



SGH

St George Housing

EQUALITY AND DIVERSITY POLICY

September 2023

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EQUALITY AND DIVERSITY POLICY

1. INTRODUCTION

1.1 This policy sets out St George Housing's (SGH) approach to promoting equality and diversity across our management arrangements and services.

2. POLICY STATEMENT

2.1 SGH is committed in our pursuit to actively seek to remove and minimise barriers faced by individuals related to their protected characteristics.

2.2 We aim to eradicate and reduce discrimination across our organisations by proactively advancing and promoting equality in our policies, procedure and service delivery

3. LEGAL FRAMEWORK

3.1 The legal framework that underpins the policy has taken into account the following legislation, regulation and codes of practice.

- Equality Act 2010
- Human Rights Act 1998
- Employment Equality (Age) Regulations 2006:
- Public Sector Equality Duty
- Data Protection Act 2018 (DPA 2018)
- UK General Data Protection Regulation
- Equality Act 2010 (Specific Duties) (England) Regulations 2011.

3.2 This policy complies with Regulator of Social Housing (RSH) Standards.

4. SCOPE AND OBJECTIVES

4.1 This policy applies to all staff, residents and key stakeholders.

4.2 Our primary objective as a housing provider and employer is to eradicate discrimination and promote equal opportunities for all. We are committed to treating both our customers and employees with fairness, dignity, and respect.

4.3 We recognise and embrace diversity within our communities, as well as among our individual customers and staff members. Our stance is one of zero tolerance towards harassment and hate crime, aiming to foster tolerance and strengthen community cohesion within our neighbourhoods.

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4.4 Furthermore, we are dedicated to adhering to all relevant legislation and continuously striving to meet the highest standards of best practice in our operations. We also actively encourage our contractors and suppliers to share in our commitment to promoting equality, respecting diversity, and preventing discrimination in all aspects of their work with us.

5. LEGAL AND REGULATORY REQUIREMENTS

EQUALITY ACT 2010

5.1 The Equality Act 2010 establishes a comprehensive legal framework that safeguards the rights of individuals and promotes equal opportunities throughout the United Kingdom. This legislation identifies nine distinct "protected characteristics," which are as follows:

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

5.2 Under this Act, it is strictly prohibited to engage in any form of discrimination, harassment, or victimisation against an individual based on one or more of these protected characteristics. In the context of the services provided by SGH, which encompass a wide range of public functions, SGH is also bound by the general equality duty outlined in section 149 of the Equality Act. This duty imposes specific responsibilities on SGH:

5.3 In addition to the mentioned characteristics, SGH considers the following when assessing inequality impact:

- **Caring Responsibilities:** This includes individuals who are "carers" of disabled children, adults, or family members, such as children or elderly relatives. Discrimination against individuals associated with a protected characteristic, like being a carer, is covered by the Equality Act 2010.
- **Mental Health & Wellbeing:** SGH assesses the impact of policies, practices, activities, or decisions on the mental health and wellbeing of staff and residents. It involves identifying and addressing negative impacts while promoting and enhancing good mental health and wellbeing in the community. Staff are responsible for mitigating any adverse effects on mental health and wellbeing.

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- 5.4 **Eliminate Unlawful Discrimination:** This includes addressing both direct and indirect discrimination, as well as discrimination arising from disability. SGH must take active measures to prevent harassment and victimisation.
- 5.5 **Advance Equality of Opportunity:** SGH is committed to promoting equal opportunities among individuals who possess a protected characteristic and those who do not share it, ensuring fairness and equity in all aspects of our services.
- 5.6 **Foster Positive Relations:** SGH actively works towards cultivating positive relationships among individuals who share a protected characteristic and those who do not. Promoting understanding, respect, and inclusivity is a fundamental part of our mission.
- 5.7 In alignment with the principles of the Equality Act 2010, SGH is dedicated to upholding these values, ensuring that discrimination is eradicated, equal opportunities are advanced, and positive relations are fostered within our organization and the communities we serve.

6. HUMAN RIGHTS ACT

- 6.1 The Human Rights Act 1998 enshrines fundamental rights and protections for individuals. It specifies that every person has the following rights:
- **Right to Own and Enjoy Property:** This includes the right to possess and derive enjoyment from one's property.
 - **Right to Respect for Private Life:** Individuals have the right to expect that their private lives will be respected, safeguarding their personal autonomy and privacy.
 - **Right to Respect for Family Life:** This right ensures that individuals are entitled to the preservation and respect of their family relationships and bonds.
 - **Right to Respect for Home:** The Act guarantees the right to the preservation and respect of one's home.
- 6.2 The Act further establishes safeguards against discrimination concerning any of these rights, and it can have significant implications for various services provided by SGH.

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6.3 It's important to note that the European Convention on Human Rights contains articles that define and protect these rights. Alleged breaches of these articles are typically adjudicated by the European Court of Human Rights (ECHR). At the time of writing this policy The Human Rights Act remains in place following the UK's exit from the European Union.

6.4 SGH remains committed to upholding and protecting these fundamental human rights, ensuring that discrimination is prevented and that individuals' rights to property, private life, family life, and home are respected, regardless of any changes in legal frameworks.

7. EMPLOYMENT EQUALITY (AGE) REGULATIONS 2006

7.1 Employment Equality (Age) Regulations 2006: These regulations implement the Age Discrimination provisions of the Equality Act 2010 in relation to employment.

8. EQUALITY AND HUMAN RIGHTS COMMISSION CODE

8.1 Equality and Human Rights Commission (EHRC) Codes of Practice: The EHRC provides codes of practice that offer guidance on various aspects of the Equality Act, such as employment, services, and public sector equality duty.

9. PUBLIC SECTOR EQUALITY DUTY (PSED)

9.1 Public sector organisations, including many housing associations, are subject to the PSED, which requires us to promote equality and eliminate discrimination in our policies, practices, and services. The specific duties under PSED are outlined in Equality Act 2010 (Specific Duties) (England) Regulations 2011.

10. REGULATORY STANDARDS ON EQUALITY

10.1 The Regulator of Social Housing sets similar standard to promote diversity and equality across housing associations. housing providers are expected to@

- Understand and responding to the diverse needs of tenants
- Treat all tenants with fairness and respect
- Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

11. SGH EQUALITY AND DIVERSITY PLEDGE

11.1 This section of the policy outlines the primary steps and initiatives that SHA (or your organization) will undertake to fulfil our commitments and achieve our obligations and objectives in various key areas. These areas encompass:

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GOVERNANCE

- 11.2 We are dedicated to ensuring that our governance practices are aligned with our equality and diversity goals. This includes promoting inclusivity and diversity within our leadership and decision-making processes.
- 11.3 **Promote a culture of respect and inclusion:** SGH is committed to cultivating a culture that not only respects but actively promotes equality, diversity, and inclusion. We believe in creating an environment where every individual is valued for their unique perspectives and contributions.
- 11.4 **Leadership and resources:** SGH will actively encourage individuals from all sections of our community to participate in the decision-making processes of SGH. This includes active involvement in new services and processes that may have an impact.
- 11.5 **Board Diversity:** Our Board remains diverse, and we maintain detailed equalities profile information for our Board to enhance diversity. We take proactive measures to attract members from under-represented groups.
- 11.6 **Equality and Diversity Training:** We are committed to ensuring that all Board members receive comprehensive training on equality and diversity to ensure continued understanding and commitment to our principles.
- 11.7 **Code of Conduct:** All Board members are expected to sign and adhere to our Code of Conduct. This Code, that aligns with the National Housing Federations code, reinforces our commitment to equality, fairness, and respectful behaviour in all interactions.

SERVICE DELIVERY

- 11.8 **Compliance with Regulatory Standards:** SGH is committed to complying with the standards set by the Regulator of Social Housing, which ensures that our housing services meet the required regulatory benchmarks.
- 11.9 **Accessible Services for All:** Our primary goal is to provide services that are easily accessible to all of our customers, including housing applicants, regardless of their individual circumstances or needs.
- 11.10 **Tailored Service Delivery:** We understand that our residents may have unique needs, and we are dedicated to tailoring our service delivery to accommodate these individual requirements whenever necessary.
- 11.11 **Staff Awareness and Training:** Ensuring that all SGH staff and our Board are well-informed about the challenges different customers may face is paramount. Equipping our employees to respond in a person-centred and flexible manner is a key aspect of our commitment to equality and inclusion.

11.12 **Prompt Response to Issues:** Discrimination, bullying, harassment, or victimization will not be tolerated within our organization. We are dedicated to taking swift and effective action to address and rectify any instances of such behaviour.

11.13 **Addressing Equality in Policies and Procedures:** We recognise the importance of addressing equality issues in our policies and procedures across various service areas, including housing allocations, repairs, property adaptations, and tenancy agreements. Our commitment to equality is embedded in all aspects of our operations.

SERVICE DEVELOPMENT AND CONSULTATION

11.14 **Resident Engagement:** We strongly encourage and enable our customers to play an active role in shaping our policies and service delivery. Their input is invaluable, and we value their perspectives as we work towards continuous improvement.

11.15 **Inclusivity and Representation:** We actively seek input from underrepresented groups within our customer base. We recognise the importance of diverse voices and perspectives in informing our decisions and initiatives.

11.16 **Cultural and Accessibility Considerations:** When planning consultation events, we are mindful of the cultural, mobility, and other specific needs of different groups. Our goal is to ensure that these events are inclusive, accessible, and welcoming to all.

11.17 **Impact Assessment:** Before implementing significant changes to our policies and procedures, we conduct comprehensive assessments to identify potential equality and inclusion impacts. This proactive approach allows us to address any potential disparities and make necessary adjustments.

11.18 **Community Engagement:** We are dedicated to developing strong relationships with community, interest, and voluntary groups that share our commitment to equality and diversity. These partnerships help us work collaboratively towards our shared goals and initiatives.

PROCUREMENT

11.19 **Contractor and Supplier Equality Policies:** We require that contractors and suppliers have acceptable Equality and Diversity policies in place. If they do not, we ensure they are willing to work in accordance with our own policies to align their practices with our commitment to equality and diversity.

11.20 **Consideration in Tendering and Selection:** In our tendering and selection processes, we take into account the equality and diversity commitment and performance of contractors and suppliers. This consideration is a vital part of our decision-making criteria.

- 11.21 **Awareness of Diverse Customer Needs:** We make it a priority to inform contractors about the diverse needs of our customers. This equips them with the knowledge and understanding necessary to provide services that are sensitive to these needs.
- 11.22 **Standards of Conduct:** We set clear standards of conduct for all individuals interacting with SHA, including contractors, to ensure that both our customers and staff are consistently treated with courtesy and respect.
- 11.23 **Supporting Smaller Contractors and Suppliers:** We actively seek opportunities to engage smaller contractors and suppliers, recognizing that they may be more likely to employ workers from marginalised groups. This approach contributes to greater diversity within the workforce.
- 11.24 **Monitoring Performance:** We have robust systems in place to monitor the performance of our contractors, suppliers and service delivery partner. This monitoring helps us ensure that they are meeting our standards and commitments related to equality and diversity.
- 11.25 **Leveraging Purchasing Power:** We leverage our purchasing power to secure community benefits that address disadvantage and inequality in our communities. By doing so, we actively contribute to positive change and inclusivity in the areas we serve.
- 11.26 Through these actions, we are dedicated to fostering an environment in which our contractors and suppliers align with our values of equality and diversity. This approach ensures that all aspects of our operations, including those involving external partners, reflect our commitment to fairness, inclusion, and respect for all individuals.
- 11.27 Through these actions, we aim to foster a collaborative and inclusive approach to policy development and service delivery. We believe that by actively engaging with our customers and communities, considering diverse perspectives, and assessing the impact of our decisions, we can better meet the needs of all individuals and advance our commitment to equality and diversity.

INFORMATION AND COMMUNICATION

- 11.28 **Accessible Documents:** We actively accommodate requests for our policies and other documents to be made available in different formats or languages, wherever feasible. Our goal is to provide information in a manner that is accessible to all individuals, regardless of language or format preference.

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11.29 **Form Assistance:** We offer assistance with filling out forms when needed. We understand that some individuals may require support in navigating paperwork or online forms, and we are committed to providing the necessary help to ensure a smooth process.

UNDERSTANDING RESIDENT NEEDS

11.30 We will collect and analyse residents' data to create profiles, enabling us to tailor our services to individual needs and identify trends among our customer base. This data-driven approach will improve service delivery and resident satisfaction while respecting privacy and consent.

11.31 We will continuously monitor our outcomes, including customer satisfaction results, to assess our performance and make necessary improvements.

OUR PEOPLE

11.32 **Promote Inclusive Culture:** We actively promote a workplace culture that respects and champions equality, diversity, and inclusion. Our goal is to create an environment where all employees feel valued and can thrive.

11.33 **Fair Treatment for All:** We ensure that every employee, regardless of their employment status (permanent or temporary, full-time or part-time), is treated fairly and with respect. Equity in treatment is a fundamental principle of our organization.

11.34 **Legislation Compliance:** All our procedures and practices are consistently aligned with relevant legislation and statutory guidance. We prioritize legal compliance in all aspects of our operations.

11.35 **Seeking Legal Guidance:** When necessary, we seek legal advice to ensure that our practices are not only lawful but also in line with good practice standards. This proactive approach helps us maintain a high standard of compliance.

12. DATA COLLECTION

12.1 Effective data collection and performance monitoring are vital components of this policy. They enable us to achieve our objectives and deliver a more responsive service.

12.2 SHA's data collection systems will seek information about all nine protected characteristics, for the following groups:

- Membership of the Association
- Board members
- Staff members and volunteers
- Existing Tenants (including MMR tenants)
- Applicants on the Housing List
- New lets or re-lets

- 12.3 We will collect data from our residents at the application and tenancy sign up stage. We will ensure this information remains up to date by reviewing this at least once a year.
- 12.4 We will assess the efficiency of our equality and diversity data collection and monitoring systems. This review will also explore opportunities for enhancements, particularly within our housing management software systems.
- 12.5 Through these actions, we aim to create a workplace environment where equality, diversity, and inclusion are not only respected but also actively promoted. Our commitment to fair treatment, legal compliance, and seeking expert advice reflects our dedication to providing a workplace where all employees are treated with dignity and respect.

13. EQUALITY IMPACT ASSESSMENT

- 13.1 In writing this policy we have carried out assessment to ensure that we are considering, equality, diversity and inclusion. Our assessments did not indicate that any group had been adversely impacted by our approach to equality and diversity.
- 13.2 We have also carried out a privacy impact assessment as information regarding applicants is sensitive. However, responsible information sharing plays a key role in the letting of our homes. We follow information sharing protocols with local authorities and our partner where they are in place.
- 13.3 To request copies of these assessments, please contact info@stgeorgehousing.co.uk

14. RELATED INTERNAL POLICIES

- Health and safety policies
- Resident engagement policy
- Zero tolerance policy
- Complaints policy
- Whistleblowing policy

15. CONSULTATION

- 15.1 This policy will be reviewed in consultation with residents and other key stakeholders.

16. REVIEW AND APPROVAL

- 16.1 This policy will be reviewed at every 2 years or as required to take into account changes in legislation.

Responsible officer: Chief Executive
Policy Author: Director of Governance
Policy version: V1
Date of Board Approval: September 2023
Date the next review is due: September 2025

17. DEFINITIONS

17.1 The Equality Act defines "protected characteristics" as the groups legally safeguarded from discrimination. These characteristics include:

- **Disability:** A person has a disability if they have a lasting physical or mental impairment significantly affecting their daily activities.
- **Gender:** Gender refers to the social, cultural, and psychological attributes, roles, and expectations associated with being male, female, or another gender identity.
- **Gender Reassignment:** The process of transitioning from one gender to another.
- **Marriage and Civil Partnership:** Marriage is inclusive of same-sex couples, and civil partnerships offer legal recognition to same-sex relationships. Civil partners should not face less favourable treatment compared to married couples, as per the Equality Act.
- **Pregnancy and Maternity:** Pregnancy is being pregnant or expecting a baby, while maternity refers to the period following childbirth, including maternity leave. Protection against maternity discrimination lasts for 26 weeks after giving birth, which includes breastfeeding.
- **Race:** This protected characteristic refers to a group defined by race, colour, nationality, ethnicity, or national origins.
- **Religion or Belief:** Religion refers to a person's faith or religious affiliation, while belief encompasses non-religious philosophical beliefs, such as atheism or humanism, as well as religious beliefs.
- **Sex:** This characteristic relates to an individual's biological and physical characteristics as male or female.
- **Sexual Orientation:** Refers to a person's sexual attraction or orientation, which can include heterosexuality, homosexuality, or bisexuality.

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