



Title:	Equality, Diversity and Inclusion Policy
Person responsible:	Director of Customer Experience
Customer consultation arrangement:	Tenants' Committee
EIA required:	Yes
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Approved by:	The Board
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1		Final draft

1. Introduction

SLH was formed in 2012 and we own and manage approx. 3300 homes across a wide geography in South Lakeland, Lancashire and North Yorkshire, with concentrations around Kendal and Ulverston and some homes in more rural communities. Our Vision is Quality homes, a platform for life.

2. Policy Purpose and Commitment

SLH is actively committed to promoting and embedding a culture of equality, diversity and inclusion. SLH is an organisation which values differences where individuals can be their authentic selves. The aim is for our organisation to be truly representative of all sections of the society and communities we serve and for each of our colleagues, residents and other stakeholders to feel respected and valued.

SLH also has responsibilities under legislation, regulation and codes of governance including, but not limited to:

- the Equality Act 2010 (incorporating the Public Sector Equality Duty);
- the Human Rights Act 1998;
- the National Housing Federation Code of Governance 2020;
- the Regulator of Social Housing.

3. Defining Equality, Diversity and Inclusion

While the terms equality, diversity and inclusion often go hand in hand, they are not one and the same.

Equality is the fair and unbiased treatment of others, taking into account systemic and structural inequalities. This ensures equal opportunity and access for all groups which are protected by legislation.

Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they were born with or have acquired. These differences can go beyond the protected groups set out in legislation.

Inclusion goes further and is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.

These terms are interdependent and go hand in hand in promoting a culture that is actively equal, diverse and inclusive.

4. Duties under the Equality Act 2010

SLH is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation (as defined in the Equality Act 2010). The protected characteristics are:

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

5. Duties under the Public Sector Equality Duty

SLH is mindful of its duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:

- A. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- B. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- C. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

6. Other Duties

SLH understands that diversity and risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010 and that it has a moral duty to address discrimination as an employer, a landlord and as a provider of services. We are committed to tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics such as the protected characteristics above, but also including:

- Socio-economic background
- Class
- Appearance
- Language

- Accents
- Education
- Learning styles
- Political affiliation
- Domestic abuse
- Spent convictions
- Caring responsibilities

7. Our Objectives and Commitments

SLH has agreed a set of objectives and commitments that reflect our values for embedding an equal, diverse and inclusive culture in the organisation. These objectives are set out throughout this policy with targets within our action plan.

The policy and action plan are part of our long-term commitment to equality, diversity and inclusion and progress will be reported regularly to board, colleagues, customers and stakeholders.

8. Review and Monitoring

SLH will develop a set of metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least once every 12 months, review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order to ensure we are meeting organisational, legal, regulatory and best practice requirements. We shall also use this information to ensure our services are accessible to all and free from discrimination.

We shall periodically carry out workforce surveys relating to equality, diversity and inclusion and the working environment to ensure all data is as up to date as possible and to gain the views of all colleagues. These surveys will help to inform our progress against our commitments and objectives.

All data and information collected will be used to track progress and monitor performance on our equality, diversity and inclusion objectives and commitments. We shall also collect information to understand the different needs of our customers. This information will form part of our reporting to the Board. It shall also be used effectively to identify best practice as well as gaps or shortcomings within our organisation and to tailor our approach in correcting these.

Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure SLH has the best quality of data to inform our progress on our objectives and commitments and also to aid better decision making.

Roles and Responsibilities

9. Accountability and Reporting

The Director of Customer Experience is the executive lead, supported by the Head of People and Culture. Heads of Service and line managers are responsible for overseeing the day to day implementation of this policy for and by colleagues, volunteers and contractors including fair and equal service delivery to customers.

SLH will monitor, report and publish information about the work we have done to deliver on our equality, diversity and inclusion commitments and objectives, and the progress we have made.

10. The Board's Role

The Board is committed to taking a clear and active lead in its commitment to achieve equality of opportunity, diversity and inclusion. This is in all of the activities of our organisation, including understanding the needs of our residents and communities, as well as the composition of the Board and committees.

SLH recognises a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board shall provide leadership on this policy and, working with the Executive Leadership Team, ensure that it is implemented.

The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements. It shall seek regular updates on how SLH is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation.

All reports to the Board shall include appropriate and robust considerations of equality, diversity and inclusion issues.

People with direct lived experience of or particular insight into, the communities we serve shall also be meaningfully engaged in our governance structures.

11. Colleagues, Contractors, Volunteers

All SLH colleagues, applicants, volunteers, contractors will be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation with regard to the protected characteristics set out in the Equality Act 2010. SLH will promote a working environment that is also free of discrimination beyond the protected characteristics.

We shall also make reasonable adjustments where necessary to overcome any disadvantages due to disabilities and flex service provision more broadly where possible.

All workforce related codes of conduct, policies, practices and procedures will reflect our values and commitments to equality, diversity and inclusion and our aims to recruit and retain a diverse and inclusive workforce reflecting the communities we serve.

When appropriate, SLH will consult colleagues when making changes to policies, practices and procedures relating to our people to promote inclusive and anti-discriminatory policies and practices, this is in addition to carrying out equality impact assessments.

SLH will not tolerate any forms of unlawful discrimination, harassment, victimisation or bullying.

All colleagues, Board members, volunteers and contractors of SLH are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing SLH. All our colleagues have a responsibility to champion our values of equality, diversity and inclusion.

Acts of discrimination or harassment by colleagues, Board members or volunteers of SLH may result in disciplinary action, in line with appropriate policies.

Any contractors, sub-contractors, agents or third parties providing services to, for or on behalf of SLH are responsible for compliance with their own policy or by agreement to promote and advance this policy. SLH will take action against non-compliance as appropriate.

12. Board and committee recruitment

SLH is committed to ensuring that our Board and committee's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve.

13. Training

SLH is committed to ensuring that Board, colleagues and contractors receive appropriate equality, diversity and inclusion training on a regular basis and that they are aware of this policy. Equality, diversity and inclusion training will also form part of our colleague inductions and contractor briefings.

14. Procurement

SLH will ensure equality, diversity and inclusion are taken into account when procuring and commissioning services from contractors, supplier, partners and consultants to maximise our economic and social value with South Lakeland.

15. Customers and Residents

SLH is committed to ensuring equality of opportunities in the provision of its housing and other services. Further details of these commitments are set out below with specific targets in the action plan.

- Proactively promote dignity and respect for all where individual differences, backgrounds, experiences and contributions are all recognised, celebrated and valued;
- Not treat individuals or groups less favourably because they belong to one of the protected groups;
- Liaise with statutory agencies to share assessments of the housing needs of local communities and any groups facing discrimination and review if/how it can meet these needs;
- Partner with specialist agencies where appropriate to meet the needs of any disadvantaged groups;
- Consider the needs of a diverse range of communities when designing and developing new homes, ensuring new homes are suitable for people with disabilities where feasible;
- Monitor allocations and nominations to ensure direct or indirect discrimination is not occurring and take action where appropriate;
- Ensure all residents are treated with fairness and respect;
- Consult with customers to obtain their views including in relation to equality, diversity and inclusion and seek to ensure engagement activities promote involvement from all groups of customers;
- Ensure relevant communications, policies and procedures are clear, simple and accessible to customers;
- Zero tolerance on harassment of residents and pro-active working with other agencies to tackle all forms of harassment;
- Ensure housing and associated services take into account the sensitivities and needs of different groups including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs.

16. Non-Compliance

SLH will take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by colleagues, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities, SLH will take proportionate action in all complaints. Failure to comply with this policy by colleagues, Board members or volunteers of SLH may result in disciplinary action.

17. Data Protection

When handling data related to equality, diversity and inclusion, colleagues will encounter personal information. The handling and use of this data will be practised in accordance with the Data Protection Act 2018 and General Data Protection Regulations 2018, with particular emphasis on 'sensitive' data.

18. Equality Impact Assessment

In implementing this policy, we aim to promote and embed equality, celebrate diversity and create a more inclusive culture in which people can thrive. An equality impact assessment has been carried out on this policy, finding that this policy has a positive impact on the protected characteristics.

19. Projects and Partnerships

SLH is a member of the Housing Diversity Network, an organisation that aims to share best practice to support those working to address inequality and celebrate diversity. We also aim to connect and work with local organisations that seek to promote equality, diversity and inclusion.

20. Review

This policy will be reviewed every 3 years, or sooner as required by statutory, regulatory or best practice.

If you have any questions about this policy, please contact SLH via email HR@Southlakeshousing.co.uk.