



Equality, Diversity & Inclusion Policy

1.0 Introduction

- 1.1 Southern Housing is committed to ensuring we are a diverse and inclusive organisation, placing our people and residents at the HEART of all we do. We understand the importance of valuing diversity, reflecting the communities we serve and attracting and retaining the best and diverse talent.

We'll achieve this by:

- Embedding equality, diversity, and inclusion (ED&I) into all we do, using data to inform our decisions at all levels, including recruitment
 - Developing our people's skills, knowledge, awareness, capability, and confidence
 - Growing an inclusive culture based on mutual trust, respect and dignity; a culture where people feel able to be themselves, included, and can thrive
 - Taking a zero-tolerance approach to any form of discrimination, harassment, or victimisation, working to create a safe environment for colleagues, residents, partners, and other key stakeholders
 - Adopting appropriate benchmarking tools and comparisons to enable us to compare our workplace representation to the communities we serve and other employers.
- 1.2 This Policy applies to colleagues, Board and Committee members, agency and bank workers, contractors, managing agents and involved residents¹ and partners.
- 1.3 This Policy includes the individual regulatory and training requirements for our colleagues, particularly in relation to our Registered Care Services.
- 1.4 The terms 'we', 'us', 'our', 'colleagues' and 'organisation' in this Policy mean Southern Housing.

2.0 Our commitment to equality, diversity, and inclusion (ED&I)

- 2.1 We are committed to upholding [The Equality Act 2010](#), legislation designed to protect people from discrimination, harassment, and victimisation in the workplace and in wider society, covering nine protected characteristics:
- Age
 - Disability

¹ Residents who actively support Southern Housing Governance arrangements e.g. sit on Regional Panels, Special Advisory Networks or Service Panels to support Southern Housing to continuously improve our services.

- Gender reassignment (also widely known as gender identity)
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

We also acknowledge the duty to protect other groups of people who may experience discrimination, for example, based on their socio-economic backgrounds, caring responsibilities, and the link to intersectionality factors.

2.2 The [Public Sector Equality Duty \(PSED\) 2011](#), created under the [Equality Act 2010](#), outlines general duty principles we must adopt. Those subject to the equality duty must, in the exercise of their functions, have due regard to the need 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.

We'll meet these duties by:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.3 We're committed to developing our people to support the creation of an inclusive culture and to mitigate and reduce cases of discrimination, harassment, or victimisation occurring through dedicated learning and awareness building at all levels of the organisation.

We'll do this through supporting our:

- Leaders and managers to understand the principles of inclusion and diversity and integrate this into their leadership and management practice
- Colleagues to feel included and so they can be their best selves
- Colleagues to understand the richness and benefit of a diverse organisation
- Colleagues to become role models and allies, visible and active across all levels of the organisation.

2.4 We'll provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.

2.5 Our commitment as an employer, landlord, and managing agent, means we'll:

- Ensure our services are designed to reflect understanding of the needs of our diverse communities
- Ensure all customers have a range of ways to easily access the organisation's services
- Seek the most suitable means of communication/engagement and respect a person's right not to engage if they so wish
- Provide translation, transcription and interpreting services for residents, colleagues, suppliers, partners, and stakeholders as needed
- Involve residents and colleagues in our decision making when developing strategies, policies, procedures, and services; giving residents and colleagues a voice on decisions that affect them
- Ensure our residents and colleagues are listened to and treated with dignity and respect
- Make reasonable adjustments to enable disabled residents and customers to have equal opportunities and gain full access to our services
- Respect gender identity through correct use of pronouns, titles, and names of our residents and colleagues, making changes to communication/systems, as required and appropriate
- Recognise the equal rights of same-sex partner relationships in our tenancy agreements and leases
- Respect and, where possible, plan for and accommodate the religious practices of residents, colleagues, and partners
- Only collect and use information about residents to improve our services, and colleagues to improve our employer offer, in line with data protection law including the GDPR (General Data Protection Regulation)
- Prioritise requests from residents with support needs and vulnerabilities, especially when dealing with repair requests or reports of anti-social behaviour
- Work in partnership with local authorities and other relevant agencies to make alterations and adaptations to properties to effectively support residents with a disability or support needs
- Be committed to tackling hate crime and supporting victims and survivors
- Be committed to tackling domestic abuse and supporting victims and survivors, recognising anyone can be a victim of domestic abuse, regardless of gender identity, age, ethnicity, religion, socio-economic status, sexual orientation, or background.

2.6 In our role as a contractor, purchaser, or partner providing services to a third party or working in partnership with other organisations, we'll maintain our commitment to equality, diversity and inclusion (ED&I). This means we:

- Do not accept instructions from any client or partner that indicates an intention to discriminate unlawfully
- Will use our purchasing power and partnership arrangements to ensure our contractors' service delivery meets our ED&I commitments
- Will work with our partners to agree and understand the importance of ED&I and to work with us in line with and contribute positively to this Policy.

2.7 Registered Care Services

Our Registered Care Homes, Extra Care and Domiciliary Care Services are regulated by the [Health and Social Care 2008 \(Regulated Activities\) Regulations 2014](#).

The Health and Social Care Act 2008 established the Care Quality Commission (CQC) as the independent regulator of all health and social care services.

To meet the regulatory requirements, these regulations contain the following with respect to equality, diversity and inclusion:

Regulation 10: Dignity and respect, which states:

- (1) Service users must be treated with dignity and respect.
- (2) Without limiting paragraph (1) the things which a registered person is required to do to comply with paragraph (1) include in particular –
 - (a) Ensuring the privacy of the service user;
 - (b) Supporting the autonomy, independence and involvement in the community of the service user;
 - (c) Having due regard to any relevant protected characteristics (as defined in section 149(7) of the Equality Act 2010) of the service user.

We are committed to live up to the quality statement from the CQC: 'Kindness, compassion and dignity: We always treat people with kindness, empathy and compassion and we respect their privacy and dignity. We treat colleagues from other organisations with kindness and respect'.

In addition, we are committed to meet the [CQC's Equality Objectives 2021-25](#) including:

Equality objective 1: Amplifying the voices of people most likely to have a poorer experience of care or have difficulty accessing care.

Equality objective 2: Using data to understand and respond to equality risks.

Equality objective 3: Working with others to improve equality of access, experience and outcomes.

Equality objective 4: Using our independent voice to reduce inequalities.

Equality objective 5: Our inclusive future: delivering on our diversity and inclusion strategy for our workforce.

All new employees working within the organisation's Registered Care Services will receive induction training in line with the learning outcomes, competencies and the 15 standards of care set out in the Care Certificate Framework. New employees who have proven experience in care and have already obtained their care certificate will not be required to complete the certificate again.

2.8 Roles, responsibilities, and authority

Board

Our Board has overall responsibility for ensuring the organisation meets its equality, diversity, and inclusion duties and commitments.

Chief Executive and Executive Team

The organisation's Chief Executive and Executive Team (ET) have the day-to-day responsibility for operating the Policy and ensuring its implementation and review. Members of the ET are individually and collectively responsible for ensuring this Policy is implemented in their areas of responsibility and across the organisation.

Involved residents and customers

Involved residents and customers carrying out involvement activities in partnership with, or on behalf of, the organisation are also required to carry out these activities in accordance with this Policy.

Colleagues

All colleagues are responsible for:

- Working in line with this Policy and treating residents, customers, colleagues, suppliers, and anyone else they come into contact with during the course of their employment or engagement in an ethical and lawful way
- Being respectful of each other and seeking to understand views, opinions and perspectives of others which may not always be the same as our own
- Supporting and behaving in ways that support an inclusive workplace and are aligned to our HEART values of being Honest, Efficient, Accountable, Respectful and Trustworthy
- Attending all learning and cultural activity that support building greater awareness, skills, confidence and knowledge of ED&I

Managers and leaders are responsible for creating a culture of openness, dignity and inclusion that supports our HEART values and dignity for all colleagues.

Contractors and partners

We'll ensure contractors and partners we work with are provided with our ED&I Policy and that all contractual arrangements include adherence to the Policy principles.

2.9 Reporting concerns

A zero-tolerance approach means we'll act quickly to investigate and take responsive action to allegations of discrimination, harassment, or victimisation.

Colleagues can access guidance for reporting concerns in confidence through our Dignity at Work Policy.

Residents can raise concerns via our [Complaints Policy](#).

3.0 What do we do to ensure this Policy is fair?

- 3.1 Southern Housing will routinely assess the impact of its policies, procedures, and services. We have established an Equality Impact Assessment process that is applied to strategies, service design, policies, and procedures to specifically consider equality, diversity, and inclusion issues when policies are produced and/or reviewed.

3.2 Definitions

Equality – this is about ensuring ‘equality of opportunity’. It doesn’t mean we treat everyone the same but that we recognise difference and treat everyone fairly, including adjustments to meet different needs to achieve the same outcome.

Diversity – this is about who and what we are – the complex mix of our people and communities.

Inclusion – is the culture in which the mix of people can come to work, feel comfortable and confident to be themselves, and work in a way that suits them and delivers our business or service needs. Inclusion will ensure everyone feels valued and importantly, that they add value and contribute to our purpose.

Direct discrimination - treating someone with a protected characteristic less favourably than others (also includes direct discrimination by perception or association).

Indirect discrimination - putting a practice, policy, or rule in place that applies to everyone, but that puts someone with a protected characteristic at an unfair disadvantage (whether intentionally or not).

Victimisation - defined in the Act as:

Treating someone badly because they have done a ‘protected act’ (or because you believe that a person has done or is going to do a protected act). A ‘protected act’ is:

- Making a claim or complaint of discrimination (under the Equality Act)
- Helping someone else to make a claim by giving evidence or information
- Making an allegation that you or someone else has breached the Act
- Doing anything else in connection with the Act.

If you do treat a person less favourably because they have taken such action, then this will be unlawful victimisation. There must be a link between what the person did and your treatment of them.

The less favourable treatment does not need to be linked to a protected characteristic.

Harassment - occurs when you engage in unwanted behaviour that is related to a relevant protected characteristic, and that has the purpose or effect of:

- Violating a person's dignity or
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment for the person.

The word 'unwanted' means 'unwelcome' or 'uninvited'. It is not necessary for the person to say they object to the behaviour for it to be unwanted.

Other types of harassment include:

- Sexual harassment
- Less favourable treatment of a person because they submit to or reject sexual harassment or harassment related to sex.

Pregnancy and maternity are not protected directly under the harassment provisions; however, unwanted behaviour (as described above) will amount to harassment related to sex.

4.0 Review

- 4.1 We will review this Policy to address legislative, regulatory, best practice or operational issues.

Policy controls

Effective from	16 December 2022
Approved by	Shadow Board
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Policy owner	Director of People Services
Policy author	People & Culture Team

Version history			
Version no.	Date	Summary of change	Author and approver
1.0	30.11.22	New policy	People & Culture Team Shadow Board
1.1	06.06.24	Updated section 2.7 in line with CQC annual review requirements	Director of Care & Independent Living Director of People Services

CQC annual review requirements

Policy review date	June 2024		
Signed		Director of Care & Independent Living	
Next review date	June 2025		