

Group Policy:

Equality, Diversity and Inclusion

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1. Purpose

The purpose of this policy statement is to confirm Spectrum's commitment to the values of diversity and inclusion and to the elimination of discrimination in all our dealings as an employer and provider of housing services. It sets out:

- Our commitment to Equality of Opportunity
- Our policy objectives in the areas of governance, employment, access to housing and service delivery
- How the policy is to be implemented in particular:
 - Responsibilities
 - Monitoring compliance and performance
 - Communications and training

Spectrum's strategic framework for delivery of the policy reflects the legal and best practice requirements placed on all Registered Social Landlords (RSLs), but also more local responses reflecting the different working environments of its Subsidiaries.

2. Scope

This policy applies to all parts of the Spectrum Housing Group including

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Subsidiary organisations.

3. Overview

3.1 Equality Diversity and Inclusion statement

We will strive to ensure that there will be no discrimination or unfair treatment on the grounds of gender (and gender reassignment status), background (e.g. gypsies and travellers, asylum seekers), race, colour, ethnic or national origin, faith, sexual orientation, marital/civil partnership status, age, disability, social position, politics, trade union membership or social disadvantage. We aim to ensure that everybody is treated equally and has equal opportunity to receive the services and employment opportunities we offer.

We recognise that there are many barriers to true equality of opportunity, ranging from overt prejudice in favour of, or against, particular groups or individuals to unwitting ignorance of different lifestyles and needs. On whatever level it exists, discrimination is neither acceptable nor tolerable. Our commitment therefore is to ensure that no group in society is less likely than another to be housed or recruited by us and that the other services we provide, such as housing advice, repairs and rent collection, are carried out fairly.

We will develop a positive action culture through which achievement of equality is a “golden thread” to our business, underpinning everything we do. To achieve this we will set clear objectives for all of our services, regularly measure our performance and take positive action to deal with any imbalances we find. We will work to ensure that appreciation of issues relating to Equality, Diversity and Inclusion are embedded throughout the organisation.

3.2 Why is Equality Diversity and Inclusion important?

The Group has identified three reasons why Equality, Diversity and Inclusion is important.

3.2.1 *The moral case*

The roots of the housing sector are in dealing with hidden disadvantage. It was the housing association sector which first highlighted and responded to the gaps in housing provision between local authorities and the private sector in the 1960's. The moral principles which underpin the origins of our sector are applicable in exactly the same way to today's campaign against inequality.

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3.2.2 *The legal case*

Discrimination is illegal whether it is direct or indirect. The law requires us to demonstrate our commitment to equality of opportunity in all our dealings, and that we work towards the elimination of discrimination through promotion of good relations with all sectors of the community. These legal requirements are also reflected in regulatory requirements set down in the Housing Corporation's Regulatory Code.

3.2.3 *The business case*

The Group deals with increasingly diverse customers and staff. Our services delivery plans have to respond to a range of different physical, cultural and religious needs which impact significantly upon life style preferences. Our employment practices must be flexible to attract staff with the right skills and experience.

3.3 **The need for positive action**

The problem is that there is a difference between equal treatment and equal outcome. Most of us take the view that if we work to rules and procedures, which are fair and treat people in the same way a fair and equal outcome will follow. In a lot of cases this is true, but the reality is that it cannot be relied upon. It takes no account of the barriers to fairness. Barriers that we are often unaware of and don't realise exist.

Positive action is a process designed to address the disadvantage of people affected by these issues. Measures range from legislative action taken by government to enforce equal pay and combat discrimination against the disabled, to best practice guidance on improving access to our services by customers and applicants from minority groups.

Examples of the latter may involve the setting of targets for BME representation among our residents relative to the balance in the community in overall terms. Similarly offering interviews to all disabled people who meet the basic job criteria may be a means of redressing imbalances in this area.

This is different from positive discrimination, which is illegal and favours an individual (or individuals) based on reasons which have no relevance to their actual needs or abilities by comparison with others in the same position.

In response to this the Group has:

- Agreed objectives in relation to the achievement of fair and equal treatment of:

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- all customers in the areas of; lettings, sales, customer satisfaction, dealing with harassment and hate-crime, governing body membership, staffing, representation in residents associations and the employment performance of suppliers, contractors and consultants,
 - all staff and applicants in the areas of; recruitment, employment, remuneration and promotion.
- Identified the need for:
 - the development of suitable performance metrics for this area of our work,
 - the annual review of impact of our actions and compliance with this policy,
 - the creation of an annual action plan to address areas for improvement and enhancement.

3.4 Stakeholder views

In developing this policy we have considered the views of the following stakeholders:

- Customers
- Staff
- Board members
- Local Authorities
- Other stakeholders such as the Race Equality Council
- Our Regulators (through their published guidance)

4. Policy Objectives

4.1 Governance

Good governance is a precondition for consistent action to promote equality in all aspects of the Group's work. In support of this, the Group will:

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1. have clear procedures for recruiting Board members, and advertise posts as widely as possible and where necessary set targets and take steps to attract people from groups that are under-represented,
2. have formal induction procedures for all staff, including Board members covering equality, diversity and inclusion and the organisation's responsibilities,
3. ensure that the organisation's commitment to equality is given high priority and that related policies and strategies are monitored and reviewed,
4. ensure that the impact on equality is assessed when developing or reviewing policies,
5. ensure that suitable performance metrics are developed, reported and monitored in each area of work and where appropriate, positive steps are taken to redress any imbalance in performance.

4.2 Recruitment and employment

The Group's policy is to comply with all statutory obligations in a positive manner. The Group's long-term aim is that the composition of our workforce should reflect that of the communities in which we work.

In support of this, the Group will:

1. have clear procedures for recruiting staff, and advertise posts as widely as possible and where necessary set timetabled targets and take steps to attract people from groups in the community that are identified as being under-represented in the workforce,
2. ensure that access to employment opportunities is available to all groups and take action to encourage the widest cross-section of people to apply by using a variety of appropriate media to advertise opportunities,
3. make reasonable adjustments to conditions of employment or working conditions in order to enable both current and prospective employees to access employment opportunities,
4. positively promote opportunities for employees to combine work and domestic and care responsibilities and ensure that no member of staff will be discriminated against because of his/her domestic or personal circumstances,

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5. ask all employees and job applicants to complete a form denoting their gender, race, religion, ethnic origin, sexual orientation and any disabilities. This information will be recorded and used to ensure that this policy is operating effectively,
6. take reasonable action to ensure that this information is kept up to date.

4.3 New and improved homes

The Group aims to provide housing for people that meets their needs. In support of this, the Group will:

1. ensure the assessment of housing needs among all the groups the organisation serves, is an essential part of the review and planning stages of any development,
2. be mindful of the requirements of people with special needs or from minority groups in the communities we serve when designing and commissioning new homes,
3. ensure that we maintain our homes to a good quality standard and that our improvement programs are appropriate for all residents.

4.4 Sales and lettings

The Group operates open systems that enable anyone in need to make an application for housing at any time. Properties are allocated in accordance with our published Policies and Procedures which include commitment to achieving balanced sustainable communities. In support of this, the Group will:

1. ask all applicants to complete a form denoting their gender, race, religion, ethnic origin, sexual orientation and any disabilities. This information will be recorded and used to ensure that this policy is operating effectively.
2. use this information to ensure that access to our homes and the information we supply about them, is available to all groups and take action to encourage the widest cross-section of people to apply for our homes.

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4.5 Tenancy and housing management

The Group is committed to ensuring that all customers and prospective customers can access the services and homes it provides. In support of this, the Group will:

1. collect information from its current residents (and Managing Agents where appropriate) regarding their gender, race, religion, ethnic origin, sexual orientation and any disabilities. This information will be recorded and used to ensure that this policy is operating effectively,
2. take reasonable action to ensure that this information is kept up to date,
3. use this information as well as feedback from consultations when reviewing or developing services so as to ensure that the service is accessible and appropriate to all groups.
4. use this information to ensure that no group is discriminated against by decisions and legal action taken at each stage of the housing process.

4.6 Neighbourhoods and community cohesion

Promoting and encouraging diversity is a central part in the development of sustainable and cohesive communities. This is a core part of the Group's mission. In support of this, the Group will:

1. ensure that consultations shall encompass all of the groups in the area it serves, and will encourage representatives of these communities to become included in our involvement structures,
2. provide training on equality and diversity covering community cohesion issues for staff, Board members and residents, especially for those involved in neighbourhood development and renewal work.

4.7 Harassment, anti-social behaviour and domestic violence

The Group is committed to dealing promptly and effectively with all aspects of hate related crime, harassment (racial and on other grounds), anti-social behaviour and domestic violence as it impacts on customers and communities as well as staff.

4.7.1 Staff

Specific policies for raising issues of harassment and whistle blowing are contained within the relevant staff policies and procedures, or staff may raise

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the issue directly with the Group Director of HR and facilities. In support of this, the Group will:

1. ensure that staff feel able to report such issues safe in the knowledge that they will not be penalised, unless it is untrue or made in bad faith,
2. ensure that any employee who harasses any other employee will be subject to the organisation's disciplinary procedure. In serious cases, such behaviour will be deemed to constitute gross misconduct and, as such, will result in summary dismissal in the absence of mitigating circumstances,
3. ensure that such cases are investigated quickly, thoroughly and fairly.

4.7.2 Customers

Specific anti-social behaviour, domestic violence and harassment policies have been developed to ensure that we have an adequate, transparent and fast method of dealing with issues. Our staff will be fully trained on a continuing basis to ensure that they are sufficiently knowledgeable to deal with such situations. In support of this the Group will:

1. ensure that our approach is victim-centred and absolute priority is given to investigating any such report. The victim will be consulted regarding remedies and actions and this includes a package of support measures available to them, as well as enforcement action against the perpetrator through our Conditions of Tenancy, where appropriate. Above all else, our response will be rapid, appropriate and proportionate to the incident(s) and the wishes of the victim,
2. where possible actively work with other agencies to take remedial action with perpetrators
3. actively seek to develop initiatives that prevent cases from occurring in its housing stock and the communities in which the stock is based,
4. work to raise awareness of the issues and publicise the Group's stance,
5. work alongside other agencies are embraced in order to develop information sharing protocols and joint approaches to both prevention of cases and action against perpetrators.

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4.8 Resident involvement

Involvement of our customers is a fundamental means by which the Group ensures that its services are relevant, accessible, of a high standard and represent good value for money. It is important that the views of different groups within our customers are enabled to give us their views and feedback so that we can, with their help, shape the services to best meet their needs. In support of this, the Group will:

1. take steps to use a variety of involvement methods so as to include customers from all groups and to involve them in consultations and the development of policies and services,
2. take steps to ensure that no section of our communities are excluded from taking part in the representative structures both formal and informal and local and corporate,
3. take steps to ensure that equality, diversity and inclusion training is made available to customers who are actively involved in our management and decision processes,
4. take steps to ensure that the involvement of different customer groups is monitored and reported as part of the wider involvement strategies.

4.9 Managing agents, contractors and suppliers

The Group acknowledges its responsibility to ensure that external suppliers working on its behalf uphold the principles of this policy in all their dealings with our customers. In support of this, the Group will:

1. maintain approved lists of external suppliers who will be required to demonstrate this commitment on an on-going basis,
2. expect to see clear policy and procedures setting out an on-going commitment to equality of opportunity in relation to employment and service delivery, in particular relating to diversity and dealing with vulnerable people and those with specialist needs,
3. take steps to ensure that these aspects are assessed in any tendering process.

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5. Implementation

5.1 Responsibilities

5.1.1 *Boards*

The Group Board has corporate responsibility for ensuring that this policy is reflected in all aspects of the Group's work. In particular it has role to ensure that:

- performance is monitored in the Subsidiary organisations
- action is taken to address areas of weakness or improvement.

Subsidiary Boards have a responsibility to ensure that the policy's objectives are properly reflected in operational plans and that there is adequate monitoring of compliance against objectives and targets. In particular they have a responsibility to ensure that:

- an annual impact assessment is undertaken
- ensuing action plans are appropriate and are delivered
- all new and revised policies are assessed for their equality, diversity and inclusion impact

5.1.2 *Equality, Diversity and Inclusion Working Group (EDIWG)*

The EDIWG comprises Group and Subsidiary staff and Board members. It is chaired by the Group Chief Executive. The EDIWG will liaise with staff representative groups and resident bodies as necessary.

The EDWP will meet at least quarterly to review performance against the policy, progress against action plans and objectives and to consider any new compliance issues arising from changes in legislation, policy and best practice

5.1.3 *Senior management*

Members of the Group Executive are individually and corporately responsible for ensuring that the policy is implemented in their particular areas of responsibility, including the annual improvement plans/objectives of Group Subsidiary organisations.

In particular:

- The Group Chief Executive is responsible for leading the adoption and

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adherence to the policy by all component parts of the Group and its staff.

- The Group Director of HR and Facilities is responsible for the operational delivery of the policy in relation to employment including the development of suitable performance metrics.
- The Group Director of Business Development is responsible for the operational delivery of the policy in relation to development activities including the development of suitable performance metrics.
- The lead executive for each of the Group's Subsidiary companies is responsible for the operational delivery of the policy in relation to service delivery including the development of suitable performance metrics.

5.1.4 *All staff*

We expect all staff to display a personal commitment to the objectives of this policy and to ensuring that it is put into practice.

Those staff who have managerial and supervisory roles will have wider and more specific responsibilities, to ensure that employment and service delivery performance properly adheres to the objectives of this policy.

5.2 **Monitoring**

Ongoing monitoring and regular analysis of records will provide the basis for appropriate action to assess the success of this policy and eliminate unlawful direct and indirect discrimination and promote equality of opportunity.

Monitoring will cover all aspects of this policy and will use comparative measures such as:

- Comparison with the local population density is one method of assessing performance for certain aspects of the group's work. An example of this would be the comparison of lettings with local population data.
- Comparison with the make up of the current customer base can also be used to assess service delivery performance. An example of this would be the comparison of number of reported complaints against

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current customer data.

- Comparison between customer groups is a robust way of analysing service delivery outcomes. An example of this would be the comparison of customer satisfaction with individual service elements, e.g. repairs and maintenance.

5.2.1 *Annually*

- Subsidiaries and Group Departments will conduct an impact assessment of performance and compliance with this policy and report this to the EDIWG, Subsidiary Boards and Group Board
- Subsidiaries and Group Departments will develop action plans to address areas of weakness or in need of improvement and report this to the EDIWG, Subsidiary Boards and Group Board
- The Group will make a full statement of progress and compliance in the Regulatory Compliance Statement

5.2.2 *Quarterly*

- Review of selected operational performance KPIs by the Subsidiary Boards and Resident Bodies (Resident Panels, Tenant Consultative Committee, Tenant Forum)
- Review of progress against objectives and action plans by EDIWG

5.2.3 *Monthly*

- Review of performance against key KPIs with operational staff as part of monthly reviews and 121s

5.3 **Communication and training**

The Group believes that the promotion of equality of opportunity is a core part of its role in the wider community.

To this end the Group will:

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- Ensure that this policy is made available and publicised on a widespread basis:
 - The policy will be made available on the Group’s website.
 - All staff, Board members, applicants for jobs and contractors and consultants working for the Group will be advised of the policy either by receiving a copy of the policy or a related leaflet.
 - Customers will be advised of the policy through their Resident Handbook.
 - Suppliers will be advised of the policy through the tendering and contract review processes

- All other policies will be monitored to ensure that equality and diversity issues are properly addressed.

- Reports to Board will carry an impact statement regarding the issues covered by this policy.

- Ensure that training is provided to the following people at induction and at other points throughout their employment or term of office:
 - All staff
 - Board and Committee Members

- Ensure that training opportunities will also be made available to other parties including:
 - Involved residents
 - Contractors, suppliers and consultants

6. Data Protection and Confidentiality

The exchange and processing of personal information will be treated with appropriate levels of confidence and will be fair and lawful. In particular the Group will ensure that the relevant processing is notified to the Information Commissioner and is conducted (where relevant) with the necessary consent of the individual concerned. The Group will ensure that personal information is

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accurate; not kept for longer than is necessary; secure; and adequate, relevant and not excessive. All information will be processed in accordance with the rights of the individual.

7. Related Documents

1. Confidentiality policy – GCE112PO
2. Disability Equality Scheme – GCE244PO
3. Gender Equality Scheme – GCE245PO

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