



POLICY DOCUMENT

Equality Diversity and Inclusion Policy

POLICY TITLE:	Equality Diversity and Inclusion Policy
LEAD OFFICER:	Equality and Diversity Manager
DATE APPROVED:	August 2024
APPROVED BY:	St Leger Homes, Board
IMPLEMENTATION DATE:	August 2024
DATE FOR NEXT REVIEW:	August 2026
ADDITIONAL GUIDANCE:	Equality Strategy 2022-2026
ASSOCIATED CUSTOMER PUBLICATIONS:	NA
TEAMS AFFECTED:	All Employees, Contractors, Board Members and St Leger Homes Customers
THIS POLICY REPLACES WITH IMMEDIATE EFFECT:	NA

DOCUMENT CONTROL

For guidance on completing this section please refer to the document version control guidance notes

Revision History

Date of this revision:	July 2024
Date of next review:	August 2026
Responsible Officer:	Head of HR and OD

Version Number	Version Date	Author/Group commenting	Summary of Changes
1	11/04/24	Equality, Diversity and Inclusion (EDI) Manager	First Draft
1.1		Trade Unions, One Voice Forum, Internal and external Equality Involvement Groups, SLHD Line managers	More detail included to clearly show how we meet our obligations under the consumer standards. Further detail added in sections related to meeting housing need and customers need as a result of feedback from equality groups and one voice forum
1.2	15/07/24	EMT	Minor changes to ensure consistency of wording
1.3	23/07/24	Board	Board wished to add in care leavers into the list of protected characteristics.
1.4	03/09/24	FINAL VERSION	

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Policy Creation and Review Checklist

ACTION	RESPONSIBLE OFFICER	DATE COMPLETED
Best practice researched (HouseMark, HQN, Audit Commission, general websites)	EDI Manager	April 2024
Review current practices from similar organisations	EDI Manager	April 2024
Review customer satisfaction data from the area the policy relates to	EDI Manager	April 2024
Undertake customer consultation if applicable	EDI Manager	July 2024
Staff consultation through Trade Unions if applicable	Head of HR&OD and EDI Manager	July 2024
Trade Union consultation if applicable	Head of HR&OD and EDI Manager	July 2024
Stakeholder consultation if applicable	Head of HR&OD and EDI Manager	May 2024
Equality analysis carried out through the intranet for all new policies or fundamental changes	EDI Manager	July 2024

NB. The above table must be completed on all occasions. The policy will not be accepted or approved by EMT without this information completed.

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1 Introduction / Background

1.1 St Leger Homes of Doncaster is actively committed to promoting and embedding a culture of equality, diversity and inclusion. We are an organisation which values differences where individuals can be their authentic selves. Our aim is for our organisation to be truly representative of all sections of the society and communities we serve and for each customer, employee, contractor, visitor and other stakeholders to feel respected and valued.

1.2 St Leger Homes of Doncaster also has responsibilities under legislation, regulation and codes of governance including, but not limited to

- the Equality Act 2010 (incorporating the Public Sector Equality Duty);
- the Human Rights Act 1998;
- the National Housing Federation Code of Governance 2020 and any relevant amendments to such legislation or further codes/frameworks of practice.

1.3 The Equality Act 2010 and the Public Sector Equality Duty places important duties on landlords of all properties to ensure legislation with regards to protected characteristics is understood and included in services that the business offer. These duties also include reporting on progress and analysis of strategies and policies to ensure compliance with equality legislation.

2 Purpose

2.1 The purpose of this document is to demonstrate our commitment to embedding equality, diversity and inclusion across the organisation.

3 Scope

3.1 This policy applies to all, all Employees, Contractors, Board Members and St Leger Homes Customers.

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4 Ownership and Responsibilities

- 4.1 **The Board** is committed to taking a clear and *active* lead to achieve equality of opportunity, diversity and inclusion. This is in all of the activities of our organisation, including understanding the needs of our residents and communities, as well as the composition of the Board and committee(s).
- 4.2 St Leger Homes of Doncaster recognise a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board shall provide leadership on this policy and, working with the Executive Management Team, ensure that it is implemented.
- 4.3 The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements. It shall seek regular updates on how St Leger Homes is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice and at least once every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation as set out at Section 6, below.
- 4.4 All reports to the Board shall include appropriate and robust considerations of equality, diversity and inclusion issues. Equality, diversity and inclusion shall regularly feature as an agenda item for Board meetings and decisions shall be made with effective equality, diversity and inclusion analysis.
- 4.5 Our Colleagues and Customers with direct lived experience of (or particular insight into) the communities we serve shall also be meaningfully engaged in our governance structures.
- 4.6 **All colleagues and Board members** of St Leger Homes of Doncaster are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing St Leger Homes of Doncaster. All our employees have a responsibility to champion our organisational values which are underpinned by our commitment to equality, diversity and inclusion.
- 4.7 **Any external contractors, sub-contractors, agents or third parties** providing services to, for or on behalf of St Leger Homes of Doncaster are responsible for complying with this policy and we shall take action against behaviours of non-compliance as appropriate
- 4.8 In summary our board will:
- Build an inclusive board culture
 - provide support and challenge to executive colleagues
 - Ensure that EDI is embedded within the business strategy

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- regularly review how the Board embeds EDI in its work

5 Policy

5.1 Defining equality, diversity and inclusion

5.1.1 **Equality** is the fair and unbiased treatment of others, taking into account systemic and structural inequalities. This ensures equal opportunity and access for all groups which are protected by legislation.

5.1.2 **Diversity** refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they were born with or have acquired. These differences can go beyond the protected groups set out in legislation.

5.1.3 **Inclusion** goes further and is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.

5.1.4 These terms are interdependent and go hand in hand in promoting a culture that is actively equal, diverse and inclusive.

5.2 Duties under the Equality Act 2010

5.2.1 St Leger Homes of Doncaster is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation (as defined in the Equality Act 2010). The protected characteristics are:

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

As an arm's length management organisation of City of Doncaster Council we are mindful of the additional protected characteristics of 'care leavers' which has been adopted. St Leger have also agreed to adopt care leavers as a group with protected characteristics.

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5.3 Duties under the Public Sector Equality Duty

5.31 St Leger Homes of Doncaster is mindful of its duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) so far as it should apply to our organisation as a Registered Provider of Social Housing. We continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:

(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;

(b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

(c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

5.4 Other Duties

5.4.1 St Leger Homes of Doncaster also understands that diversity and risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010 and that it has a moral duty to address discrimination as an employer, a landlord and as a provider of services. We are committed to tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics such as the protected characteristics above, but also including:

- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation

5.4.2 Consumer Standards

The 2024 Social Housing Consumer standards are as follows:

- The Safety and Quality Standard – requires landlords to provide safe and good quality homes and landlord services to tenants.
- The Transparency, Influence and Accountability Standard – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision-making and hold their landlord to account. Within this standard Tenant Satisfaction Methods (TSMs) require landlords to provide certain information to the Regulator of Social Housing based on resident feedback, such as repairs, safety checks and complaints.

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- The Neighbourhood and Community Standard – requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
- The Tenancy Standard – sets requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords.

We have the following duty under the consumer standards:

- Listen and understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.
- ensure that communication with and information (including policies) for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.
- ensure that our landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.
- ensure a simple and effective process for tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.
- Ensure the information we collect about our tenants and prospective tenants is robust and up-to-date, sharing how it will be used with tenants.

Above all, we want to foster good relationships, promote equal opportunities and build trust, delivering services with respect, to ensure no one feels disadvantaged by their individuality or by being themselves. We want to go on meeting more than our statutory obligations to promote an inclusive culture that will deliver better engagement and improved service delivery.

In addition to this policy our commitment to ensure that tenants are treated fairly is set out in each of our customer specific policies including the Housing Management Policy, Repairs Policy and the Compliments, Complaints and Comments Policy.

5.5 Strategy Objectives

5.5.1 St Leger Homes of Doncaster has agreed a set of objectives and commitments that reflect our strategy for embedding an equal, diverse and inclusive culture in the organisation for 2022-2026.

- Understand our customers and support their needs
- To ensure the organisation is a leader in inclusion and fairness
- To engage customers effectively, foster good relations and advance equality in local communities
- To fulfil our safeguarding to the highest standards
- To develop a progressive and diverse workforce, in a workplace free from discrimination and harassment

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The strategy is our long-term commitment to equality, diversity and inclusion and progress is reported regularly to board as in section 6 below.

5.6 Our Commitments

5.6.1 St Leger Homes of Doncaster is committed to ensuring that our Board's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve.

5.6.2 Our Commitments to Colleagues and Prospective Colleagues

All St Leger Homes of Doncaster colleagues and job applicants shall be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation with regard to the protected characteristics set out in the Equality Act 2010 as well as membership or non-membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We shall also make reasonable adjustments using support such as Access to Work where necessary to overcome any potential barriers.

All our workforce related codes of conduct, policies, practices and procedures reflect our values and commitments to equality, diversity and inclusion and our aims to recruit and retain a diverse and inclusive workforce reflecting the communities we serve.

St Leger Homes of Doncaster will not tolerate any forms of unlawful discrimination, harassment, victimisation or bullying. Acts of discrimination or harassment by employees or Board members or committee members of St Leger Homes of Doncaster will result in disciplinary action, in line with the Disciplinary Policy. Failure to comply with this policy will be treated in a similar fashion. Reporting potential incidents should be done in line with current reporting procedures.

5.6.2 Our Commitments to Customers and Tenants

St Leger Homes of Doncaster is committed to ensuring equality of opportunities in the provision of its housing services. Further details of these commitments are set out below.

5.6.3 Meeting Housing Need

We will ensure equality of opportunities, tackle discrimination and promote fair access to our housing services. We will do this by:

- Liaising with statutory agencies to share assessments of the housing needs of local communities and any groups facing discrimination
- Reviewing how our organisation can contribute to meeting these needs
- Strengthening our digital offer and supporting skills to enable access for all and that no one is left behind.
- Partnering with specialist agencies where appropriate to meet the needs of disadvantaged groups

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- Ensuring new homes are suitable for people with disabilities and following approved guidance on this.
- Work in partnership with other services including the use of intelligence and data to tackle inequalities, promote equalities and good community relations that have a positive impact.
- Improve the use of Equality Analysis in service design and delivery, capturing challenges and opportunities at the very beginning, ensuring barriers are considered and mitigated where possible

5.6.4 Access to Housing

We will ensure equality of opportunities and promoting fair access to housing by:

- Ensuring a fair and robust Allocations Policy and Housing Management policy, monitoring allocations to ensure direct or indirect discrimination is not occurring
- Working with City of Doncaster Council to eliminate direct or indirect discrimination in the nominations processes and
- Ensuring systems for housing or rehousing residents reflects our equality principles.

5.6.5 Services to Our Tenants

We will ensure equality of opportunities, tackle discrimination and promote fair access to our housing services by:

- Ensuring all residents are treated with fairness and respect;
- Ensuring staff receive appropriate equality, diversity and inclusion training [including unconscious bias training] in relation to the provision of housing services
- Communicating and engaging with residents so that they feel informed about our services and how to access these aligning with our Communications Strategy.
- Listening to service users through consultations and complaints to produce evidence-based analysis that informs service design and delivery aligning with our Tenant Voice Strategy.
- Consulting with residents and obtaining their views particularly in relation to our equality, diversity and inclusion commitments
- Seek to enhance the way that we engage with communities including those with protected characteristics using a flexible menu of engagement, to ensure as many voices are heard and feedback is given to them.
- Collect and update data around our customers so we have a better understanding of their needs such as our vulnerable customers so we can overcome any barriers and tailor services to meet their needs.
- Strengthening our digital offer and supporting skills to enable access for all and that no one is left behind.

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- Ensuring any resident involvement and participation activities promote involvement from all groups of residents
- Ensuring procedures e.g., complaints procedures are clear, simple accessible to all, including using alternative languages where appropriate
- Taking a zero tolerance approach on harassment of residents and pro-active working with other agencies to tackle all forms of harassment with clear avenues through complaints processes to report discrimination, harassment and racism.
- Ensuring all forms of information and communication are accessible to residents (e.g., large print, audio tapes, translation or interpretation services)
- Ensuring housing and associated services take into account the sensitivities and needs of different groups including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs
- Work in partnership with other services including the use of intelligence and data to tackle inequalities, promote equalities and good community relations that have a positive impact.
- Improve the use of Equality Analysis in service design and delivery, capturing challenges and opportunities at the very beginning, ensuring barriers are considered and mitigated where possible

5.7 Training

St Leger Homes of Doncaster is committed to ensuring all staff receive appropriate equality, diversity and inclusion training through their induction and every 2 years following this. All new members of staff will be made aware of this policy as part of their induction.

Colleagues will be supported and enabled to access personal and career development in line with our learning and organisational development policy, with support to address barriers that may arise.

5.8 Recruitment

Line managers involved in recruitment of new colleagues are required to attend recruitment training and this includes a focus on unconscious bias.

6 Monitoring, Compliance and Effectiveness

6.1 St Leger Homes of Doncaster have developed and continually review and report against a set of metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives.

6.2 Regularly, and at least once every 12 months, we review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order to ensure we are meeting organisational, legal, regulatory

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and best practice requirements publishing a progress 'snapshot' report each quarter and a forward look each 12 months.

- 6.3 We shall regularly, and at least once every 12 months, ensure that our employee pulse surveys enable us to gather data from the workforce to measure the impact of our activity on the working environment to ensure all data is as up to date as possible and to gain the views of all staff. These surveys will help to inform our progress against our commitments and objectives.
- 6.4 We collect data from our customers upon application and at other times to understand the different needs of our customers. Much of this information forms part of our regular reporting to the Board. It is also used effectively to identify best practice as well as gaps or shortcomings within our organisation and to tailor our approach in correcting these.
- 6.4 Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure St Leger Homes of Doncaster has the best quality of data to inform our progress on our objectives and commitments and also to aid better decision making.
- 6.4 We are committed to utilising a range of methods and forms of insight to gather data, customer feedback and involve our employees, partners and stakeholders in our work to champion our equality, diversity and inclusion commitments these include but are not limited to :
- Customer and Employee Involvement Groups
 - Surveys and Questionnaires
 - Colleague customer interactions (such as visits and calls)
 - Attendance and involvement on local and national networking groups such as Housing Diversity Network, Minority Partnership Board, Ethnic Culture Fusion Network

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