



Business Units: The Community Housing Group & all subsidiaries

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Introduction

The Community Housing Group Ltd (hereafter referred to as TCHG, or the Group) as a registered housing provider and employer recognises that everyone should have an equal chance to live, learn and work free from discrimination, harassment, victimisation and prejudice and is committed to delivering a high standard of customer care and ensuring all its customers receive quality services to meet their needs.

We recognise the importance of social and financial inclusion and that in addition to the protected characteristics, our customers may face social and financial disadvantage.

This Group policy sets out how we are committed to incorporating the twin key principles of equality of opportunity and respect for diversity throughout its business.

1.0 Policy Statement

- 1.1 We believe that equality and diversity are at the heart of everything we do and underpin our vision of 'Improving Lives'.
- 1.2 We are committed to the principle that all customers have the right to the same high standards of provision of and services.
- 1.3 We are committed to ensuring that all employees are treated with dignity and respect.
- 1.4 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 the policy complies with all legal, statutory and regulatory requirements.

- The Group therefore aims to:



- i. Provide equality of opportunity and respect for diversity, and
- ii. Identify and eliminate unlawful discrimination

Across all its business activities, including those occasions where we interact with our customers, partners, contractors, other agencies and the public, as well as with future customers and applicants for our services.

TCHG also firmly believes that no one it employs should have to suffer unfair or unequal treatment from other employees, or from bodies or individuals with whom the Group works or provides services to.

2.0 Legislative and Regulatory Context

- 2.1 We are committed to meeting the duties of the Equality Act 2010 which effectively replaced/consolidated previous equality legislation.

The Equality Act protects people sharing 'protected characteristics' of – age, disability, gender re-assignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex and sexual orientation from discrimination.

- 2.2 Under the legislation all organisations providing a public service are required to observe the public sector equality duty of which requires organisations to demonstrate how they will:

- Eliminate discrimination, harassment, and victimisation and other conduct prohibited in the act.
- Advance equality of opportunity between people who share a protected characteristic and those who don't by:
 - Removing/minimising disadvantages suffered by people due to their protected characteristics.
 - Taking steps to meet the needs of people from protected groups where they are different from the needs of other people.
 - Encouraging people from protected groups to participate in public life or in activities where their participation is disproportionately low.
- Foster good relations between people who share protected characteristics and those who do not.

- 2.3 In addition to the legal requirements, as a provider of social housing we work within the regulatory framework, codes of practice and guidance issued by the Homes and Communities Agency and other government and relevant agencies.



Our regulator specifies the requirements of registered providers through its standards framework. Under these standards all registered providers must:

- Provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards.
- Develop and implement opportunities for involvement and empowerment, including by providing support to tenants to build their capacity to be more effectively involved.
- Understand and respond to the diverse needs of their tenants, including in relation to the equality strands and tenants with additional support needs, in the way they provide services and communicate with tenants.

2.4 We are committed to meeting the duties under the Modern Slavery Act 2015 to ensure that slavery and human trafficking are not taking place:

- Anywhere in our supply chains.
- In any part of our business.

3.0 Policy

3.1 Definitions

Associative Discrimination – this is direct discrimination against someone because they associate with another person who possesses a protected characteristic i.e. an employee is passed over for promotion because they disclose they have a disabled family member and the manager assumes they will not concentrate on their job because of their caring responsibilities.

Equality – Equality between individuals, where everyone has the same opportunities. No-one should be discriminated against because of their Protected Characteristic.

Diversity – Valuing the fact that individuals are different. Recognising that people with different backgrounds, skills and attitudes bring fresh ideas and opinions.

Direct Discrimination – This occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see Perceptive Discrimination), or because they associate with someone who has a protected characteristic (see Associative Discrimination).



Indirect Discrimination – When a condition or practice is put in place that disadvantages a person or group of people with protected characteristics, compared with others in the same group i.e. a change in working practices imposing a requirement that all employees should work on Saturday, may indirectly discriminate against an employee for whom Saturday is a religious day when work is not permitted.

Harassment – Unwanted behaviour that violates a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive home/working environment.

Perceptive Discrimination – This is direct discrimination against an individual because others think they possess a particular protected characteristic i.e. A 40 year old employee who could pass for 25 is not promoted to a senior position because the recruiting manager thinks they look too young.

Positive Action – in some circumstances it may be appropriate (and legal) to take action to improve the opportunity someone with a protected characteristic has, to access a service or employment opportunity i.e. advertising a job vacancy in a specialist publication, such as 'PosAbility', as well as in the general press, increasing the likelihood of a person with a disability becoming aware of it.

Protected Characteristics – the Equality Act 2010 covers the same groups that were protected by earlier equality laws and extends the protections to characteristics that were not previously covered. Protected Characteristics are: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual orientation.

Third Party Harassment - The Equality Act makes employers potentially liable for harassment of their employees by people (third parties) who are not employees of the company, such as customers or clients, subject to certain conditions.

Victimisation – Less favourable treatment of a person because they have been involved in or brought, legal proceedings against individuals or organisations, or because they are suspected of doing so. This does not apply where the claims have been maliciously made or are proven to be untrue.

Prejudice – is when someone forms an opinion about something or somebody without the knowing the full facts.

Modern Slavery – is a term used to encapsulate both offences in the Modern Slavery Act 2015, slavery, servitude and forced or compulsory labour, and human trafficking.



Slavery – slavery is defined as behaviour on the part of an offender as if he/she had a right of legal ownership over a person, which deprives the victim of their freedom.

Servitude – is the obligation to provide services that is imposed by the use of coercion and includes the obligation for the individual to live on another person's property and the impossibility of changing his or her condition.

Forced or compulsory labour – is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered him/herself voluntarily.

Human trafficking – requires that a person arranges or facilitates the travel of another person with a view to that person being exploited.

3.2 This policy covers all aspects of housing, providing services, employment, and other areas of work.

3.3 Investigation under this policy may result in legal action against an individual. It may result in TCHG disciplinary procedures being followed where staff may be involved.

3.4 Our aim is that our residents, board and committee members, contractors, forums and staff reflect the communities in which we work.

We have created our Equality and Diversity Policy and the measures to put it into practice, on the basis of advice from the relevant organisations, reflecting best practice, and through consultation with residents and employees.

3.5 As a provider of services and as an employer we will ensure that:

- In providing housing services and employment, we will aim to eliminate discrimination and make sure we treat everyone fairly, with dignity and respect.
- We do not treat anyone applying for housing, receiving services, or working for us less favourably than others and will consider appropriate positive action where legal.
- We review our policies and practices regularly and maintain up to date information on our residents, employees and applicants for services or jobs to ensure that this policy is operating effectively.
- We will set targets for improving the number of people from groups in the communities that we identify as being under represented in terms of residents and workforce. We will take positive action to help disadvantaged



or under represented groups to find housing or compete for jobs and provide services on a genuine basis of equal opportunities.

- Staff, board members and resident forums are aware of current legislation and good practice and reflect our commitment to equal opportunities.
- All contractors, consultants and other agencies we work with meet the objectives of this policy.
- We will take effective action to tackle all forms of victimisation and harassment and we will always place the victim at the centre of what we do.
- People have equal access to services through the provision of interpreting and translation services, ensuring offices are accessible, new homes achieve Lifetime Homes Standards wherever possible, and our asset investment programmes help us to meet our stated aims.

3.6 As a service provider we will:

- Seek to ensure that we are governed by board members whose understanding of our customer is key to their board member role.
- Seek to understand who our customers are and provide a range of services and housing options for people in the communities in which we work.
- Ensure homes are allocated through a system that aims to produce a fair assessment of housing need and to prevent prejudice and discrimination.
- Actively seek the views of customers and potential customers when planning, reviewing or making significant changes to our services, ensuring that our services are accessible, relevant and of use to our customers.
- Provide clear and meaningful information in ways which are accessible and which meet the diverse needs of our customers.
- Investigate promptly any complaint and take immediate action where there is evidence of direct or indirect discrimination.
- Monitor and evaluate the services we provide to ensure they do not discriminate or exclude individuals or people from different groups.

3.7 As an employer – we will:

- Seek to establish a workforce that reflects the local population in which we work. We will adopt recruitment, support and retention practices (for example flexible working procedures) to support this aim.
- Assist staff to realise their potential ensuring fair consideration of their training and career development needs and opportunities. We will ensure that all training and development needs are identified through the Personal Progress Review.
- Provide a safe, supportive, and accessible working environment.
- Monitor our employment policies and practices to ensure they are fair and demonstrate our commitment to diversity.



- Ensure that staff understand how valuing diversity can improve our ability to deliver better quality services and so reduce inequality.
- Ensure all staff are aware of the policy through induction training. Further updates or training specific to an employee's role and service area will be undertaken when required, focussing on legal or good practice.

In working with others – we will:

- Promote, share information, experiences and examples of good practice of equality and diversity through links with other organisations.
- Ensure that equality and diversity is embedded throughout our procurement activity, and that slavery and human trafficking are not taking place within our supply chains.

3.8 Implementation

- i. Group Board has overall responsibility for this policy and the Group Chief Executive and Executive Team for its implementation.
- ii. All employees and board members will be trained and provided with guidance on this policy to ensure that they clearly understand their position in law, and the implications for them of the Group's policy.

4.0 Equality Impact Assessment

4.1 We will ensure that our services reflect the customers and communities that we work with and are in line with this policy.

4.2 An Equality Impact Assessment has been undertaken in respect of this policy to understand the impact it may have on groups or individuals.

4.3 The Group is committed to equal opportunities and as such all tenants and customers will be dealt with fairly, consistently, and no one will be discriminated against.

4.4 An Equality Impact Assessment form was completed in March 2016.

5.0 Performance Measurement and Targets

5.1 We will seek to ensure that our commitment to equality and diversity and the elements of this policy are implemented through:



- Using Equality Impact Assessments, analysis of equality data and benchmarking, opportunities to inform and influence policy and service delivery.
- Monitoring our key services by equality group/protected characteristics.
- Involving customers and partners to shape our future activities.
- Using our learning and development programmes to deliver consistent messages relating to this policy.
- Participating in forums to help improve our understanding of the issues and to receive and share best practice.

6.0 Monitoring and Review

- 6.1 Board members and TCHG staff are ultimately responsible for the policy. Together they will monitor the effectiveness and implementation of the policy and recommend changes to improve service delivery where appropriate.
- 6.2 This policy and any associated procedures will be reviewed every 3 years to ensure its continued relevance, adequacy and effectiveness or as required by the introduction of new legislation or regulation.

7.0 Associated Documents/Policies

Internal

- Code of Conduct for Board Members (CC009)
- Code of Conduct for Contractors (CC010)
- Code of Conduct for Employees (CC011)
- Code of Conduct for Tenant and Resident Group Members (CC012)
- Code of Conduct for Volunteers (CC055)
- Corporate Social Responsibility Policy (PL018)
- Adult Protection Policy (PL001)
- Customer Care and Customer Service Policy (PL019)
- Customer Feedback and Complaint Policy (PL020)
- Domestic Violence Procedure (PR032b)
- Equipment and Adaptations Procedure (PR044b)
- Employee Handbook
- Harassment and Bullying Policy (PL062)
- Information Management and Data Protection Policy (PL100)
- Nuisance and ASB Procedure (PR032j)
- Property and Persons at Risk (PPAR) (PR082)
- Recruitment and Selection Procedure (PR071)



- Resident Involvement Policy (PL041)
- Safeguarding Policy (PL043)
- Tenants Handbook
- Whistleblowing Policy (PL049)

External

- Crime & Disorder Act 1998
- Criminal Justice and Public Order Act 1994
- Employment Rights Acts
- Equality Act 2010
- Equality and Human Rights Commission Guidance: Human Rights at Home
- HCA: The Regulatory Framework 2015 and Standards
- Housing Acts 1988 and 1998
- Human Rights Act 1998
- Rehabilitation of Offenders Acts and Exemptions
- Modern Slavery Act 2015