

Equality, Diversity, Inclusion and Human Rights Policy

2022- 2025



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We will provide this policy on request at no cost, in large print, in Braille, on tape or in another non-written format.

Approval body	<i>Group Board</i>
Date of approval	<i>28 September 2022</i>
Review Year	<i>2025</i>
Customer engagement required	<i>No</i>
Trade union engagement required	<i>Yes- for information</i>
Equality Impact Assessment	<i>Yes</i>

1 Foreword by Wheatley Housing Group Chair, Jo Armstrong

Equality, Diversity and Inclusion (“EDI”) and Human Rights go to the heart of the common values shared by all members of the Wheatley Group (“the Group”).

We know that to achieve our ambition to deliver excellent services to our customers, be a great place to work for our people, and be trusted by our employees and communities this needs to be reflected in the way we work and through the decisions we make.

Our Group and partner Boards and Executive team are fully committed to EDI and recognise the importance of role-modelling this commitment through our decision making and governance.

In our Group 2021–2026 strategy, *Your Home, Your Community, Your Future*, one of our goals is that our customers and employees will think:

‘I am proud to feel part of an ethical organisation that shares my values’

We want to ensure both our customers and employees are provided with equal opportunities that allow them to succeed and realise their potential.

We want all our customers and employees to be able to access our services equitably. As both a housing and care provider and an employer, we wish to deepen our understanding of the barriers different individuals may face so that we can tailor our services accordingly, meeting these varied needs.

As a Group, we recognise that we are in a unique position to help tackle inequalities and alleviate socio-economic hardship. In doing this, we also want to ensure that our policies, procedures and services do not unfairly disadvantage any person or group.

This policy demonstrates our continued commitment to embrace and promote EDI and Human Rights. As we navigate ongoing complexities post-pandemic, we are more focused than ever on our commitment to EDI and Human Rights.

We place our people and communities at the centre of our decisions and always strive to achieve better outcomes with them.



Our Group values:

Excellence

to deliver quality in everything we do

Community

to build more sustainable communities where customers have a real say in decisions affecting them

Ambition

to do more for our customers and to provide more opportunities for our employees and stakeholders

Trust

to be trusted by our employees, customers and partners

2 Introduction

- 2.1 Wheatley Housing Group Limited (“the Group”) is Scotland’s leading housing, care and property-management group. We recognise that our employees, customers and communities have a diverse range of needs and experiences.
- 2.2 A strong feature of our 2021-2026 Group Strategy, *Your Home, Your Community, Your Future*, is to deliver services to our customers and communities inclusively and in a way that reflects their diversity. We are also committed to ensuring that EDI is part of the culture for our employees.
- 2.3 The Equality, Diversity, Inclusion and Human Rights Policy (“the Policy”) provides a framework for us and our partners to meet the requirements of the Equality Act 2010 and the Human Rights Act 1998, as well as our equalities obligations as required by the Scottish Housing Regulator. The Policy demonstrates our commitment to equality of opportunity and anti-discriminatory practice both in the provision of services and as an employer.
- 2.4 This forms part of our overall approach to equalities and human rights, ensuring we are compliant with the aforementioned legislation and regulation.
- 2.5 This Policy outlines our approach to mitigating discrimination, disadvantage and unfairness in the broadest sense for our employees and customers. This will help to ensure that EDI informs the decisions we make as a business and is embedded into our policies, procedures and service design/delivery.

3 Scope

This Policy applies across our Group, to ensure we adopt a consistent approach and treat all of our employees, customers and communities fairly. 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.

4 Definitions

- 4.1 For us, EDI means:
- **Equality** – people with different characteristics are treated fairly and have access to the same opportunities to fulfil their potential. This recognises:
 - 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.

- **Diversity** – respecting and valuing individual differences and unique characteristics. This recognises:
 - 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.
- **Inclusion** – making sure our employees and customers feel comfortable being themselves and that they feel valued, respected and heard. This recognises:
 - not everyone will feel able to be completely themselves all of the time;
 - we need to actively promote an inclusive culture; and
 - individuals should feel a sense of belonging within our workforce and communities and trust their individual needs will be met and respected.

5 Statement of Intent

5.1 As a Group we will:

- treat all customers and members of staff equally, regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, , religion or belief, sex or sexual orientation (“**Protected Characteristics**”);
- work to recognise, understand and respond to the different needs of these groups;
- collect equalities data on each of the Protected Characteristics from applicants, employees, people on waiting lists, new and current customers and our governing body members;
- use the equalities data collected to inform our decision making and service design;
- offer everybody the same opportunity, regardless of circumstance;
- eliminate unlawful discrimination within the organisation;
- celebrate and value our diverse customer base and workforce;
- encourage engagement from all demographics, including underrepresented groups within our communities;
- monitor our workforce and governing bodies’ equalities and take positive steps to diversify this where required; and
- value and respect the Human Rights of our workforce and customers.

5.2 We expect our employees to live these values of EDI when dealing with customers, colleagues and any external stakeholders. We will not tolerate any form of discrimination, harassment, victimisation or bullying.

5.3 Similarly, we expect our employees to be treated with respect by our customers and will enact our Unacceptable Actions policy if confronted by intolerable behaviour or language.

6 **Our Commitments**

6.1 We are committed to ensuring equality, diversity and inclusion are reflected in our organisation and in everything we do.

6.2 We recognise people living in our communities have a wide range of needs and experiences and aim to ensure they are reflected in how we design and deliver our services. We understand that we play an important role in the alleviation of socio-economic hardship.

6.3 We are committed to valuing and promoting diversity, fairness 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.

6.4 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.

6.5 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.

6.6 We are committed to providing fair and equal treatment for all our stakeholders and will not unlawfully discriminate.

6.7 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.

How we will do this

6.8 We will thread EDI principles through our culture and service provision, including but not limited to:

Protected characteristic data collection

- 6.9 We will collect equalities data on each of the Protected Characteristics from our new and current customers, people on waiting lists, applicants, employees and governing body members. To ensure we are respectful of privacy, data will be collected anonymously and on a voluntary basis. We will carry out an equalities data collection exercise at least every three years to ensure that our information is up to date and relevant.
- 6.10 We will use the data collected to inform our decision-making and service design, such as:
- understanding how our employee diversity reflects the communities we serve;
 - understanding how our engagement structures reflect the diversity of our communities;
 - developing community profiles to better understand local needs and shape our engagement structures;
 - inform Equality Impact Assessments of our services and strategies;
 - development of staff training, learning and inclusiveness programmes;
 - using age, ethnicity and disability diversity markers, along with skills, experience and gender, to inform Board succession planning; and
 - monitoring and reporting on the gender pay gap.

Further detail on where and how we will use the data in key areas is set out below:

Policy and service design

- 6.11 We carry out an Equality Impact Assessment (“EIA”) on new or existing policies and services which have (or have the potential to have) a direct, significant effect on a substantial number of service users, employees or the wider community.
- 6.12 The EIA process supports us embedding EDI into our policy and service development. We may also engage with people, mainly staff and customers, who have different Protected Characteristics in the design/review of our policies.
- 6.13 Policies are available in different formats including braille, audio, interpreted/translated etc. to ensure everyone can access these in a way that suits their needs.

Communications

- 6.14 We will communicate with employees and customers in a way that is inclusive and meets their needs. We will routinely ask customers for their communications preferences and make a range of options available such as braille, audio or through written correspondence in large text.
- 6.15 We will respect cultural differences and where possible will aim to meet any specific requests arising from these differences.

Recruitment

- 6.16 Our job profile adverts, assessments and interview questioning will be designed to be inclusive and promote our commitment to EDI. We work to ensure our selection panels are diverse to mitigate the risk of bias and to make applicants more comfortable.
- 6.17 We will monitor and report on applicant equality data and use this to inform strategic planning/ future recruitment campaigns. When relevant, we will advertise our intention to increase the presence of an under-represented group.

Training and awareness raising

- 6.18 Our staff will receive mandatory EDI awareness training upon on induction and at regular intervals thereafter. We ensure EDI is part of our Continuous Professional Development programme for our Governing Body Members, and is included in our Leadership programmes and embedded within our Group Learning Framework.
- 6.19 We train staff on particular equality and inclusiveness topics as necessary, such as Hate Crime training for our frontline housing staff.
- 6.20 Under the Group wellbeing and inclusion *Different Together* brand, we awareness-raise and promote EDI resources through internal staff campaigns and through our Different Together Community of Excellence.

7 Prohibited Conduct – Behaviour banned by the Equality Act 2010

- 7.1 We aim to actively eliminate and prevent unlawful discrimination.
- 7.2 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 their sexual orientation .
- (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, not allowing a job to be done flexibly may adversely affect staff who have recently taken maternity/paternity leave because they are more likely to have childcare commitments. 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.

8 Public Sector Equality Duty

8.1 The Public Sector Equality Duty (“**PSED**”) requires public authorities to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Although we are not bound by this duty, we aim to abide by this as a form of Good Practice.

8.2 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 promote understanding.

8.3 We will have due regard to these needs, in particular to the extent that the Group exercises public functions.

9 Human Rights Approach

9.1 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, which is compatible with our EDI aims.

9.2 We adopt a human rights approach in our work through 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. Our EIA process includes consideration of Human Rights.

10 Roles and Responsibilities

Whilst responsibility for the implementation of this policy rests with Wheatley Solutions Board, 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, inclusion and human rights.
- **Group Directors** have overall responsibility for compliance with and to role-model the principles within their Business division. All **Board and Committee Members** and **Staff** must comply with and promote/embrace the values contained within this Policy.

It is a standard condition of our contracts that our **agents and sub-contractors** will comply with the law in relation to EDI and human rights and promote its principles.

11 Policy Review

11.1 We will review this policy every 3 years or sooner if there is a significant change which requires attention.