



CALEDONIA GROUP

EQUALITY, DIVERSITY AND INCLUSION POLICY

POLICY IMPLEMENTATION CHECKLIST	
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Author:	Governance Manager
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Data Protection compliant:	Yes
Health & Safety compliant:	Yes
Procedure implemented:	Yes
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KPIs / reporting arrangements implemented:	
Training Completed:	Yes
Posted on intranet:	Yes
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Publicity material issued:	

This document can also be provided in large print, braille, audio or other non-written format, and in a variety of languages

1 POLICY STATEMENT

Equality, Diversity and Inclusion Policy

1.1 The Caledonia Housing Association Group (“the Group”) is committed to being an equal opportunities employer and service provider, ensuring equality of opportunity for all tenants, customers and staff. The Group also respects and values the diversity of groups and individuals that it interacts with and the benefits this can bring, and it will take appropriate action to ensure those who may otherwise be excluded, feel included. We respect the human rights of all as defined within the Human Rights Act 1998.

1.2 This policy outlines our intent to fulfil our aims of providing opportunities for all sections of the community; develop and enhance sustainable neighbourhoods and provide an enjoyable working and living environment which is free from harassment and discrimination.

1.3 This policy is underpinned by both the Equalities Act 2010, the Human Rights Act 1998 and the Scottish Housing Regulator’s Regulatory Framework. Together, this provides a framework which supports the delivery of fair, transparent and accountable governance and services; promotes equality, diversity, inclusion and respect; and helps to ensure that positive outcomes for tenants, services users, customers and employees are achieved.

Appendix 1 contains a list of legal terms and their definitions. We also acknowledge relevant guidance and recommendations within publications including:

- “Is Scotland Fairer?” report by the Equality and Human Rights Commission, Scotland (2018)
- “Walking the Talk: An Overview of the Right to Adequate Housing and Human Rights Issues for Landlords in Scotland” by Chartered Institute of Housing (CIH) Scotland and Newhaven Research (2022)
- “Equality data collection: National guidance for Scottish Social Landlords” published by Scottish Federation of Housing Associations (2022)

1.4 The aim of this policy is to support the organisation in putting commitment into practice. This includes ensuring that employees and governing body members are aligned in their understanding and equipped to deliver a culture of equity, diversity and inclusion.

1.5 The underlying principles of this policy are shaped by the Group’s Guiding Principles:

Keep it simple – make sure you are understood and you understand

Keep it personal – value differences, adjust to meet the needs of others

Make it right – provide the service and housing provision that is needed

1.6 These underpin our approach to both promoting fairness and equality, and ensuring legislative compliance in respect of the nine protected characteristics as defined by the Equality Act 2010:

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

1.7 This policy is not, however, restricted to just these protected characteristics. The Group also recognises that factors such as socio-economic status and background, including income, education, employment, and social supports, can impact on an individual's life experiences, their ability to access opportunities and their sense of inclusion. We will take this into consideration wherever appropriate, including for example in our approach to providing employment, training and volunteering opportunities, and identifying and developing service improvement initiatives.

2 POLICY CONTENTS

2.1 This policy covers eight specific areas: governance, service delivery, access to information and advice, housing provision, procurement, working for the group, dealing with harassment, and complaints.

2.1.2 It will be supported by relevant strategy documents and action plans, and be embedded within all other Group policies, processes and procedures to ensure that equality, diversity and inclusion (EDI), and the human rights of the individual, become fully integral to who we are and what we do.

2.2 Governance

2.2.1 The Governing Body will provide oversight of this policy and support continuous improvement in the achievement of our EDI objectives. Our Environmental, Social and Governance (ESG) Framework provides corporate oversight of ESG activity across the Group and is closely aligned with EDI principles. Responsibility for developing and delivering initiatives that raise awareness of EDI sits with the EDI

Action Group. However, we recognise that embedding EDI across all areas of our work is a shared responsibility, and that all colleagues have a role to play in creating an inclusive and equitable organisation.

2.2.2 Staff and governing body members are required to adhere to this policy in the discharging of their duties and be aware of the standards of behaviour expected of them through the respective Codes of Conduct.

2.2.3 The Governance Team will work with all areas of the Group to ensure the benefits of embracing a culture of EDI are realised by carrying out a range of actions to evidence the work that has been undertaken.

2.2.4 We will use Equality Impact Assessments (EqIAs), where appropriate, to identify and consider the potential impact of proposed policies, strategies, projects, service changes and decisions on different groups. The findings of those EqIAs will inform decision-making, help mitigate unintended adverse impacts, and support the advancement of equality, diversity and inclusion across the Group.

2.2.5 We fully acknowledge the benefits of having a membership that reflects the diversity of our communities, to hold us accountable for our performance and activities. We will maintain arrangements for monitoring the characteristics of our members and actively explore opportunities to promote membership to under-represented groups. Equally, we are committed to ensuring the diversity of our governing bodies reflects that of the membership and, more broadly, of the communities we serve, as a means of achieving informed and robust decision making at a strategic level.

2.3 Service Delivery

2.3.1 We will better understand the needs of all our customers through providing a range of opportunities for customer involvement and feedback. These opportunities will be designed with inclusiveness and accessibility in mind, and aim to cater for individual preferences wherever possible.

2.3.2 We will ensure that all services are accessible to the individuals and communities we serve. In the provision of services, we will endeavour at all times to act in a non-discriminatory manner taking positive action to engage with those that might otherwise be excluded. We will do this by:

- monitoring how tenants and customers access our services,
- undertaking equality impact assessments, where appropriate, to help understand the potential impact of proposed service changes and decision on different groups and to identify actions that promote accessibility and inclusion,
- engaging with organisations that can assist us to communicate more widely,
- reviewing customer service standards, and customer experience feedback,
- ensuring our communication style is fit for purpose,

- developing our staff and equipping them with the skills, knowledge and abilities to deliver the services needed.

2.4 Access to Information and Advice

2.4.1 The Group will ensure all information is available to tenants and customers, through our website, social media, hard copy publications and correspondence, in a format that is accessible and easy to understand. We will ensure that we:

- provide information in accessible formats as required, including community languages; large print; Braille; and audio, utilising suitable technology to assist wherever necessary. We will also provide translation and interpretation services, where required to aid access to and understanding of our information and advice,
- provide information in a manner that is understandable to the reader, taking into account individual needs, and communicate consistently in line with the Group's Communication Guidelines and Tone of Voice documents. These provide practical guidance on delivering clear, accessible and customer-focused communications which reflect our brand and help ensure information is easy for people to understand.

2.5 Housing Provision

2.5.1 The right to adequate housing is a basic human right recognised by law and we will provide housing that is warm and affordable and meets the needs of the people we serve.

2.5.2 Action will be taken to try and ensure that housing is accessible to the specific needs of individuals; and that it can continue to meet these needs as they evolve over time.

2.6 Procurement

2.6.1 The Group uses contractors, suppliers, consultants and agencies to ensure its services are delivered speedily, to a high quality, and in the most cost-effective manner.

2.6.2 The Group is committed to promoting equality, diversity and inclusion through its procurement activities. We expect all contractors, suppliers and partners to comply with relevant equality legislation and to operate in a manner consistent with this Policy.

Through our procurement processes, we seek to generate social, economic and environmental value for the communities we serve. This includes supporting employment and skills opportunities, promoting sustainability, encouraging local investment and delivering positive outcomes for priority groups.

We will work collaboratively with suppliers to support understanding of our EDI expectations and will address any complaints or concerns relating to discrimination, harassment or unfair treatment through our complaints procedure and contract management processes. Contractors and suppliers are expected to take prompt and appropriate action where any breach of EDI standards is identified within their organisation.

2.6.3 The Group will promote equality through its procurement and supply chain arrangements by encouraging suppliers and contractors to adopt the principles of the Scottish Government's Fair Work First approach and to demonstrate a commitment to fair, inclusive and equitable employment practices.

2.7 Our People – Employees and Volunteers

2.7.1 We understand the importance of developing a diverse workforce and governing bodies that represent the communities we operate in and a culture that instils a sense of belonging, authenticity and trust. We will promote fair and equal access to all our job opportunities for existing and future staff. The ability to accelerate equity, diversity and inclusion within the workforce strengthens engagement and wellbeing, and therefore is a key driver of continued business improvement.

2.7.2 We aim to ensure that no existing or prospective employee or governing body member receives less favourable treatment due to a protected characteristic; and acknowledge our obligation to provide reasonable adjustments.

2.7.3 Staff and governing body members will be able to access opportunities for learning, development and personal growth through the implementation of effective talent management and succession planning.

2.7.4 We recognise the importance of treating everyone with equal dignity and respect. This includes taking account of a person's human rights as outlined within the Human Rights Act 1998. We will endeavour to achieve equality of opportunity within our approach to staffing and employment and will:

- employ a diverse workforce that reflects the populations of the areas and communities in which we work,
- ensure that staff are aware of their roles and responsibilities in relation to equity, diversity and inclusion,
- raise awareness of equality, diversity and inclusion throughout the Group and provide training so staff are equipped with the skills and knowledge to support the delivery of this policy,
- review our policies and procedures to ensure they provide equality of opportunity, experience and reward,
- maximising flexible working opportunities to support inclusion,
- use our influence and resources to create training and employment opportunities within the communities which we work, and

- strengthen and communicate our commitment to reducing bullying and harassment.

2.7.5 The Group will take all reasonable actions to ensure that every member of staff or governing body member treats everyone with respect and dignity whilst carrying out their duties.

2.8 Dealing with Harassment

2.8.1 The Group endeavours at all times to provide a work and living environment that is free from discrimination and harassment.

2.8.2 The Group will not tolerate harassment or victimisation of employees and will take appropriate action against the perpetrator(s).

2.8.3 All governing body members; employees; consultants; and contractors are expected to adhere to the principles of this policy and all claims of harassment and discrimination will be quickly and actively investigated in a sensitive and appropriate manner.

2.8.4 Where tenants or members of the public report cases of harassment, the relevant policies and procedures will apply, including the Anti-Social Behaviour policy.

2.8.5 The Group is committed to addressing domestic abuse and supporting those affected by it. We will provide support to employees affected by domestic abuse and will work proactively to respond to incidents involving or affecting our tenants, using all appropriate powers available to us.

2.8.6 Staff members will be made aware that conduct outside of work may lead to investigatory and disciplinary action if it is in breach of code of conduct or contractual obligations.

2.9 Complaints

2.9.1 In the delivery of our complaints policy and procedure we aim to deal with complaints from staff and customers fairly, professionally, and respectfully, regardless of their personal characteristics.

2.9.2 To enable all tenants and customers to have clear information and equal access to our complaints policy, we will accept complaints, compliments and feedback in any form, including in person or via email, in line with our Complaints Handling Procedures. This reflects the individual preferences and needs of customers and staff.

2.9.3 We will endeavour to provide practical assistance where required to anyone who wishes to make a complaint, and remove any barriers that may prevent them from doing so.

3. Policy Review

- 3.1 This policy will be reviewed every three years, or sooner if required as a result of changes to legislative provisions or associated guidance.

4. Compliance Statement

- 4.1 *It is important that all members of staff, in carrying out their duties for the Group, do so in accordance with the Group's policy framework. Our policy framework ensures we comply with laws and regulation, while giving guidance to inform operations and decision-making. Our policies have been designed to be clear and easy to understand, and are available on our website and intranet. If any member of staff is unclear as to their responsibilities under this policy, then they should refer to their line manager and / or the policy author for further guidance. A failure to comply with Group policies can have serious consequences for the Group. Should an employee become concerned about serious non-compliance with the policy, they should speak to their line manager or refer to the guidance set out in the Group Whistleblowing policy.*

1 DEFINITIONS

1.1 The definitions used are derived from relevant pieces of legislation and codes of practice.

1.2 Discrimination

1.2.1 **Direct discrimination** - when someone is treated less favourably than someone else as a result of a protected characteristic.

2.2.2 **Associative discrimination** - similar to direct discrimination. It applies when someone is treated less favourably because they associate with another person who possesses a protected characteristic.

1.2.3 **Perceptive discrimination** - direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

2.2.4 **Indirect discrimination** - occurs when an apparently neutral condition, rule, policy or practice that applies to everyone disproportionately disadvantages people who share a protected characteristic and cannot be justified.

2.2.5 **Institutional discrimination** - the collective failure of an organisation to provide an appropriate and professional service or employment to people because of their personal characteristics.

2.3 Harassment

2.3.1 Harassing behaviours are demeaning and unacceptable to the recipient. Harassment is unwanted conduct which affects dignity. It may be related to any personal characteristic of the individual and may be persistent or an isolated incident.

2.4 Victimisation

2.4.1 Victimisation occurs when an employee, board director, or customer is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act 2010 or internal complaint procedure; or because they are suspected of doing so.

2.5 Domestic abuse

2.5.1 Any abuse between current or former partners. The abuse may include physical, sexual, emotional or financial abuse as well as coercive control and other controlling behaviours. This applies to those generally recognised as a couple

whether or not married, in a civil partnership or cohabiting, and regardless of whether they currently live together.