the equality and diversity in our recruitment process and training.
- 7.2. Teign Housing is proudly recognised as a 'Disability Confident Employer'. This demonstrates our commitment to recruiting and retaining a diverse range of job candidates based on the skills, abilities and experience they can offer, regardless of any disability or health conditions they may have. Teign Housing will make reasonable adjustments where appropriate to enable those with any disability to attend interviews.

8. Monitoring & Review

- 8.1. This policy will be monitored by The Respect for People Panel on an ongoing basis. Updates will also be communicated to the Executive Management Team, and the Customer Excellence Committee. For further information on the Equalities Act 2010, and our legal obligations, please visit <https://www.gov.uk/guidance/equality-act-2010-guidance>