Equal Opportunities & Diversity Policy

Document Control

Responsible Person	Chief Executive			
Review Frequency	5 Yearly			
Reviewed by	Board			
Date Approved	April 2023			
Next Review Due	April 2028			
Consultation Required	Yes		No	✓
Equalities Impact Assessment	Yes	✓	No	
Added to Company Website	Yes	✓	No	
Associated Documents Considered	Yes	✓	No	

In accordance with the core values Waverley Housing are committed to treating everyone fairly and with dignity, meeting the diverse needs of Waverley Housing's tenants, Employees and other stakeholders as an employer and through the promotion of equality in terms of the services Waverley Housing deliver.

Appendix 1 to this Policy gives an outline of the types of unlawful discrimination.

1. The Policy

1.1. This policy aims to foster a culture of Equality and to recognise the positive contribution that each individual can make to the business irrespective of their gender, marital or civil partner status, pregnancy or maternity, sexual orientation, gender reassignment, race (which includes colour, nationality and ethnic or national origins), religion or belief, age or disability ("the Protected Characteristics").

1.2. A commitment to this policy is required from all individuals working at all levels, including Board Members, Employees, consultants and contractors, (collectively referred to as "Staff" in this policy). Waverley Housing also expect the same commitment from all those who receive a service from them and will promote this policy in Waverley Housing's dealings with them.

1.3. Staff are entitled to be treated with respect and dignity and Waverley Housing will not tolerate any less favourable treatment of any person on the grounds of the Protected Characteristics. It should be noted that Staff have a personal responsibility for the implementation of this policy and to ensure that they treat others with the respect and dignity that they expect to be treated with themselves.

2. The Policy in Operation

2.1. This policy applies to the advertisement of jobs, recruitment and appointment, promotion, training and development, terms and conditions of work, performance management, pay, termination of employment, any references issued and to every other aspect of employment. All terms and conditions of employment and related benefits shall be non-discriminatory, other than where there are legal grounds for discriminating such as in the case of gender specific jobs. Applicants for employment will be assessed according to their skills, experience and suitability for the job.

2.2. This policy also applies to Waverley Housing's governance, employment, provision of homes, meeting the needs of Waverley Housing's customers, contractors, partners and consultants.

2.2.1. <u>Governance</u>
Waverley Housing will:

a) ensure awareness of, and compliance with, the relevant legislative and regulatory requirements as a landlord and employer.

b) seek to ensure that Waverley Housing's governance structure understands, and is broadly representative of, the diverse communities Waverley Housing serve.

c) provide training on equality and diversity to board members, and involve tenants, so they are able to discuss the issues fully and lead the promotion of diversity across Waverley Housing's activities.

2.2.2. Employment

Waverley Housing will:

a) treat all Employees, whether permanent or temporary, full time or part time, fairly and with respect.

b) recruit, develop and promote staff on the basis of a fair and objective assessment of competence and attitude; and help and encourage all Employees to develop their full potential.

c) provide a working environment where harassment, bullying and offensive behaviour are unacceptable and where individuals are able to bring complaints without fearing prejudice.

d) seek to comply with the requirements of equalities legislation, including making reasonable adjustments in the workplace where appropriate.

e) pay the living wage.

f) where service delivery is not compromised, ensure that all staff have access to flexible working and that the benefits of work-life balance are recognised.

g) equip staff with appropriate equality and diversity awareness training tailored to their needs.

2.2.3. Providing Homes

Waverley Housing will:

a) aim to understand the diverse housing needs in Waverley Housing's areas of operation.

b) as part of Waverley Housing's asset management strategy regularly review how Waverley Housing can contribute to meeting the needs and aspirations of tenants.

c) ensure that no current or potential customer is discriminated against by letting a property on less favourable terms due to a protected characteristic.

2.2.4. Meeting the needs of Waverley Housing's customers

Waverley Housing will:

a) ensure no tenant will be treated less favourably than any other.

b) provide appropriate means of communication such as the provision of an interpreting service and key information on audio tape as required.

c) encourage and welcome diversity when it comes to customer involvement and participation in service development.

d) provide a range of opportunities for customers to have their say on decisions that affect them and to scrutinise Waverley Housing's performance.

e) monitor customer satisfaction across Waverley Housing's services with the aim of ensuring there are no significant differences across the strands of diversity.

f) not tolerate harassment of tenants and other stakeholders. Waverley Housing will be proactive in co-operating with other agencies in dealing with all forms of harassment.

2.2.5. Contractors, Partners and Consultants

Waverley Housing will:

a) ensure that Waverley Housing's contractors, partners and suppliers are aware of the importance of equality and diversity to us and that they support Waverley Housing's commitments.

b) ensure such organisations have a current and effective Equality & Diversity policy, and, where not, that they are willing to work in accordance with Waverley Housing's own.

2.2.6. Responsibilities

Everyone at Waverley Housing has a responsibility for delivering Waverley Housing's equality and diversity commitments:

a) The Board is responsible for ensuring compliance with Waverley Housing's legal and regulatory requirements and policy commitments.

b) The management team has overall responsibility for delivering identified actions, monitoring the implementation of this policy, and actively promoting equality and diversity in all areas of their work.

c) All staff are responsible for ensuring that Waverley Housing's policy relating to equality and diversity is incorporated in their work activities, in all dealings with customers, colleagues and anyone else they come into contact with, in the course of their employment.

2.3. If a member of Staff is found to have discriminated against, harassed or victimised another member of Staff or a tenant, they will be subject to disciplinary proceedings and depending on the seriousness of the incident, may be dismissed for Gross Misconduct. In exceptionally serious cases the police may also be involved.

Appendix 1

Types of Unlawful Discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination - occurs where someone is treated less favourably because of one or more of the protected characteristics set out above.

Indirect discrimination - occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage.

Associative discrimination - is where someone is directly discriminated against or harassed for association with another person who has a protected characteristic

Perceptive discrimination - is where someone is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when he/she does not, in fact, have that protected characteristic.

Harassment - related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Third party harassment related to gender, sexual orientation, gender reassignment, race, religion or belief, age or disability is also unacceptable.

Victimisation - is also prohibited under this policy. This is less favourable treatment of someone who has raised or supported a complaint or raised a grievance under the Equality Act 2010 for discrimination or harassment, or because they are suspected of doing so.

Disability

Waverley Housing is committed to ensuring equality of opportunity for those members of staff who are disabled or become disabled for the purposes of the Equality Act 2010 during their employment with Waverley Housing.

If an Employee is disabled or becomes disabled, Waverley Housing encourages him or her to tell it about their condition so that Waverley Housing may support them as appropriate.

If an Employee experiences difficulty at work because of their disability, he or she may wish to contact HR to discuss any reasonable adjustments that would help to overcome or minimise the difficulty. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service. HR may wish to consult with them and their medical adviser(s) about possible adjustments. Waverley

Housing will consider the matter carefully and seek to make reasonable adjustments to the Employee's role based on any medical advice it feels is relevant.

If an Employee is unable to continue in their current role as a result of a disability, Waverley Housing will consider any alternative roles and vacancies they may have as a way of retaining the services of that Employee.

Remedies

The Chief Executive will take responsibility for monitoring the implementation of this policy. However, if any member of staff believes that he or she has been discriminated against, harassed or victimised on any of the grounds referred to above, he or she may raise the matter informally with his or her immediate Line Manager. If the member of staff wishes to raise the matter further, he/she should invoke Waverley Housing's grievance procedure setting out in detail the basis of their complaint. All such complaints will be taken seriously by Waverley Housing. They shall be treated in confidence and investigated fully by an independent member of management. False allegations which are found to have been made in bad faith, however, will be dealt with under the Disciplinary Procedure.

If a member of staff is found to have discriminated against, harassed or victimised another member of staff they will be subject to disciplinary proceedings and, depending on the seriousness of the incident, may be dismissed for Gross Misconduct. In exceptionally serious cases the police may be involved.

Training

This policy will be supported by a program of training activities to make sure that all barriers, procedures, attitudes and behaviours that prevent equal opportunity are removed. Any Employee who has any questions about the applicability of this policy should consult the senior management team or HR.