



Equality, Diversity and Inclusion Policy

1.0 Purpose and scope

This policy sets out our approach to equality, diversity and inclusion. It highlights our commitment to maintaining fairness and inclusivity as a housing provider and an employer.

We recognise that transparency and engaging with residents and employees is the most effective way to maintain an accurate view of Equality, Diversity and Inclusion in the communities that we serve, the workplace and wider society. We employ a pro-active approach ensuring that the diverse needs of employees, residents and stakeholders are met.

This policy includes our approach to the effects of wider social issues on our residents, employees and stakeholders and our commitment to providing reasonable adjustments in service provision.

We will:

- Ensure inclusive service provision, whether these services are primarily provided digitally or in other ways;
- Recognise the individual needs of both employees and residents and tailor our decision-making processes accordingly;
- Comprehensively and proactively tackle discrimination and unfair treatment of employees, residents and stakeholders;
- Encourage greater awareness and understanding of different protected and non-protected characteristics;
- Remain abreast with external topics that affect our residents and employees;
- Be at the forefront of creating a truly equal, diverse and inclusive workforce.

2.0 Definitions

Equality:¹

- Understands that every individual has an equal opportunity to make the most of their lives and talents, a right to be treated the same as everyone else, and believing that no one should have poorer life chances because of where, what or whom they were born, what they believe, or whether they have a disability.
- Recognises that historically, certain groups of people with protected characteristics have experienced more discrimination.

¹ The definition of equality was adopted from the [Equality and Human Rights Commission](#)

Diversity:

- Means that everyone is unique and recognises, values and takes account of people's different backgrounds, knowledge, skills, needs and experiences.
- Encouraging and using those differences to create a cohesive community and effective workforce.

Inclusion:

- Strives to make every individual or group feel welcome, accepted and respected.
- Creates an environment which meets the needs of people with different backgrounds allowing them to reach their full potential.

Protected Characteristics²:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation.

Unprotected Characteristics: characteristics which are not included in the Equality Act 2010, such as; height, weight, care responsibilities, education and socioeconomic class, but which may still lead to prejudice/discrimination.

Reasonable Adjustments: designed to support residents/employees needs whilst accessing our services as a housing provider/employer, to remove barriers, enabling residents/employees with a disability to access the same benefits, terms or conditions as other residents/employees.

Diversity Impact Assessment: an analysis of data with the aim of identifying if any residents/employees with protected characteristics are negatively impacted, as a result of the policy, procedure, project or guidance.

3.0 Policy statement

We are committed to respecting and promoting equality, diversity and inclusion for residents, employees, stakeholders and volunteers.

In accordance with the Equality Act 2010, we will not tolerate any discrimination, harassment or victimisation of someone because they have or are perceived to have a 'protected characteristic' or are associated with someone who has a protected characteristic.

² [Protected Characteristics as defined by the Equality Act 2010](#)

In addition to this we will not tolerate discrimination against unprotected characteristics (as defined in this policy) and will investigate cases where such allegations have been made, where a resident or employees believes they have been excluded or treated unfairly.

Although we are not a 'public body' within the meaning of the Equality Act; as a social housing provider, we have adopted and give due regard to the aims of the Equality Duty as part of our policy. Giving due regard means consciously thinking about the aims as part of the process of decision-making.

We recognise a statutory duty to challenge any instances of discrimination as an employer, landlord, service provider, and through our contractors and any person/organisation that works with us or on our behalf.

3.1 Diversity and Inclusion

We will support residents and employees when sharing experience of diversity and inclusion and provide them with the platform to facilitate open discussions and training if they wish.

When commissioning contractors and third-party services, we will ensure that they are committed to equality, diversity and inclusion.

As essential best practice, we will systematically monitor our service delivery and employment practices to ensure equality of opportunity and eliminate any discriminatory behaviours, policies and practices.

3.2 Diversity Impact Assessments

Diversity impact assessments will be used when creating new policies, procedures, strategies and restructures.

The aim of diversity impact assessments is to highlight any unintentional bias and alter the way we work accordingly. Bias can be identified when analysing our diversity data and understanding whether a group is affected by our policies or procedures negatively. Whenever we are made aware of any unintentional bias as a result of our process, this will trigger a review.

3.4 Diversity Data

We collect data on the protected characteristics of residents and employees. We use this data to analyse if our policies, procedures, guidance or projects could have a negative impact on the groups they affect.

Where we keep data on protected characteristics for residents and employees, we will follow the principles of the UK GDPR and the Data Protection Act 2018 and our Data Protection policy.

When we report this data, we will not use it in any way that will enable individuals to be identified, unless they have given permission for the data to be used in this way.

We will continue to improve the quality of the data held on employees and resident diversity. The data will be used to improve service provision and workplace practices where applicable.

4.0 Recognising Wider Social Issues

We are mindful that issues in current affairs and news which affects our communities can be brought to our attention by our residents and employees.

Where new issues emerge, we will strive to learn and gain knowledge to support and truly empathise with any affected employees, residents and stakeholders.

It is the responsibility of everyone, and not only the responsibility of the affected individuals, whether employees, residents or stakeholders, to educate the organisation. We all have the responsibility to do our best to be sensitive with emerging issues, and not undermine continued efforts to live in an equal, diverse and inclusive organisation. We encourage those who live in our communities to also be sensitive to emerging issues.

We will learn from what is going on around us, and use this to develop appropriate policy, procedures, guidance and strategies.

5.0 Our Residents

We will deliver services to our residents in a fair, equal, inclusive and non-discriminatory manner. We will ensure that the protected and unprotected characteristics (as defined in this policy) of our residents do not affect their accessibility to our services.

We are committed to understanding and celebrating the diversity of our residents, resulting in effective service delivery.

We will encourage the development of resident groups and panels, to improve resident participation with the help of our Resident Involvement Team. This will enable residents to have greater input into how we deliver our services.

We will support and facilitate equality, diversity and inclusion activities through our resident forums and panels.

5.1 Reasonable adjustments

We are committed to ensuring that no one is at a disadvantage when accessing our services. The following statements do not endeavour to detail how we would approach every scenario but are intended to provide a general overview ensuring that the services that we provide are tailored to the needs of our residents.

Reasonable adjustment is about adjusting our provision of services, which does not include aids and adaptations to our properties and common parts of a building.

The term 'reasonable' is reliant on what we can do as an organisation without effecting our resources, efficiency and ability to practically carry out what is requested.

We aim to provide services that are accessible to all who require them; as a result of this we will:

- Ensure Local Officers get to know their residents and their individual needs;
- Provide a range of ways for residents to contact their Local Officer including phone, text, mail, email and an electronic account;

- Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.;
- Ensure residents are always able to select their preferred method of contact;
- Tailor our services to meet the individual circumstances of our residents;
- Ensure our offices are fully accessible to visitors;
- Ensure NHG online services are available to all.

We will continue to diversify service provision to meet the needs of our residents, where it does not have a negative impact on our resources, our efficiency and our practical ability to complete the request.

6.0 Our employees

Employees must be aware of and take responsibility for diversity and inclusion in their behaviour with residents, colleagues and stakeholders.

We will actively monitor the diversity of our workforce and strive to show equal representation throughout the hierarchical structure of the organisation. We will aim for the whole of our workforce to reflect the communities that we serve.

If an employee witnesses a discriminatory incident at work, they have a duty of care to other employees and members of the public to report discriminatory behaviour as follows:

- If the discriminatory incident is caused by a resident, our employees will report the incident to their manager, record it fully, and follow our Unreasonable Behaviour policy.
- If the discriminatory incident is caused by a staff member, this will be reported to the manager and the HR Team, and investigated under our Disciplinary/Bullying and Harassment Policies.
- In the case of racist and other serious discriminatory incidents, e.g. hate crime, we may also report these to the Police as appropriate.

6.1 Employees Networks

Our employee networks help to make our organisation a more equal and inclusive place to work for all employees. They promote diversity through articles and initiatives that celebrate and raise awareness of different perspectives. They scrutinise changes proposed by the organisation, review draft policies and evaluate key diversity data. Through their action plans, they champion the best interests of their members and deliver initiatives supporting personal development and career progression.

Our employee networks will provide insight, so we constantly monitor the way we work to improve the delivery of our services, so they are inclusive and meet the diverse needs of our workforce.

We will support the development of new employee networks where the need is identified by our employees.

We will ensure that our employee networks and relevant parts of the business will periodically report and openly discuss equality, diversity and inclusion matters.

6.2 Reasonable adjustments

We are committed to providing reasonable adjustments for all employees to support them to meet the requirements for their role. We aim to remove all barriers to enable our employees to use their skills effectively and access the same benefits, terms or conditions of employment as all who work for our organisation. For more information please refer to our Reasonable Adjustment Policy on milo.

6.3 Recruitment, retention and selection

We apply the principles of the Equality Act 2010 when designing and reviewing our recruitment processes and policies. Where specialist agencies highlight best practice in recruitment, retention and progression matters, we will recommend that these practices are implemented in the wider business.

We are committed to having a workforce which is diverse throughout the hierarchical structure of the organisation and we have created an action plan called, 'Race at Work' to achieve this.

When commissioning training for career progression we will ensure that the principles of this policy are followed, e.g. through digital learning opportunities, 'lunch and learns' and discussions via groups and forums.

6.4 Training and development

We will provide training and information to employees in fair recruitment, selection and progression.

We will also provide training and development sessions on wider aspects of diversity and inclusion within the workplace, and when dealing with customers.

We will provide information and learning opportunities on diversity through tools such as our staff intranet, team meetings, and staff briefings.

7.0 Complaints

We will investigate all claims of discrimination in a thorough and serious manner and support any claims of discrimination, after an investigation.

An employee who feels they have been discriminated against within the scope of this policy should raise the matter through our Grievance or Bullying & Harassment policies.

Where a resident feels like they have been discriminated against, this can be raised through our Complaints and Compliments policy.

8.0 Our approach

In writing this policy we have carried out assessments to ensure that we are considering equality, diversity & inclusion and privacy & data protection.

If you'd like more information about this work, please get in touch at policy@nhg.org.uk

9.0 Reference

- [Equality Act 2010](#)
- [Equality Duty for public sector \(EHRC website\)](#)
- [Data Protection Act 2018](#)

Document control

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Approval date	24.02.2021
Effective date	25.03.2021
Approved by	Policy Group
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Version Control

Date	Amendment	Version
August 2019	New NHG Policy	V1.0
February 2021	Renewed NHG Policy	V2.0