

Equality Diversity and Inclusion	Policy
Approved by Board	Issue number 09.00
Approved date January 2025	Review date January 2027
Previous Version Equality & Diversity Policy 2023 – 2025	Responsible Officer Director of C&SH

1.	Aims and Objectives
1.1	This policy sets out Hightown's commitment to promoting equality, diversity and inclusion and to meeting its responsibilities under the Equality Act 2010.
2.	Definitions
2.1	Equality is essentially about fairness and ensuring that our staff, residents and the people we support have the best possible chance to succeed in life, whatever their background or identity. Achieving equality of outcomes means we may have to do specific things for different individuals or groups to ensure that everyone has the opportunity for the same outcome.
2.2	When we talk about diversity , we mean ensuring that we employ colleagues and deliver services to cater for the needs of people with different backgrounds, perspectives and experiences.
2.3	When we talk about inclusion , we mean creating a working environment and delivering services where everyone has a 'voice' and people's opinions and views are heard and respected.
2.4	Scope This policy applies to all areas of Hightown's work. It applies to Board and Committee members, permanent, temporary (including people on fixed-term contracts) and bank employees, involved residents, people we support, trainees, consultants and volunteers and applicants for jobs and housing.
2.5	Contractors, major suppliers, consultants, agencies, trade organisations and training providers working for Hightown will either be required to adhere to this Policy or demonstrate that they have their own appropriate equal opportunity policy and practices in place.
3.	Policy Statement
3.1	Hightown provides good quality housing and services to people who cannot afford to purchase or rent housing at market rates. We provide supported housing and care to people with learning disabilities, people with mental health problems, young people, and homeless adults.
3.2	In developing and managing quality housing and support services to diverse cultural communities, we treat all our residents, the people we support and employees fairly. We believe in openness



	and equality in our dealings with people and that every individual is entitled to be treated with dignity and respect.
3.3	It is Hightown's policy to promote an operational and working environment free from discrimination, harassment and victimisation. We will endeavour to protect residents, people who we support and staff from discrimination, harassment or victimisation by supporting the people affected and taking disciplinary or legal action following investigation against any perpetrators.
3.4	We welcome diversity and recognise the contributions of all individuals. We aim to ensure equality of opportunity by adopting an equitable approach and working to eliminate disadvantage and unfair discrimination against people by reason of their diversity characteristics (age, disability, gender, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation), or HIV status, caring responsibilities or through financial exclusion.
3.5	We recognise that needs differ for a variety of reasons, including those outlined above, which can impact on people's ability to access services or their ability to participate in the life of their community.
3.6	For this reason we believe it is important that equality considerations underpin the Association's policies and functions so that we can demonstrate our commitment to Equality Diversity and Inclusion.
4.	Implementation
4.1	We will use our 3 year EDI plan to set out our longer term targets and report on EDI performance against these goals to our Renumeration and Nomination Committee and Board.
4.2	We will operate fair and inclusive recruitment and employment practices to achieve our operational needs, not precluding choice of the people we support. And we seek to maintain a diverse workforce that reflects the diversity of the communities we serve.
4.3	We will promote our equality and diversity aims with our partners, residents, people we support, employees and other stakeholders.
4.4	We will appoint a member of Board as EDI Champion and ensure that all Board and Committee members and employees are aware of their responsibilities in implementing this Policy.
4.5	We will ensure that access to relevant training is provided to all staff, Board and Committee members, involved residents and people we support and representatives of the staff and EDI forum members.
4.6	We consider EDI training mandatory and will monitor and report on compliance and take action to ensure non-compliance is managed.
4.7	We expect compliance with and commitment to this Policy including compliance in terms and conditions of employment practices. This includes recruitment and selection, promotion, conditions of employment, job descriptions, staff handbook and disciplinary processes etc. In the event of non-compliance, we will take appropriate action.
4.8	Ensure that all policies and practices reflect our approach to equality and diversity, are developed with regard to the diverse needs of our communities, are regularly updated, are easily accessible and are in line with relevant legislation.



- 4.9 We will monitor and produce annual reports and action plans based on EDI data for: housing, access to services and employment, Ethnicity and Gender Pay Gap linked to population data for the area in which Hightown operates.
- 4.10 We will support and promote the work of the associations EDI forum.
- 4.11 We will publish information summarising our work to deliver our EDI commitments and objectives, and the progress we have made against any related plans.
- 4.12 We are committed to ensuring that no one is disadvantaged in accessing our services. To achieve this, we will respond to workplace adjustment requests from customers and staff in line with the Equality Act. Upon receipt of a request, we will discuss requirements and seek to reach an agreement based on the circumstances. We will let people know that we can provide workplace adjustments by publishing and raising awareness of our policy, creating bitesize guidance and including this in relevant training.

5. Legal/Regulatory Background

Public Sector Equality Duty (PSED)

Section (149), Paragraph 1 of the Equality and Diversity Act 2010 states that a public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Whilst Housing Associations are not a public authority, some of their activities, such as nominations or evictions from affordable tenancies, could be said to be public functions for which due regard of the PSED should be taken.

6. Other Considerations

Resident Involvement – Residents have not been consulted in this policy update as there are no fundamental changes proposed to our approach. However, the revised policy will be promoted amongst residents and people who we support.

Equality & Diversity – Equality Impact Assessment has been carried out.

Financial Implications – This policy is designed to protect the Association's financial strength.

Environmental/Sustainability impact – None identified.

Risk –The considerations set out in this policy are specifically designed to manage risk for the Association. Failure to adhere to EDI principles creates a risk of litigation and of failure to recognise potential.

Employee engagement – EDI champion Board member and members of the EDI forum were consulted over this policy review.



7. Role and Responsibilities/Authority

7.1 Corporate culture, Governance and Leadership

The board is responsible for setting and reviewing commitments to achieve equality of opportunity, diversity and inclusion across all of Hightown's activities, as well as in its own composition. The process for filling Board vacancies includes advertising and recruiting in ways aimed at attracting BME candidates and other minority groups. The reasons for Board members leaving will be analysed to see if there are any equality and diversity implications that need to be addressed.

7.2 The Board and Chief Executive

The Board has adopted this Equality Diversity and Inclusion Policy and accepts overall responsibility for ensuring that it is implemented. The Board will seek regular assurance about how our EDI commitments and objectives are being delivered in

practice and will track progress against the priorities set. The Board will require the Chief Executive to oversee the day-to-day operation of the policy throughout Hightown, the monitoring of its effectiveness and its review in the light of changing legislative and regulatory requirements.

7.3 **Directors and Managers**

All Directors and Managers within Hightown are responsible for taking into account equality diversity and inclusion issues when developing effective policies and procedures within their own areas of responsibility, ensuring that discrimination is not condoned in any way in the provision of services or employment. The Director of Care and Support is the Diversity Champion. Directors and Managers are also responsible for identifying activities which conflict with this Policy and must address any unacceptable attitudes or behaviours.

7.4 Employees

All employees must comply with and carry out their duties in accordance with this Policy. Employees must not discriminate, harass or victimise any residents, people who we support, employees, volunteers, applicants, members of the public or any other persons with whom they come into contact as an employee of Hightown.

8. Policy/Internal Document References

Resident and Service User Involvement Policies, Recruitment and Selection Policy and Procedure, PR and Comms Policy, Harassment Policy and Procedure, Grievance Procedure, Complaints Policy and Procedure, Procurement Policy, Tenancy Management Policy, Development Policy, Repairs and Maintenance.