

Equality, Diversity and Inclusion Policy – HR026

1. WHY WE HAVE THIS POLICY

- 1.1 At bpha we are committed to treating people fairly, promoting equality of opportunity, and creating a work environment that is inclusive and free from discrimination or harassment, enabling people to flourish at work and be the best they can be.
- 1.2 The purpose of this policy is to confirm our commitment to equality, diversity and inclusion, (ED&I), in service delivery and employment. This policy is for bpha residents, customers, employees and partners.

2. OUR COMMITMENT

- 2.1 Our vision is to build communities where people can live happily in a home they can afford; recognising and valuing the diversity of our residents and communities, and promoting an inclusive work environment for our employees, are essential to delivering this vision.
- 2.2 **bpha has both a responsibility and an opportunity to reduce discrimination. All discrimination is unacceptable and will not be tolerated.**

IN SERVING OUR CUSTOMERS	AS AN EMPLOYER
<p>We have a duty to make sure that our services meet the needs of our customers and the communities we serve in a responsive and inclusive manner.</p> <p>Our commitment is to work with our residents, customers and partners to achieve the best equality outcomes possible for all individuals or groups in the housing and other services we provide, such as lettings, housing advice, repairs and rent collection.</p>	<p>Promoting an inclusive work environment for our employees is essential to delivering our vision.</p> <p>Our commitment is to ensure that all employees or groups of employees are treated fairly in recruitment, pay, promotions or more generally during their employment.</p> <p>We will work with our employees to develop understanding and remove barriers to achieving true inclusion and equality of opportunity such as overt prejudice; direct and indirect discrimination in favour of, or against, particular groups or individuals; to unwitting ignorance of different lifestyles and needs.</p>

3. OUR EQUALITY, DIVERSITY AND INCLUSION PRINCIPLES

- 3.1 We want to be an open, inclusive and diverse organisation and these three principles guide our work:
1. We value everyone and treat them with dignity, fairness and respect.
 2. We promote and celebrate equality, diversity and inclusion with our residents, communities, employees, partners, stakeholders and supply chain and recognise the benefits that come from this.
 3. We challenge and will not tolerate prejudice, discrimination and harassment.

Our Ambition - Dignity, Fairness and Respect	
<p>SERVING OUR CUSTOMERS</p> <ul style="list-style-type: none"> • We value our customers and want to involve them in the development of services. • We want to understand our customers better so that we can better meet their diverse needs and aspirations. • We want our workforce and governance structure to reflect the communities we serve. 	<p>BUILDING OUR PEOPLE</p> <ul style="list-style-type: none"> • We want to ensure that people have equal access to employment opportunities and will provide additional support to enable disadvantaged groups to compete on a level playing field. • We want to create a diverse workforce and inclusive workspaces where we actively respect, embrace and nurture the diversity and talents of all individuals. • We will support, develop and empower our employees and give them the tools and support to succeed. • We want to understand our employees and are committed to creating a culture where we do not make judgements about others lifestyle choices.

4. THE BUSINESS CASE

- 4.1 Treating people fairly and equally, recognising that each individual is different, and creating inclusive cultures that value diversity helps us build better communities and a stronger organisation. It enables us to be more open to ideas and opportunities and this can only add value to the services we provide our customers and the culture in our workplace.
- **Moral case** - the principles of equality and diversity are about social justice, fairness, human rights, equal access to opportunities and are simply the right thing to do. We recognise the impact on those who experience discrimination or harassment of any kind.
 - **Customer Care** – we want to know and understand our customers better so that we can treat them as individuals and create flexible services tailored to their diverse needs.

- **Diverse workforce** – a diverse workforce broadens the organisation's perspective and innovation, helping to inform the development of new services and more fully represent the communities we serve. A workplace that embraces diversity will help us to attract and retain talented people and reduce turnover.
- **Competitive edge** – diverse teams bring different ideas, innovation and creativity and will help us to better understand the needs of our customers and communities. Our approach to diversity will give us an economic edge in new market opportunities.
- **Reputation** – inclusive work environments encourage loyalty and teamwork; and enhance our reputation as a housing provider that puts residents at the heart of what we do and as an employer of choice.
- **Legal obligations** – we want to meet our legal responsibilities in relation to equality, diversity and inclusion to minimise any adverse impact on our employees, residents or communities, impact to our reputation or financial cost.

5. EQUALITY LEGISLATION AND REGULATION

- 5.1 As an employer and housing provider, we want to ensure that people have equal access to employment opportunities and will provide additional support to enable disadvantaged groups to compete on a level playing field.
- 5.2 As a social housing provider, we have certain responsibilities under the Equality Act 2010 to promote equality of opportunity. The Act makes discrimination unlawful in relation to nine protected characteristics:
- Age
 - Disability
 - Gender
 - Religion/belief
 - Race
 - Gender re-assignment
 - Marriage (civil/same sex)
 - Sexual orientation
 - Pregnancy/maternity

5.3 Equality Duty

- 5.3.1 The Public Sector Equality Duty requires Housing Associations delivering public services to give 'due regard' to the need to:
- eliminate discrimination, harassment and victimisation
 - advance equality of opportunity
 - foster good relations (tackling prejudice and promoting understanding).
- 5.3.2 bpha is not a public body but is required to comply with this duty in the provision, allocation and management of social housing.

5.4 Regulatory Requirement

- 5.4.1 This policy meets the requirement of the regulatory framework for registered housing providers to respond to the needs of diverse residents. Registered providers are required to treat all residents and tenants with fairness and respect including protected characteristics and those with additional support needs.

6. RESPONSIBILITIES

- 6.1 It is the responsibility of everyone within bpha to embrace our ED&I policy and deliver on our commitment in their day-to-day work.
- 6.2 The Executive Leadership Team has corporate responsibility for ensuring that this policy is reflected in all aspects of bpha's work and ensuring compliance with equality legislation.
- 6.3 The Equality, Diversity and Inclusion Strategic Group is responsible for promoting equality, diversity and inclusion across the business and oversees the implementation of the policy and action plan.
- 6.4 The Equality, Diversity and Inclusion Project Group engages with employees from across business in delivering the action plan and provides employee feedback to the Strategic Group.
- 6.5 The Customer Committee ensures that customer insight and engagement processes are effective in providing a representative overview of customer needs and opinions and that customers' views are properly taken into account when setting strategy and policy. The Committee will also review progress against the Customer elements of the ED&I Action Plan.
- 6.6 The Remuneration and Nominations Committee ensures that the principles of the ED&I Policy are reflected in recruitment activities, appointments and remuneration decisions. The Committee also reviews progress against the Employee elements of the ED&I Action Plan.
- 6.7 All managers and employees should ensure that they understand, promote and comply with this Policy, undertake training as required and participate in employee engagement activities.
- 6.8 Managers, particularly, are expected to role model the commitments and principles of this Policy and to tackle any non-compliance in their teams. All employees are asked to speak up if faced with a situation or a concern, through line management, the Speaking Up Whistleblowing Policy and Process or members of the Strategic or Project Groups.

7. OUR APPROACH

7.1 Understanding our Customers and our Employees

- 7.1.1 An understanding of our employees and customers will help shape our approach to ED&I work. As such we will collect and analyse data relating to protected characteristics and other factors in order to inform our action planning and enable the organisation to monitor the success of the policy.

7.2 Harassment, Anti-Social Behaviour and Domestic Abuse

- 7.2.1 bpha is committed to dealing promptly and effectively with hate related crime, harassment (racial and on other grounds), anti-social behaviour and domestic abuse as it impacts on customers, communities and employees. Our approach is outlined in the table below:

CUSTOMER	EMPLOYEE
<ul style="list-style-type: none"> • We want to do our part to keep our customers safe and free from harassment, anti-social behaviour and domestic abuse. • We work with the police and other relevant agencies to respond when these issues impact on the communities we serve. • Specific anti-social behaviour, anti-domestic abuse and harassment policies and procedures have been developed to ensure that we have adequate, transparent and fast methods of dealing with issues. • We expect our customers to treat their communities and our employees with dignity and respect. • Our employees will be fully trained on an on-going basis to make sure that they are sufficiently knowledgeable to deal with such situations. Our approach is victim-centred, and priority is given to investigating any such report. • Just as we expect our employees and contractors to treat our residents with respect, we also expect our customers to reciprocally treat our staff with respect. Any discriminatory behaviour directed at our employees, contractors and volunteers when representing bpha is unacceptable. We will act quickly and decisively in dealing with these cases, with the focus on the protection of the member of staff, contractor or volunteer. 	<ul style="list-style-type: none"> • We expect our employees to treat customers and colleagues with dignity and respect; to not make assumptions about a person based on personal characteristics; and to promote an environment free of discriminatory behaviour. • Our employees can expect a safe and open environment that promotes dignity and respect at work and that addresses harassment, discrimination, intimidation or bullying. • Specific bullying, harassment and anti-domestic abuse policies and procedures have been developed to ensure that we have adequate, transparent and supportive methods of dealing with these matters.

7.3 The need for positive action

7.3.1 In society not everyone is treated equally and there are individuals and groups that are also socially excluded. To promote fairness and to give equal opportunity, bpha will consider positive action measures, as appropriate.

7.3.2 Examples of our approach are:

FOR OUR CUSTOMERS	FOR OUR EMPLOYEES
<ul style="list-style-type: none"> Improving diverse representation among our Panels or Resident Involvement Groups relative to the balance in the community. Engaging with local community groups, participation in community events and hosting Open Days. Exploring the option of targeted apprenticeships. 	<ul style="list-style-type: none"> Improving diverse representation among our senior management and non-executive directors relative to our workforce and the communities we serve. Reviewing and enhancing our recruitment process from role design and advertisement to offer and induction to improve diversity amongst successful applicants. This will include formal interview skills and unconscious bias training for all interviewers. Establishing a reciprocal mentoring programme, providing opportunities for individuals from under-represented groups across bpha to mentor senior managers to create a powerful alliance where knowledge and understanding of their lived experience is used to shift awareness and action at leadership level. Having an apprentice model which is attractive to a diverse range of candidates.

7.4 Learning and Development

7.4.1 All employees, managers, directors and non-executive directors will complete appropriate training on diversity and inclusion, unconscious bias and diversity best practice appropriate to their role. HR has overall responsibility for equal opportunities training.

7.5 Procurement and Supply Chain

7.5.1 We are committed to equality, diversity and inclusion in respect of achieving best value in all our procurement activities. We will take specific measures to ensure that our values are reflected by all external suppliers working on behalf of bpha and that they uphold the principles of this policy in all their dealings with our customers.

8. COMMUNICATING OUR POLICY

8.1 This policy will be available in a range of accessible formats and will be published on our website and intranet and shared with key partners. Customers will be advised of the policy through their Resident Handbook and as part of regular customer communications e.g. Talk Magazine. It will also be made available during recruitment, induction, tender and supplier contract review processes.

9. MONITORING

9.1 The Equality, Diversity and Inclusion Strategic Group and HR are responsible for reviewing and updating this policy, supporting the cultural development of bpha and monitoring the implementation of the action plan. Progress will be reported to the Customer and Remuneration and Nominations Committees and the Board.

9.2 We will monitor and review our policies, action plan employment practices, procedures and services to ensure fairness for all. We will make any changes to our policies and strategies as necessary if there are any significant changes to legislation, policy or practice.

10. DATA PROTECTION AND CONFIDENTIALITY

10.1 The use of personal information will be in accordance with our Data Protection Policy available on our website and intranet.

11. ASSOCIATED LEGISLATION, NATIONAL STANDARDS AND REGULATION

- Equality Act 2010
- Regulator of Social Housing Tenant Involvement and Empowerment Standard 2017

12. ASSOCIATED DOCUMENTS

- Customer Anti-Social Behaviour Policy HO046
- Customer Domestic Abuse Policy HO062
- Data Protection Policy
- Employee Bullying and Harassment Policy and Process HR028
- Employee Domestic Abuse Policy and Process HR046
- Speaking Up Whistleblowing Policy and Process HR034

13. REVIEW/AMENDMENTS

13.1 This policy does not form part of any contract and may be amended at any time.

13.2 This policy will be reviewed every two years or before if legislative changes are identified.

Approved by	Board
Date approved	26 November 2020
Owner	ED&I Strategic Group
Review date	November 2022