

Equality Diversity and Inclusion Policy

1.0 Policy Summary

- 1.1 This policy sets out Stonewater's approach to Equality Diversity and Inclusion.
- 1.2 We are committed to putting equality, diversity and inclusion at the heart of everything we do.

2.0 Policy Objectives

2.1 We know that Employees, Customers and Contractors are central to our success and that we work in a diverse society. We understand and take seriously our legal responsibility to make sure all groups have equality of opportunity. Stonewater's policy clearly demonstrates our commitment to ensuring equality diversity and inclusion irrespective of:

- Race/Ethnicity/Nationality
- Disability
- Age
- Gender
- Gender identity
- Sexual orientation
- Religion/ belief
- Marriage or Civil partnership
- Pregnancy/Maternity

2.2 Stonewater understands that people may be discriminated against for reasons other than the protected characteristics covered by the Equality Act 2010. We are fully aware and committed to our legal and moral obligations to challenge discrimination and injustice where practical and appropriate. Our commitment to championing equality and diversity will include the following:

- Socio economic group
- Appearance
- Political affiliation
- Class
- Membership or non-membership of a Trade Union
- Responsibility for dependants
- Part time or shift workers
- Unrelated criminal activities
- Any other matter which causes a person to be treated with injustice

2.3 The aims of this policy are to ensure our equality diversity and inclusion commitments are embedded into our organisational culture and day-to-day working practices.

2.4 The policy will support Stonewater to meet its legal and regulatory obligations.

2.5 We have created our Equality and Diversity Policy and the measures to put it into practice following engagement with our Customers and stakeholders and to reflect best practice.

- 2.6 The responsibility for the Policy lies with the Board and the Chief Executive. However, every employee has a responsibility to make sure they apply this Policy.
- 2.7 From providing housing services, recruiting to our governance structures, and resourcing, we will aim to ensure we do not discriminate, we treat everyone fairly and equitably and we respect their human rights.
- 2.8 We will apply this policy in connection to the Equality and Diversity Strategy & Action Plan and the People Strategy and all other relevant policies and strategies.

3.0 Legal Duty

- 3.1 Stonewater is subject to the Equality Act 2010 Public Sector Equality Duty. This requires organisations delivering public services to pay Due Regard to
- eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it;
 - Foster good relations between people who share a protected characteristic and people who do not.

Stonewater's equality commitment goes much further than our legal obligations, it is our aim to tackle prejudice and promote an understanding equality, diversity and inclusion. We believe that it is important for our customers, board and committee members, contractors, forums and employees to reflect the communities in which we work. In achieving these aims, we will comply with the current equality legislation and regulatory requirements.

We will also

- Not to discriminate against someone on the grounds of, protected characteristic, part-time or fixed-term status or because of membership of a trade union.
- Adapt normal policies, procedures, or processes to accommodate an individual's needs.

4.0 Policy Details

4.1 General

- 4.1.1 We will not treat anybody applying for housing, receiving services or working for us less favourably than anyone else, due to a protected characteristic.
- 4.1.2 We will not treat anybody applying for housing, receiving services or working for us less favourably than anyone else, due to a protected characteristic.

- 4.1.3 We will take positive action when we need to, to allow members of underrepresented groups with a protected characteristic to receive equality of opportunity in housing, services and work.
- 4.1.4 Members of the board, committees, and customer groups will role model and champion our commitment to equal opportunities. Following our equal opportunities policy is essential for customers' associations to be recognised.
- 4.1.5 All main contractors, consultants and other agencies we hire must adhere to our equal opportunities policy, and over a reasonable period have or set appropriate targets for representing minority groups within their workforce and have systems for monitoring and reporting progress as required by the equality legislation.
- 4.1.6 Contractors, consultants and other agencies working for us or in partnership with us will be asked to attend our equality and diversity training, where they cannot show that they have provided their colleagues with the appropriate learning.
- 4.1.7 If we discover unlawful discrimination by partners, consultants, contractors or suppliers we will take action and where necessary we may review or seek to terminate our agreements with them.
- 4.1.8 We will agree initiatives with our major partners to promote social inclusion and enhance community cohesion.
- 4.1.9 We will take effective action to tackle victimisation and harassment and we will always adopt a victim centred approach.
- 4.1.10 We will provide support to customers, colleagues and partners will follow all of our Harassment and Victimisation policies and procedures that apply to the service they provide, and will provide sufficient support through our various assistance programmes to help employees.
- 4.1.11 To make sure people have equal access to services, we will provide an interpreter service and translate policies and documents where essentially required to meet people's needs.
- 4.1.12 We aim to ensure that our hubs are accessible and where this is not possible ensure the service provided is accessible.
- 4.1.13 We will build all new housing to the current standards set out in the equality and planning legislation.
- 4.1.14 We will ensure there is equal access to information and services by providing appropriate facilities. We will continue to consult with customers and stakeholders to ensure our organisational development helps us to meet our aims in the Business Plan.

4.2 **Housing and Associated Services**

- 4.2.1 In providing services to our customers, we will:

- i. ensure our properties are let through the use of fair processes adopting the relevant housing letting systems with an aim to prevent prejudice or discrimination; and
- ii. Make sure we deal with complaints promptly, fairly and without discrimination.
- iii. Respond to reasonable adjustment requests in a timely and proactive manner, considering our duties as a Landlord under the Equality Act and implementing agreed adjustments where practicable to do so.

4.2.2 Further information regarding our approach to complaints handling can be found in our Complaints Policy and associated guidance.

4.3 Employment

4.3.1 Using tools such as workforce profiling we aim to:

- iv. make sure we have access to the widest range of people and recruit the best employee for the job;
- v. make sure no applicant or employee receives less favourable treatment than another due to a protected characteristic and, wherever possible, we give them the help they need to reach their full potential;
- vi. achieve a workforce based on ability, which is in line with the working population in the communities in which we work;
- vii. make sure all colleagues are trained effectively to ensure they are able to co-operate with this policy;
- viii. **carry out EDI-specific training on complaints handling for our dedicated complaints handling colleagues;** and
- ix. Take appropriate action against anyone who breaches this policy.

4.3.2 Further information regarding our approach to recruitment and selection is found in our Recruitment Policy and associated guidance.

4.3.3 Further information regarding our approach to learning and development is found in our Learning and Development Policy and associated guidance.

4.4 Workplace and Customer Reasonable Adjustments

4.4.1 A reasonable adjustment is a change that must be made to remove or reduce a disadvantage related to:

- A colleague's disability when doing their job
- A job applicant's disability when applying for a job
- A disabled customer when receiving a service

4.4.2 Stonewater has a legal requirement to make reasonable adjustments under the Equality Act 2010, which stipulates that where a disabled person is put at a substantial disadvantage compared with non-disabled people, employers and service providers are under a duty to take reasonable steps to prevent this.

4.4.3 As a Housing Association and provider of services to the public, Stonewater are bound by the Public Sector Equality Duty, and our duty to make reasonable adjustments is also anticipatory. Stonewater therefore take a proactive approach to ensuring equality of opportunity.

4.4.4 In addition to fulfilling our legal obligation, Stonewater is committed to maintaining a high standard of accessibility and experience to all our colleagues and customers. We should therefore extend our approach to reasonable adjustments to embrace not just disability, but any special need or circumstance.

4.4.5 Our Reasonable Adjustments Guidance provides specific guidance in relation to how best to approach and implement workplace or reasonable adjustments for both colleagues and customers.

4.5 Customer and Colleague Profiling:

4.5.1 To ensure this policy is operating effectively and the organisation is providing a fair and equitable service we will use customer profiling and insight information. This information will be used to ensure we continue to comply with the Public Sector Equality Duty, all other equality legislation and the General Data Protection Regulation. Ongoing monitoring will allow us to take appropriate action to tackle discrimination, victimisation or harassment and promote equality of opportunity.

4.5.2 We will ask colleagues regularly to update their sensitive Information on our HR system to ensure the data we hold is accurate.

4.5.3 We will analyse these records regularly and take appropriate follow-up action.

5.0 Key Objectives

5.1 We are able to design and maintain services that meet the diverse needs of the communities in which we operate.

5.2 Clear leadership establishes a strong ethos for equality & diversity and improves our outcomes and service delivery.

5.3 We continue to review and work within our cohesive Stonewater Equality & Diversity Strategy and Action Plan.

5.4 Employee and Customer profiling data is recorded and maintained.

5.5 All Stonewater employees have an understanding of equality & diversity issues that relate to their delivery of service, reflecting good practice and their rights and responsibilities as an employee.

6.0 Key Areas of Work

6.1 We are to ensure we are able to embed equality and diversity into the heart of the organisation we will focus on the following key areas of work

- Knowing our customers
- Leadership, partnership and organisational commitment
- Community engagement and satisfaction
- Responsive services and customer care
- Modern, diverse and reflective workforce

7.0 Key Outcomes

- 7.1 We will comply with equality legislation and work towards developing mechanisms to challenge and tackle discrimination when providing goods and services.
- 7.2 When recruiting employees, we comply with all equality legislation
- 7.3 We will treat people fairly and equitably to improve equality of opportunity for our employees, customers and stakeholders.

8.0 BREACHES OF THIS POLICY

- 8.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure, The Anti-social Behaviour Policy, the Unacceptable Customer Conduct Policy or Customer Complaints Policy.
- 8.2 We are committed to making reasonable adjustments where appropriate. Failure to make necessary reasonable adjustment resulting in disability discrimination may amount to a breach in this policy, resulting in disciplinary proceedings.
- 8.3 If a colleague believes that they have suffered discrimination, they can raise the matter through our Grievance Procedure or through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 8.4 If a customer reports or complains of experiencing discrimination by Stonewater, the issue will be investigated following the Customer Complaints Policy and dealt with appropriately.
- 8.5 There must be no victimisation or retaliation against colleagues who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.
- 8.6 There must be no victimisation or retaliation against customers who complain about discrimination. However, should we have reason to believe that a spurious claim has been made we will consider this to be a breach in the customer contract and dealt with in accordance with the Anti-Social Behaviour Policy and/or Unacceptable Customer Conduct Policy.

9.0 Equality and Diversity

This policy aims to ensure that Stonewater is fully compliant with its legal obligations and places equality, diversity and inclusion at the heart of all of its working practices. The policy allows us to consider the needs of all individuals in their day-to-day work, in developing policy, in service delivery and in relation to all our employees and residents.

10.0 Technical Data

Risk Assessment	This policy outlines our approach to equality and diversity and helps us to prevent discrimination claims being brought against the Association.
Value for Money	By ensuring that we give equality of opportunity to people, we give ourselves a wider pool of talent, residents, and contractors, etc.
Consultation	People Senior Team 20/6/22
COG Lead	Darren Martin
Responsibility for Implementation	EDI Delivery Board
Date of Issue Date agreed by Board	
Committee Review	People & Governance Panel
Performance Reporting & Tenant Scrutiny	

Version	Date	Name	Description
0.1		Cordelia Johnney	Created
1.0	6.1.15		Agreed by board
1.1	20.2.18	Cordelia Johnney	Updated
1.2	14.3.18	Tom Morris	Proof Read and Updated
2.0	12.6.18	Cordelia Johnney	Approved by the board
2.1	14.07.22	Donna Warr	Reviewed and non-material amends to language following legal advice Inclusion of specific reference to Reasonable Adjustments and Complaints Handling and Training to adhere to new Complaints Code
4.0	26.08.22	Cordelia Johnney	Update the Reasonable Adjustment section to include Customers
5.0	31.08.22	Cordelia Johnney	Update the Reasonable Adjustment section to include Customers and Customers who breach the policy.

6.0	02.09.22	Cordelia Johnney	Updated following CX review of the customer sanctions.
7.1	05.09.22	Cordelia Johnney	Updated the language in section 8 customer sanctions.
8.0	14.02.23	Cordelia Johnney	Approved by GPP