

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

## 1. INTRODUCTION

- 1.1 This document sets out Hornsey Housing Trust's (hereafter referred to as "HHT") Equality, Diversity & Inclusion (EDI) Policy and Practices in relation to its roles as a service provider and an employer.
- 1.2 HHT is committed to the promotion of equality and the valuing of diversity. To this end, we will continuously monitor and review the implementation of this Policy, whilst also ensuring that it is updated annually.
- 1.3 HHT seeks to meet the requirements of the Equality Act 2010 and include consideration of the protected characteristics, related codes of practice and other legislation and regulatory requirements, 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]; and
  - Regulator of Social Housing, the Regulatory Framework,
- and any relevant amendments to such legislation or further codes/frameworks of practice.
- 1.4 HHT seeks to ensure in its approach to recruitment that its staff and Board reflect the diversity of the tenant demographic.
- 1.5 This Policy applies to all employees and Board members of HHT, along with other volunteers and sub-contractors/consultants. The wider shareholders of HHT are also expected to adhere to the core principles outlined here. These principles also apply to all those for whom HHT provides services.
- 1.6 The implementation of this Policy should be considered in the wider socio-economic context in which HHT operates. Additionally, we must also take into account the EDI policies of our key funders and commissioning partners.

## 2. DEFINITIONS

The following definitions help in the interpretation of this Policy, and the understanding of its implementation:

### 2.1 EQUALITY AND DIVERSITY

**Equality** - *Everyone has access to the opportunities they deserve as a basic human right and so as to achieve their full potential*;

**Diversity** - *The differences between people are recognised and valued, with each person being seen as a unique individual*.

**Inclusion** - *That all people, regardless of their abilities, disabilities, or health care needs, have the right to be respected and appreciated as valuable members of their communities and in particular as residents and staff of HHT.*

### 2.2 DISCRIMINATION

Categories of Discrimination

Discrimination can come in one of the following forms:

- direct discrimination - treating someone with a protected characteristic less favourably than others
- indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage
- harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them
- victimisation - treating someone unfairly because they've complained about discrimination or harassment

It can be lawful to have specific rules or arrangements in place, as long as they can be justified.

### **Types of discrimination ('protected characteristics')**

It is against the law to discriminate against anyone because of:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

**Note on Disability** – Under the 2010 Equality Act a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities, including using the telephone, reading a book or using public transport. There is a duty on the employer to make reasonable adjustments to working practices to help someone who is disabled- e.g., use of assistive technology.

- 'substantial' is more than minor or trivial, e.g., it takes much longer than it usually would to complete a daily task like getting dressed
- 'long-term' means 12 months or more, e.g., a breathing condition that develops because of a lung infection

## 2.3 HARASSMENT

Harassment is defined as '*unwanted conduct related to a **Protected Characteristic** which violates an individual's dignity, or creates a hostile, degrading, humiliating or offensive environment*'.

The harassment provisions apply to all **Protected Characteristics** except marriage and civil partnership, and pregnancy / maternity.

Employees, can complain about behaviour which they find offensive, even if it is not specifically directed at them.

Employers are potentially liable if their staff are subject to harassment by a third party, i.e., a person they do not employ, where the employer's action in dealing with the harassment are deemed to have been motivated by discrimination

The most commonly reported forms of harassment are sexual, racial or workforce related. Examples of these are given below:

### **Sexual harassment**

Examples of sexual harassment include:

- Verbal propositions, innuendo, suggestive remarks
- Display of sexual offensive pictures, sexually suggestive gestures, written material
- Physical touching, pinching, brushing against another employee's body
- Offensive or unwanted comments about appearance, clothes or personal characteristics

### **Racial harassment**

Examples of racial harassment include:

- Abusive remarks, racist jokes
- Graffiti or gestures
- Physical threats or assaults

### **Workforce harassment**

Examples of workforce harassment include:

- Shouting or swearing at people in public and in private
- Persistent or unwarranted criticism
- Ignoring or deliberately excluding people
- Dispensing disciplinary action which is unjustified
- Deliberately sabotaging or impeding work
- Removing areas of responsibility without explanation
- Consistently imposing excessively demanding tasks with the expectation of failure

## 2.4 VICTIMISATION

Victimisation in this context is defined as *“treating an individual or group badly because they have made / supported a complaint or grievance under the Act”*.

## 3. IMPLEMENTATION AND RESPONSIBILITIES

- 3.1 In implementing this Policy, HHT will ensure that, as an employer, we access the widest possible labour market and secure the most suitable employees for our needs, whilst promoting inclusion and treating all applicants/employees fairly, in every aspect of recruitment, employment, performance appraisal and career development.

- 3.2 All employees, volunteers and Board members will be treated with respect and enabled to work in a climate free from intimidating, hostile or humiliating treatment. Likewise, all our tenants, service users and partners will be treated fairly and with respect.
- 3.3 All employees, Board Members and volunteers are expected to understand and uphold this Policy, demonstrate good EDI practice in their work with HHT. The wider shareholding membership is also expected to ensure that they comply with the key aims and principles of this Policy.
- 3.4 The Board of Management has a strategic overview responsibility for the Policy, with the day-to-day implementation being delegated to the Chief Executive (CEO).

The Nominations and Remuneration Committee shall review and monitor the Policy as it affects staff and board members.

The CEO will ensure that this Policy is drawn to the attention of and explained to all employees, volunteers, shareholders, sub-contractors, consultants, funders and other partners, along with tenants and service users, as appropriate.

Relevant updating and training will be given as needed.

All employees, Board members and volunteers are expected to promote this Policy in their internal and external dealings on behalf of HHT.

- 3.5 HHT recognises that it has a duty of care for all its employees and volunteers, including protection from discrimination and/or harassment in the workplace. The organisation will not tolerate discrimination or harassment of or by any employee and will take measures to handle any such incidents. Failure to comply with the letter and spirit of this policy may result in disciplinary action being taken.

Employees or volunteers who consider that they have been subject to discrimination or harassment should raise the matter with the CEO, invoking the Grievance Procedure where appropriate.

Where it is the CEO who is causing the disruptive behaviour, the employee or volunteer should complain directly to the Chair of the Board of Management.

All complaints will be investigated with formal procedures being invoked as necessary.

#### 4. MONITORING AND REVIEW

- 4.1 The implementation of this Policy will be continuously reviewed as well as being updated annually, also taking into account progress with an agreed **Action Plan** relating to key activities. **(See Appendix 1 for latest version)**
- 4.2 EDI Impact Assessments will be undertaken in relation to other key HHT Policies being introduced or updated, to ensure that they both comply with and support this Policy.

#### 5. FURTHER INFORMATION

- 5.1 Further information is available at the following government websites:

Types of discrimination and protected characteristics:

<https://www.gov.uk/discrimination-your-rights/how-you-can-be-discriminated-against>

Definition of disability:

<https://www.gov.uk/definition-of-disability-under-equality-act-2010>

Discrimination at work:

<https://www.gov.uk/discrimination-your-rights/discrimination-at-work>

Reasonable adjustments for disabled workers:

<https://www.gov.uk/reasonable-adjustments-for-disabled-workers>

## APPENDIX 1 - EQUALITY & DIVERSITY POLICY ACTION PLAN

| Activity   | Milestone  | Completion Date               | Lead Person(s)  |
|--|--|-------------------------------|-----------------|
| HHT board member for EDI identified  | Bekah Ryder confirmed as board representative                                | 26 <sup>th</sup> January 2023 | Bekah Ryder     |
| EDI Policy embedded in new HR system                                       | Policy included within staff handbook  | July 2023                     | Liz Hanley      |
| New design brief to comply with EDI Policy                                 | Completion of design brief   | August 2023                   | Euan Barr       |
| Tenant Satisfaction Survey response data reflects diversity of our tenants | Response rate in line with diversity   | November 2023                 | Phil Johnson    |
| Staff trained in EDI   | Training session to be delivered   | November 2023                 | Euan Barr       |
| Board trained in EDI   | Training session to be delivered   | January 2024                  | Euan Barr       |
| Tenant panel trained in EDI  | Training session to be delivered   | December 2023                 | Euan Barr       |
| NHF EDI tool   | Introduce use of NHF EDI tool to compare workforce to the community we serve | N&RC<br>January 2024          | Euan Barr       |
| EDI impact assessment of HHT housing management related policies           | Impact assessments completed   | N&RC<br>January 2024          | Phil Johnson    |
| EDI impact assessment of HHT asset management & procurement policies       | Impact assessments completed   | N&RC<br>January 2024          | Chris Adegoroye |

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|-----------------------------|---------------------|
| <b>Approved by:</b>         | Board of Management |
| <b>Effective date:</b>      | October 2023        |
| <b>Review date:</b>         | October 2026        |
| <b>Policy developed by:</b> | CEO                 |