

# **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

**Equality** means ensuring everyone is treated fairly, with an active focus on addressing and removing discrimination and barriers.

**Diversity** means acknowledging and valuing differences that make up person's identity.

**Inclusion** means creating an environment where all people are valued, respected and able to be their true selves.

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 clear principles which enable a culture of inclusivity where diversity is actively celebrated, 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 Purpose, Vision and Mission and **Corporate Strategy 2021-26** as well as the **Equality, Diversity and Inclusion Framework** 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.

## 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 policy also takes into consideration the major regulatory changes within the social housing sector which include, the new Consumer Standards, The Better Social Housing Review, new Tenant Satisfaction Measures (TSM). The policy is also informed by the renewed focus on EDI priorities and benefits of EDI to the Group as identified by the Executive Team and Board, as well as the Group's Purpose, Mission and Vision that underpin our strategic objectives.
- 2.3. 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.
- 2.3.1 Internally, the Group will be mindful of socio-economic barriers and poor 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 Framework**:
- 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 aid the realisation of the Group's Purpose, Mission and Vision.

## **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.
- 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+, ethnic minority groups but also deprived local communities.
- We are committed to making reasonable adjustments within the workplace and ensuring that colleagues who declare 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, we seek to address disadvantage and under-representation among protected groups. We recognise 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 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.
- 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.
- The Group is committed to meeting the needs of customers who declare disabilities, in terms of both service delivery and housing design where applicable. Customers are encouraged to be part of decision-making processes also known as cocreation to improve both physical access and access to services. Disabled access is to be provided to all offices where reasonably practicable. The Group will provide reasonable adjustments in relation to alternative communication methods.
- 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 **Development and Shared Ownership**

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

## **6. Complaints**

6.1 We aim to meet the needs of our 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 our 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 regard to all policies having an impact on employees and customers.

The next policy review is scheduled for May 2027 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 an updated version is available.

## 8. Associated Documents

- 8.1 List of documents - associated policies, procedures and publications:

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

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