

Equality, Diversity and Inclusion Policy

Purpose

Through this Policy, Hastoe aims to ensure that equality, diversity and inclusion (EDI) are embedded in all of its internal and external services and activities, to:

- Provide high quality services that meet the current and future needs of residents, through understanding the diversity of our customers.
- Offer fair treatment in every aspect of working life in Hastoe, from our written procedures through to every decision made.
- Promote a culture where each resident, employee and colleague is treated with respect and dignity and recognises the value that a diverse workforce can bring.
- Use our influence to raise awareness and gain commitment to EDI from our partners and suppliers.

Scope

This Policy applies to all Board and Committee members, employees, workers and others who work for us through contracting arrangements. It applies to the way we deliver and receive services and to recruitment, selection, training, promotion, transfers, pay and benefits and performance appraisal procedures, in addition to all terms and conditions of employment. All visitors, contractors and suppliers are also expected to abide by this Policy.

Glossary of terms used in this Policy:

- *Associative discrimination* is the act of direct discrimination against someone because of an association with another person who has a protected characteristic.
- *Direct discrimination* occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have.
- *Inclusion* means creating environments in which any individual or group can be and feel welcomed, respected, supported and valued to participate fully: in other words, it is a sense of belonging.
- *Indirect discrimination* occurs when a condition, rule, policy or practice that applies to everyone particularly disadvantages people who share a protected characteristic and that condition, rule, policy or practice is not justified.
- *Perception discrimination* occurs when someone is directly discriminated against because other people think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Commitment

Hastoe is an equal opportunities employer and we seek to ensure, within the framework of the law, that our workplace is free from discrimination. We aim to ensure that staff achieve their full potential and that all employment decisions are taken without reference to discriminatory criteria.

We are committed to providing high quality services to all residents whilst meeting the changing needs of the diverse communities in which we work; and to creating a

stimulating and rewarding workplace, and one that is inclusive where differences are valued and equality of opportunity is advanced.

It is our policy to comply with and work within the spirit and detail of the Equality Act 2010. Thus no person employed by us or acting on our behalf shall be permitted to discriminate against an individual or group, directly or indirectly, on any of the following grounds: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Hastoe also aims to ensure that the workforce at each office location should reflect, as far as is reasonably possible, the community within which it operates.

To achieve its aims, Hastoe commits to the following:

- To ensure that the principles of this Policy are embedded in all policies and procedures.
- To provide awareness training and guidance to all Board members, employees, workers and managers to ensure Hastoe's commitment to equality of opportunity, inclusivity and valuing diversity is known and understood.
- To make all contractors, with which Hastoe works, aware of this Policy and encourage them to embed EDI into their own working practices.
- To monitor and measure diversity at various stages of employment to remove any direct or indirect, associative or perception discrimination, as defined by the 2010 Act.
- To monitor and measure the profile of our customers to ensure that our services are delivered fairly and meet the needs of our internal and external communities.
- To challenge and investigate discriminatory behaviour and enforce the Disciplinary Procedure, when this is considered necessary.
- To follow best practice principles at all times.
- To communicate to colleagues, tenants and other stakeholders, and review regularly the initiatives which have been implemented.
- To work with external groups and advisory bodies to keep up to date with practice and how issues are dealt with.
- To ensure that recruitment and employment decisions are made on the basis of fair and objective criteria. Person and job specifications shall be limited to those requirements which are necessary for the effective performance of the role.

Responsibilities:

- Every individual is responsible for their own behaviour and actions. All employees, workers and others working for us through contracting arrangements must abide by this Policy and live its principles in their day-to-day work. Individuals must ensure that they do not support or condone unfair or exclusive behaviour by ignoring what they see; nor must they incite or collude with others in unfair behaviour or actions. We would expect the same of employees outside of the work situation. Hastoe supports individuals who challenge these types of unwanted behaviour provided it is done in a positive way.
- A breach of this Policy is potentially a serious disciplinary matter and may be dealt with under our Disciplinary Policy.

- The Chief Executive has overall responsibility for making sure the commitments in this Policy are fulfilled.
- Directors are responsible for ensuring that this Policy is implemented and complied with, and for leading by example in promoting the Hastoe brand.
- The Board Champion is responsible for keeping up to date on national policy and legislative changes; acting as an advocate; raising awareness and being the voice for equality, diversity and inclusion during Board discussions, in decision-making and when setting core strategies, as well as for leading by example in all interactions with employees and tenants.
- The Executive Team Champion and the Head of Human Resources are responsible for developing and implementing strategies to support continuous improvement.
- Managers are responsible for implementing the aims of this Policy, ensuring that their teams are clear about their responsibilities, that they are adequately trained, for leading by example and managing inappropriate behaviour.

Monitoring

- Hastoe collects information with regard to sex, marital or civil partnership status, age, disability, gender reassignment, race, colour, nationality, ethnic or national origin, sexual orientation and religion or belief for monitoring purposes, to ensure that this Policy is working effectively.
- The information we collect is used only for monitoring purposes and for improving our performance in respect of equality, diversity and inclusion. We hold and process all details in accordance with the Data Protection Act 1998, and, from 25 May 2018, with the General Data Protection Regulation (GDPR).
- As a member of the Equality and Diversity Charter for Housing run by the Chartered Institute of Housing, we ensure that we are meeting our professional standards, as detailed in the Charter. A copy of the Charter can be provided on request.

Complaints

- Any tenant or nominee for housing who feels that their issue or application for housing has been unfairly dealt with, shall have the right to make a formal complaint to Hastoe using our Complaints Policy.
- If any employee or prospective employee feels they have been treated unfairly, they should raise their complaint using the Grievance Policy and Procedure.
- Confidential complaints should be raised in line with Hastoe's Whistle Blowing Policy and Procedure.

Review

This Policy supersedes all previous policies. This Policy is non-contractual and does not form part of any employee's contract of employment. It will be reviewed from time to time and will be changed to ensure that it continues to meet the needs of Hastoe Group and is in line with current legislation.