



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: People Team

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1. INTRODUCTION

- 1.1 Progress Housing Group (“the Group”) recognises the importance of equality, diversity and inclusion. We operate in increasingly diverse communities and we aim to increase diversity amongst our colleagues, customers, suppliers and other stakeholders.
- 1.2 We understand that people who work for us and use our services have diverse experiences, characteristics, needs and aspirations. We are committed to creating a workplace where these individual differences are valued and respected and where each employee can fulfil their potential and maximise their contribution.
- 1.3 Progress Housing Group is actively committed to promoting and embedding a culture of equality, diversity and inclusion. The Group is an organisation which values differences where individuals can be their authentic selves. The aim is for our organisation to be truly representative of all sections of the society and communities we serve and for each of our colleagues, tenants and other stakeholders to feel respected and valued.

2. SCOPE OF THE POLICY

- 2.1 All employees directly employed by Progress Housing Group or any of its Group Member organisations, including Concert Living and Key Unlocking Futures. This policy also applies to agency colleagues, contractors and consultants.
- 2.2 This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on the Group’s reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to the Group).

3. RESPONSIBILITY

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Colleagues

- 3.1 All those working on behalf of the Group are responsible for implementing this policy in their day-to-day work and in their dealings with colleagues and customers. Any concerns with regard to the conduct of other employees should be reported to your line manager.
- 3.2 Managers are also responsible for the monitoring of this policy, leading by example, recognising unacceptable behaviour and taking appropriate action.
- 3.3 It is the expectation that everyone within the Group will conduct themselves in an appropriate manner, which can be characterised by:
- treating others with dignity, trust and respect;
 - having an awareness of the effects our behaviour may have on others;
 - working collaboratively to achieve objectives;
 - communicating openly and honestly, clearly stating what we mean and what we expect of others;
 - giving and receiving constructive feedback as part of normal day-to-day activities, that is evidence based and delivered appropriately.
- 3.4 The Group's Equality, Diversity and Inclusion Working Group is responsible for the development of strategic goals, monitoring progress and coordinating action related to equality, diversity and inclusion for colleagues and tenants.
- 3.5 The Working Group will:
- a. Oversee the development, monitoring and implementation of the equality, diversity and inclusion strategy and practice.
 - b. Oversee the publication of equality objectives to demonstrate how the Group will meet the equality duty.

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- c. Ensure publication of annual progress reports detailing progress made against wide equality, diversity and inclusion aims and objectives and key performance indicators.
- d. Devise and recommend policies, procedures and action plans to ensure that equality and diversity legislative requirements are met and best practice adopted.
- e. Foster an inclusive culture by promoting the involvement and interaction of a diverse range of colleagues and tenants.

The Board

- 3.6 The Board is committed to taking a clear and active lead in its commitment to achieve equality of opportunity, diversity and inclusion. This is in all of the activities of our organisation, including understanding the needs of our tenants and communities, as well as the composition of the Board and committee(s).
- 3.7 The Group recognises a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board have delegated oversight of this policy to the Remuneration and Nominations Committee and, working with the Senior Leadership Team, will ensure that it is implemented.
- 3.8 The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements. It shall seek regular updates on how the Group is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice and at least once every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation.

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- 3.9 Equality, diversity and inclusion shall regularly feature as an agenda item for Board meetings and decisions shall be made with effective equality, diversity and inclusion analysis.
- 3.10 Board Equality, Diversity and Inclusion Champions actively demonstrate the Board's commitment, model the way and monitor progress of the strategy.
- 3.11 People with direct lived experience of (or particular insight into) the communities we serve shall also be meaningfully engaged in our governance structures.
- 3.12 Progress Housing Group also has responsibilities under legislation, regulation and codes of governance including, but not limited to:
- the Equality Act 2010 (incorporating the Public Sector Equality Duty);
 - the Human Rights Act 1998;
 - the National Housing Federation Code of Governance 2020;
 - as a registered provider of social housing registered with the Regulator of Social Housing, the Regulatory Framework; and
 - any relevant amendments to such legislation or further codes/frameworks of practice.

4. POLICY

Aims & Objectives

- 4.1 One of our key values is to be people-focused: to treat everyone fairly and understand their diverse needs and strengths so we can positively impact lives and improve opportunities. In supporting equality, diversity and inclusion our way of working is genuine, that is, true to what we stand for.
- 4.2 The Group's approach is based on four key areas:

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- (i) Equality – ensuring everyone has an equal opportunity and is not treated differently or discriminated against because of a characteristic such as race or gender. Equality means removing barriers wherever possible to ensure equal opportunities and access for all.
- (ii) Diversity – put simply, diversity can be defined as the mix of our people, people who are different from each other and come from different backgrounds. We recognise and place a positive value on those differences which bring a range of perspectives in decision making and developing services. These differences can go beyond the protected groups set out in legislation.
- (iii) Inclusion – creating a working culture where everyone feels included, has a voice, is treated fairly and has equal access to opportunities and resources. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.
- (iv) Belonging – achieving a working culture, based on the principles above, where individuals feel they can be accepted and supported.

4.3 These terms are interdependent and go hand in hand in promoting a culture that is actively equal, diverse and inclusive.

4.4 The Group will not tolerate any acts of unlawful or unfair discrimination (including harassment, victimisation or bullying) committed against a colleague, job applicant, contractor or customer because of a protected characteristic (see Appendix 1 for protected characteristics).

4.5 Everyone has the right to equality of opportunity and to a positive working environment where they are treated with dignity and respect and feel they can be themselves.

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- 4.6 Each colleague is an individual with visible and non-visible differences. A colleague who is neurodivergent, for example, will not necessarily be known or evident (e.g. someone who has dyslexia, executive functioning issues, or autism). By respecting difference everyone can feel valued for their contributions, promoting individual and organisational wellbeing and fulfilment of potential.
- 4.7 Recognising intersectionality (the idea that people have more than one identity and that these identities interlink) will also support allyship amongst colleagues and the broader understanding of the protected characteristic groups.
- 4.8 It is important to stress that embracing diversity in the workplace means creating an environment in which the contributions of ALL colleagues can be valued and supported. These can include differences that are highlighted in current equality legislation, such as race, religion and gender, but also things like personality and lifestyle choices.
- 4.9 Given people have different personal needs, values and beliefs, a 'one size fits all' approach does not achieve fairness for everyone and people management needs to be flexible and inclusive to support both individual and business needs.
- 4.10 Our messaging, policies, promotional materials and written communications should use inclusive language and images, acknowledging differing views and perspectives where appropriate.
- 4.11 We aim to have a representative Board, committees and workforce, reflecting the communities we serve.

Duties under the Equality Act 2010

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4.12 Progress Housing Group is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation (as defined in the Equality Act 2010).

4.13 A brief outline of equality legislation is set out in Appendix 1.

Duties under the Public Sector Equality Duty

4.14 Progress Housing Group is mindful of its duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:

- a. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.
- b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Other Duties

4.15 Progress Housing Group also understands that diversity and risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010 and that it has a moral duty to address discrimination as an employer, a landlord and as a provider of services. We are committed to tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics such as the protected characteristics

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defined in employment legislation, but also including:

- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation
- any other matter which causes a person to be treated with injustice

Policy Application

- 4.16 Promoting equal opportunities and providing an inclusive workplace applies to all employment policies and practices, including those related to recruitment, promotion, training and development, terms and conditions of employment, discipline and selection for redundancy.
- 4.17 The Group will ensure all employment strategies and policies have undergone an equality impact assessment (EIA), an evidence-based approach designed to help organisations ensure that their policies, practices and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation.
- 4.18 Equality involves more than simply treating everyone alike. To promote equal opportunity it requires recognition that some groups and individuals have particular and specific requirements that need to be met if they are to enjoy equal access to the opportunities available within the Group.
- 4.19 **Recruitment and promotion** - We wish to attract, recruit, employ and promote those people who are best fitted for the positions on offer, basing selection on values, aptitude and ability. Therefore:

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- person and job specifications will be limited to those requirements that are necessary for the effective performance of the job
- candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability
- disability and personal or home commitments will not form the basis of employment decisions except where necessary
- the Group will endeavour to reach traditionally under-represented groups by advertising and promoting our brand in areas and publications they engage with.
- we will monitor and investigate where it is found that individuals from particular groups do not apply for employment or promotions, or fewer than expected apply; are not recruited or promoted at all, or are appointed in a significantly lower proportion than their rate of applications or are concentrated in certain jobs/grades/ teams and there appears to be a point beyond which they do not rise.

4.20 **Terms and conditions** - During employment the benefits, terms and conditions of employment and facilities available to Group employees will be reviewed on a regular basis to ensure they remain inclusive and to determine if any actions are required to meet the needs of disadvantaged or under-represented groups.

4.21 **Flexible working** - The Group will operate flexible working practices wherever possible to take account of the needs of employees. Our Family Friendly and Work Life Balance Policies include information on flexible working patterns, parental leave, support for carers and career breaks. The Group will comply with its obligations in relation to statutory requests for flexible working / contract variation and will refuse such requests only if there are good reasons for doing so.

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- 4.22 **Reasonable adjustments** - In conjunction with the People team and occupational health services, the Group will also make reasonable adjustments in the workplace to overcome barriers caused by disability, such as providing physical adaptations or adapting standard working practices.
- 4.23 **Learning and development** - The Group wishes to ensure equal access to learning and development. In order to ensure this, learning and development opportunities should be based on identified training needs and the methods used to select participants must be free from bias and / or prejudice. All employees will be encouraged to develop their skills and take advantage of learning, development and mentoring opportunities in the Group. When selecting external courses, every effort will be made to ensure the provider has an inclusive approach in both the materials used and in the running of the course.
- 4.24 **Handling bullying and harassment** - The Group has a separate Dignity at Work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with. This policy provides information on what you should do if you feel your dignity at work has been affected. There are separate informal and formal procedures for resolving concerns under this policy.
- 4.25 The Group will promote diversity and inclusive practice during recruitment, induction, colleague briefings, manager and team meetings and through @Today Intranet. We will work to ensure our online presence and marketing material is representative.

Monitoring and review

- 4.26 The Group will report on gender and ethnicity pay gaps and produce action plans to address any issues or imbalances identified.

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- 4.27 The Group shall develop a set of metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least once every 12 months, review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order to ensure we are meeting organisational, legal, regulatory and best practice requirements.
- 4.28 All data and information collected will be used to track progress and monitor performance on our equality, diversity and inclusion objectives and commitments. This information will form part of our regular reporting to the Board. It shall also be used effectively to identify best practice as well as gaps or shortcomings within our organisation and to tailor our approach in correcting these.
- 4.29 Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure the Group has the best quality of data to inform our progress on our objectives and commitments and also to aid better decision making.

Raising a concern

- 4.30 If you consider that a policy or practice has unlawfully discriminated against you or has posed a barrier to your inclusion, discuss the matter with your line manager in the first instance.
- 4.31 Where your concern cannot be resolved informally or where you consider that an informal approach is not appropriate, refer to the formal procedure in the Group's Early Resolution and Grievance Policy. If your concern involves bullying or harassment, you should also refer to the Dignity at Work Policy.
- 4.32 The Group will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

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4.33 Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination or harassment. Serious breaches of this policy will be treated as gross misconduct.

4.34 Employees may also be personally liable for any actions of discrimination they commit (as prohibited by this policy), which means they can be sued by the victim.

5. RESPONSIBILITY

Abbreviations

5.1 Group – Progress Housing Group Limited and its subsidiary companies.

5.2 EIA – Equality Impact Assessment.

Definitions

5.3 N/A

References

5.4 This policy follows best practice and legislative guidelines: Equality Act 2010 and Employment Rights Act 1996.

Data Protection

5.5 The handling of any personal data will be dealt with under the Group's Data Protection Policy which ensures compliance with the Data Protection Act 2018 and the General Data Protection Regulation.

6. IMPLEMENTATION

Training

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- 6.1 Progress Housing Group is committed to ensuring all colleagues receive appropriate equality, diversity and inclusion training on a regular basis and that all colleagues are aware of this policy. Equality, diversity and inclusion training forms part of our induction training programme and all new colleagues will be made aware of this policy as part of their induction. All colleagues will also regularly receive refresher training on equality, diversity and inclusion.
- 6.2 We are also committed to providing training on our Dignity at Work Policy to all colleagues including those who are involved in the provision of housing services to our customers, management and recruitment decisions.
- 6.3 The Group will provide training to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

7. LINKED DOCUMENTS

- Equality, Diversity and Inclusion Strategy (Group wide, including customers)
- Equality, Diversity and Inclusion Action Plan
- Dignity at Work Policy
- Family Friendly Policy
- Work Life Balance Policy
- Attendance Management Policy
- Early Resolution and Grievance Policy
- Disciplinary Policy
- Media and Social Media Policy
- Raising Concerns at Work Policy

Procedure references

- N/A

8. CONSULTATION

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8.1 The following groups have been consulted with in the development of this policy:

- People Forum
- Equality, Diversity & Inclusion Working Group
- Operational Leadership Team
- Senior Leadership Team

9. REVIEW

9.1 This policy may be reviewed at any time, and will normally be reviewed every two years, unless any changes are required due to legislation, good practice, regulatory requirements or business changes.

10. EQUALITY IMPACT ASSESSMENT

10.1 This policy will be subject to an Equality Impact Assessment (EIA) incorporating a number of employment policies grouped together under the definition of Workplace Performance.

10.2 Whilst the Group aims to undertake an EIA before a policy is formally introduced, for this policy, it will be completed as part of a rolling programme of EIAs. Any findings from EIA may lead to a further review of the policy at that time.

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Appendix 1

Equality Act 2010

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

Indirect discrimination is where an unjustifiable requirement or condition is applied, which appears to be the same for all, but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate. For example, a requirement for a high standard of literacy in English could disadvantage applicants for whom English is not their first language. This could amount to indirect discrimination on the grounds of race.

Harassment is where there is unwanted conduct, related to one of the protected characteristics that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct, it is how the recipient perceives the behaviour.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity). For example an employee is discriminated against because his / her son is disabled.

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Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.