



EQUALITY, DIVERSITY AND INCLUSION POLICY

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Applicable Committee(s)	Management Committee
Owner - role	Corporate Services Manager

Record of Updates/Changes			
Current Version	Date Approved	Approved By	Changes
V2			Review of documents to align with New EDI strategy.
V1	November 2019	MC	Amalgamation of policy documents into one.

1.0 Policy Statement

1.1 Introduction

As a Registered Social Landlord, employer and service provider, Castlehill Housing Association (CHA) is committed to ensuring equality, diversity and inclusion (EDI) and promoting a culture that actively values differences in peoples' backgrounds and experience.

CHA is committed to ensuring that EDI principles are fully embedded in all areas of work undertaken by, and on behalf of, CHA. This policy sets out CHA's aims, how it will implement EDI and how it will monitor its performance.

1.2 Principles

Equality

We are committed to treating everyone fairly and with respect, regardless of their background, identity, or circumstances. We will ensure that no individual is discriminated against on the basis of protected characteristics, which include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Inclusion

We strive to create an inclusive environment where all individuals, regardless of their differences, feel valued and have equal access to opportunities. We will actively seek to remove barriers that prevent participation and ensure that our services are accessible to everyone.

Diversity

We welcome the diversity of our tenants, employees, contractors, and communities. We recognise that different perspectives and experiences enrich our organisation and contribute to better decision-making and problem-solving.

1.3 Legislative and Regulatory Framework

This Policy aims to cover the obligations and requirements set out in relevant legislation and in the Scottish Social Housing Charter.

The Equality Act 2010 sets out nine protected characteristics, which cannot be used as a reason to treat people unfairly. The protected characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- race

- religion or belief
- sex
- sexual orientation or
- pregnancy and maternity

The Scottish Housing Regulatory monitors our performance in this area using the regulatory framework in place.

1.4 Scope

This policy applies to all staff, volunteers, Management Committee members and contractors of CHA and its subsidiaries.

This policy applies to all aspects of CHA's activities, including but not limited to provision of services to our tenants, applicants and other user, employment practices, contractor relationships, and community engagement and participations efforts.

1.5 Related Documents

- Equalities, Diversity and Inclusion Strategy
- Equalities, Diversity and Inclusion Action Plan
- Data Protection Policy
- Bullying and Harassment Policy

2.0 Definitions of Discrimination

CHA is opposed to any form of discrimination and will take appropriate steps as both a service provider and employer to counteract discrimination. CHA recognises that discrimination can take many forms:

- Direct Discrimination – treating a person less favourably because of a protected characteristic.
- Associative Discrimination – direct discrimination against someone because they are associated with another person who possesses a protected characteristic.
- Discrimination by Perception – direct discrimination against someone because others think that they possess a particular protected characteristic.
- Indirect Discrimination – applying any requirement or condition, which though applied equally to everybody, is such that a considerably smaller proportion of people of one group can comply with it than the proportion of other groups of people, unless the requirement or condition can be shown to be justifiable.

- Harassment – behaviour that is deemed offensive by the recipient. Employees can now complain of the behaviour they find offensive even if it is not directed at them.
- Victimization – when someone is treated badly because they have made or supported a complaint or grievance under this Policy.

3.0 RESPONSIBILITIES

Management Committee

- Has overall responsibility for ensuring compliance with equalities legislation and the regulatory framework, by monitoring implementation of Equality, Diversity Inclusion Strategy, policies and action plans.
- Aim to be reflective of the profile of the communities we operate within.

Senior Management Team

- To be a good role model for adherence to expected behaviour related to Equality, Inclusion and Diversity.
- To communicate the importance of EDI to all staff and support and promote the EDI strategy, policy and action plan.
- Maintain their knowledge of their responsibilities in relation to Equalities legislation and the regulatory framework to ensure quality of opportunity.
- Ensure the completion of Equality Impact Assessments on policies strategies and decisions.
- To review performance against the Annual Action Plan and overarching EDI strategy.

Managers

- Communicate to their teams the importance of adherence to EDI Policy
- Promote EDI within their teams and effectively deal with complaint of unfair treatment in line with policy and, allowing resources required to deal with complaints.
- Ensure that services which are provided are responsive and reflect the diverse needs of the communities.
- Listen to feedback from all stakeholders to improve our approach
- Ensure staff are fully trained to perform their roles and attend mandatory programmes of training on EDI.

All Employees

- Ensure their actions do not contribute to unfair or discriminatory treatment of others.
- Support colleagues who may be experiencing unfair or discriminatory treatment to take appropriate action by reporting incidents to line management or HR
- Challenge unacceptable behaviour which impinges on dignity
- Maintain knowledge of their responsibilities by undertaking mandatory training and attending all opportunities provided to improve knowledge and skills in this area
- To take responsibility for making a positive contribution towards achieving aims and objectives.

Equality, Inclusion and Diversity Champion

- Ensure EDI policy is included in the induction of all new employees and committee members.
- Ensure programme of EDI training is properly implemented and reflective of the aims of the EDI strategy and action plan.
- Ensure any legislation or good practice updates and amendments are incorporated into existing documents and communicated as they come into effect.
- Track and monitor progress against action plan, assisting others in the association to achieve their objectives.

Tenants

- To give feedback to allow us to take action to remove the unfair treatment of others.

Contractors

- Contractors must work in a way that promotes E&D and must operate in accordance with CHA's E&D principles and relevant legislation.

4.0 OBJECTIVES

4.1 Commitment to Employees

- To provide a working environment in which everyone feels valued, respected and has their dignity maintained.
- To set clear expectations that all employees will treat people respectfully, politely and in a way that maintains their dignity and to act quickly when behaviour does not meet expected standards.
- To aim to have a workforce where people from different groups are represented at all levels CHAs structure.
- To ensure that employees understand their role in valuing diversity and how they can contribute to delivering better quality services, thereby reducing inequality.
- To provide fair access to learning and development opportunities, encouraging and supporting employees in fulfilling their potential.
- To develop an effective communication strategy that involves and communicates actively with employees.
- To provide support to any employees who may experience any form of discrimination or unfair treatment whilst at work and take appropriate action against people involved in discriminatory or unfair practices.
- To ensure that our employment practices are non-discriminatory and supportive of employees who may have specific needs.
- To monitor our employee profile, assess the impact of major operational and strategic decisions on specific groups and take action where required to improve.

4.2 Commitments to our Tenants and Service Users

- To treat people respectfully, politely and in a way that maintains their dignity and to provide or secure assistance for individuals should they require it.

- To understand better who our customers are so that we are able to provide appropriate services and resources which are accessible and relevant to all people within the communities we serve.
- To monitor allocation of properties and evaluate services to ensure they do not discriminate against, or exclude, individuals or people from different groups.
- To consult actively with our customers to ensure that the services we deliver are appropriate to customers' needs.
- To deal effectively with complaints of unfair treatment, personal interaction and/or in the provision of services.
- To provide clear, meaningful information about Castlehill services in ways that are accessible and meet the diverse needs of our communities.
- To deal effectively with complaints about the behaviour of people to whom we provide services where this fails to comply with the principles set out in this policy and to involve other agencies where such behaviour is of a serious concern.

4.3 Our Commitment to others

- To treat all board members and volunteers in line with the principles stated in this policy.
- To work with partners, contractors and suppliers to ensure that they understand our commitments and ensure that their approach will support our aims.

5.0 MONITORING AND REPORTING

To report on our performance, we must collect equality data from relevant stakeholders. The main purpose of equality monitoring is to ensure that we address the needs of our employees, tenants and other service users.

We have a number of specific reasons we have to monitor data, which we identify through data mapping exercises and outline within our Fair Processing Notices. These are:

- Meeting our legal duties
- Complying with regulatory requirements
- Identifying if any form of discrimination could occur so appropriate action can be taken.
- To improve service delivery.

Data is gathered through a number of methods including application forms; contact with various stakeholders and through surveys. We only process equality data if this satisfies the strict rules covered in data protection legislation, including processing of special category data. Further information about this can be found in our Data Protection Policy and related Fair Processing Notices.

Alongside our Annual Equalities Action Plan, a framework for reporting is agreed in with our Management Committee and is regularly reviewed, to ensure that it addresses the aims of our EDI Strategy. This allows us to identify improvements and set measurable objectives to improve our performance.

6.0 REVIEW

CHA undertake to review this policy at least every three years, with regard to:

- Applicable legislation, regulations and guidance
- Changes in the organisation
- Continued best practice