



Impact Housing Association Limited

Equality & Diversity Policy

In addition to fulfilling our legal and regulatory requirements, we are committed to developing an organisation which values people from all sections of the community. We will work to eliminate discrimination and have an equitable approach to the rights and responsibilities of everyone.

We will ensure that no resident, customer, employee or job applicant is discriminated against or receives less favourable treatment on the grounds of a protected characteristic.

Policy aims and objectives

The main aims of the policy are to ensure that;

- Our culture, structures, policies, procedures and practices actively contribute to developing a diverse organisation, delivering appropriate services
- We will provide appropriate, accessible and effective services and facilities to all section of the community, without prejudice or bias.
- The particular needs of each person are recognised and respected whether or not they are covered by legislation
- Staff, contractors, volunteers and clients are fully aware of our commitments
- We develop and maintain a proactive approach to diversity issues
- Our commitments are widely known and respected in the external environment
- We comply with and exceed statutory and regulatory requirements

We expect everyone involved in our organisation to uphold the principles embodied in this policy, including;

- Board and Committee members
- Employees
- Volunteers
- Contractors
- Other stakeholders.

Protected Characteristics

Legislation protects people from being treated less favourably because they have a protected characteristic. The relevant protected characteristics are:

1. age
2. disability
3. gender reassignment
4. marriage and civil partnership
5. pregnancy and maternity
6. race (including ethnic or national origins, colour and nationality)
7. religion or belief (including lack of belief)
8. sex
9. sexual orientation

Types of Discrimination

It is recognised that discrimination can take different forms, these are:

Direct Discrimination takes place if a person is treated less favourably than someone else due to them being part of a protected group i.e. not offering someone a job because of their sex or sexuality.

The disability legislation is slightly different in that it introduces the concept of 'reasonable adjustment'. Failure to comply with a duty to provide a 'reasonable adjustment' can be classed as direct discrimination.

Indirect Discrimination takes place when people from a particular equality/diversity group cannot meet a rule, condition or practice set which is not completely necessary. For example unnecessary requirements for an English qualification, this could discriminate against people from an ethnic minority.

Associative Discrimination is direct discrimination against someone because they are associated with another person who has a protected characteristic. For example discriminating against someone who is a carer for a person with a protected characteristic.

Discrimination by Perception is direct discrimination against someone because others think they possess a particular protected characteristic. For example repeatedly making homophobic jokes about someone because you believe they are homosexual when in fact they are heterosexual.

Harassment can take many forms from the most obvious abusive remarks to extremely subtle use of power. The key issue being the impact of this behaviour on the person receiving it and the feeling of violating that persons dignity or creating an intimidating or

hostile, degrading, humiliating or offensive environment for them. Examples of harassment can be:

Harassment of a sexual nature i.e. making unwanted sexual remarks, unwanted physical contact and repeated sexual advances.

Or, racial harassment which can be for example, comments and jokes relating to race, treating someone differently because of their race.

Victimisation is where a person is treated less favourably than others in the same circumstances because they carry out a protected act i.e. have complained about discrimination, or supported someone else who has.

Equality and Diversity in Recruitment and Selection:

Diversity Monitoring-

To help us fulfill our commitment to equal opportunity, Impact will collect and monitor records of customers, applicants, volunteers and employee diversity characteristics.

This information will inform the regular review of the organisation's policies and procedures with the aim of making Impact representative of the area in which it works.

If trends/ patterns of different protected groups not applying for Impact tenancies or job adverts become apparent we will work to ensure any barriers are broken down.

Positive Action-

Following the introduction of the Equality Act 2010 the positive action provision mean that it is not unlawful to recruit or promote a candidate who is of equal merit to another candidate, if Impact reasonably thinks the candidate:

- has a protected characteristic that is underrepresented in the workforce; or
- that people with that characteristic suffer a disadvantage connected to that characteristic.

However, positive action does not allow us to appoint a **less suitable candidate** just because that candidate has a protected characteristic that is under-represented or disadvantaged.

In practice it allows us when faced with making a choice between two or more candidates who are of **equal merit** to take into consideration whether one is from a group that is disproportionately under-represented or otherwise disadvantaged within the workforce.

How the Policy will be implemented

This policy will be implemented by:

- Overall responsibility being held at Board and Managing Director level
- An expectation that all staff and Board members are committed to ensuring the policy is effective and that they are competent to implement it
- All staff having an understanding of diversity and what it means for them in their day to day work including regular training activities
- An action plan, agreed at Board level, which is annually reviewed and updated
- Areas of work audited on a rolling programme basis
- Diversity commitments incorporated into the Vision, Blue Print, Business Plan, Value For Money and policy reviews, team annual plans and organisational development activities.
- Continuing to develop appropriate service delivery and human resources policies, procedures and practices.
- Sharing good practice throughout the organisation and examining good practice elsewhere.
- Using key documents from the Equality and Human Rights Commission, the Homes and Community Agency, National Housing Federation and Chartered Institute of Personnel and Development etc to audit, plan, implement, monitor and review progress.

Responsibilities

All Board members, management and staff share the responsibility to create an environment within which Impact can make measurable progress on equality and where there is genuine inclusion and respect for diversity.

People at different levels in the organisation carry varying responsibilities

Each employee is responsible for:

- Actively addressing equality and diversity issues in their day-to-day work including reporting any concerns about diversity to their manager or the HR Team Leader.
- Ensuring their behaviour is appropriate and in line with Impact's Equality and Diversity policy.

Each Manager is responsible for:

- Acting as a role model for staff with regards to equality and diversity.
- Policing any inappropriate behaviour/ comments from employees with regard to equality and diversity.

- Dealing with any allegations of discrimination in line with Impact's grievance and disciplinary procedures.
- Carrying out Equality Impact Assessments new or amended policies, or procedure or service – based on a risk-based approach.

The Board is responsible for:

- Ensuring a current policy is in place.
- Ensuring the Managing Director and senior management group embodies the policy and is committed to its principles.
- Ensuring the Equality Impact Assessments are carried out within the organisation.

Progress on the implementation plan will be monitored and reviewed annually by Board, the Managing Director and senior management group.

Complaints Procedure

Failure to comply with this policy, or co-operate with its effective operation, is a disciplinary offence which may lead to disciplinary action up to and including dismissal.

If you are a member of staff and feel that you are not being treated in accordance with the policy then you should raise the issue through the Grievance Procedure. Your complaint will be fully investigated.

If you are a customer or job applicant and feel that you are not being treated in accordance with this policy then you should raise this under our Complaints and Compliments Policy. Your complaint will be fully investigated.