



Equality & Diversity Policy

July 2022-2024



**Equality & Diversity
Policy**

Adopted:	April 2019
Contact Officer:	Corporate Head of Culture
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Formal Review of Policy by:	Board
Policy Links:	<p>This policy links to all policies, procedures and strategy documents adopted by LHP.</p> <p>Specific reference is made to the following documents:</p> <ul style="list-style-type: none">• Disciplinary and Grievance Procedures• Complaints Procedure• Pay Progression Policy• Dignity at Work Policy

Brief Policy Summary:

This policy sets out how Lincolnshire Housing Partnership will achieve its aims to promote equality and diversity as an employer and housing provider.

It outlines how Equality & Diversity will underpin all areas of the organisation's work and service provision, including the communities within which it operates.

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1. Purpose

1.1. Policy Statement

Lincolnshire Housing Partnership (LHP) recognises that its customers and staff come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring equality and diversity is embedded into our day-to-day working practices. LHP actively promotes fairness, respect, equality, diversity inclusion and engagement and is committed to continuous improvement.

- 1.2. Through our policies and in our day-to-day work and fulfilment of our legal responsibilities, LHP is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of gender reassignment, race, disability, religion or belief, sex, sexual orientation, age, pregnancy and maternity or marriage and civil partnership.

2. Objectives

- 2.1. In order to effectively implement its commitment to being an equal and diverse organisation, LHP has identified the following objectives:

- Provide the organisation's leaders with the skills and knowledge to fully embed fairness, respect, equality, diversity, inclusion and engagement into the organisation's culture, strategy and processes.
- Provide equality and diversity training to all staff, involved tenants and Board members, which will include content on their responsibilities, relevant legislation and this policy.
- Ensure that no customer or potential customer receives less favourable treatment than any other, making adjustments to services where necessary in order to facilitate this.
- Ensure opportunities are accessible to all, introducing reasonable adjustments to facilitate this where required
- Create an environment where staff and service users are treated fairly and with dignity and respect.
- Ensure fair treatment for job applicants, which is free from bias.
- Make the best possible use of our existing and potential workforce through effective talent management.
- Provide a safe, supportive and welcoming environment where everyone can contribute to their fullest potential.
- Challenge discrimination and promote diversity.
- Act as role models to partner organisations and other external stakeholders.
- Gather data to help us understand the diversity and needs of our workforce and customer base.

- Use data to enable us to track our progress with delivery of services and processes such as the full employment and the recruitment journey, service usage, customer, and staff satisfaction. This data will assist us in identifying and addressing any negative trends by protected characteristic.
- Enforce a zero-tolerance approach in relation to discrimination, bullying, harassment and inappropriate behaviour, thoroughly investigating any reported incidents and taking appropriate actions.
- Provide training to staff on LHPs approach to equality and diversity, its commitment to zero tolerance in relation to discrimination, bullying, harassment and inappropriate behaviour and the contents of this policy.
- Undertake Equality Impact Assessments on all policies, processes, and procedures in order to ensure that no direct or indirect discrimination exists within these.

3. Scope

- 3.1. This policy applies to the organisation, its Board members, Trustees, employees, partners, tenants and leaseholders and to any external stakeholders which are supported by or engage with the organisation, including procurement.
- 3.2. Equality and Diversity imposes rights and responsibilities on every member of staff. All employees and the Board of Directors will be informed that an Equality and Diversity policy is in operation and that they are bound to comply with its requirements. The policy will also be drawn to the attention of external stakeholders, job applicants and those using our services, and those working with us to supply services either to us, or on our behalf.
- 3.3. The policy ensures that our statutory equality duties outlined in the Equality Act 2010 are met, having due regard to the following when we are carrying out our functions:
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic, and those who do not.
 - Foster good relations between people who share a protected characteristic, and those who do not.
- 3.4. Due regard involves:
 - Removing or minimising disadvantages suffered by people due to their protected characteristics.
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.

- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

3.5. Protected characteristics are defined in the Equality Act 2010 as being:

- age
- disability
- gender reassignment
- marriage/civil partnership
- pregnancy/maternity
- race
- religion or belief
- sex
- sexual orientation

4. Key Equality & Diversity Concepts

4.1. Equality

Equality means making sure that everyone is treated fairly and with dignity and respect. It means challenging discrimination and removing barriers, so that everyone has opportunities to achieve their desired outcomes.

4.2. Diversity

Diversity is about recognising the benefits of different values, abilities, and perspectives, and celebrating people's differences. This means promoting an environment that welcomes and values diverse backgrounds, thinking, skills and experience.

4.3. Inclusion

Inclusion is providing a space where everyone has equal access to opportunities and resources, and where everyone feels valued and accepted. Everyone should be able to contribute and have a voice. This may mean making reasonable adjustments to facilitate participation.

4.4. **Discrimination** is unequal treatment of an individual because of a protected characteristic. It may be direct or indirect as outlined below.

4.5. Direct discrimination is defined as where someone is treated less favourably than another person. Direct discrimination can happen in any of the four following ways:

- because of one of the protected characteristics, you are known to have;
- because you are associated with someone with a protected characteristic;
- because you are perceived to have a protected characteristic;

- a failure to make a reasonable adjustment for someone with a disability.

Direct discrimination cannot be justified.

- 4.6. Maternity and Pregnancy and Marriage and Civil Partnership are not protected characteristics with regard direct discrimination by both association and perception.
- 4.7. An example of direct discrimination may be refusing to send someone on a training course because they are married or have children, or not inviting them assuming they can't go due to having children.
- 4.8. Indirect discrimination occurs when a provision, criterion or practice that applies in the same way for everybody but has an effect which particularly disadvantages people who share a protected characteristic. This kind of discrimination is unlawful unless it can be shown that it is objectively justified. Justification in this context means that it can be demonstrated to be a proportionate means of achieving a legitimate aim. Assertion or custom and practice will not amount to justification.
- 4.9. An example of indirect discrimination may be declaring a post as being suitable only for a full-time member of staff without proper justification (i.e., establishing the need for a full-time member of staff rather than for part-timers or job sharing).
- 4.10. Discrimination may be subtle and unconscious and may not be easy to identify. For example, discrimination sometimes results from general assumptions about the capabilities, characteristics and interests of particular groups or individuals, which are allowed to influence the treatment of staff or job applicants or clients. This includes unconscious bias.
- 4.11. Detriment arising from disability is when a person discriminates against a disabled person if they treat them unfavourably because of something arising as a consequence of their disability, and it cannot be shown that the treatment is a proportionate means of achieving a legitimate aim.
- 4.12. **Harassment or bullying** is defined as unwanted conduct which has the purpose or effect of violating the individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may consist of a single incident or a series of incidents. Behaviour which may appear trivial as a single incident, can constitute harassment or bullying when repeated. It may not always be intended, but it is always unacceptable.

- 4.13. Harassment or bullying has the effect of causing undue stress on individuals and of de-motivating them. Harassment or bullying of any kind will not be tolerated and serves to undermine the safe, supportive and welcoming environment which LHP wishes to encourage.
- 4.14. Harassment applies to all protected characteristics. Although Pregnancy and Maternity, and Marriage and Civil Partnership are not directly protected under the harassment provisions of the Equality Act, they do remain protected.
- 4.15. It also applies to those employees who find behaviour offensive even when it is not directed at them, and the complainant does not need to possess the relevant characteristic themselves. Employees are also protected against harassment because of perception and association.
- 4.16. Examples of harassment can be as follows:
- sexual harassment;
 - racial harassment;
 - harassment of individuals with a disability;
 - harassment on the grounds of a person's sexuality;
 - sexual or racial banter;
 - the display of material with sexual or racial overtones (even if not directed at the complainant);
 - mistaken assumptions about the capabilities of people with disabilities;
 - offensive comments relating to an individual's sexuality;
 - sarcastic or derogatory remarks about colleagues, or constant criticism especially of those reporting to you;
 - spreading malicious rumours, or insulting someone;
 - victimisation or bullying of a whistleblower;
 - ridiculing or demeaning an individual such as picking on them or setting them up to fail;
 - exclusion or victimisation;
 - unfair treatment;
 - overbearing supervision or other misuse of power or position
 - unwelcome sexual advances such as touching, standing too close;
 - making threats or comments about job security without foundation;
 - deliberately undermining a competent worker by overloading and constant criticism;

- preventing individuals progressing by intentionally blocking promotion or training opportunities.

The above list is not exhaustive.

5. Management and Delivery of this policy

- 5.1. Fairness, Respect, Equality, Diversity, Inclusion and Engagement are the responsibility of everyone within LHP.
- 5.2. The Leadership team of LHP is committed to embedding Equality and Diversity within the business, ensuring that everything we do and the manner in which it is done, makes reference to and considers the impact upon our equality objectives.
- 5.3. LHP uses the procurement process to ensure that its partners and external stakeholders operate their businesses with similar equality objectives and delivers its services with the same ethos.
- 5.4. It is the responsibility of LHPs Chief Executive to implement, monitor and evaluate the equality and diversity policy in terms of employment practices (selection, recruitment and retention) and service delivery. The Chief Executive is also under a duty to ensure that the Board of Directors is regularly kept updated in terms of the policy's implementation. Additionally, the implications for the Board arising from the decisions it makes and the policies it introduces must be made clear to the Board (e.g. Paying Due Regard).
- 5.5. The Policy Statement (at paragraph 1.1) will be communicated to all staff, visitors, customers and other stakeholders using a variety of methods such as the staff intranet, the website, displayed in offices and where appropriate included in publications.
- 5.6. Annual work plans are in place, which specifically address the equality and diversity aspects of all areas of work for staff and the Board of Directors; these support the delivery of the objectives contained within this policy.
- 5.7. Our staff will receive appropriate training to ensure they understand their responsibility not to discriminate and to treat everyone with respect and dignity. Staff are expected to be aware of personal prejudices, unconscious bias and stereotypes and avoid labels at all times.
- 5.8. All staff will be made aware of and follow the requirements in the Dignity at Work policy.

- 5.9. Existing processes will be used to review and investigate any complaints in relation to discrimination, harassment or bullying as follows:
- staff - Disciplinary and Grievance procedures
 - customers (those using our services) - Complaints procedure
- 5.10. It is expected that when staff or Board Members represent LHP at any time, including through attendance at committees, meetings with external stakeholders and contact with customers, they will ensure that the equality and diversity principles and practices outlined in this policy are adhered to.
- 5.11. When representing LHP on the committees of other agencies, each staff member or Board Member will endeavour to ensure that equality and diversity principles and practices are adopted by those agencies.
- 5.12. We will use an Equality Impact Assessments framework to regularly review our policies, to minimise the possibility of directly or indirectly discriminating against any group or individual as a result of our working methodologies.

6. Selection, Recruitment and Retention

- 6.1. LHP aims to promote equality and diversity as an employer. It also aims to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.
- 6.2. Selection, recruitment, training, promotion and employment practices generally will be subject to regular review to ensure they comply with this policy. In particular, selection and recruitment procedures will be reviewed annually in order to constantly improve equality and diversity practices and respond to changes in legislation. LHP will monitor data on all applicants as well as those that are successful in order to identify any practices that unintentionally discriminate against specific groups.
- 6.3. We will take whatever positive action is required where it can be shown that under-representation of any particular group has occurred in recruitment. Where appropriate and legally permissible, employees from under-represented groups will be given training and encouragement in order to promote equality and diversity within LHP.
- 6.4. Employees involved in the selection and recruitment process, and in the

management of staff, will receive appropriate training to ensure they recognise when they are making stereotypical assumptions or judgements about people, and avoid any discriminatory practices in the way in which they shortlist, recruit or manage employees. This will include unconscious bias training.

- 6.5. We regard discrimination, harassment, abuse, victimisation or bullying of staff, clients or of others in the course of work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of harassment of themselves or others.
- 6.6. LHP has considered the working practices it has in place to address inequality, and discrimination and how it promotes fairness for all. Examples of these against each of the protected characteristics are given below but is not a definitive list of all that LHP does:
 - 6.6.1. We recognise that employees have different needs at different stages during their career, both men and women, for example to balance work and caring responsibilities. We will attempt to accommodate staff requests to work flexibly, whether part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the organisation. We will also encourage initiatives designed to help staff who wish to return to work after a career break.
 - 6.6.2. Our terms and conditions of employment allow for paternity and partner leave in addition to standard maternity leave, in accordance with current legislation. Allowance is also made for compassionate and dependant's leave to deal with domestic emergencies through our family friendly policies.
 - 6.6.3. We recognise that organisations have a duty to make reasonable adjustments for disabled people. We will make reasonable adjustments in our service provision, and for people who apply to work with us, and for people who are employed by us where reasonable, in order to help remove barriers, whether or not we are obliged to do so by law, and whether or not a disabled applicant or employee is covered by the definition of 'disabled' under the Equality Act 2010.
 - 6.6.4. We are committed to ensuring employees do not experience discrimination (or less favourable opportunities/treatment) on the basis of their race, religion or belief by:-
 - Allowing time and, if possible, a place for prayers during the working day and at the workplace as appropriate.
 - Considering employees' dietary requirements in catering for staff, and when providing facilities for staff to eat and store food.
 - Allowing staff of particular faiths to take their holidays for religious festivals and

- other religious observance.
- Trying to arrange job interviews or other important work meetings at times when they do not clash with important religious festivals.
 - Not imposing a dress code with which people of a particular religion cannot comply.
- 6.6.5. We will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits - such as pension contributions or health insurance.
- 6.6.6. We will not discriminate on the grounds of gender, where an individual is in the process of gender reassignment or where an individual has completed this reassignment.
- 6.6.7. LHP will not discriminate on the grounds of marriage or civil partnership and will support individual need as required.
- 6.6.8. We will not discriminate on the grounds of an individual's sex or on the grounds of sexual orientation providing everyone, whether a member of staff or an applicant for a home, with exactly the same opportunity to achieve their goals.
- 6.7. As part of its talent management strategy, LHP will operate an annual staff appraisal system. Training or education development to enhance potential within the existing job, arising out of needs identified through appraisal or from other circumstances, will, where appropriate or possible, be provided. We may, in certain circumstances, allow for paid or unpaid leave for training or educational purposes.
- 6.8. LHP's retention, reward and progression processes are fair and take account of the social, domestic, cultural and physical obstacles to people progressing. We seek to identify where these exist for individuals and take actions to limit these where necessary.
- 6.9. We undertake review of pay and continually work towards eliminating any unfair pay gaps where these are identified, such as through Gender Pay Gap Reporting.
- 6.10. All training opportunities will be published widely through internal communications and Line Managers to all appropriate employees, and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group. Taking care not to exclude, in all training opportunities, we will pay due regard to the need to eliminate discrimination on the grounds set out in this policy. This will include ensuring that we make reasonable adjustments for participants where these are needed.

7. Service Delivery

- 7.1. LHP aims for its services to be accessible to all sections of the community and that no-one receives less favourable treatment because of factors related to their disability, race, gender reassignment, pregnancy and maternity, religion or belief, sex, marital status, age or sexual orientation, which are the characteristics protected in law. In particular, we will ensure that this applies to those most at social, economic or educational disadvantage.
- 7.2. We will use a variety of methods to regularly consult with our customers. We will gather their views on existing and planned services, including changes to provision.
- 7.3. We will make public our commitment to combating discriminatory attitudes where these are encountered by publishing this policy widely amongst staff, partners, recognised trade unions and external stakeholders and in a variety of formats.
- 7.4. We will regularly review our services to improve accessibility for everyone, including people for whom English is not a first language, people with visual or hearing impairments, and people who cannot easily travel or for who mobility is difficult.
- 7.5. We will take all reasonable steps to ensure that all activities are carried out in premises which are accessible.
- 7.6. We will be sensitive to the particular needs of service users by regularly reviewing the support we offer, for example, translations, childcare facilities run by vetted carers, and, when providing food, having regard to religious and other dietary requirements.
- 7.7. We will operate a wide variety of means to allow people to contact staff and Board Members. We will ensure that there is no 'wrong door' through which our customers can make contact with us; the first person the customer makes contact with will take responsibility for ensuring the customer is connected with the person or department that will provide them with the support or service that they need.
- 7.8. We will be concerned especially with people and communities that are disadvantaged and excluded, and will find ways to support the representation of their interests.

8. Procurement

- 8.1. LHP is committed to working with a wide range of suppliers and contractors, from local businesses through to large multi-nationals across a wide range of different types of contracts and purchases.
- 8.2. Equality and Diversity will be considered during the procurement process and in the award of contracts there will be an expectation that contractors comply with the relevant legislation and principles of this policy.
- 8.3. Each contractor that engages in the LHP procurement process will be required to hold the appropriate certification and qualifications for the works and services they are submitting a bid to carry out. The application process will require the contractor to provide evidence of a formal equality and diversity policy further supported by evidence of training delivered to staff, the provision of information and a commitment to on-going support and training.
- 8.4. The extent will be dependent on the nature of the work and size of the contractor, but examples of compliance requirements may include contractors being required to;
 - Provide published material in alternative languages or formats,
 - Provide equality and diversity training for all of their staff, or for their staff to attend LHP's equality and diversity training
 - Carry out equality and diversity monitoring of their staff and to take action to deal with any under-representation of particular groups
 - Undertake 'reasonable adjustments' when delivering services for customers.
 - Establish a fully inclusive workforce and provide employment and skills for locally disadvantaged groups of the long term unemployed.

9. Monitoring and Evaluation

- 9.1. LHP will systematically evaluate its services and the effectiveness of its equality and diversity policy by a variety of means.
- 9.2. In order to effectively monitor and evaluate the effectiveness of the implementation of this policy, we will monitor the diversity of our customers, staff and Board through the gathering of data on protected characteristics.
- 9.3. We will be sensitive to groups and individuals, and will have due regard for the principles of GDPR when seeking information. Where sensitive information is gathered, those responding will be explicitly informed of the purpose and that they are at liberty to withhold the information (i.e. be given the option of 'prefer not

to say'). However, we will ensure that those asked for this information understand the benefits to them of providing information around their protected characteristics. All monitoring information will be securely stored, aggregated and anonymised.

9.4. Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by protected characteristics where this information is available to identify any particular trends. Where any negative trends are identified, these will be investigated fully and recommendations made to the Board.

9.5. We will report annually to the Board on the outcomes of monitoring and evaluation activities, including any trends in relation to particular protected characteristics.

10. Review Cycle

10.1. Responsibility for review of this policy sits with LHP's Board of Directors.

10.2. A formal review will be completed 2-yearly.

10.3. Additionally, an interim review would be conducted in the following circumstances:

- A change is made to relevant legislation, including but not limited to the Equality Act 2010
- The investigation into a negative trend indicates a review of this policy is appropriate
- An external review of our services identifies the need for a policy review

EQUALITY IMPACT ASSESSMENT

Name of policy / strategy / project (the” initiative”):
Equality & Diversity Policy – July 2022 Version

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

- The Equality & Diversity policy has been reviewed in line with policy review schedule requirements
- The policy has also been updated to reflect Investors in Diversity recognition being sought

Completed by: Rachael Mason, Interim HR Manager **Date:** June 2022

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e. have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

No specific group shall benefit

EQUALITY IMPACT ASSESSMENT

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

There should be no adverse impact. The policy is equality neutral.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

LHP collects data on its employees and is held within secure personnel files as well as the HR system online.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

N/A

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

No

EQUALITY IMPACT ASSESSMENT

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data. Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Beilief, Sexuality

Guidelines: Things to consider

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation, it must be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.