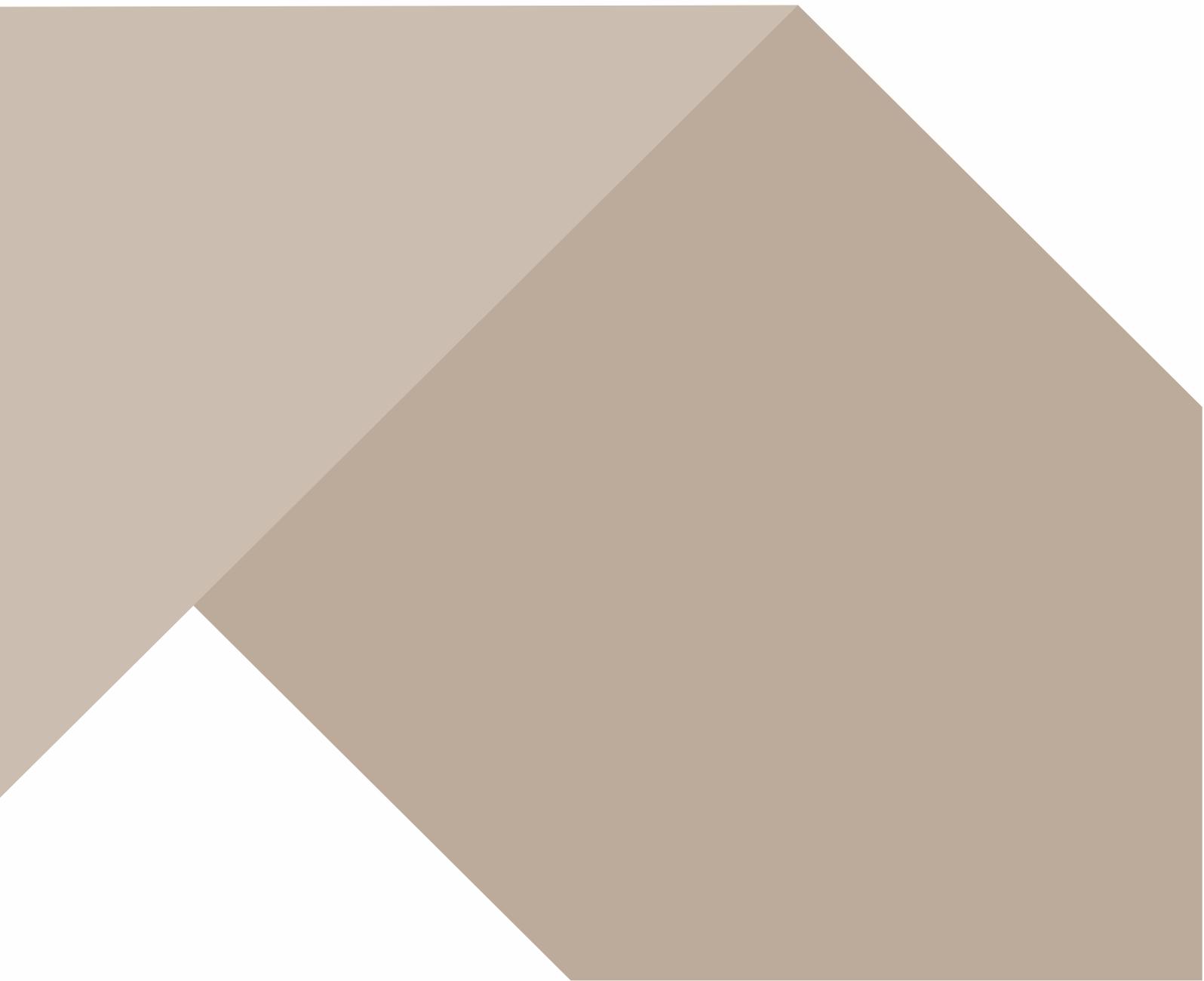


Equality, Diversity and Human Rights Policy

2019-2022



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1 **Introduction**

- 1.1 The Equality, Diversity and Human Rights Policy (the Policy) provides a framework for the Wheatley Housing Group Limited and all of its Subsidiaries (the Group) to meet requirements of the Equality Act 2010 and the Human Rights Act 1998.
- 1.2 The Policy demonstrates the Group's commitment to equality of opportunity and anti-discriminatory practice both in the provision of services and as an employer.
- 1.3 This Policy will outline our approach to mitigating discrimination, disadvantage and unfairness in the broadest sense for our staff and customers. This will help to ensure that equality and diversity remains at the heart of decisions we make across the business and make sure it factors into all our procedures and processes.

2 **Scope**

The Policy shall apply across the Group and is intended to ensure a standardised approach. This policy applies to all staff (whether permanent or temporary) including those that are mobile working or working off site or working within joint partnerships, agency workers, contractors, consultants, modern apprentices, secondees, and those on work experience placements.

3 **Definitions**

- 3.1 Equality is about treating people fairly so that everyone can participate and have the opportunity to fulfil their potential and it recognises that:
- everyone has individual needs and the right to have those needs respected;
 - inequality exists and that unlawful discrimination needs to be tackled; and
 - employment and services should be accessible to all.
- 3.2 Diversity is about respecting and valuing individual difference. Diversity recognises that:
- everybody is different;
 - we need to understand, value, and respect those differences; and

- diversity can include individuals and groups with varying backgrounds, experiences, styles, perceptions, values and beliefs.

A diversity approach aims to recognise, value and manage differences to enable all customers and staff to contribute and realise their full potential. Diversity challenges us to recognise and value all sorts of differences in order to make the Group a better working environment and to ensure that we provide an excellent service for all people.

4 **Statement of Intent**

4.1 We are committed to ensuring that all of our staff and customers can enjoy the same opportunities and receive the same excellent level of service.

4.2 We aim to:

- treat all customers and members of staff equally, regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (“**Protected Characteristics**”);
- offer everybody the same opportunity, regardless of circumstance;
- eliminate unlawful discrimination within the organisation;
- celebrate and value our diverse customer base and workforce;
- encourage input from minority groups within our communities;
- monitor our workforce diversity and take positive steps to make this more balanced; and
- value and respect the Human Rights of our workforce and customers.

5 **Our Commitments**

5.1 We are committed to keeping equality and diversity principles at the heart of all the decisions we make as a business.

5.2 All of our customers are equally important, but we recognise that they will have different needs which we could meet through different services and engagement. We understand that we play an important role in the alleviation of socio-economic hardship with regard to housing.

- 5.3 We are committed to valuing and promoting diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures. We will take a proactive role to ensure this is achieved throughout our services and in supporting its achievement within our communities and with our partners.
- 5.4 We recognise that there are many barriers to achieving true equality of opportunity. These range from overt prejudice to unwitting ignorance of lifestyles, cultures and needs. On whatever level, discrimination is not acceptable.
- 5.5 We will work to ensure that no individual or group experiences unlawful discrimination in the provision of our services, in recruitment or in any of our actions. To do this we will challenge our ways of working and thinking to ensure we identify all potential barriers. We will do this through learning and development, through our service and strategy delivery and in our day to day work.
- 5.6 We are committed to providing fair and equal treatment for all our stakeholders and will not unlawfully discriminate.
- 5.7 For our customers, one of the key barriers to equality can be in relation to poverty and deprivation. Poverty and deprivation lead to inequalities in health, employment opportunities and life chances. We provide housing and care in some of the most deprived communities in Scotland and we are committed to using our services and our wider influence to reduce the inequality gap in these areas.

6 **Prohibited Conduct – Behaviour banned by the Equality Act 2010**

- 6.1 The Group aims to actively eliminate and prevent unlawful discrimination.
- 6.2 The following forms of discrimination are prohibited under this policy and are unlawful:
- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
 - (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater

childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- (e) **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

7 Public Sector Equality Duty

7.1 The Public Sector Equality Duty (“**PSED**”) requires public authorities to have due regard to the need to eliminate discrimination, to advance equality of opportunity and to foster good relations between different people when carrying out their activities.

7.2 In summary, those subject to the PSED must demonstrate due regard in the exercise of their services and functions to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This includes having due regard to the need to tackle prejudice and to promote understanding.

7.3 We aim to have due regard to these needs in everything that we do and will have particular regard to the PSED to the extent that the Group exercises public functions.

8 Human Rights Framework

8.1 The Human Rights Act 1998 sets universal standards to ensure that a person's basic needs as a human being are recognised and met, and it is unlawful for an organisation to act in a way that is incompatible with the Act. The Act urges public authorities to apply a human rights framework to decision making across public services in order to achieve better service provision.

8.2 In practice this means treating individuals with fairness, respect, equality, dignity and autonomy whilst also safeguarding the rights of the wider community when developing policies and procedures and carrying out our functions. The Group will consider these human rights principles in relation to our staff and customers at all times (and specifically when exercising public function), aiming to demonstrate our commitment to quality outcomes which will improve the customers experience and provide satisfaction to staff that they are undertaking a job that is valued.

9 Roles and Responsibilities

Whilst responsibility for the implementation of this policy rests with our Boards, Directors and Executive Management Team, it is incumbent upon **everyone** in the organisation, including all managers, teams and employees to embrace and adhere to the ethos and requirements of this policy at all times.

- The **Group Chief Executive Officer** has ultimate responsibility for compliance with the law on equality, diversity and human rights.
- **Group Directors** have overall responsibility for compliance with the principles within their Business division.
- All **Board and Committee Members** and **Staff** must comply with this Policy.
- The **Company Secretary** has particular responsibility for maintenance and implementation of this Policy in order to ensure that the Group complies with its legal and regulatory duties. The Company Secretary will report as necessary to the Group Board.
- It is a standard condition of our contracts that our **agents and sub-contractors** will comply with the law in relation to equalities, diversity and human rights.

10 **Policy Review**

- 10.1 We will review this policy every 3 years or sooner if there is a significant change which requires attention. We will publish and update an Equality and Diversity Assessment and Action Plan once per year, which will specify our objectives and targets.
- 10.2 Our primary objective is to embed equality, diversity and human rights considerations into every aspect of our work.