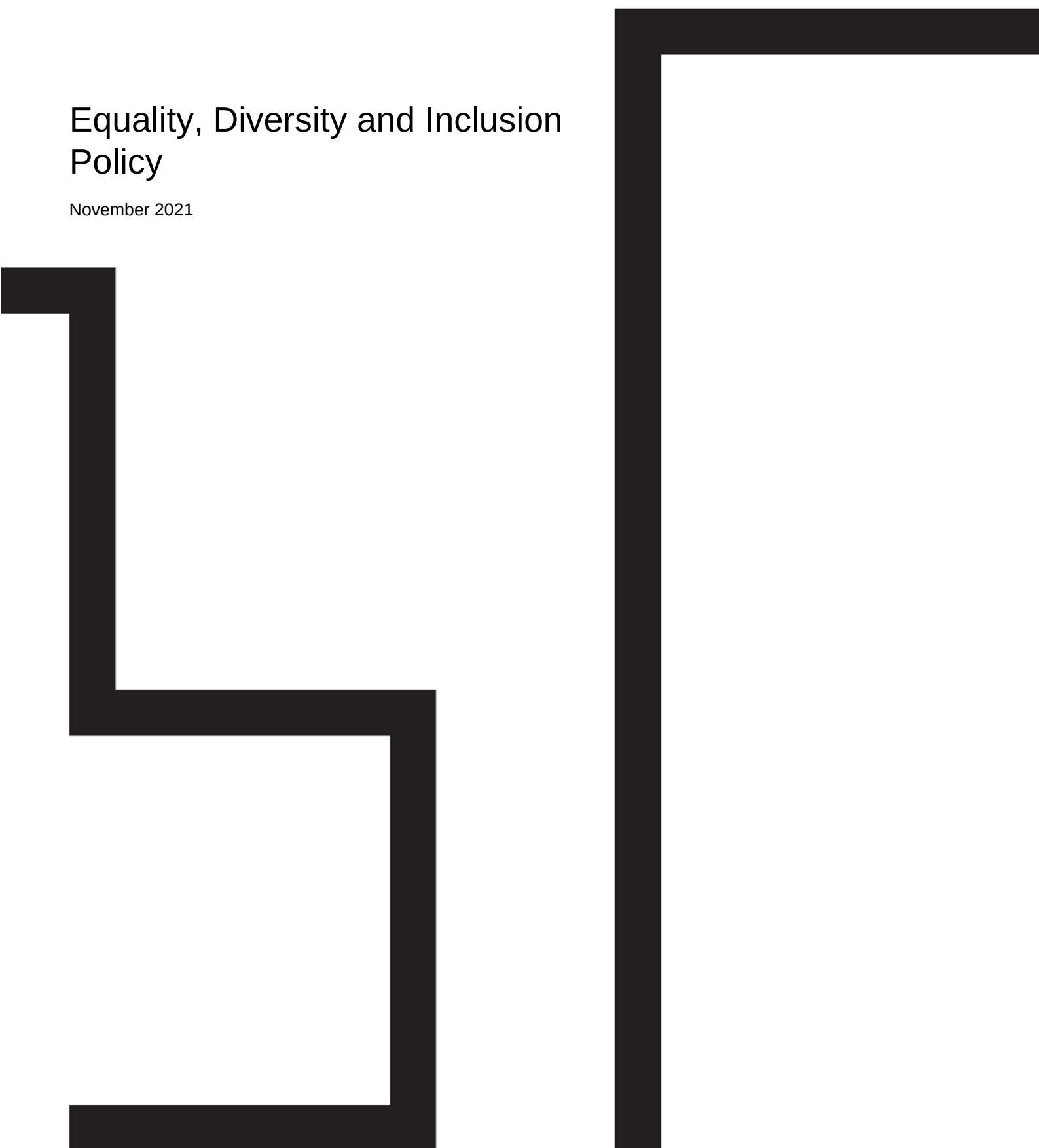


Equality, Diversity and Inclusion Policy

November 2021



Company	Thirteen Group
Lead Manager	Janice McNay
Date of Final and Version Number	May 2019
Review Date	November 2024
Officer Responsible for Review	John Rafferty

Policy Review History

Version	Action & Changes	Author	Date
1	Review anniversary, updated regulator and landlord information	JM	02/05/19
2	Review anniversary, updated to reference inclusion		

1 POLICY STATEMENT

- 1.1 Thirteen is an equal opportunities employer and service provider, committed to achieving equality of opportunity, valuing diversity and promoting an inclusive culture for everyone. This Policy demonstrates how we intend to fulfil our vision of providing support and opportunities for communities to grow and be an employer of choice, focused on the continued development of colleagues, board and committee members with the necessary skills and experience to deliver the vision. This Policy is driven by our strong commitment to be a caring landlord and employer, with the ability to attract and retain a highly skilled and motivated workforce to join us on our journey as we invest and contribute to the regeneration of the neighbourhoods we serve.
- 1.2 Compliance with this Policy will also ensure that colleagues, board and committee members do not commit unlawful acts of discrimination. We want to demonstrate how we respect individuality as part of our on-going commitment to promoting equality, diversity and inclusion.
- 1.3 The underlying principles of this Policy are shaped by Thirteen's values:
- **Considerate** in our behaviour.
 - **Smart** in the way we do things.
 - **Progressive** we move things on.
- 1.4 Our values compliment the underlying principles of this Policy, which are the nine protected characteristics as defined by the Equality Act 2010:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual Orientation
- 1.5 However, this Policy is not restricted to these protected characteristics: we also take into consideration additional factors such as socio-economic status which may impact an individual's life.

2 REFERENCE MATERIAL

2.1 Legislation

- 2.1.1 In developing this Policy, consideration has been given to legislation, regulation and best practice. The following list of statutes and guidance is not exhaustive, but it outlines the current framework which exists to assist equality.
- Equality Act 2010
 - The Human Rights Act 1998
 - Equality and Human Rights Commission Guidance: Human Rights at Home

- Crime and Disorder Act 1998
- Regulator of Social Housing Regulatory Framework
- Commission for Racial Equality: Code of Practice on Racial Equality in Housing
- EU Equal Treatment Directive

3 DEFINITIONS

3.1 The definitions of Equality, Diversity and Inclusion are derived from relevant pieces of legislation and codes of practice.

3.1.1 **Equality** is about creating a fairer society, where everyone can participate and can fulfil their potential. It is about breaking down barriers which currently limit opportunities for certain groups of people within society. As a Registered Provider of Social Housing, we believe in fairness for tenants; prospective tenants; colleagues; members; and volunteers. We also recognise the importance of removing discrimination to achieve this goal; as discrimination is the unjust or prejudicial treatment of different categories of people based upon attributes such as gender, race, and sex. Discrimination can present in ways of working, stereotypes and attitudes which are detrimental to equality.

3.1.2 **Diversity:** As everyone is different, we know that it is essential to recognise these differences so that we can consider the needs and aspirations of individuals. If we treat everybody the same, we could indirectly cause inequality and unfairness. Diversity is a given, not a choice. That is why we celebrate differences and respect, value, and harness individual potential.

3.1.3 **Inclusion** aims to recognise, respect and value people's differences, to contribute to and realise their full potential by promoting an inclusive culture for everyone. It is about providing an environment where customers and colleagues feel respected, considered, and listened to, having channels of communication and engagement to enable the sharing of views and influence the way we do things. Ensuring equal access to opportunities and resources for those who might be excluded due to their specific circumstances. This gives everybody the opportunity to live and work in the way which is most suitable for them.

3.2 Discrimination

3.2.1 **Direct Discrimination:** When someone is treated less favourably than someone else as a result of a protected characteristic.

3.2.2 **Associative Discrimination:** Similar to direct discrimination. It applies when someone is treated less favourably because they associate with another person who possesses a protected characteristic.

3.2.3 **Perceptive Discrimination:** Direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

3.2.4 **Indirect Discrimination:** Occurs when an apparently neutral condition, rule, Policy or practice that applies to everyone disproportionately disadvantages people who share a protected characteristic and cannot be justified.

3.2.5 Institutional Discrimination: The collective failure of an organisation to provide an appropriate and professional service or employment to people because of their personal characteristics.

3.3 Harassment

3.3.1 Harassing behaviours are demeaning and unacceptable. Harassment is unwanted conduct which affects dignity. It may be related to any personal characteristic of the individual and may be persistent or an isolated incident.

3.4 Victimisation

3.4.1 Victimisation occurs when someone is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act 2010 or internal Complaint Procedure, or because they are suspected of doing so.

3.5 Domestic Violence

3.5.1 Any violence/abuse between current or former partners. The violence may include physical, sexual, emotional or financial abuse between those generally recognised as a couple whether or not married, a civil partnership and whether or not co-habiting.

4 POLICY CONTENTS

4.1 To aid its implementation, this Policy will cover six areas: governance; service delivery; access to information and advice; procurement and supply diversity; staffing and employment; and dealing with harassment.

4.1.1 A number of Strategies and Policies support this Policy, such as the Equality, Diversity & Inclusion Framework and associated Action Plan; the Procurement Strategy, Working at Thirteen guidance; and the Code of Conduct for Board and Committee members.

4.1.2 Further details on the implementation of this Policy can be found in other relevant Policies and Procedures, such as those relating to recruitment, disciplinary issues and dignity at work.

4.2 Governance

4.2.1 The Thirteen Board will provide leadership and direction in relation to equality, diversity and inclusion, and drive ongoing improvement.

4.2.2 Board and Committee members are required to adhere to this Policy. All members are aware of the standards of behaviour expected of them and any breaches will be dealt with immediately. Refresher training is carried out annually and as part of our induction process.

4.3 Service Delivery

4.3.1 We will ensure that all services are accessible to colleagues and the communities we serve, and services will be tailored to meet the diverse needs of colleagues and customers. Services will provide equality of opportunity and respect and value people's differences, ensuring that they are free from prejudice or exclusion. In the provision of services, we will always endeavour to act in a non-discriminatory, inclusive manner. We will:

- Deliver services that are flexible and responsive.
- Remove barriers which may deny access.
- Ensure services meet the needs of diverse communities, particularly those who face discrimination and disadvantage.
- Provide information in accessible formats.
- Provide translation and interpretation services as appropriate.
- Provide mechanisms for colleagues and customers to give feedback and be listened to.
- Monitor the usage of services and address under-representation.
- Look for opportunities to work in partnership with other organisations, including voluntary and community groups; Local Authorities; and other Housing Associations to improve outcomes for specific communities or groups.
- Carry out regular accessibility audits to ensure that our premises comply with the disability requirements of the Equality Act 2010.

4.4 Access to Information and Advice

4.4.1 We will ensure that all information is available to colleagues and customers in a format that is accessible to them. We will ensure that we:

- Provide information in accessible formats as required, e.g., community languages; large print; Braille; audiotape; etc.
- Provide translation and interpretation services as required.

4.5 Procurement and Supply Diversity

4.5.1 We use contractors, suppliers, consultants and agencies to ensure our services are delivered speedily, to a high quality, and in the most cost-effective manner.

4.5.2 We will promote equality within our approach to procurement in the following ways:

- We require that contractors and suppliers of services comply with equal opportunities' requirements. All organisations will be expected to ensure that their contractual duties are executed so as not to conflict with our Policy.
- We will provide guidance, advice and training to contractors/suppliers on equality, diversity and inclusion issues as appropriate.
- Complaints against external organisations will be monitored closely; any allegation of discrimination or harassment will be taken seriously and swiftly investigated.
- Contractors/suppliers will also be expected to take prompt and appropriate action against any member of their own workforce found in breach of this Policy.
- All major projects that are undertaken above the World Trade Organisation's GPA threshold are awarded in line with the Public Contract Regulations 2015 legislation.

This process of selection of Contractors/ Suppliers is a fair approach providing equality of opportunity.

4.6 Staffing and Employment

4.6.1 We understand the importance of having a highly committed workforce to support colleague wellbeing and performance, and are committed to being a good employer to support these aspirations. We understand that in order to achieve this, we must act responsibly; provide equality of opportunity; value diversity; and promote inclusion.

4.6.2 We want to ensure that no employee or prospective employee receives less favourable treatment on any grounds.

4.6.3 We recognise that it is important to treat everyone with equal dignity and respect, and aim to achieve equality of opportunity within our approach to staffing and employment by:

- Ensuring that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.
- Aiming to have a workforce representative at all levels of the diverse communities we serve.
- Considering taking positive action for some recruitment and promotion exercises to address under-representation in our workforce by encouraging applications from people from certain under-represented groups. However, we will ultimately make recruitment and promotion decisions on merit and not on the basis of protected characteristics.
- Ensuring all posts (except those subject to legal exemption, e.g., genuine occupational qualifications) are equally open to all members of the community.
- Having Policies and practices which are inclusive and respectful of the needs and wishes of different groups.
- Providing relevant training for recruitment and selection.
- Developing cultural awareness within our organisation.
- Monitoring the diversity of the workforce; applicants for employment and promotion; commencement of career developments; colleague use of Complaints and Grievance Procedures.
- Providing training on equality and diversity and on understanding and avoiding discrimination.
- Making adjustments to accommodate disabled colleagues where possible and reasonable. For example, we can provide extra equipment or support, we can re-arrange duties and we can make changes to our premises in appropriate cases. Colleagues who have a disability are encouraged to tell the People Team about this so that we can explore appropriate adjustments.
- Giving all disabled and BAME applicants who meet the minimum requirements for an advertised job an interview.
- Offer flexible working arrangements to colleagues to assist with individual personal circumstances, provided that this does not conflict with service delivery commitments.

4.7 Dealing with Harassment

- 4.7.1 We endeavour to provide a work and living environment that is free from discrimination and harassment.
- 4.7.2 Harassment can be a source of great stress to an individual. Behaviour constituting harassment is considered a serious offence and is taken very seriously. We will not tolerate the harassment or victimisation of colleagues by other colleagues; members; customers; contractors; or members of the public in any circumstances, and will take appropriate action against the perpetrator(s).
- 4.7.3 All claims of harassment and discrimination will be treated sympathetically and with discretion, and investigated quickly and actively in a sensitive manner.
- 4.7.4 Any behaviour constituting harassment or discrimination is subject to the range of measures outlined below. This could also lead to criminal prosecution, where it is deemed appropriate to contact the Police.
- Disciplinary action, up to and including dismissal for colleagues.
 - Expulsion from Thirteen for Board and Committee members.
 - Eviction from a property for tenants.
 - Other non-tenant customers.
- 4.7.5 Where customers and members of the public report cases of harassment, the relevant Antisocial Behaviour, Safeguarding and Complaints Policies and Procedures will apply. Our Policies and Procedures adopt a victim-centered approach to dealing with the reported incident and support the victim throughout the process.
- 4.7.6 All claims of harassment and discrimination from colleagues may invoke formal grievance proceedings.
- 4.7.7 We are committed to challenging domestic violence and will assist and support colleagues who want help in addressing problems arising from domestic violence.
- 4.7.8 Should a perpetrator affect the health and safety of a colleague, appropriate action will be taken. Managers should be flexible about working arrangements until the situation is resolved.
- 4.7.9 We will also support perpetrators who genuinely wish to change.
- 4.7.10 Improper conduct by a colleague outside of work may lead to disciplinary action if it has implications for a colleague's role and contractual obligations or the reputation of Thirteen.

4.8 Complaints

- 4.8.1 In the delivery of our Complaints Policy and Procedure, we are committed to dealing with complaints from colleagues and customers fairly, professionally and respectfully, regardless of their personal characteristics.
- 4.8.2 To enable all residents to have clear information and equal access to our Complaints, Compliments & Feedback Policy, we accept complaints, compliments and feedback in any form (for example, in person or via email) to reflect the individual preferences and needs of customers and colleagues.

- 4.8.3 Where required, assistance will be given to people who wish to make a complaint but have difficulty doing so because of their circumstances, e.g., disability or language difficulties.
- 4.8.4 We will monitor trends among groups of customers who access the Complaints, Compliments & Feedback Procedure to ensure accessibility and customer satisfaction for everyone.

5 GOVERNANCE INFORMATION

Equality and Diversity	This Policy provides guidance to ensure that there are no negative impacts on any of the protected characteristics detailed in the Equality Act 2010.
Customer Involvement and Consultation	Consultation for this Policy review was undertaken with customers in November 2021. Further consultation will be carried out prior to review of the Policy in 2024.
Monitoring and Review	This Policy will be reviewed in 2024 and then subsequently every three years and/or subject to changes in legislation.
Responsibility	Overall responsibility for the implementation of this Policy lies with the Head of Governance & Compliance – Janice McNay. All managers have a particular responsibility for ensuring that the equality of opportunity and diversity within their own areas.