

## EQUALITY, DIVERSITY AND INCLUSION POLICY

### Introduction

ccha owns and manages over 1500 homes in Bromley, Croydon, Sutton and Merton. The organisation's roots are in the local community and have been since 1967 when the organisation was created to meet housing needs in the community.

As a housing provider and employer, we can reduce the disadvantages that some people experience, by making our services more responsive and accessible for a diverse range of individual and community needs. We are committed to listening to our customers and involving them in the development of services which recognise and value their diversity. We also want our colleagues to feel that in everything they do they are valued and are making a difference.

This policy underpins our commitment to promote equality, diversity and inclusion, and to meet the needs and surpass the expectations of all our employees and customers. Our goal is for our workforce to be truly representative of both our residents and all sections of society, and for each employee and customer to feel respected and valued.

We will only achieve this if we:

- **The organisation has a clear idea of its strengths and weaknesses with regards to equality, diversity and inclusion and areas for development.**
- **Equality, Diversity, and Inclusion is core to the organisations values and ethos and communicated to staff, residents, and service users.**
- **Prejudice-related incidents are dealt with effectively and staff, customers and contractors have confidence in the process.**
- **A diverse team with engaged and talented staff who are innovative and truly understand customer needs.**

### Legal Duties

As a Social Housing Provider, we welcome our duties under the Equality Act 2010 to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The protected characteristics outlined by the Equality Act 2010 are:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation

### **Human Rights Act 1998**

As a Social Housing Provider, we need to consider three articles contained within the Human Rights Act in providing all our services:

- Article 6 – right to a fair trial
- Article 8 – right to respect for private life, family life and the home
- Article 14 – prohibition of discrimination

### **Policy Statement**

ccha believes that discrimination, harassment, and victimisation must be challenged, not just because it may be unlawful, but because we believe that diversity enriches all of our lives. We strive to promote equality, diversity and inclusion throughout our employment practices, the services we provide and the arrangements we enter in to with our partners.

We believe that valuing and managing equality, diversity and inclusion is about recognising and appreciating individual needs and differences and always treating all people with dignity and respect.

The purpose of this policy is to provide equality, fairness and respect for all in our employment and service provision. It applies to all ccha employees and places an obligation on us all to act in accordance with it. Everyone working within ccha has a personal responsibility for implementing and promoting the principles of the policy in our day-to-day work and will be held accountable for this.

Behaviour which is in breach of this policy may lead to formal disciplinary action. Some forms of discrimination may amount to criminal acts as well as employment rights issues. ccha will encourage anybody who feels they have been a victim of a criminal act by a member of staff or customer to report the matter to the police.

*This policy applies to employees, Board and Committee members, agency workers, contractors, managing agents and involved residents and partners.*

## **Implementation Framework**

ccha takes a number of measures and steps to ensure that equality, diversity, and inclusion is implemented in all its services and activities, as well as in its responsibility as an employer.

### **As an employer:**

1. ccha aims to build a diverse workforce which reflects our communities and to ensure that no job applicant or employee receives less favourable treatment on the grounds of any factors irrelevant to a person's ability to do a job. To ensure this is the case we have a robust *Recruitment and Selection Procedure* which is regularly reviewed to ensure that it meets the highest equality, diversity and inclusion standards.
2. It is unlawful to discriminate against any employee, worker or job applicant because of any "protected characteristic", namely age, disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex or sexual orientation. We recognise our responsibility under the Equality Act 2010 to take all reasonable steps to ensure fair and equal treatment to all. Please refer to ccha *Equality, Diversity and Inclusion Policy statement in the staff handbook and DSE reasonable adjustments procedure*. Contact HR if you need further advice and assistance in this area.
3. We recognise our duty under the Equality Act 2010 to make reasonable adjustments to accommodate disabled people and to enable them to do their job without unnecessary difficulty. We will make adjustments which are reasonable, whether or not we are obliged to do so by law, and whether or not a disabled applicant or employee is covered by the definition of disabled under the Equality Act 2010.
4. We respect the religious beliefs and practices of staff and follow reasonable requests relating to religious observance and practice.
5. We will take all reasonable steps to ensure the wellbeing and inclusion of transgender staff, including those who transition during their employment at ccha.

ccha regards discrimination, harassment, victimisation and bullying of employees and customers as a disciplinary offence that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. We will work to ensure that all unacceptable attitudes, behaviour, and language which lead to discrimination, harassment, victimisation and bullying are challenged and appropriately addressed. As well as disciplining the perpetrator(s),

we will give appropriate support to people who complain of discrimination, harassment or victimisation of themselves or others with anonymity at the request of the employee wherever possible. Please refer to *ccha's Dignity at Work Policy* and our *Code of Conduct* for more information.

6. All our written policies will be subject to regular review, and we will conduct Equality Impact Assessments when policies are created and reviewed ensure that they do not unfairly impact on groups with certain protected characteristics. Please refer to *ccha's Equality Impact Assessment Toolkit* for more information.
7. We provide training for employees about their rights and responsibilities under this policy.

Please refer to *ccha's Employee handbook* and HUB regarding full processes, policies and procedures around maternity, paternity, adoption, flexible working, complaints, grievances, disciplinary, criminal records, safeguarding,

**As a service provider:**

1. ccha seeks to ensure that its services are accessible, inclusive and appropriate to all sectors of the community and provide choices, information and communication that are appropriate to the diverse needs of our customers. Please refer to the *Reasonable Adjustments Policy* for further details and contact ccha's customer service team if you require further advise on reasonable adjustments
2. Our *Customer Care Standards* ensure that all customers are treated with dignity and respect.
3. The Association looks to create inclusive community engagement structures in line with both our Customer and our Community Strategy.
4. We involve residents in decision making and look to remove barriers that hinder our residents' voices being heard, to ensure residents are included in the key areas that impact on them and we can tailor our services accordingly.
5. ccha has complaints procedures that are clear, simple and accessible and that ensure that complaints are resolved promptly, politely and fairly. This would include reporting bullying, harassment, discrimination and victimisation. Please see our *Complaints Policy* for further information.
6. We seek to ensure that our partners reflect our values and support their own employees to embody these. Our *Procurement Policy* reflects our strong vision

of equality, diversity and inclusion and we seek to ensure this is reflected in our procurement processes and outcomes.

## **Roles and Responsibilities**

All those involved with ccha contribute to the achievement of our equality, diversity and inclusion policy and are encouraged to work positively towards our development in improving the diversity of our workforce and our audiences.

### **The Board is responsible for:**

- Leading ccha's equality, diversity and inclusion agenda.
- Agreeing an overall equality, diversity, and inclusion strategy.
- Adopting a fair and open system for selecting board members to ensure that our Board reflects the composition of the communities we serve.
  
- Communicating the plans to others both inside and outside the organisation.
- Ensuring that the Senior Management Team are held accountable through review of outputs.
- Overseeing our progress and the outcomes to advance our equality and diversity service delivery commitments and identify possible discrimination in service trends through presentation of an annual report to Board.

### **The Leadership Team is responsible for:**

- Ensuring equality, diversity and inclusion is considered and included in all future strategies which are developed and delivered.
- Ensuring compliance with relevant statutory requirements.
- Agreeing the resources needed.
- Monitoring and reviewing the equality, diversity and inclusion actions which are included in all strategies for their effectiveness.
- Taking the lead on equality, diversity and inclusion inside and outside the organisation.
- Making sure that equality, diversity and inclusion are central to all the work undertaken by ccha.

### **Managers are responsible for:**

- Including equality, diversity and inclusion issues in the strategic plans and performance reviews within their areas of responsibility.
- Putting the policy and strategy into practice on a day-to-day basis.
- Checking on equality, diversity and inclusion issues when assessing performance.
- Making sure that all staff act in line with the policy, providing support and direction when needed.
- Dealing quickly and effectively with concerns and complaints regarding alleged breaches of the policy.

### **All staff are responsible for:**

- Actively tackling equality, diversity and inclusion issues in practical ways in their day-to-day work.
- Ensuring their own behaviour, attitude and language are appropriate, and that they do not discriminate, harass, victimise or bully others.
- Providing a public service which respects and takes account of the needs and background of customers.
- Meeting any equality, diversity and inclusion targets agreed in their workplan.
- Improving the overall performance of ccha on equality, diversity and inclusion.
- Recognising and respecting the different backgrounds of the people they work with.

### **The HR Team is responsible for**

- Making opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation. In addition, positive action will be taken to meet the specific training needs of under-represented groups or individual staff or groups of staff with particular learning needs related to diversity.
- Opposing and avoiding all forms of unlawful discrimination. This includes benefits and pay, progression and performance review policy, procedures and practice, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion or other developmental opportunities
- Producing fair and transparent policy and process around pay and performance management with clear monitoring in place.
- Provision of a professional and confidential advisory service to all staff who wish to raise any issue regarding their welfare.
- Dealing with all complaints of discrimination, victimisation or harassment quickly, confidentially and sensitively.
- Ensuring consistent and effective application of ccha's Grievance, Disciplinary and Dignity at Work policies across the organisation.

### **Customers/Residents**

Customers that breach a term of their tenancy agreement in relation to equality and diversity will have appropriate action taken against them in line with our policies such as:

- Tenancy Policy
- Anti-Social Behaviour Policy

### **Monitoring and Evaluation**

We collect, study and use quantitative and qualitative data relating to the implementation of this policy, and make adjustments as appropriate. This includes

the make-up of our Board, employees and residents broken down by protected characteristics. This allows us to monitor who is accessing opportunities and identify potential issues.

We monitor the profile of complainants through an annual complaints report that goes to the Leadership Team to see whether any groups are disadvantaged by our policies and the services we provide.

We carry out regular employee and customer surveys to identify issues around equality, diversity and inclusion.

We utilise this monitoring information to develop Equality Objectives and have an *Equality Action Plan* which outlines the steps that the Association is taking to work towards these objectives.

<b>Policy Name</b>	Equality & Diversity Policy	
<b>Lead Officer</b>	Senior HR Advisor	
<b>Data Protection Impact Assessment Completed</b>	Date: 03.04.24	Ref: CA
<b>Equality Impact Assessment Completed</b>	Date: 31.03.25	Ref: CH
<b>Resident Consultation Completed</b>	Date: 20.06.24	Ref: CH
<b>Employee Consultation Completed</b>	Date: 28.03.25	
<b>Date of Issue</b>	Date: 31.03.25	
<b>Review Date</b>	Date: 31.03.28	

## **Connected Policies**

- Anti-Social Behaviour
- Aids & Adaptations
- Allocations & Lettings
- Capability Procedure
- Code of Conduct
- Complaints
- Dependant and Compassionate Leave
- DBS and criminal records checks
- Disciplinary Procedure
- Flexible Working
- Grievance Procedure
- Harassment
- Reasonable Adjustments policy
- Redundancy & Redeployment procedure
- Resident Involvement
- Tenancy
- Training & Development
- Work life Balance
- Recruitment and Selection Procedure
- Dignity at Work Policy
- Procurement Policy
- EDI strategy and action plan
- Staff Handbook

## Glossary

Disability	A physical or mental impairment, which has a substantial and long-term adverse effect on someone's ability to carry out normal day-to-day activities
Discrimination	<p>This can be direct: When someone is treated less favourably than another person or other people because:</p> <ul style="list-style-type: none"> <li>• they have a protected characteristic</li> <li>• someone thinks they have that protected characteristic (discrimination by perception)</li> <li>• they are connected to someone with that protected characteristic (discrimination by association)</li> </ul> <p>Or indirect: There is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic</p>
Diversity	Understanding and valuing the differences between people. Recognising the diversity within our communities and reflecting it in our organisation and services.
Equality	Ensuring that individuals, or groups of individuals, are afforded equal worth and opportunity and are not treated less favourably because of their protected characteristics.
Gender reassignment	If someone is proposing to undergo, is undergoing or has undergone a process (or part of a process) to change sex and/or gender. This might involve medical intervention, but it can also mean changing names, pronouns, dressing differently and living in their self-identified gender.
Harassment	Harassment is unwanted offensive behaviour directed at someone because they have a protected characteristic, are perceived to have a protected characteristic or are associated with someone with a protected characteristic.
Inclusion	Ensuring that our work, language, facilities and activities are open, inclusive and accessible to all.
Race	Includes skin colour, nationality and ethnic or national origins.

Reasonable adjustments	<p>Taking reasonable steps to remove disadvantages faced by disabled people by:</p> <ul style="list-style-type: none"> <li>• changing provisions, criteria or practices</li> <li>• changing or removing a physical feature or providing a reasonable alternative way to avoid that feature</li> <li>• providing auxiliary aids</li> </ul>
Religion or belief	<p>Religion is a formalised system of belief that aims to relate humanity to spirituality. Beliefs included are philosophical beliefs, which are considered to be similar to a religion.</p> <p>We include people who have no religion or a lack of belief.</p>
Sex	Whether someone is male, female or intersex
Sexual orientation	Who someone is emotionally, mentally, and physically attracted to in relation to their sex/gender. This includes (but is not limited to) heterosexual, lesbian, gay, bisexual, pansexual and asexual
Victimisation	<p>Treating someone badly because they are:</p> <ul style="list-style-type: none"> <li>• making a claim or complaint of discrimination</li> <li>• helping someone else to make a claim by giving evidence or information</li> </ul> <p>Or because they intend to do so.</p>