



CALEDONIA GROUP

EQUALITY, DIVERSITY AND INCLUSION POLICY

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Governance Manager
Author:	Governance Manager
Version number:	1.0
Approved by Chief Executive:	October 2021
Approved by Governing Bodies:	October 2021
Effective from:	October 2021
Due for review on:	October 2024
Diversity compliant:	Yes
Equality Impact Assessment required:	Yes
Data Protection compliant:	Yes
Health & Safety compliant:	Yes
Procedure implemented:	Yes
QL system changes made:	
KPIs / reporting arrangements implemented:	
Training Completed:	
Posted on intranet:	Yes
Posted on website:	Yes
Publicity material issued:	

This document can also be provided in large print, braille, audio or other non-written format, and in a variety of languages

1 POLICY STATEMENT

Equality, Diversity and Inclusion Policy

1.1 The Caledonia Housing Association Group (“the Group”) is committed to being an equal opportunities employer and service provider, ensuring equality of opportunity for all tenants, customers and staff. The Group also respects and values the diversity of groups and individuals that it interacts with and the benefits this can bring, and it will take appropriate action to ensure those who may otherwise be excluded, feel included. We respect the human rights of all as defined within the Human Rights Act 1998.

1.2 This policy outlines our intent to fulfil our aims of providing opportunities for all sections of the community; develop and enhance sustainable neighbourhoods and provide an enjoyable working and living environment which is free from harassment and discrimination.

1.3 This policy is underpinned by both the Equalities Act 2010 and Human Rights Act 1998 and takes cognisance of the EU Equal Treatment Directive. Appendix 1 contains a list of legal terms and their definitions. We also acknowledge relevant guidance and recommendations within publications including:

- “Is Scotland Fairer?” report by the Equality and Human Rights Commission, Scotland (2018)
- “Human Rights at Home - Guidance for social housing providers” by the Equality and Human Rights Commission (2011)
- “Collecting equality information: guidance for Scottish Social Landlords” by Scottish Federation of Housing Associations (2020)

1.4 The aim of this policy is to support the organisation in putting commitment into practice. This includes ensuring that employees and governing body members are aligned in their understanding and equipped to deliver a culture of equity, diversity and inclusion.

1.5 The underlying principles of this policy are shaped by the Group’s Guiding Principles:

Keep it simple – make sure you are understood and you understand

Keep it personal – value differences, adjust to meet the needs of others

Make it right – provide the service and housing provision that is needed

1.6 These underpin our approach to both promoting fairness and equality, and ensuring legislative compliance in respect of the nine protected characteristics as defined by the Equality Act 2010:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex;
- Sexual Orientation.

1.7 This policy is not, however, restricted to just these protected characteristics. The Group also recognises that factors such as socio-economic status and background, including income, education, employment, and social supports, can impact on an individual's life experiences, their ability to access opportunities and their sense of inclusion. We will take this into consideration wherever appropriate, including for example in our approach to providing employment, training and volunteering opportunities, and identifying and developing service improvement initiatives.

2 POLICY CONTENTS

2.1 This policy will cover eight specific areas: governance, service delivery, access to information and advice, housing provision, procurement, working for the group, dealing with harassment, and complaints.

2.1.2 It will be supported by relevant strategy documents and action plans, and be embedded within all other Group policies, processes and procedures to ensure that equality, diversity and inclusion (EDI), and the human rights of the individual, become fully integral to who we are and what we do.

2.2 Governance

2.2.1 Governing body members will provide oversight in relation to this policy and ensure continuous improvement in the delivery of our EDI objectives. The design and delivery of a programme of activities promoting EDI will be the responsibility of the EDI Working Group. As a general principle however, we recognise that implementation of EDI across all areas of our work is the responsibility of all our people.

2.2.2 Staff and governing body members are required to adhere to this policy in the discharging of their duties and be aware of the standards of behaviour expected of them through the respective Codes of Conduct.

2.2.3 The Governance Team will work with all areas of the Group to ensure the benefits of embracing a culture of EDI are realised by carrying out a range of actions to evidence the work that has been undertaken.

2.2.4 We fully acknowledge the benefits of having a diverse membership to hold us accountable for our performance and activities. We will maintain arrangements for monitoring the characteristics of our members and actively explore opportunities to promote membership to under-represented groups. Equally, we are committed to ensuring the diversity of our governing bodies reflects that of the membership and, more broadly, of the communities we serve, as a means of achieving informed and robust decision making at a strategic level.

2.3 Service Delivery

2.3.1 We will better understand the needs of all our customers through providing a range of opportunities for customer involvement and feedback. These opportunities will be designed with inclusiveness and accessibility in mind, and aim to cater for individual preferences wherever possible.

2.3.2 We will ensure that all services are accessible to the individuals and communities we serve. In the provision of the services we will endeavour at all times to act in a non-discriminatory manner taking positive action to engage with those that might otherwise be excluded. We will do this by:

- reviewing how tenants and customers access our services,
- engaging with organisations that can assist us to communicate more widely,
- reviewing customer service standards,
- ensuring our communication style is fit for purpose,
- developing our staff and equipping them with the skills, knowledge and abilities to deliver the services needed.

2.4 Access to Information and Advice

2.4.1 The Group will ensure all information is available to tenants and customers, through our website, social media, hard copy publications and correspondence, in a format that is accessible. We will ensure that we:

- provide information in accessible formats as required, including community languages; large print; Braille; and audio, utilising suitable technology to assist wherever necessary. We will also provide translation and interpretation services, where required to aid access to and understanding of our information and advice,
- provide information in a manner that is understandable to the reader, taking into account individual needs.

2.5 Housing Provision

2.5.1 The right to adequate housing is a basic human right recognised by law and we will provide housing that is warm and affordable and meets the needs of the people we serve.

2.5.2 Action will be taken to try and ensure that housing is accessible to the specific needs of individuals; and that it can continue to meet these needs as they evolve over time.

2.6 Procurement

2.6.1 The Group uses contractors, suppliers, consultants and agencies to ensure its services are delivered speedily, to a high quality, and in the most cost-effective manner.

2.6.2 The Group will promote equality within its approach to procurement in the following ways:

- We require that contractors and suppliers of services comply with equal opportunities' requirements. All such organisations will be expected to ensure that their contractual duties are executed so as not to conflict with this Group EDI policy;
- We will provide guidance, advice and training to contractors/suppliers on equality and diversity issues where appropriate;
- We will ensure that community benefits are written into larger contracts;
- Complaints against external organisations will be monitored through our Complaints Handling Procedures: any allegation of discrimination or harassment will be taken seriously and swiftly investigated;
- Contractors and suppliers will also be expected to take prompt and appropriate action against any member of their own workforce found in breach of this policy.

2.6.3 The Group will also promote equality by embedding the Scottish Government's Fair Work First criteria into the way it deals with its supply chains.

The Fair Work First criteria are:

- appropriate channels for effective voice, such as trade union recognition;
- investment in workforce development;
- no inappropriate use of zero hours contracts;
- action to tackle the gender pay gap and create a more diverse and inclusive workplace;
- providing fair pay for workers (for example, payment of real Living Wage)

2.7 Our People – Employees and Volunteers

2.7.1 We understand the importance of developing a diverse workforce and governing bodies that represent the communities we operate in and a culture that instils a sense of belonging, authenticity and trust. We will promote fair and equal access to all our job opportunities for existing and future staff. The ability to accelerate equity, diversity and inclusion within the workforce strengthens engagement and wellbeing, and therefore is a key driver of continued business improvement. We will achieve this by:

- full review of our recruitment strategy

- full review and analyse of attraction, retention and promotion data
- benchmarking against Best Companies, and
- implementing a Young Workforce Strategy

2.7.2 We aim to ensure that no existing or prospective employee, governing body member or other volunteer receives less favourable treatment due to a protected characteristic; and acknowledge our obligation to provide reasonable adjustments.

2.7.3 Staff, governing body members and volunteers will be able to access opportunities for learning, development and personal growth through the implementation of effective talent management and succession planning.

2.7.4 We recognise the importance of treating everyone with equal dignity and respect. This includes taking cognisance of a person's human rights as outlined within the Human Rights Act 1998. We will endeavour to achieve equality of opportunity within our approach to staffing and employment and will:

- employ a diverse workforce that reflects the populations of the areas and communities in which we work,
- ensure that staff are aware of their roles and responsibilities in relation to equity, diversity and inclusion,
- raise awareness of equality, diversity and inclusion throughout the Group and provide training so staff are equipped with the skills and knowledge to support the delivery of this policy,
- review our policies and procedures to ensure they provide equality of opportunity, experience and reward,
- maximising flexible working opportunities to support inclusion,
- use our influence and resources to create training and employment opportunities within the communities which we work, and
- strengthen and communicate our commitment to reducing bullying and harassment.

2.7.5 The Group will take all reasonable actions to ensure that every member of staff or governing body member treats everyone with respect and dignity whilst carrying out their duties.

2.8 **Dealing with Harassment**

2.8.1 The Group endeavours at all times to provide a work and living environment that is free from discrimination and harassment.

2.8.2 The Group will not tolerate harassment or victimisation of employees and will take appropriate action against the perpetrator(s).

2.8.3 All governing body members; employees; volunteers, consultants and contractors are expected to adhere to the principles of this policy and all claims of harassment and discrimination will be quickly and actively investigated in a sensitive and appropriate manner.

2.8.4 Where tenants or members of the public report cases of harassment, the relevant policies and procedures will apply, including the Anti-Social Behaviour policy.

2.8.5 The Group is committed to challenging domestic violence. As an organisation, we will assist and support employees who want help in addressing problems arising from domestic violence. Similarly, we will use all available powers to deal effectively with incidents of domestic abuse caused by or affecting our tenants.

2.8.6 Staff members will be made aware that conduct outside of work may lead to investigatory and disciplinary action if it is in breach of code of conduct or contractual obligations.

2.9 Complaints

2.9.1 In the delivery of our complaints policy and procedure we aim to deal with complaints from staff and customers fairly, professionally, and respectfully, regardless of their personal characteristics.

2.9.2 To enable all tenants and customers to have clear information and equal access to our complaints policy, we will accept complaints, compliments and feedback in any form, including in person or via email, in line with our Complaints Handling Procedures. This reflects the individual preferences and needs of customers and staff. We will develop appropriate monitoring arrangements to enable us to assess the accessibility of the Complaints Handling Procedures and to take action to improve this where required.

2.9.3 We will endeavour to provide practical assistance where required to anyone who wishes to make a complaint, and remove any barriers that may prevent them from doing so.

3. Policy Review

3.1 This policy will be reviewed every three years, or sooner if required as a result of changes to legislative provisions or associated guidance.

4. Compliance Statement

4.1 *It is important that all members of staff, in carrying out their duties for the Group, do so in accordance with the Group's policy framework. Our policy framework ensures we comply with laws and regulation, while giving guidance to inform operations and decision-making. Our policies have been designed to be clear and easy to understand, and are available on our website and intranet. If any member of staff is unclear as to their responsibilities under this policy, then they should refer to their line manager and / or the policy author for further guidance. A failure to comply with Group policies can have serious consequences for the Group. Should an employee become concerned about serious non-compliance with the policy, they should speak to their line manager or refer to the guidance set out in the Group Whistleblowing policy.*

1 DEFINITIONS

1.1 The definitions used are derived from relevant pieces of legislation and codes of practice.

1.2 Discrimination

1.2.1 **Direct discrimination** - when someone is treated less favourably than someone else as a result of a protected characteristic.

2.2.2 **Associative discrimination** - similar to direct discrimination. It applies when someone is treated less favourably because they associate with another person who possesses a protected characteristic.

1.2.3 **Perceptive discrimination** - direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

2.2.4 **Indirect discrimination** - occurs when an apparently neutral condition, rule, policy or practice that applies to everyone disproportionately disadvantages people who share a protected characteristic and cannot be justified.

2.2.5 **Institutional discrimination** - the collective failure of an organisation to provide an appropriate and professional service or employment to people because of their personal characteristics.

2.3 Harassment

2.3.1 Harassing behaviours are demeaning and unacceptable to the recipient. Harassment is unwanted conduct which affects dignity. It may be related to any personal characteristic of the individual and may be persistent or an isolated incident.

2.4 Victimisation

2.4.1 Victimisation occurs when an employee, board director, or customer is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act 2010 or internal complaint procedure; or because they are suspected of doing so.

2.5 Domestic violence

2.5.1 Any violence/abuse between current or former partners. The violence may include physical, sexual, emotional or financial abuse between those generally recognised as a couple whether or not married, a civil partnership and whether or not co-habiting.