

# Equality, Diversity and Inclusion Policy

## Scope of Policy

This policy sets out the steps taken to meet Platform Housing Group's (the Group) legal obligations to eliminate unlawful discrimination, advance equality of opportunities and foster good relations within the workplace and in communities where we provide services. It also outlines our proactive approach to creating an inclusive culture with our employees, customers and partners.

## Definitions of Equality, Diversity and Inclusion

The Group understands **equality** as offering the same level of opportunities to thrive and succeed within our organisation to all colleagues, regardless of their background and/or identity; whereas equality in relation to our customers means enabling fair and equitable access to all services we provide as prescribed by law.

**Diversity** is understood within the Group as acknowledgement and celebration of different backgrounds and identities, often intersecting with each other, that our colleagues and customers represent. The Group appreciates that diversity of our colleagues and customers enhances our ability to succeed both as an employer and housing provider.

**Inclusion** refers to our proactive approach to respecting and valuing colleagues and customers because and despite of their background and/or identity.

Our approach to equality, diversity and inclusion is designed to continuously develop a sense of **belonging** among colleagues and customers who genuinely feel that they matter, that their opportunities to have a voice and succeed are prioritised, that their diversity is recognised and celebrated and that they have the sense of psychological safety in the workplace and in communities in which they live.

## Applicability

This policy applies to all members of the Group which includes the Board, panels/committees and all subsidiaries of the Group. It also applies to all Group employees and customers, and to those who provide the Group and our customers with goods and services.

### 1. Policy Statement

1.1 This policy sets out our commitment to promoting and managing equality, diversity and inclusion (EDI) within the Group, and for dealing with any form of discrimination and harassment of individuals or groups because of their:

- Age
- Disability
- Gender reassignment and identity
- Marital or civil partnership status
- Pregnancy or maternity

- Race
- Religion or belief
- Gender
- Sexual orientation

1.2 It also aims to address and alleviate any cause of inequality or discrimination, including socio-economic deprivation.

1.3 The purpose of this policy is, **firstly**, to prevent any employee, customer or Board member from acting in a discriminatory manner, or from harassing or intimidating any other employee or potential employee, Group customers/potential customers or Board members.

Reports of discrimination, harassment or intimidation will be dealt with both seriously and sensitively and, if required, appropriate disciplinary or other administrative action will be taken against any employee, customer or Board member who are found to be in breach of the terms of this policy. A more detailed policy statement and guidance on harassment, bullying and victimisation can be found within the Dignity at Work Policy which complements this policy.

1.4 **Secondly**, this policy aims at setting out clear principles upon which the culture of inclusivity and celebrating diversity can be actively built, maintained and promoted throughout the business. This culture is aligned to our corporate values and behaviours.

Under the **People Matter** value, we put colleagues and customers at the heart of everything we do. Valuing difference, we are free to challenge each other and are open and honest in our relationships.

**Owning It** means that we say what we'll do and then we do it. We listen, understand and are empowered to make decisions. We look for our own ways to learn and adapt and focus on what we can do.

**One Team** means we are connected, collaborative and in it together. We want everyone to reach their potential and be the best they can be. We actively support each other to make this happen.

And finally, under **Be Brave** we look for better ways to do things, are comfortable trying them and learn quickly. We are not afraid to stand out from the rest and celebrate our successes.

The policy reflects current legislation and key definitions for equality. While it refers to equal and fair treatment of groups and persons as specified by law, it also strives to provide the basis for building an inclusive culture in which talent and aspirations of all employees are recognised and supported. We also understand the organisational benefits and operational benefits that proactive adherence and implementation of this policy will bring to the Group.

The policy also aims to set out our inclusive approach to providing services in an inclusive manner to all our customers.

- 1.5 This policy should be read in conjunction with the Group's **Corporate Strategy 2021-26** as well as the **Equality, Diversity and Inclusion Strategy 2021-26** which provides clear measures and performance indicators allowing us to demonstrate progress in achieving our EDI aims and objectives. The list of other associated documents is provided below.
- 1.6 The **Equality, Diversity and Inclusion Strategy** clearly sets out the governance and accountability framework that establishes operational responsibilities the Group has under the equality law. However, this policy is clear in establishing that responsibility for introducing the principles of EDI applies to all persons specified above under the heading of Applicability.

## 2. Context

- 2.1 The Equality Act 2010 is the main legislative source for this policy. The Act reviews, revises and consolidates previous equalities-related legislation to create a single approach to unlawful discrimination.
- 2.2 The Group is strongly committed to ensuring that equality of opportunity, valuing diversity and culture of inclusivity are key principles in our business. We developed this policy to help us meet our aspirations contained in our new **Corporate Strategy 2021-2026**. Being recognised as both an employer of choice and a well-respected social housing provider are key strands of our strategic objectives. Adopting this policy will enable us to put measures in place that strive to prevent discrimination of individuals and groups and take a proactive approach to meeting our legal and regulatory obligations as well as adhering to best practice.

### 2.3 Socio-economic Equality and Inclusion

There is growing acceptance by social housing providers that the Welfare Reform Act 2012 has caused some individuals and groups to be at greater risk of socio-economic deprivation. Consequently, the banner of 'Diversity and Inclusion' has acquired a wider socio-economic definition than the protected characteristics defined in the Equality Act 2010.

- 2.3.1 Although not bound by the Public Sector Equality Duty to do so, the Group embraces this wider definition of Diversity and Inclusion and will seek to improve community cohesion and resilience through various projects and initiatives such as employability, adding social value, job-seeking and health and wellbeing initiatives, digital inclusion, understanding of communities in financial and economic distress, their aspirations and changing needs, and improving choice in housing options.

- 2.3.2 Internally, the Group will be mindful of socio-economic barriers and lack of social mobility in areas of deprivation while planning its recruitment and retention strategy. It will also take special care in how it monitors career progression across the protected characteristics. This approach will consider flexible working and care arrangements.

### **3. Aims and Objectives**

- 3.1 This policy has the following aims which are aligned with the Group's **Equality, Diversity and Inclusion Strategy**:

- To help the Group in creating an inclusive workplace environment where everyone is encouraged to bring and share their true best
- To ensure that our service delivery is fair, inclusive and more effective in recognising specific needs of our customers
- To provide guiding principles that will help the Group to eliminate the potential for unlawful discrimination in the workplace and service delivery by looking into our processes and impacts that they have
- To set out the Group's clear zero tolerance approach to any form of discrimination, harassment and bullying
- To serve as a guiding document for our partners as we strive to become Leader, Partner and Influencer both within our sector and beyond

### **4. Policy Outline**

#### **4.1 People and Workplace**

- The Group recognises and takes very seriously its legal duty not to discriminate against any individual or any section of society in our employment policies and procedures. It values a diverse workforce, believing this enhances its effectiveness and overall success as a business. It aims to reflect the diversity of the communities it serves in the workforce at all levels.
- In order to ensure this happens each applicant is asked to complete a diversity monitoring form. The diversity profile of applicants and successful applicants is then monitored to ensure effectiveness and fairness of advertising vacancies.
- Vacancies will be advertised as widely as possible using inclusive language and, if necessary, specialist recruitment platforms to attract talent from diverse groups e.g., disabilities, LGBTQ+, Black and Minority Ethnic (BME) groups but also deprived local communities.
- The Group is committed to making reasonable adjustments within the workplace and ensuring that colleagues with disabilities are treated equitably in comparison with others. This will include proactive efforts to accommodate people requiring reasonable adjustments during the recruitment process.
- By applying a proactive approach to general positive action provisions in the Equality Act 2010, the Group seeks to address disadvantage and under-

representation among protected groups. The Group recognises that this provision allows account to be taken of a candidate's protected characteristic in recruitment or promotion if the candidate is as qualified as another candidate and, additionally, if the Group "reasonably thinks" that the protected group is at a disadvantage or is under-represented. The Group recognises that the positive action must not be confused with positive discrimination, which is unlawful e.g., the setting of quotas (as opposed to targets, which are lawful) or any form of preferential treatment.

#### 4.2 Learning and Career Development

- The Group is committed to ensuring that all employees have equal access to training and are positively encouraged to participate in learning opportunities relevant to their roles.
- The Group will provide appropriate learning on the main principles of equality, diversity and inclusion legislation and on our approach to creating the culture of diversity and inclusion within workplace. All employees are to take their obligation to attend such training seriously as this will demonstrate they embrace the Group's commitment to the principles of EDI.
- To ensure fairness, the Group will monitor how career development opportunities within the organisation are offered to all employees regardless of their background or self-identification (e.g., Lesbian, Gay, Bisexual, Trans and Questioning or LGBTQ+, ethnic/religious background or disabilities, gender).

#### 4.3 Customers and Communities

- The Group is committed to a policy of fair housing, to ensure that all groups and individuals have equal access to our resources and that they are treated fairly when they become our customers. Regular research, examination of local demographics data and trends, but also robust Equality Impact Assessments are to assist this process.
- The Group takes a careful approach to developing an in-depth understanding and insight into who our customers are, what challenges and opportunities they face within their communities and how we can best engage them. This policy will rely on our Customer Experience Strategy for practical methods of developing this in-depth insight.
- The Group will undertake equal opportunities monitoring of housing applications and all allocations. This is to be carried out to ensure that people from all groups have equal access to housing and are treated fairly, subject to provisions in the Local Lettings Plan which will have been assessed for their equality impact. The Group is committed to acting where it finds that the housing needs of any group are not being met. We will monitor the proportionality of lettings to BME communities in our operational area. Other customer groups will be monitored for fair access to housing as specified in the EDI Action Plan.

- The Group is committed to meeting the needs of disabled customers, in terms of both service delivery and housing design where applicable. Customers are encouraged to be part of decision-making processes to improve both physical access and access to services. Disabled access is to be provided to all offices where reasonably practicable. The Group encourages methods of service delivery which are more accessible to those with disabilities, such as the telephone service, online services and producing information in alternative formats.
- The Group condemns all forms of harassment, victimisation and bullying. It recognises its duty to ensure that all customers can enjoy the privacy and comfort of their homes. It has adopted clear procedures for dealing with harassment, bullying, victimisation and hate crime including reporting, victim support and action against perpetrators.

#### 4.4 **Access to Information and Services**

The success of the Group depends to a large extent on how we communicate with the community about services and employment opportunities. We will ensure that:

- our customers have equal opportunity to access the information about our business, our services and employment opportunities
- our employees are trained to have the skills, information and understanding to respond to all our communities appropriately
- customers are aware that information is available in all formats, including different languages, audio, braille, Easy Read and that any other communication needs are met e.g., important cultural or religious considerations will be considered when providing service and information
- our offices and buildings are as accessible as possible

#### 4.5 **Development and Shared Ownership**

The Group will ensure EDI considerations are incorporated into all relevant aspects of development and shared ownership initiatives and strategies. These include:

- the data which is used to identify the needs and trends within local demographics
- the location of schemes
- the design and specification of schemes where possible
- the marketing of schemes
- the consultation undertaken, as well as procurement and contract processes

The Group recognises that successful development depends on:

- up-to-date data on the housing position of local people in the area where it operates
- a development strategy which considers, as much as possible, the needs of local people in terms of location, type, design and specification of schemes

- robust consultation with local community groups and customers
- maintaining close relationships with specialist charities and advocacy groups representing the needs of vulnerable groups
- shared ownership schemes which are taken up by a wide cross section of people, including those who experience social exclusion

## **5. Equality and Diversity**

5.1 We are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

### **5.2 Equality Impact Assessment**

An Equality Impact Assessment has been undertaken in respect of this policy and identified no negative impacts on any persons or group with a protected characteristic as a result of this policy.

## **6. Complaints**

6.1 The Group aims to meet the needs of its customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to the Group's [Complaints, Comments and Compliments Policy](#).

## **7. Monitoring and Review**

7.1 The effectiveness of this policy will be reviewed by the Platform Together steering group which will recommend it for approval to Group Executive Team and Board via the People and Governance Committee. The EDI Action Plan contains specific targets and performance indicators which are monitored and reviewed to reflect the effectiveness of this policy.

Equality Impact Assessments will form an integral part of the policy development process and will be required with regards to all policies having an impact on employees and customers.

The next policy review is scheduled for January 2024 and then 3 years thereafter.

7.2 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.



## 8. Associated Documents/Policies

### 8.1 List of documents/associated policies/publications:

- Corporate Strategy: Building a Truly Modern Housing Association 2021-2026
- Equality, Diversity and Inclusion Strategy 2021-2026
- Dignity at Work Policy
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Customer and Community Engagement Strategy 2021-2026
- Customer Experience Strategy
- Hate Crime Policy
- Anti-Social Behaviour (ASB) Policy
- Parental Leave Policy
- Maternity Leave and Pay Policy
- Paternity Leave and Pay Policy
- Adoption Leave and Pay Policy

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