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## **EQUALITY, DIVERSITY AND INCLUSION POLICY**

We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider. We expect everyone who works with or for the Society to uphold these principles. The Society will seek to actively demonstrate its commitment to this policy through its actions and statements.

The Society will ensure that equality, fairness, empowerment, dignity and respect, are central to the way we work. To achieve this for our customers and staff, we will:

- Respect and listen to our customers and staff.
- Review this policy regularly to see if it is working.
- Tackle prejudice wherever it is found in the organisation.
- Induct our staff and have training on equal opportunities.

### **The context of this new policy**

This policy has been developed to bring together all our equality, diversity and inclusion policies. It also demonstrates our commitment to meet the requirements of Equality Act 2010.

### **The scope of the policy**

All aspects of Sutton Housing Society's work, our business and services are covered by this policy.

### **Introduction**

The Society meets all relevant legislative and regulatory requirements.

We recognise our responsibility to provide equality of opportunity, eliminate discrimination and foster good relations, both in our activities as an employer, landlord, and in procurement.

Here is a brief overview of the key frameworks – legal, regulatory and good practice.

### **The Equality Act 2010**

The Equality Act 2010 consolidated previous equality legislation with the aim of making it more accessible and easier to understand. It refers to nine protected characteristics for which discrimination, harassment and victimisation are prohibited:

- Age
- Disability
- Gender Reassignment

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- Race
  - Religion or Belief
  - Sex
  - Sexual Orientation
  - Marriage and Civil Partnership
  - Pregnancy and Maternity.

**Other associated legislation:**

- Human Rights Act 1988
- Rehabilitation of Offenders Act 1974
- Employment Act 2008
- Civil Partnership Act 2004
- Data Protection Act 1998

The Society also adheres to related standards and good practice, including those of the:

- Homes and Communities Agency
- National Housing Federation
- Local authorities (London Borough of Sutton).

**Terminology**

**Appendix 1** provides useful terminology and definitions relating to equality, diversity and inclusion.

**Our vision and principles****Our vision**

Fairly let and maintained housing stock, satisfied residents and staff who are all treated fairly, with respect and dignity, and open to everyone including those with protected characteristics and other vulnerable groups as identified by SHS.

**Our principles**

We have placed equality, diversity and inclusion at the centre of everything we do.

- **Fairness:** We will work in a way that promotes equality, diversity and inclusion and does not discriminate against any of our customers, staff or other stakeholders.
- **Respect:** We will work in partnership with our customers, staff and other stakeholders to encourage a culture where everyone is valued and respected, and their voice is heard.
- **Integrity:** We will work to ensure that our practices are transparent and open to scrutiny.
- **Providing opportunity:** We will work towards a culture which is fair and where all our customers, staff and other stakeholders have the opportunity to reach their full potential.
- **Expertise and excellence:** We will work to ensure that the skills and knowledge of our workforce meet the diverse needs of residents. The Society should be led

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by a Board that fairly represents the communities it works in, and acts as a true leader in promoting equality.

- **Equal access:** People with protected characteristics should have equal access to services and to the Society's decision-making processes. All communities should be equally satisfied with the choices available and the quality of services they receive.

### Our objectives

The objective of this policy is to set out how Sutton Housing Society intends to meet and promote its duties under the Equality Act 2010.

In all our activities, we will have "due regard" to the need to:

- Eliminate bullying, discrimination, harassment and victimisation.
- Advance equality of opportunity by removing or minimising disadvantages suffered by people with different characteristics. This includes taking steps to meet the different needs of disabled people.
- Foster good relations between people and encourage them to participate in public life, or in any other activity in which their participation is disproportionately low.

### How we will meet these objectives

We will:

- Ensure that no customer, member of staff, consultant, contractor or supplier is discriminated against.
- Ensure that housing services are accessible, and appropriately tailored to the individual needs of customers.
- Develop practices which will provide genuine equal opportunities for all.
- Have in place and monitor a responsive complaints procedure.
- Have in place and monitor a responsive aids and adaptations procedure.
- Promote diverse customer participation in key decision-making and service improvement.
- Promote the development of safe, secure communities and reduce antisocial behaviour, domestic violence, bullying, discrimination and harassment.
- Develop positive partnerships that support stronger service provision, and share common equality and diversity principles.
- Promote equality and diversity in employment practices and organisational culture.
- Provide regular training, learning and development opportunities to help the Board and staff gain knowledge and skills in delivering equality, diversity and inclusion successfully in their work.
- Provide training, learning and development opportunities to help representative Residents gain knowledge and skills in equality, diversity and inclusion.
- Wherever possible, establish performance targets for our services under this policy, and actively monitor progress against these targets at Board or Committee level.

**Resident Selection and Allocation of Tenancies**

No applicant for housing or for a transfer to alternative accommodation will receive less favourable treatment than another. Within the guidelines of the Equalities Act the Society will actively assist disadvantaged groups to benefit from its housing and services.

All tenancies will be allocated strictly in accordance with the Society's policy which is designed to ensure all applicants are treated fairly in the allocation of accommodation. Having achieved this the needs of under-represented groups will be considered and actively addressed where necessary.

The Society will work closely with the local Council to ensure that our lettings reflect the diversity of the local population.

**Resident Participation**

In order to meet the objective of resident scrutiny of services the Society will support a Residents' Forum. We will work to ensure that the members of this forum are representative of the diverse mix of the Societies residents, including minority groups.

**Resident satisfaction**

The Society treats all matters relating to the service delivery, for example complaints and repairs, equally seriously and will ensure satisfactory outcomes for all residents.

**Employment Policy and Practice**

Sutton Housing Society will strive to ensure that every job applicant or employee is treated fairly in all employment matters. The Society requires its staff through their work to actively promote and support this policy. Staff will be supported by their respective managers wherever necessary in this particularly. Where failings are identified by staff which they are not able to resolve, staff will bring these matters to their line manager who will take up the case.

No conditions or requirements will be made which cannot be justified and which would place a potential applicant or member of staff at a disadvantage.

Transfer, promotion and training opportunities and the application procedure will be made known to all eligible employees. Staff will be encouraged to develop their skills and abilities as effectively as possible.

The Society's Recruitment and Selection Procedure will be reviewed regularly to promote equality of opportunity in recruitment and selection and ensure recruitment procedures are fair and open.

The Society will, subject to the business needs of the organisation, consider job share arrangements and requests for flexible working. The Society will recognise the different needs of staff members in relation to cultural or religious beliefs and, where appropriate, make specific provision for these.

Interview panels will have an appropriate mix of members.

Terms and conditions of employment and benefits will be afforded equally to all employees in the same or similar circumstances.

### **External Agencies**

All agencies working with Sutton Housing Society will be expected to comply with the Society's Equality, Diversity and Inclusion Policy.

We expect contractors, consultants, potential and existing customers and employees to respect our values on diversity.

### **Your responsibilities**

Everyone concerned is required to familiarise themselves with the Equality, Diversity and Inclusion Policy. This includes all the Society's staff, temporary workers, Board Members, consultants, contractors and customers. All staff are also expected to abide by the policy as part of their employment contract. A breach of the policy will be regarded as misconduct and could lead to disciplinary action.

### **The Board**

The Board and its Committees will reflect as far as possible the make-up of the local community in terms of race, gender and people with disabilities. Members of the Board and Committees are expected to:

- Set an example in non-discriminating behaviour
- Ensure that staff act in accordance with the policy
- Check the content of the policy
- Ensure it is monitored and reviewed

The Board has overall responsibility for ensuring that the Society meets its legal obligations for equality and diversity.

### **Management**

The Chief Executive will ensure effective implementation and operation.

### **Staff**

The attitudes of staff are crucial to fair employment practices, in particular, all members of staff should:

- Make sure they understand the policy and are clear about its implications. Any breach of the policy will be treated seriously and may lead to disciplinary action that could include dismissal.

**Related documents**

All policies and procedures are governed by our Equality, Diversity and Inclusion Policy.

**APPENDIX 1****EQUALITY, DIVERSITY AND INCLUSION - TERMINOLOGY AND DEFINITIONS***From the Equality and Human Rights Commission - [www.equalityhumanrights.com](http://www.equalityhumanrights.com)*

Age Discrimination	Assumptions may be made about the capability of younger and older people because of their age. Age discrimination can occur both directly (i.e. treating people less favourably because of their age – or apparent age), or indirectly (i.e. treating everyone the same if that causes a disadvantage for people in a particular age group).
Bullying	Bullying is persistent, destructive behaviour that has a detrimental impact on a person's confidence and self-esteem. Workplace bullying is offensive behaviour that undermines an individual or group of employees in vindictive, cruel, malicious or humiliating ways. It may be related to an abuse of power. Such conduct by one or more people in a position of strength, authority or responsibility abuses the power of that position. It can involve the misuse of any form of individual power, such as physical strength, personality or age, or collective power through strength of numbers. All these can result in intimidating, insulting or malicious behaviour.
Discriminate unlawfully	When an employer has treated someone less favourably because of a protected characteristic (in other words, discriminated against them) and does not have a valid defence.  Discrimination can be intentional or unintentional. It can also be direct, indirect or occur through harassment, victimisation or third party harassment. Individuals, groups, whole institutions or organisations can be discriminatory. Perception is as important as intention. It is essential to take seriously the views of people who feel they experience discrimination.
Disability Discrimination	Someone has a disability if they have a physical or mental impairment with a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Discrimination involves this being taken into account to offer them less favourable services or opportunities.  Physical barriers in the environment, and attitudinal barriers in society lead to disability discrimination. Disabled people are disadvantaged by these factors rather than by their impairment. (See also Reasonable Adjustments).
Discrimination, direct or indirect	Refers to discrimination because of a person's protected characteristic (direct discrimination). Indirect discrimination occurs when criteria or a provision or practice are applied that creates disproportionate disadvantage for a person with a protected characteristic (as compared to those who do not share that characteristic) under the Equality Act 2010.

	(e.g. Age, religion or belief, ethnicity or race, gender, sexual orientation, trans-gender, disability, marriage or civil partnership, pregnancy or Paternity/Maternity) .
Diversity	Recognising and valuing the differences and individual contribution that people make, and treating them fairly and with respect. This includes providing accessible and relevant services that respond to the customer's needs, ensuring that any workforce is representative of the community served, and creating an inclusive environment.
Have due regard	To 'have due regard' means that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.
Ethnicity	A strict definition of an ethnic group is a group regarded as a distinct community by virtue of certain essential characteristics. This could be a shared history which distinguishes it from other groups, and a cultural tradition of its own. Sikhs and Gypsies are examples. However 'ethnicity' has come to have a broader meaning, and the expression "ethnic monitoring" is also used to refer to groups defined by colour, race or national origin.
Exceptions	Where, in specified circumstances, a provision of the Act does not apply. This is very limited e.g. the Intelligence Service of Government.
Flexible working	Working different hours or at home to accommodate childcare or dependants' commitments.
Gender	The word 'gender' is often used in place of the word 'sex' in equality issues. 'Gender' does not appear in legislation (except for 'gender re-assignment' – see below) but 'sex discrimination' and 'gender discrimination' are generally interchangeable.
Gender Reassignment	Gender reassignment is where someone experiences deep conflict between their physical sex and their mental gender. They will have elected to re-assign their gender. We recognise that trans-sexualism is a genuine medical status. We will provide appropriate support to employees, temporary workers, Board Members and service users with this status.
Genuine Occupational Requirements	The Equality Act 2010 allows for circumstances where a person's sex, racial group, religion or sexual orientation is a genuine requirement for a particular job.
Harassment	<p>This is unwanted conduct that violates a person's dignity or creates an undermining, intimidating, hostile, degrading, humiliating or offensive environment for them.</p> <p>It is the impact of the unwanted conduct that is relevant, not the intention. The intent may be malicious or seen as humorous by the perpetrator.</p>



	If the outcome for the recipient is unwanted, then it may be classed as harassment, regardless of the intention.
Indirect Discrimination	A provision or practise that disadvantages people because of race, gender, sexual orientation etc. It has the purpose or effect of violating the person's dignity or creating an environment for them that is intimidating, hostile, degrading, humiliating or offensive.
LGTB	Lesbian, Gay, Transgender and Bi-Sexual. The abbreviation 'LGTB' is used in many areas to identify this group of individuals, although they all have different characteristics.
Liability	Employers have legal liability for any act of discrimination (including harassment) carried out by their employees, unless the employer can show that they have taken all reasonably practicable steps to prevent it.
Occupational requirement	Where having a protected characteristic is an occupational requirement, certain jobs can be reserved for people with that protected characteristic (e.g. Women support workers in women's refuges, Ministers of Religion.)
Proportionate	This refers to measures or actions that are appropriate and necessary. Whether something is proportionate in the circumstances will be a question of fact. It involves weighing up the discriminatory impact of the action against the reasons for it, and asking if there is any other way of achieving the aim.
Positive Action	This refers to a range of lawful actions that seek to overcome or minimise disadvantages (e.g. in employment opportunities) that people who share a protected characteristic have experienced, or seek to meet their different needs.
Public sector equality duty	The duty of a public authority when carrying out its functions to have due regard to the need to eliminate unlawful discrimination and harassment, foster good relations and advance equality of opportunity.
Quotas	It is unlawful to select a person for a job on the basis of their gender or race in order to achieve a fixed quota of employees of that gender or race. (However, see definition of Positive Action above).
Racism	Racism is a general term to describe the conduct, practise and attitude that advantages or disadvantages people because of their race, skin colour, culture or ethnic origin. Institutional racism is the failure of an organisation to provide a service to people because of their skin colour, culture or ethnic origin. It can be seen in processes, attitudes, and behaviour and power imbalances that discriminate through unwitting prejudice, ignorance and thoughtlessness – it leads to the disadvantage of minority ethnic people.
Reasonable Adjustments	Where a disabled person is at a substantial disadvantage in comparison with people who are not disabled, there is a duty to take reasonable steps

	to remove that disadvantage by (i) Changing provisions, criteria or practices, (ii) Altering, removing or providing a reasonable alternative means of avoiding physical features and (iii) Providing auxiliary aids. What is 'Reasonable'? This will depend on all the circumstances of the case, including the size of an organisation and its resources, what is practicable, the effectiveness of what is being proposed and the likely disruption that would be caused by taking the measure in question – as well as the availability of financial assistance.
Religious Discrimination, Belief Discrimination	To hold a religious or other belief is a basic human right that should be treated with respect and tolerance. Belittling belief or unreasonably promoting your own faith can be deemed offensive.
Sex Harassment	Any conduct of a sexual nature that is unwanted by the recipient, including verbal, non-verbal and physical behaviours, and which violates the victim's dignity or creates an intimidating, hostile, degrading or offensive environment for them. Sexism comes from the belief that one gender is superior to the other or that sexism can be seen in organisations' powerholders, structures, systems and practices.
Sexual Orientation	Where a lesbian, gay or bisexual's characteristics are used as a basis to treat them differently or less favourably. Whether a person is attracted to people of their own sex, the opposite sex or both sexes. Assumptions and perceptions of a person's sexual orientation are also covered by law.
Targets	These can be percentages of under-represented groups that employers aim to achieve in the makeup of their workforce, as part of their equality action plan. It is unlawful to use a target as a reason for selecting someone, but it is not unlawful to take steps to develop more qualified applicants from particular groups (see 'Positive Action' and also the Recruitment, Selection and Retention Procedures).
Transgender, Transsexual	Refers to a person who has the protected characteristic of gender reassignment. This may be a woman who has transitioned or is transitioning to be a man, or a man who has transitioned or is transitioning to be a woman. The law does not require a person to undergo a medical procedure to be recognised as a transsexual,
Victimisation	Subjecting a person to a detriment because they have done a protected act, or there is a belief that they have done a protected act i.e. bringing proceedings under the Act; giving evidence or information in connection with proceedings under the Act; doing any other thing for the purposes of or in connection with the Act; making an allegation that a person has contravened the Act.  If victimisation happens and an organisation does not take reasonable steps to prevent it, the organisation may be liable to pay compensation. Individuals who victimise may also be ordered to pay compensation.

	When a person is treated less favourably than another because he or she has brought a complaint, given evidence, rejected advances, or complained about someone harassing or bullying, they are being victimised.
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