



Equality, Diversity and Inclusion Policy

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Document owner	CEO

1. Introduction

This policy sets out how Empower Housing Association (EHA) is committed to supporting and promoting Equality, Diversity and Inclusion (ED&I). It informs all our activities and the impact on our tenants, colleagues and other stakeholders. It will help us deliver our purpose and uphold our values. It underlines our commitment to develop as a Healthy Business, a key priority set out within our Corporate Plan. It aims to ensure that we comply with our legal and regulatory responsibilities; current requirements are set out principally in the Equality Act 2010; and helps us ensure we comply with the National Housing Federation's Code of Governance 2020.

2. Scope of the Policy

The policy applies to everyone who receives a service from EHA, is employed and contracted by EHA. We seek to ensure that anyone who works on our behalf demonstrates commitment to ED&I. As we review our procurement practices in 2024, we will introduce an expectation that any contractors that work on our behalf can demonstrate that they have their own EDI policy or are happy to adopt EHA's policy.

3. Policy

Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents and believing that no one should have poorer life chances because of any protected characteristics. Promoting equality is about behaving in a way that tackles inequalities, aiming to ensure that all tenants and colleagues are treated fairly, and do not experience discrimination.

Diversity is about recognising that everyone is different and creating an environment that values each tenant and colleague, ensuring that services are delivered and that we can successfully achieve our goals.

Inclusion is about positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.

EHA is committed to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense and align with our Values.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all colleagues are recognised and valued.
- Train all colleagues about their rights and responsibilities under the equality, diversity and inclusion policy, including conducting themselves in a way to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.
- Ensure all colleagues understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful

discrimination, in the course of their employment, against fellow colleagues, tenants, suppliers, visitors and the public.

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow colleagues, tenants, suppliers, visitors, the public and any others in the course of the organisation's work activities.
- Dealing with such acts as misconduct under the organisation's grievance or disciplinary procedures and taking appropriate action. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Raising awareness that sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- Make opportunities for learning and development to all colleagues, who will be encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

As an employer and service provider we promote, value and respect ED&I which is set out in our Corporate Plan. When collecting data and reporting against it we will:

- Collect, review, and measure data on a regular basis to inform us on ED&I demographics regarding tenants, colleagues and Board members.
- Consider positive action where we identify under-representation of groups with protected characteristics within our wider base of tenants, board members or colleagues.
- Carry out equality impact assessments on all policies, making changes where necessary to ensure they deliver agreed ED&I objectives.
- Provide a full explanation of why information is collected and what we use it for, treating sensitive personal data confidentially and only for the purposes of promoting and ensuring equality and fairness; and improving outcomes.

In doing so, we will:

- Seek to better understand the composition of our tenants, colleagues, and Board for each of the protected characteristics, and aim to reflect the communities we serve, provide accessible services and consider the needs of future tenants.
- Take positive action to assist under-represented groups to access services, opportunities and employment.
- Ensure our employment workspaces are accessible and our processes are fair to encourage applications from under-represented groups.
- Participate in good practice networks and events to continue to learn and contribute to the promotion of ED&I.

4. Responsibilities

Board, Chief Executive and Operations Director provide overall leadership, championing ED&I across the organisation and approving the policy. All colleagues take responsibility for delivering positive ED&I outcomes, by being aware of the policy and knowing how it affects their relationships with other colleagues, their work and service delivery to tenants. Any colleague who unjustifiably discriminates or induces others to do so may be subject to disciplinary action.

5. Related Legislation, Regulation and Codes of Practice

- The Equality Act 2010
- National Housing Federation's Code of Governance 2020
- Protection from Harassment Act 1997

6. Related Policies, Procedures and Documents

- EHA Colleague Handbook (Disciplinary Policy & Grievance Policy)
- EHA Corporate Plan
- Learning and Development Policy

7. Reporting and Monitoring

Senior Management Team are responsible for monitoring EHA's approach and performance against agreed objectives. ED&I performance regarding tenants, colleagues and Board members including the Protected Characteristics as defined in the Equality Act 2010, will be collected, monitored and reported to the Board on an annual basis.

8. Consultation and Publicising

The following groups have been consulted with in the development of this policy:

- Management Team
- Senior Management Team
- EHA Board Members

This policy will be publicised on EHA website.

9. Review

This policy may be reviewed at any time and will normally be reviewed every 3 years unless any changes are required due to legislation, good practice, regulatory requirements or business changes.

10. Equality Impact Assessment

An Equality Impact Assessment was completed in January 2024.