

# Equality Diversity and Inclusion Policy

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## **1. WHAT THIS POLICY IS ABOUT AND WHY WE NEED IT.**

1.1 This policy sets out Acis Group's commitment to equality, diversity and inclusion (ED&I) and confirms the following objectives:

- To comply with legislation and regulatory requirements
- To recognise the diversity of our communities, customers, and our people and to ensure that everyone is valued and supported as an individual
- To treat all of our customers and our people fairly, with dignity and respect
- To proactively eliminate discrimination and advance equality of opportunity as both a service provider and an employer
- To show zero tolerance of harassment and victimisation

## **2. WHO DOES THIS POLICY APPLY TO?**

2.1 This policy applies to all Acis Group people (including any agency workers) Board members, contractors and suppliers working with and for Acis Group, and to our customers and the communities that Acis Group works in.

2.2 Specific responsibilities are as follows:

- Acis Group's Board and Executive Leadership Team (ELT) have responsibility for oversight and implementation of this policy and the achievement of its objectives
- Acis Group's Senior Management Team (SMT) are responsible for ensuring that operational services are delivered in accordance with this policy
- Everyone within Acis Group has a responsibility to show a positive commitment to promoting equality, diversity, and inclusion and helping to tackle any form of discrimination in the workplace and/or relating to our customers and communities

- The Diversity Action Group (comprising representation from across the company) will take responsibility for progressing agreed actions to support the delivery of this policy
- Diversity Champions will actively promote equality, diversity, and inclusion both within their own directorates, and across the company

### 3. POLICY STATEMENT

Our policy is that Acis Group values ED&I and is committed to promoting and mainstreaming it across its governance, operations and services. To deliver this policy, Acis Group will have regard to:

i) **The Equality Act 2010.** This sets a legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. It confirms the following nine protected characteristics on which unlawful to discriminate against, harass or victimise a person because they have one or more of:

- Race
- Gender
- Gender Reassignment
- Disability
- Sexual Orientation
- Religion or Belief
- Age
- Marriage and Civil Marriage/Partnership
- Pregnancy and Maternity explicitly.

ii) **The Human Rights Act 1998.** This specifies that every individual has the right to own and enjoy the ownership of property; the right to respect for private life; the right to respect for family life; and the right to respect for their home. The Act provides protection against discrimination with regard to any of these rights and could apply to housing and other services that AGL provides.

iii) **The Regulatory Framework for Social Housing in England**  
The Consumer Standards (Tenant Involvement and Empowerment) prescribe the following required outcomes:

#### **Customer service, choice and complaints**

Registered providers shall:

- provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards

## **Understanding and responding to the diverse needs of tenants**

Registered providers shall:

- treat all tenants with fairness and respect
- demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs

AGL recognises content in the 2020 White Paper – ***The Charter for Social Housing Residents, Chapter 4*** - *To be treated with respect, backed by a strong consumer regulator for tenants*, and expects that in due course, there will be further regulatory prescription regarding the diverse needs of tenants.

### **iv) National Housing Federation (NHF) Code of Governance 2020**

AGL has adopted the NHF Code of Governance 2020 which requires that:

- 1.1 The Board demonstrates a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation's activities, as well as its own composition. It has policies and statements which meaningfully demonstrate this commitment, and sets priorities and objectives for the organisation to achieve.
  - (1) The Board seeks regular assurance about how these commitments and objectives are being delivered in practice, and tracks progress against the priorities it has set
  - (2) The organisation annually publishes information about its work to deliver these commitments and objectives, and the progress it has made

It also confirms:

#### **3.2 Functions of the board:**

Establishing a positive culture, focused on the needs of current and future residents, other customers and other key stakeholders, and **embeds ED&I in the organisation.**

#### **3.4 Board election, selection and appointment:**

Board election, selection and appointment: the board has a **diverse** membership with the collective skills and attributes needed to govern effectively.

- (1) The board understands, states and regularly reviews the collective skills and attributes it requires to be effective.

(2) Prospective board and committee members undergo an open and merit-based assessment process to establish their suitability. Where the organisation's constitution provides for one or more board members to be nominated by an external body, or directly elected, the organisation ensures that those coming forward have the necessary attributes and qualities, and that they are aware of the responsibilities of the role, including those of exercising independent judgement.

**(3) The membership of board and committees comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities the organisation serves and in line with the organisation's stated commitments to ED&I.**

(4) People with direct lived experience of (or particular insight into) the communities served by the organisation are meaningfully engaged in governance structures.

(5) Shareholders who are not board members are supported and informed to play their proper constitutional role in the organisation's governance and in particular in the election of board members.

**(6) The organisation annually publishes information about the appointment of new board members, and about the diversity, skills and attributes of all the board members.**

v) **NHF Together with Tenants (TWT) Charter**

AGL has adopted the NHF's TWT Charter which includes the following commitments:

***Relationships*** – housing associations will **treat all residents with respect** in all of their interactions. Relationships between residents and housing associations will be based on openness, honesty and transparency.

***Communication*** – residents will receive clear, **accessible** and timely information from their housing association on the issues that matter to them, including important information about their homes and local community, how the organisation is working to address problems, how the organisation is run, and information about performance on key issues.

***Voice and influence*** – housing associations will seek and value the views of residents, and will use this information to inform decisions. **Every individual resident will feel listened to** by their housing association on the issues that matter to them and can speak without fear.

***When things go wrong** – residents will have simple and accessible routes for raising issues, making complaints and seeking redress. Residents will receive timely advice and support when things go wrong.*

#### **4. DELIVERING THIS POLICY AND ACHIEVING OUR OBJECTIVES**

4.1 To deliver this policy and achieve its objectives, AGL makes the following commitments:

##### **A) CUSTOMER INFORMATION AND COMMUNICATIONS**

We will seek to obtain relevant **information** about our customers\* (existing and prospective) to:

- Profile needs and seek to ensure that no one is discriminated against due to any protected characteristic
- Monitor who is/is not using our services and inform action(s) to remove any barriers
- Act upon any significant differences in the service outcomes that customers may be experiencing

**We will meet this commitment by:**

- Capturing information about our customers through multiple routes, including but not exclusively contacts/sign-ups/visits/surveys
- Analysing and using the information collated and tailoring our services to meet identified needs where necessary

We will take reasonable steps to make all **communications** accessible

**We will meet this commitment by:**

- Aiming to keep all communication clear and concise, as per the plain English campaign
- The design of our website
- Translating material where possible and practicable
- The use of alternative formats, where needed.
- The offer of help with such activities as completing forms, where required

- The provision of professional language and communication assistance, where possible and practicable

Otherwise, communications will be a core part of awareness raising (see section G).

## **B) SERVICE DELIVERY**

- We will recognise and take account of diverse customer needs in the delivery of our services
- Ensure that all strategies and policies reflect AGL's policy commitment
- Encourage and enable customers to work with us to co-design our policies and service delivery

### **We will meet this commitment by:**

- Equipping our people with an awareness (see awareness raising commitment) of the issues that different customers may experience, and know how to respond to these issues in a person-centred and flexible way
- Undertaking Equality Impact Assessments (EIAs) for new strategies and policies and, where appropriate, procedures and processes
- Widely promoting opportunities and activities to co-design services through a variety of channels
- Making reasonable adjustments to our services and products

## **C) CUSTOMER ENGAGEMENT AND INVOLVEMENT**

- We will ensure that all engagement and involvement opportunities are clear and accessible to all customers
- We will encourage engagement from underrepresented groups
- We will be sensitive to the cultural, mobility and other needs of different groups when we are planning "Your Voice" engagement/consultation activity

### **We will meet this commitment by:**

- Widely promoting "Your Voice" activities through a variety of channels



- Profiling customers\* involved in “Your Voice” activities to understand the scope of representation
- Assessing actions that are necessary to support diverse engagement and involvement

#### **D) OUR PEOPLE**

- We will aspire to have a workforce that broadly reflects the diversity of the communities where AGL operates
- We will recognise the variety of diversity and divergence within the scope of the Equalities Act 2010 - both physical and mental characteristics
- We will review our people practices and remove barriers to ED&I at work

#### **We will meet this commitment by:**

- The collation and use of data in the HR system to understand the profile of our people\* (including volunteers)
- Using the NHF Equality & Diversity Tool to compare our people to the communities where it operates
- Referencing our commitment to ED&I when advertising and/or promoting job vacancies
- Making appointments against objective and non-discriminatory criteria
- Monitoring the profile of job applicants and successful candidates, via our recruitment portal
- Maintaining our Disability Confident accreditation and committed status to make opportunities accessible to disabled candidates
- Collating gender and ethnicity pay gap information for assessment and reporting

#### **E) THE BOARD**

- We will meet the requirements contained in the NHF Code of Governance 2020 - *The Board demonstrates a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation’s activities, as well as its own composition*

**We will meet this commitment by:**

- Profiling the Board\*
- Giving consideration to ensuring diversity of thought as well as the skills, knowledge and experience required (a requirement set out in the NHF Code of governance) when conducting future recruitment campaigns
- Creating a programme of development opportunities for prospective new Board members

*\*We will make clear that customers/our people/the Board can choose not to provide some or all of the information sought and explain clearly the reasons for asking for it and how it will be held and used*

**F) OUR PREMISES/THE WORKPLACE**

- We will make sure that our office premises are accessible to customers/our people
- We will provide a workplace environment that meets the needs of our people

**We will meet this commitment by:**

- Undertaking premises audits
- Ensuring that our buildings meet the accessible design requirements of the Building Regulations
- Making reasonable adjustments, carrying out adaptations, and providing suitable equipment where required

**G) AWARENESS RAISING**

- We will carry out equality, diversity and inclusion awareness raising activities to ensure an understanding of why this is important for the business.

**We will meet this commitment by:**

- Using the National Centre for Diversity questionnaire to establish a pre-training benchmark and inform requirements
- Undertaking a programme of awareness raising

- Undertaking a repeat survey to establish improvements in awareness and understanding
- Sharing progress in delivering our policy aims (see section 5)

## **H) INVESTMENT IN HOMES (EXISTING AND NEW)**

- We will have regard to customer needs when investing in existing and new homes

### **We will meet this commitment by:**

- Seeking to identify particular customer needs as part of our ongoing condition surveys (existing homes)
- Working with key partners to identify, carry out, or enable adaptations to existing properties to meet the needs of customers who require changes to be made to their homes
- Consulting on reviews of standards for new and existing homes
- Being aware of diverse housing needs when formulating proposals or pursuing opportunities to provide new homes, so as to align the type and design to meet them where this is possible

## **I) APPOINTMENT OF CONTRACTORS AND SUPPLIERS**

- In appointing contractors and suppliers to deliver services, we will require their work practices to be consistent with AGL's policy commitments

### **We will meet this commitment by:**

- Considering the equality and diversity commitment and performance of contractors and suppliers in any tendering/selection process
- Making contractors and suppliers aware of the diverse needs of AGL's customers, so that they are equipped to meet them
- Confirming required standards of conduct, so that all AGL customers and people are treated fairly at all times

## **J) HARASSMENT AND VICTIMISATION**

- We will take a zero-tolerance approach to cases of harassment, victimisation, hate crime
- We will work to ensure that the workplace is free from harassment and victimisation

### **We will meet this commitment by:**

- Taking prompt action to address any recognised/reported instances, through the application of our workplace policies or the enforcement of tenancy conditions and/or in liaison with other agencies
- By making our people fully aware of their responsibilities and expectations with regard to equality, diversity, and inclusion

## **K) INFORMATION/SUPPORT**

- We will ensure that we have suitable information and necessary support to meet our ED&I commitment

### **We will meet this commitment by:**

- Establishing a network of information sources (i.e. National Centre for Diversity, Disability Confident, NHF) and building relationships with support groups and contacts (community/voluntary)

## **5. HOW WE WILL MONITOR/MEASURE THE DELIVERY OF THIS POLICY?**

5.1 We will monitor the delivery of this policy through progress against the accompanying action plan, and the following measures for each of the commitments:

### **A. Customer Information and Communication**

- Profiling of customers
- Translations of material/use of alternative formats/help completing forms/provision of professional language and communication assistance

- B. Service Delivery**
  - EIAs completed + actions in response
  - Operational activity - lettings, tenancy failures, evictions, support provision, complaints, hate crimes, property sales
- C. Customer Engagement and Involvement**
  - Profiling of customers involved in “Your Voice” activities
- D. Our People**
  - Our workforce profile
  - Our candidate profile
  - Flexible working request opportunities
  - Internal progression and career development opportunities
  - Gender/ethnicity pay reporting
  - Performance management outcomes
- E. The Board**
  - Profile of membership
  - Outcomes from Board member development programme
- F. Our premises/Workplace**
  - Workplace audits undertaken
  - Adaptations/equipment provided
- G. Training and Awareness**
  - Surveys undertaken and findings reported
  - Awareness raising/development activity undertaken
- H. Investment in Homes (Existing and new)**
  - No. of surveys of existing homes where customer needs identified
  - No. of adaptations carried out
  - No of surveys of new homes customers + action taken in response to findings
- I. Appointment of contractors and suppliers**
  - Tender submissions discounted due to failure to meet ED&I requirements
- J. Harassment, Victimisation, and Discrimination**
  - No of cases/incidents reported/recorded + action taken

**K. Information/support**

- Information/support referenced/used

We will report to the Board on progress in delivering the action plan and against the above measures at an agreed frequency.

We will publish information about the delivery of our policy commitments to customers and our people on an annual basis.

**6. Procedures and other documents that link into this policy**

6.1 Procedures that link into this policy are:

- Equality Impact Assessments

**7. Links to other policies, legislation and/or regulations**

7.1 Policies, legislation and/or regulation that link to this Policy are listed below:

- Allocations
- Anti-Social Behaviour
- Asset Management Strategy
- Conduct
- Confidential Reporting
- Customer Feedback
- Data Protection
- Dignity at Work
- Domestic Abuse
- Flexible Working
- Grievance
- Hate Incidents and Mate Crime
- Health and Safety
- Hoarding
- Learning and Development
- Maternity
- Neighbourhood and Estate Management
- People Strategy
- Procurement
- Reasonable Adjustments
- Recruitment and Selection
- Safeguarding
- Starter Tenancy
- Tenancy Management

Related legislation and regulation is detailed in section 3.

## 8. When this policy will be reviewed

- 8.1 This policy will be reviewed for November 2024 or in the intervening period if required as a result of changes to legislation or regulation, or if emergent best practice necessitates.

## 9. Jargon buster

Reference	Definition
Disability Confident accreditation	Scheme supports employers to make the most of the talents disabled people can bring to the workplace
Diversity of thought	The idea of bringing together individuals from different cultures, backgrounds and personalities to share their thoughts
Equality Impact Assessment	A way of ensuring that policies, practices, services, and functions are as inclusive as they can be by ensuring that they do not inadvertently disadvantage anyone directly affected
Harassment	Unwanted behaviour which may be offensive or cause intimidation or humiliation It can happen on its own or alongside other forms of discrimination
Hate crime	Crimes that are targeted at a person because of hostility or prejudice towards that person's: 1. disability 2. race or ethnicity 3. religion or belief 4. sexual orientation 5. transgender identity. They can be committed against a person or property
Reasonable adjustments	A physical change to premises or to work practices to avoid or correct the disadvantage to a person with a disability
Victimisation	Victimisation (defined in Section 27 of the Equality Act 2010) takes place where one person treats another less favourably because he or she has asserted their legal rights in line with the Act or helped someone else to do so
Your Voice	The company's customer engagement framework