

policy



equality and diversity

Responsible Officer:	Assistant Chief Executive Resources
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Regulatory Code:	Tenant Involvement & Empowerment Standard
Scope:	Group Wide

Equality and Diversity

1.0 Introduction

1.1 We believe that equality and diversity are at the heart of everything we do and underpin our vision and values.

Our vision

- Improving Lives Incommunities.

Our Values

- Use our strength and influence to improve people's lives
- Communities should be great places in which to live.

1.2 Our Equality Strategy (2012 - 2015) supplements this policy and supports key Equality priorities that address the Protected Characteristics as contained within the Equality Act 2010:

- ▶ age
- ▶ disability
- ▶ gender reassignment:
- ▶ marriage and civil partnership
- ▶ pregnancy and maternity
- ▶ race
- ▶ religion or belief
- ▶ sex (gender)
- ▶ sexual orientation

1.3 'The Strategy' enables us to consider discrimination, disadvantage and unfairness in the broadest sense and, in doing so, helps us in delivering more effective services for individuals and more inclusive policies, procedures and processes.

2.0 Statement of Intent

2.1 This policy applies to all employees of the Incommunities Group including employees of subsidiary companies, contractors, volunteers, agency workers and those on work placement.

2.2 The Incommunities Group is committed to the principle that all **customers** have the right to the same high standards of provision and services.

2.3 The Incommunities Group is committed to ensuring that all **employees** are treated with dignity and respect:

- We are committed to equality and diversity and recognise the nine protected characteristics as defined by the Equality Act 2010
- We will make sure that this policy complies with all legal, statutory and regulatory requirements
- The Board and Executive Management Team are responsible for ensuring that commitment to equality and diversity is embedded within the organisation at all levels through the provision of regular training, briefings and the completion and reporting of Equality Analysis of strategies, policies, procedures and key decisions and service changes
- They will provide clear and consistent messages on the principles of fairness, dignity and respect
- We are committed to the recognition of equality and diversity in each of the nine protected characteristics, which enables people from all communities to achieve their potential and not be subject to prejudice and discrimination
- We will seek to make sure that no unlawful or unfair discrimination takes place against an individual or a group directly or indirectly
- We are committed to placing equality and diversity principles at the core of all of Incommunities Group business activities.

2.4 We recognise the importance of social and financial inclusion and that in addition to the protected characteristic our customers may face social and financial disadvantage. The Incommunities Group recognises that it cannot tackle equality and diversity issues in the communities and neighbourhoods it serves in isolation and we will work in partnership with district wide stakeholders and communities of interest to develop and deliver our Vision and Values.

2.5 **We define equality as:**

- Elimination of unlawful discrimination both direct and indirect through regular customer consultation and/or customer equality groups, and completion of equality analysis.
- Treating people fairly with dignity and respect
- Making decisions or judgements about people based on individual merit and need not through bias, prejudice, assumptions or stereotyping
- Creating a climate where everyone has fair and equal access to employment, promotion opportunities and training through inclusive people policies and procedures

- Maintaining a working environment, which is free from discrimination, harassment, victimisation or bullying
- Providing equality of access to our services, ensuring a consistent standard of service delivery to all customers.

2.6 We define diversity as:

- Recognising and respecting differences
- Striving to achieve equality for an increasingly diverse customer and employee groups
- Providing appropriate services that match differing needs and preferences
- Providing training on and promoting good relations between people who have different backgrounds and experiences.

3.0 Policy

3.1 We will ensure that the principles of dignity and respect and equality and diversity apply across all of our business and employment activities and that it is an integral part of business planning and service delivery.

3.2 We will ensure that any personal monitoring information collected about staff or customers will be kept confidential and only shared with the relevant employees. It will be explained to any individual providing information exactly who the information will be shared with and for what purpose. Where we are required to share personal data beyond employees, for example where required to by law, we will do so in line with our Data Protection Policy.

3.3 Governance

3.3.1 The Board of Incommunities Group Ltd is fully committed to promoting equality and diversity across all of its business activities and is united in tackling discrimination of any type. The Board will ensure that:

- It provides effective leadership and delivers a clear vision on its principles relating to equality and diversity
- Its composition and leadership represent the diversity of the areas in which we work as far as possible given the appropriate skills and experience
- Targets are set that relate to the composition that reflects the diversity of the areas in which we work
- The Groups' equality and diversity objectives are underpinned in Board recruitment, selection and succession policies and procedures.
- The Board and Committee appraisal, training and development programmes include equality and diversity objectives and support Members in achieving their leadership role in this area

- It develops training and support programmes for new and existing Board Members to assist them in leading the promotion of equality and diversity within the organisation
- The Board or its Committees in approving changes to policy will have regard to the accompanying Equality Analysis
- The Code of Conduct sets out its expectations of all Board and Committee Members in respect to equality and diversity, and it has procedures for dealing with those members who fail to meet those expectations
- It has in place an Equality and Diversity Board Champion to promote and embed equality and diversity.

3.4 Employment

3.4.1 The Incommunities Group will develop an employee profile and analyse the results to monitor how it compares with the diversity of local communities. We will adopt recruitment, support and retention practices (for example, flexible working procedures) to ensure that this profile remains representative in the future.

3.4.2 The objective of the Recruitment and Selection Procedures is to employ the person who best meets the personal criteria for the position available and ensuring the principles of equality and diversity is central to this process:

- We will eliminate all forms of illegal discrimination in the areas of recruitment and employment and will take positive measures to encourage employees and potential employees from under-represented groups to take up employment and promotion opportunities
- We will ensure that all candidates who consider they to have a disability and meet the essential criteria for a post will be selected for interview and measures will be adopted to take account of individual needs throughout a person's employment
- We will ensure that job applicants and employees are provided with suitable access to buildings and working environments in-line with current legislation
- We will ensure training programs covering the nine protected characteristics are mandatory for all employees and will monitor outcomes of this training.

3.5 Training and Development

3.5.1 The Incommunities Group will provide mandatory equality and diversity training within the first six months of employment as part of employee induction. Further training specific to employees' roles and service areas will be undertaken when required, focussing on legal or good practice:

- We will ensure that the criteria and selection procedures for courses leading to qualification will be based on the principles of equality and diversity so that all employees have the same training opportunities regardless of their working arrangements, receiving support from line managers as appropriate, based on individual training needs
- We will make reasonable adjustments to accommodate the particular needs of individual employees
- We will ensure that all training and development needs are identified through the appraisal process
- We will ensure that measures are implemented to analyse and evaluate all training and development programmes delivered, monitoring levels of opportunity provided across the organisation.

3.6 Services

3.6.1 The Incommunities Group is committed to delivering the highest standards of housing and related services in meeting the diverse needs of customers and will achieve this by:

- Promoting good relations between people and taking the nine protected characteristics into consideration
- Responding seriously to, and investigating complaints of, bullying, harassment, discrimination, victimisation or hate crime of any kind
- Periodically monitoring demographic changes in all the nine protected characteristics
- Carrying out and reporting on equality analysis in all key service areas to ensure any new policies or changes to existing policies or services do not have a negative impact on any particular group of people. Policies will be assessed on the possible negative impact on each of the nine protected characteristics, plus their potential socio-economic impact
- Promoting social inclusion through working in partnership to establish housing support needs and preferences to meet the diverse needs of local communities
- Providing reports to the Board and Committees on how existing and future services meet the diverse needs of local communities
- Providing services that are sensitive to the diverse needs of individuals, groups and local communities

- Ensuring that customers, stakeholders and service users have suitable access to our service access points.

3.6 Customer and Community Involvement

3.6.1 The Incommunities Group places customer involvement and participation at the heart of its business and this includes incorporating a diversity of residents' views, expectations and aspirations regarding our services:

- We will deliver the highest standards of service to people living in our communities within a framework of empowerment, engagement and value for money
- We have developed a customer involvement toolkit that provides a detailed overview regarding how to make consultation/meetings accessible
- We have a scrutiny process which customer's inspectors play a pivotal role.
- We will reflect the views and expectations of customers in our business planning and service review processes in monitoring performance and improving services
- In supporting community and tenants' groups, we will work with them to ensure that equality and diversity principles are integrated into their terms of reference and are acted upon
- As part of its general approach to customer involvement, we will develop and support structures to ensure that groups related to each of the nine protected characteristics are able to become involved in our activities
- We will consult with a diverse range of customers from the nine protected characteristics who are under-represented at community involvement events to see how they would like to be involved in participation and consultation in relation to service delivery and review, removing any potential barriers to involvement
- We will assist customers to be actively involved in scrutinising our services by building strong panels with groups to help us provide transparent services
- We will ensure our consultations are fully inclusive of all our customer base and provide accessible venues and other reasonable adjustments for this to happen in line with our customer consultation toolkit.

3.7 Contractors, Consultants, Partners and Suppliers

3.7.1 The Incommunities Group will ensure that contractors, consultants, partners and suppliers meet the objectives of this policy.

- 3.7.2 We wish to engage with suppliers who take active steps to follow good practice in promoting equality and diversity within its own staff teams, and are willing to work within the remit of the Incommunities Group Equality and Diversity, Dignity & Respect policies.
- 3.7.3 As a criterion for award of work or contracts and as a condition for doing business, we have specified the requirements of contractors, consultants, partners and suppliers in meeting equality legislation and eliminating all forms of discrimination:
- We will maintain standards promoting equality and diversity in service areas where contractors, consultants and partners are employed
 - We will develop standard contract agreements with contractors, consultants, partners and suppliers that meet the Incommunities Group equality and diversity principles
 - Where catering and/or other culturally sensitive events are being contracted out to external providers, discussions and guidance with regards to the Incommunities Group expectations will be initiated to ensure that services are delivered in line with the Incommunities Group expectations.

3.8 Communication

- 3.8.1 The Incommunities Group will involve customers and employees in developing our policies in a variety of different ways, including all of our service review groups:
- We will ensure that all information provided for service users is in plain and understandable language.
 - Upon request customers can access communication in differing formats including, CD's and braille (subject to being a cost effective communication method)
 - We will involve customers and other stakeholders in, monitoring performance, evaluating and reviewing services and carrying out self-assessment reviews as required
 - We work with our customer Editorial Panel whose role is to check our communications to ensure that the content of our communications are written in an understandable, jargon free format
 - We will ensure our website is accessible in other languages and for those whose sight is impaired.

4.0 Performance Management

4.1 The impact of Equality and Diversity practices across the Incommunities Group will be monitored by the employee and customer Equality Steering Groups. The finding will be reported through to the Executive Management Team and the Board upon request.

The Equality steering groups will:

- Evaluate the effectiveness of the equality and diversity work by the Incommunities Group in meeting customer expectations
- Where relevant information is available, compare the Incommunities Group performance with other organisations to ensure the highest standards of service delivery
- Showcase good practice and learn from good practice initiatives, including at Housing Practitioner forums
- Use information from surveys and research to continuously improve policies and services. Where trends relating to the Protected Characteristics are identified actions will be taken as deemed appropriate
- Monitor complainants by the nine protected characteristics to ensure fair access to services and their standard of delivery
- Monitor the delivery of the objectives within the Employee and Customer Equality Strategies.

5.0 Responsibilities Associated with the Policy

- 5.1 The Governing Body and Executive Management Team have specific responsibility for overseeing that the organisation has in place effective controls.
- 5.2 Line Managers are responsible for ensuring this policy is implemented and that team members are aware of and understand their responsibilities.
- 5.3 All employees are responsible for ensuring that they are aware of, understand and comply with this policy as abuse of this policy will invoke disciplinary action.
- 5.4 The Policy and Performance Team are responsible for monitoring and reviewing the policy in accordance with legislation and good practice.

6.0 Other Linked Policies and Procedures

- ▶ Dignity and Respect Code of Conduct (Board Members, Employees and Involved Residents) Disciplinary Policy and Procedure

7.0 Review

- 7.1 We will undertake a review of this policy annually or whenever there are any relevant changes to legislation, case law or good practice that would impact on this policy or in the light of any required service improvements identified through our Complaints Policy.
- 7.2 We will constantly review service provision in line with systems thinking principles, and will undertake regular reviews to ensure continuous improvements and value for money in the delivery of our services.
- 7.3 The Board of Incommunities Group Ltd will be responsible for ensuring that reviews of this policy are carried out annually and that the policy contributes to and complements the strategic objectives of the organisation.
- 7.4 Last reviewed: February 2016