

Equality, Diversity and Inclusion Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	21 st June 2022
Review date:	June 2024

1	Introduction
1.1	One Vision Housing (OVH) is committed to promoting equality, diversity and inclusion in everything it does from its employment practices through to the services it provides to its customers.
1.2	This Policy sets out how OVH will meet or exceed its legal requirements as outlined primarily in the Equality Act 2010 and the Human Rights Act 1998. The Policy also demonstrates how OVH will meet the requirements of Public Sector Equality Duties, (which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation).
1.3	The Equality, Diversity and Inclusion Policy also sets out how OVH will implement the Sovini Groups' Equality, Diversity and Inclusion Strategy in compliance with legislative requirements.
1.3.1	The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England, responsibility of the Regulator of Social Housing (RSH) as outlined below:
1.4	Registered providers shall: <ul style="list-style-type: none"> ● Provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards ● 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
1.5	As part of our commitment to embed equality, diversity and inclusion in everything we do each OVH Policy has standard clauses on 'access and communication' and 'equality, diversity and human rights' as set out below:

<p>1.6</p> <p>1.6.1</p> <p>1.7</p> <p>1.7.1</p> <p>1.7.2</p> <p>1.6.3</p> <p>1.7</p>	<p>Access and Communication</p> <p>OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for the organisation or use its services.</p> <p>Equality, Diversity and Human Rights</p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Religion and or Belief, Civil Partnership, Marriage, Pregnancy and Maternity.</p> <p>OVH also recognises that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).</p> <p>This Policy should be read in conjunction with the following OVH Policies:</p> <ul style="list-style-type: none"> • OVH Recruitment Policy • OVH Bullying Grievance and Harassment Policy • OVH Attendance Policy • OVH Aids and Adaptations Policy • OVH Anti-Social Behaviour, Domestic Abuse and Harassment Policy • Sovini Group Equality, Diversity and Inclusion Strategy
<p>2</p> <p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p>	<p>Statement of Intent</p> <p>OVH has a mission statement to ‘To provide excellent services that meet or exceed customer and stakeholder expectations’ and therefore needs to attract and retain the best staff.</p> <p>OVH will achieve this by being fair and consistent in its recruitment and employment practices, ensuring there are no real or perceived barriers that would prevent or deter any group with protected characteristics from working with OVH.</p> <p>OVH will ensure it meets or exceeds all legal requirements in its employment practices and in the provision of services including the Public Sector Equality Duties which it has chosen to adopt as a matter of good practice.</p> <p>OVH will work in partnership with other service providers and through its community development activities to promote and foster good relations with all groups with protected characteristics to create safe and sustainable neighbourhoods.</p>

2.5	OVH will take a zero tolerance approach to all forms of discrimination, bullying and harassment in the workplace including behaviour from or directed to its staff. It will also take swift and effective action for any incidents of hate crime involving its customers and will work with other agencies on finding lasting solutions wherever it occurs.
3	Policy
3.1	<u>Recruitment Practices</u>
3.1.1	<p>When new vacancies become available as part of the 'review process' for the post, OVH will assess all job descriptions and roles to ensure:</p> <ul style="list-style-type: none"> • The role does not lead to direct or in direct discrimination (whereby a person is treated less favourably than another person because of a protected characteristic – as defined by the Equality Act 2010) • The job descriptions, personal specifications and adverts do not contain any language or inferences that would put a person with a protected characteristic at a disadvantage • Job descriptions and personal specifications accurately reflect the requirements of the role
3.1.2	At the point of this Policy review, OVH did not have any job roles whereby it would be 'objectively justified' to favour a person with a protected characteristic over another who does not share that characteristic.
3.1.3	OVH will, however, consider the need to objectively justify roles on a case-by-case basis and will amend its recruitment practices accordingly.
3.1.4	<p>As per the requirements of the Equality Act 2010, OVH will not ask any pre-employment health questions on any 'on-line' or 'hard copy' application forms. It will, however, ask disability related questions for the purposes of:</p> <ul style="list-style-type: none"> • Monitoring the numbers of disabled applicants • To assist in the running of its 'Disability Confident' scheme, whereby all disabled applicants that meet the minimum job criteria will be guaranteed an interview • To make 'reasonable adjustments' to the recruitment process at assessment centre and / or interview where these are requested in advance
3.1.5	OVH will monitor the profile of all job applicants to ensure there are no real or perceived barriers for any group with protected characteristics from working with OVH.
3.1.6	OVH will take a 'positive action' where it is recognised that there is a lack of applicants from certain groups with protected characteristics. This includes reviewing its job advertising procedures to ensure greater take up of applications from under-represented groups. This may include targeted advertising in specialist publications or making support and advocacy groups aware of vacancies.
3.1.7	OVH will strive to provide training to all managers and other staff who are involved in recruitment practices to ensure they have due regard for equality considerations when interviewing and selecting prospective candidates.

3.1.8	Any request for references will only be made once a decision by the recruitment panel (which will always include a representative from the People and Learning Team) has been made to ensure objectivity.
3.1.9	Further details on the OVH recruitment process are available in the OVH Recruitment Policy.
3.2	<u>Working Practices</u>
3.2.1	Staff Profile Monitoring
3.2.1.1	<p>OVH requests that all employees provide ‘equality monitoring information’ on a voluntary basis. OVH uses this information to:</p> <ul style="list-style-type: none"> • Gain an understanding of the ‘make-up’ of its workforce • Identify any under-represented groups and to inform actions to improve expressions of interest from these groups • Ensure all support needs are being met • Ensure recruitment and selection processes are fair and effective • Create a culture of openness and honesty enabling people to be their true selves at work
3.2.2	Human Resources Policies
3.2.2.1	<p>OVH values its staff as its greatest asset and strives to ensure that whilst working for OVH they obtain job satisfaction and reach their full potential. Central to achieving this aim is a comprehensive suite of human resources Policies which are regularly reviewed with staff input. OVH maintain the human resources Policies to:</p> <ul style="list-style-type: none"> • Ensure all staff, regardless of their identity and protected characteristics are treated fairly and consistently • Ensure OVH meets all legal requirements in employment practices • Ensure staff are aware of their employment rights including any company enhancements that exist with improved terms and conditions • Ensure staff know the options that are available to them to take remedial action and receive support if they believe any of their employment rights have been breached in any way (including those relating to equality legislation)
3.2.2.2	<p>Whilst all of the OVH human resources Policies are designed to support OVH’s aim of being a fair and equitable employer, the following Policies have particular relevance in meeting equality duties:</p> <ul style="list-style-type: none"> • Bullying, Grievance and Harassment Policy – setting out OVH’s zero tolerance stance to all forms of harassment in the workplace or associated with work related activities. This Policy has close links with the Disciplinary Policy and OVH’s commitment to fully investigate any allegations of harassment on any grounds and take action where staff are found to be responsible for these types of behaviour • Family Friendly Policy – setting out the provisions OVH has in place to facilitate maternity, paternity, adoption and surrogacy arrangements

- Special Leave and Flexible Working Policy – Including details of OVH’s response for dealing with flexible working requests (as outlined in the ‘Children and Families Act 2014’)

3.2.3 Reasonable Adjustments

3.2.3.1 OVH will meet the requirements of the Equality Act 2010 when considering any ‘reasonable requests’ for adjustments to the work place or working practices to ensure disabled staff are not put at a substantial disadvantage. This may include:

- Removing or altering physical features of the workplace
- Providing auxiliary aids and equipment
- Altering working practices or the location where work takes place

3.2.3.2 Making reasonable adjustments will apply to any new member of staff with a disability but will also apply to any existing member of staff that develops a disability during the course of their employment with OVH.

3.2.4 Provisions for Trans Employees

3.2.4.1 OVH will ensure that it provides a working environment where transgender employees are supported and do not suffer any forms of bullying, harassment or detriment as a result of being trans status or the transitioning process (where steps are taken by an individual in order to live in the gender they identify as).

3.2.4.2 OVH appreciate there are many different routes that individuals may take in order to transition and will offer support to all staff undergoing or considering this process (both those that choose to undergo medical procedures and treatments and those that do not).

3.2.4.3 In order to provide the most appropriate form of support it will be necessary for the individual to inform their line manager or the People and Learning Team of their intentions. This is so support can be offered prior, during and after a transition process.

3.2.4.4 The line manager will keep the staff members trans status confidential and will work with the individual and the People and Learning Team on developing a personalised plan, outlining a pathway for how the individual wants the process to be handled.

3.2.4.5 This plan will set out key milestones and timescales including how and when colleagues are to be informed of the individual’s decision and implementation of practical arrangements, including system updates, name change, facility use etc.

3.2.4.6 Where individuals require time off during the transitioning process e.g. to attend medical appointments they will be entitled to company and / or statutory sick pay and leave provisions, as outlined in the OVH Attendance Policy and as appropriate, according to length of service.

3.2.4.7 OVH will monitor any absence periods associated with the transitioning process and require staff to comply with the normal reporting requirements. This type of absence will be recorded separately from normal absence monitoring and will not be used as trigger points for disciplinary action (although all other absence monitoring requirements will still apply).

3.2.4.8	OVH will provide specialist training for any line manager whose reportees are transitioning, so that they can provide the most appropriate support to individuals and will ensure general awareness raising is available to wider colleagues.
3.2.4.9	OVH also advise all employees (including new employees) that have previously transitioned to inform their line manager and the People and Learning Team at the point of recruitment so on-going support can be offered.
3.2.5	Support for Victims of Domestic Abuse
3.2.5.1	In addition to the support that OVH provides to its customers that may be experiencing domestic abuse through the provisions set out in the 'Anti-Social Behaviour, Domestic Abuse and Harassment', 'Allocations' and 'Safeguarding' Policies, OVH also supports staff members that may be in this situation.
3.2.5.2	If employees feel able to, they should make their line manager aware of any situations where they believe they are suffering domestic abuse, so that the appropriate support can be offered.
3.2.5.3	This may include consideration for reasonable adjustments in duties, hours of work or work location and approval of unpaid leave on a discretionary basis.
3.2.5.4	In extreme cases, OVH may also use its housing stock and powers to grant 'management lets' to staff members where alternative accommodation is required.
3.2.5.5	Line managers will work with staff that are victims of domestic abuse and will endeavour to uphold confidentiality at all times when dealing with wider team members in line with General Data Protection Regulation (GDPR) 2018. With the support of the People and Learning Team personalised plans for dealing with the domestic abuse will be developed with the staff member.
3.2.5.6	OVH have signed-up to the 'Make a Stand' pledge developed by the Chartered Institute of Housing and have appointed a Champion (Operations Director Support Services) to ensure commitment to supporting victims of domestic abuse.
3.2.5.7	As part of this pledge, OVH will ensure it works in partnership with local, external advocacy groups that provide support for victims of domestic abuse and will make referrals to these agencies in consent with staff members, where appropriate.
3.2.5.8	If OVH believes a staff member is a victim of domestic abuse and has experienced or is at a risk of harm but has not disclosed the issue to the organisation (and is working on a managed response) it may be duty bound to make safeguarding alerts, as appropriate, following the procedures outlined in the Safeguarding Adults Policy.
3.2.6	<u>Menopause</u>
3.2.6.1	OVH is committed to developing a workplace culture that supports staff experiencing the menopause in order for them to feel confident to raise issues about their symptoms and ask for reasonable adjustments at work.

3.2.6.2	Support for employees experiencing the menopause
3.2.6.2.1	OVH will provide appropriate information and an optional e-learning training to all staff and managers to enhance understanding on the effects of the menopause and also to make it comfortable for people to discuss and address the impacts that menopause can have on employees in carrying out their roles.
3.2.6.2.2	OVH encourages employees who are experiencing the menopause to speak to their line manager or People and Learning Team to let them know if they are struggling with symptoms that may impact on their roles, so that appropriate support can be provided. Such information will be treated confidentially and in accordance with OVH Data Protection Policy.
3.2.6.2.3	Managers will make allowances where there is an additional need for absence by employees experiencing the menopause in order to manage their menopausal symptoms.
3.2.6.2.4	OVH recognises that employees experiencing the menopause may find that its related symptoms may impact on their health and wellbeing, and OVH will aim to provide as much support as is reasonably practicable for individuals.
3.2.6.3	Agile Working Employees
3.2.6.3.1	<p>Agile working employees will be assisted by flexibility of working arrangements which include, to work around symptoms to manage menopause symptoms that affect their work by exercising the following:</p> <ul style="list-style-type: none"> ● Flexibility around the taking of breaks, longer or more breaks during the working day ● Adjust start and finish time, for example an employee who has had a sleepless night may attend work slightly later to help to make up for time that they have missed ● Flexibility around attending menopause related medical appointments
3.2.6.4	Office or Location Based Employees
3.2.6.4.1	<p>OVH will provide the following reasonable adjustments to the office or location-based employees who are experiencing the menopause to support them in their roles:</p> <ul style="list-style-type: none"> ● Environmental factors –OVH will: <ul style="list-style-type: none"> ○ Provide desk fans on request ○ Review office seating plans so that affected employees can be near the window or open doors, or away from direct sources of heat such as radiators ○ Fit blinds to windows ○ Provide chilled drinking water ● Provide changing facilities for staff to change clothes during the working day ● Give employees time off to attend menopause related medical appointments ● Consider reducing the duration of travel and/or increase rest breaks for employees who are required to drive as part of their usual work pattern. This must be authorised by the relevant Director

3.2.6.5 Confidential support is available for individual employees from the Employee Assistance Programme, and this may include counselling where appropriate, in addition to practical information and advice.'

3.2.7 **Equality, Diversity and Inclusion Training**

3.2.7.1 In order to ensure that all staff understand the importance of equality, diversity and inclusion in achieving OVH's vision, mission and that it is in keeping with its values, a comprehensive and mandatory programme of equality training will be provided. The interactive training will cover:

- Exploring personal understanding of equality and diversity
- Effects of unfair treatment
- Exploring perceptions and stereotyping
- Challenging inappropriate behaviours
- Behaviour and language in the work place
- Dealing with conflicting views

3.2.8 **Links to Corporate Social Responsibility**

3.2.8.1 To ensure equality, diversity and inclusion remains central to strategic planning and operational delivery of services, OVH have established a Corporate Social Responsibility (CSR) Steering Group with staff representation from all teams. The remit of the Group includes:

- Reviewing customer insight information and exceptions reporting on any issues that impact on groups with protected characteristics in differential and adverse ways and suggesting remedial actions
- Planning and organising equality, diversity and inclusion events and activities including cultural awareness raising
- Review the impact of new legislation on OVH activities
- Set and review progress on achieving equality, diversity and inclusion objectives
- Drive external equality, diversity and inclusion accreditations
- Give feedback on team requests for additional equality training or requests for equality information

3.2.8.2 **Employee Assistance Programme**

3.2.8.2.1 In order to support staff in all aspects of their personal and working lives, OVH has developed an 'Employee Assistance Programme' whereby staff can seek confidential advice provided by an independent expert advisor, including any issues that may be related to a protected characteristic. Staff wanting to access the service can do so anonymously by contacting www.workplaceoptions.co.uk or **0800 015 5630**.

3.3 **Business Practices**

3.3.1 OVH are keen to work with 'like-minded businesses' and to spread good practice in equality, diversity and inclusion throughout its supply chain and in sub-contractor selection. Through its procurement and contractor selection processes, OVH will ensure others it chooses to work with meet the standards it expects in this area by:

	<ul style="list-style-type: none"> • Giving preferential weighting in procurement selection procedures to organisations that can demonstrate a strong commitment to equality and diversity in their employment and service delivery practices • Ensuring organisations have their own policies and procedures for equality or are willing to abide by the principles outlined in OVH documents
3.3.1.1	OVH expects all visitors to its buildings to demonstrate appropriate behaviours and to show respect for others and will not tolerate any behaviour which could be interpreted as being discriminatory, which causes harassment or offence in any way.
3.3.2	Modern Day Slavery Act
3.3.2.1	OVH is committed to ensuring that all business activities are delivered in compliance with the Modern Slavery Act 2015. In order to achieve this, OVH has put provisions in place to tackle modern slavery, which include ensuring that staff are protected and treated fairly during their time of employment with the organisation.
3.3.2.2	OVH will continuously monitor any arrangements it has with contractors and supply chains to ensure they act in accordance with the Modern Slavery Act when doing business with us.
3.4	<u>Service Provision</u>
3.4.1.1	OVH has a proud track record of delivering excellent customer services that are tailored to individual needs. To ensure this level of service provision continues, OVH collects 'customer profile' information on a voluntary basis for lead tenants about: <ul style="list-style-type: none"> • Age • Gender • Religion • Ethnicity • Sexual Orientation • Disability • Gender Identity / Gender Expression • Race
3.4.1.2	With targets to keep collection rates in the upper quartile when compared with other housing providers, OVH uses this information to provide personalised services including: <ul style="list-style-type: none"> • Sending communications in alternative formats • Provision of additional support where it is required e.g. for elderly or disabled customers • Respect for religious customs when visiting properties
3.4.1.3	OVH will attempt to update profile information via its programme of tenancy audit visits, targeting priority properties where they have been referred by other agencies or stakeholders.
3.4.1.4	To ensure the needs of disabled customers are met, OVH offers a comprehensive 'aids and adaptations' service. Minor Adaptations to properties up to the value of £1000 can be reported via the day-to-day repairs service without referral from an Occupational Therapist.

	For full details of the aids and adaptations service reference should be made to the OVH Aids and Adaptations Policy.
3.4.1.5	In compliance with the Equality Act 2010, OVH will periodically carry out accessibility audits on all office locations and those of purpose built retirement accommodation to ensure they are fully accessible to those with disabilities and further assessments will be triggered in the event of modifications of internal layout of the buildings
3.4.1.6	Mindful of the aging population within the areas of its operation, OVH will, where possible incorporate 'lifetime' homes standards in design features in any new developments. This approach ensures the properties are suitable for disabled, elderly customers and families with young children as well as being suitable for future adaptations.
3.4.1.7	Similar to the stance taken with employees, OVH promotes a zero-tolerance approach to all forms of 'hate crime, domestic abuse and harassment' involving its customers. This involves: <ul style="list-style-type: none"> • A well-resourced and experienced team to investigate any allegations of hate crime, domestic abuse or harassment and take appropriate actions depending on the circumstances involved (including the full range of legal remedies) • A dedicated system for recording, evidence gathering and tracking all reported cases, supported by a comprehensive Policy and procedures • Well-established links and commitment to partnership working with local agencies including the Police and Multi Agency Risk Assessment Conferences
3.4.1.8	Reference should be made to the OVH Anti-Social Behaviour Policy for further details on OVH's provisions to deal with incidents of this nature. OVH's provisions for dealing with hate crime, domestic abuse and harassment assist it to meet the public sector equality duties (that it has chosen to adopt), namely: <ul style="list-style-type: none"> • 'Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (Equality Act 2010)'
3.4.1.9	OVH is committed to the principles of co-regulation and provides a number of opportunities for customers to get involved in the way that it operates and provides services. Options available to customers include but are not exclusive of the following: <ul style="list-style-type: none"> • Receiving support to set and run residents associations and community groups • Regularly assessing performance and reality checking of service delivery • Scrutiny of specific aspects of the business and service reviews • Input into strategic decision making
3.4.1.10	Feedback from these involvement mechanisms is used to continuously improve service delivery and ensure the needs of all customers are being met.
3.4.1.11	Throughout all of the involvement opportunities, OVH promotes equal access and encourages appropriate behaviours by putting in place terms of reference and, codes of conduct. OVH also provides training on a regular basis to various involvement forums on equality, diversity and inclusion issues, where possible in conjunction with OVH staff.

3.4.1.12	<p>OVH will monitor the profile of its ‘involved customers’ and will take positive actions to encourage greater involvement from under-represented groups wherever they are identified. Actions in this area help OVH to meet the public sector equality duty of:</p> <ul style="list-style-type: none"> • ‘Advancing equality of opportunity between people who share a relevant protected characteristic and people who do not share it’ 	
3.4.1.13	<p>OVH is committed to the principles of Corporate Social Responsibility and invests significantly in community development initiatives. This is in acknowledgement of the impacts our activities have on wider communities and society in general. Investment and activity in this area contributes to OVH meeting the third public sector duty of:</p> <ul style="list-style-type: none"> • ‘Fostering good relations between people who share a relevant protected characteristic and those that do not share it’ 	
4	Implementation	
4.1	All OVH staff have a responsibility for the effective operation of the OVH Equality, Diversity and Inclusion Policy.	
5	Performance	
5.1	EMT will receive annual report on staff training in equality, diversity and inclusion.	
6	Consultation	
6.1	All OVH Staff have been consulted in the development of this Policy.	
6.2	The OVH Tenant Policy Review Group have also been consulted on the development of this Policy on 10/06/2022.	
7	Review	
7.1	The OVH Equality, Diversity and Inclusion Policy will be reviewed every 2 years and approved by the Executive Management Team. The review process will ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on OVH’s obligations in regard to equality, diversity and inclusion, changes to OVH business practices or in the light of management system audits.	
8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	The EIA conducted by the Policy Writer and Policy and Strategy Manager in April 2022.
8.3	Results of EIA	The measures that OVH has in place to ensure full compliance with the Equality Act, Human Rights Act and Regulatory Framework for Social Housing

		<p>in England are sufficient to mitigate any risks of a differential or adverse impact on any groups with protected characteristics. The EIA contains recommendations for OVH to continue:</p> <ul style="list-style-type: none"> • Promoting the equality, diversity and inclusion to all staff and partners • Providing E&D training for all staff 	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Executive Management Team	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Group Director – Governance and Compliance	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Director – Governance and Compliance	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
24 th July 2018	Reviewed in line with changes to OVH's business practices	See Section 6	<ul style="list-style-type: none"> • Inclusion of provisions for supporting employees who are victims of domestic abuse
6 th October 2020	Reviewed in line with changes to OVH's business practices	See Section 6	<ul style="list-style-type: none"> • Inclusion of appropriate language for equality and diversity purposes • Removal of the statement that OVH will have a disclaimer on the back of visitors identification badges outlining expected behaviours • Inclusion that EMT will receive reports on staff training in equality, diversity and inclusion
21 st June 2022	Reviewed in line with changes to OVH's business practices	See Section 6	<ul style="list-style-type: none"> • Inclusion of a 'Menopause Section' in section 3.2.6 • Inclusion of the Sovini Groups Equality, Diversity and Inclusion Strategy