

# Equality, Diversity and Inclusion Policy



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# 1. Equality, Diversity, and Inclusion Commitment statement

– published on our website:

We are proud to be an equal opportunity, anti-discriminatory and anti-racist organisation committed to creating a diverse and inclusive environment for our workforce and the communities we serve.

## 2. Equality, Diversity, and inclusion Policy Statement

- 2.1 We are fully committed to the elimination of unlawful and unfair discrimination and promoting a culture that actively values differences and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.
- 2.2 We believe that everyone has the right to be valued, treated with respect for their culture, beliefs and values, and feel safe and secure in their workplace. We value all our colleagues for the differences they bring; each one is unique, whether in terms of background, personal characteristics, experience, skills and motivations.
- 2.3 We expect colleagues to take personal responsibility for observing, upholding, promoting and applying this policy. We expect them to treat everyone, including our colleagues, tenants, customers, suppliers, contractors, agency workers and consultants fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.
- 2.4 By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.
- 2.5 We have a Board-level Equality, Diversity, and Inclusion Champion which demonstrates our genuine commitment to diversity and cultural change. Board members are able to raise diversity issues at the highest level and have a high degree of influence over the organisation's strategy and its culture. The Board member champion also attends our established Equality, Diversity and Inclusion Advisory Group with colleagues from across our organisation.
- 2.6 We recognise that our ability to meet the needs of individuals and communities is improved by having a diverse workforce which reflects the diversity of the local communities within which it operates, and which has a range of skills and competence to better enable us to achieve our objectives.

## 3. Scope

- 3.1 This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, students and apprentices. This policy also relates to job applicants and is relevant to all stages of the employment relationship. It covers our approach to our colleagues, tenants, customers and other key stakeholders and the behaviours we expect and encourage.
- 3.2 This policy accompanies our Anti-Harassment and Anti-Bullying policy for employees which is available on Synergy and our Anti-Social Behaviour and Harassment (including hate crime) policy for tenants/residents, which is available on our website.

## 4. Our Commitments

4.1 To comply with all legal and regulatory requirements placed on us by:

- a. the Equality Act 2010 The Equality Act protects people with 'protected characteristics' of; age, disability, sex, gender reassignment, race, religion or belief, sexual orientation, pregnancy and maternity leave, those who are married or in a civil partnership from discrimination.
- b. The Human Rights Act 1998
- c. Regulatory Framework for Social Housing in England - Our Regulator specifies the requirements on housing associations through its Standards framework. Regulatory standards contain specific expectations and the outcomes that we are expected to achieve in relation to Governance & Viability, Value for Money, Rents, Neighbourhoods & Communities, Transparency, Influence and Accountability, Safety & Quality and Tenancies.
- d. Public Sector Duty Act - Under this duty all organisations providing a public service are required to have due regard to the need to achieve the following objectives: (i) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (ii) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (iii) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- e. Care Quality Commission's (CQC) Single Assessment Framework including Regulation around Person Centred Care, Dignity and Respect, Staffing and Being Well-Led.
- f. Ofsted regulations, including the Protection Standard (Regulation 5), Accommodation Standard (Regulation 6), Support Standard (Regulation 7), and Statement of Purpose.
- g. Any other relevant employment law regulations.

In addition to fulfilling our statutory responsibilities to promote equality and diversity in all of our activities, we are committed to developing an organisational culture which values people from all sections of the community and the contribution each individual can make to its work – to support that commitment we aim to:

- a. Continuously develop services to achieve equality, diversity and inclusion in all our activities
- b. Monitor the outcomes of service delivery to ensure we are achieving fair and equitable outcomes and access to services
- c. Ensure colleagues understand how valuing diversity can improve our ability to deliver better services

- d. Provide all employees and managers with the mandatory training and development they need to enable them to ensure we value diversity, achieve organisational goals and challenge inappropriate behaviours
- e. Provide a supportive, open environment where all employees have the opportunity to reach their full potential
- f. Ensure that employees are paid equitably for work of equal value regardless of their sex
- g. Involve employees in the development of this organisational culture
- h. Operate and monitor our policies and practices that prevent unlawful discrimination and promote equality across all protected characteristics / equality groups
- i. Complete an Equality Impact Assessment for any updated policy, service change or use of new technology
- j. Provide equality of opportunity in recruitment and selection, promotion, access to training / personal development initiatives and all other areas of employment
- k. Consider the disability needs of employees and customers and make reasonable adjustments where required
- l. Our Board and workforce to be representative of the community we serve and for each employee to feel respected and able to give their best
- m. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- n. Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms, and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities
- o. Not tolerate discrimination, harassment, bullying or victimisation of colleagues, customers or third parties. If any colleague or Board member is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary Policy.

## **5. Key Responsibilities**

### **Our Board**

- Overall accountability to ensure EDI is fully incorporated into our strategic objectives
- Hold CMT accountable for implementing this policy effectively and regularly reviewing progress through reports and audits
- Appoint a Board member champion for EDI.

## **Our Corporate Management Team (CMT)**

- Ensure all legal obligations are met in relation to equality, ensuring that risks related to non-compliance are managed and mitigated
- Translate this policy into actionable plans across the organisation, ensuring adequate resources are allocated
- Model inclusive leadership and behaviours and encourage a culture of diversity and respect throughout the organisation
- Oversee the collection of EDI data and report progress to the Board.

## **Our Managers**

- Embed a culture of inclusivity where everyone is treated with dignity and respect
- Ensure EDI practices and policies are followed in all activities including recruitment, promotion and development
- Proactively address any issues of discrimination, harassment or victimisation, and to work to create an environment which reduces the possibility of these occurring
- Promote open discussions about EDI and create an environment where all voices are heard and respected
- Ensure that decision-making processes are inclusive and consider diverse perspectives
- Ensure that all colleagues are trained and supported in EDI principles and practices
- Model inclusive behaviours and encourage a culture of diversity and respect.

## **Our HR Team**

- Maintain and update this policy in conjunction with CMT and Employee Forum, ensuring alignment with legislation and other policies and procedures
- Develop and promote fair recruitment process, mitigate bias, and promote the career growth of diverse talent through learning and development opportunities
- Collect and analyse EDI data, track progress and provide reports to the EDI Advisory Group
- Provide support for colleagues and managers to handle EDI-related grievances, complaints or conflicts fairly and sensitively.

## **All Colleagues**

- Familiarise yourself with this policy and adhere to its principles in your work, actions, and behaviours

- Treat everyone with dignity and respect, taking the time to understand how they would like to be treated
- Participate in EDI training and awareness activities provided; be open to learning about EDI and contribute ideas for creating a more inclusive environment
- Take into account the uniqueness of colleagues and tenants and look to celebrate differences
- Recognise your own unconscious biases and take positive action to challenge your own thinking
- Challenge others, speak up and report matters if any behaviour is not aligned to the expectations of this policy.

## 6. Key Terms/Definitions

### 6.1 Equality, Diversity and Inclusion Definitions

- **Equality** is about ensuring that every individual has an equal opportunity to make the most of their lives and talents and are not treated unfairly because of reasons protected by discrimination law ('protected characteristics').
- **Diversity** is psychological, physical, and social differences that occur among any and all individuals; including but not limited to race, ethnicity, nationality, religion, socioeconomic status, education, marital status, language, age, gender, sexual orientation, mental or physical ability, and learning styles. A diverse group, community, or organisation is one in which a variety of social and cultural characteristics exist.
- **Inclusion** is where people's differences are valued and enables 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.

### 6.2 Discrimination Definitions

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability
- sex
- gender reassignment
- marriage and civil partnership status
- race
- religion or belief
- sexual orientation
- age
- pregnancy and maternity

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments".

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumption about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirement or conditions that put those in particular groups at a disadvantage. Examples include:

- steering employees into types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of others; and
- using different standards for different groups of employees to judge performance.

## Different types of discrimination under the Equality Act 2010

- **Direct Discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for examples choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect Discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared to people who do not have that characteristic, unless there is good reason to justify it. An example is introducing a requirement for all staff to finish at 6pm. It is arguable that female employees, who statistically bare the larger share of childcare responsibilities, could be at a disadvantage of the new working hours as they prevent them from collecting their children from school or nursery.
- **Associated Discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by Perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from Disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
  - Dismissing or failing to pay a bonus to someone because of their disability-related absence; or

- Disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
  - Allocating some of the disabled person's duties to a colleague
  - Changing their working hours or place of work
  - Adjusting procedures for assessing job candidates
  - Modifying disciplinary and grievance procedures.

### 6.3 Harassment and Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment is:

*Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and less favourable treatment related to sex or gender reassignment that occurs because of a rejection or, or submission to, sexual conduct.*

You should refer to our Anti-harassment and anti-bullying policy for further information on our procedure for reporting harassment.

### 6.4 Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

### 6.5 Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside of work.

If bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our anti-harassment and anti-bullying policy for further information on our procedure for reporting bullying.

## **7. Breaches of this policy**

You must not unlawfully or otherwise discriminate against, harass or victimise, other people including current and former colleagues, job applicants, clients, tenants, customers, suppliers and visitors. This applies in the workplace (including while working from home), outside the workplace (when dealing with tenants, suppliers or other work-related contacts) and on work-related trips or events including social events. You may be held individually liable for such acts while working with us.

We treat any acts or allegations of discrimination, harassment or victimisation against others extremely seriously and they will be investigated and dealt with in accordance with the Disciplinary Policy, which could amount to gross misconduct resulting in dismissal. Sexual harassment may amount to both an employment rights matter and a criminal matter.

If you believe that you have suffered discrimination, harassment or victimisation you should raise the matter with us, either through our Complaints policy (if you are not employed by us) or through our Grievance Policy or Anti-harassment and Anti-bullying policy. The Complaints policy is available on our website and employee policies are available on Synergy. Complaints will be treated in confidence and investigated as appropriate. You will not be victimised or retaliated against for complaining about discrimination. However, if an employee makes a false allegation deliberately and in bad faith is likely to be treated as misconduct and dealt with under our Disciplinary Policy.

## **8. Equality of Opportunity**

### **8.1 Recruitment**

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making decisions about recruitment must not discriminate in any way and must have attended our Respect and Diversity training course.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

### **8.2 Career development**

Any decision made relating to a person's promotion or career development must be free from discrimination.

Every decision-maker should ensure that selection criteria and processes for recruitment and promotion are reviewed to ensure that there is no discriminatory impact on a certain group.

### **8.3 Recruiting people with a disability**

Managers and the HR team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments arrangements for interviews, job descriptions and person specifications and selection criteria are appropriate and as inclusive as possible.

We ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process and candidates are advised to contact the HR team.

Those involved in the interview process, must not ask job applicants about their health or disability except with prior approval from the HR team. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

### **8.4 Talking about Disability**

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or “banter”. Anyone adopting such language will be subject to investigation and action against them under our disciplinary policy.

### **8.5 Reasonable Adjustments**

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties because of your disability, please speak to us so that we can discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you to fully understand how we can support you. For employees, this may involve seeking advice and guidance from our Corporate H&S Manager and Occupational Health to help us get the right support in place.

For employees who are returning from long-term disability-related absence, we have a return-to-work support programme in place. For further information, please contact the HR team.

### **8.6 Support**

Employees with a disability, or who care for someone with a disability, and need emotional support or help with practical issues, can contact our Employee Assistance Programme for free, confidential advice. You can access this service via Synergy.

## **8.7 Training**

All colleagues with line management responsibility are required to attend our Respect and Diversity training for managers.

All new starters must attend the Respect and Diversity training within their first year of employment.

Every current employee must attend the relevant Respect and Diversity refresher training every 4 years.

We expect all colleagues to proactively support EDI initiatives by attending events and workshops offered to educate themselves on the challenges faced by other and how to help alleviate these in the workplace.

## **9. Our Tenants and Customers**

We will promote equality of opportunity and welcome diversity in all aspects of our services and activities. We will not tolerate discrimination, harassment or victimisation against any tenants or customers. We will work to ensure our colleagues and partners treat everyone with dignity and respect.

We will continuously review our complaints to ensure we are providing the right level of service to all of our tenants and customers, and we will continue to learn, develop and adapt to ensure we continue to tailor our services to people's needs.

Tenant and customer involvement is at the heart of everything we do, we will engage and involve people to adapt and make changes to services as needed. We will work towards ensuring that our services are accessible. We will recognise people's cultural and language needs and services will be provided which are appropriate to those needs. We will make reasonable adjustments to ensure services are accessible to everyone who needs them and seek alternative methods of service delivery for disabled people where barriers may exist.

## **10. Procurement of Goods, Work and Services**

We expect all individuals acting on our behalf to comply with legislation and behave towards others in a way that is in keeping with this policy. We will only work with contractors who demonstrate that they comply with acceptable EDI standards.

## **11. EDI Data Collection**

We collect EDI data from our customers, tenants and colleagues. It helps us to identify inequalities, barriers and information gaps, highlight different experiences and help target support. We use an agreed set of questions for diversity monitoring based on the NHF's EDI toolkit. Our EDI Advisory Group has been overseeing our work on EDI data collection and will be setting and reviewing targets to ensure that our Board membership, workforce and customers reflect the local community.

For further information about how we protect your personal data, please see the relevant privacy notice on our website.

## Related CHS documents and polices

CHS Group Corporate Plan

EDI Strategy

Unreasonable Customer Behaviour Policy

Capability Policy and Procedure

Code of Conduct – Board and Committee Members

Code of Conduct – Employees

Data Protection Policy and procedure

Disciplinary Procedure

Domestic Abuse Policy

Exit Interview Policy

Grievance Policy

Health and Safety Policy

Recruitment and Selection Policy

Email, Internet, and Social Networking Policy

Managing Sickness Absence Policy and Procedure

Training and Development Policy

Whistleblowing Policy

Anti-harassment and Anti-bullying Policy (formerly known as Dignity at Work policy)

Anti-Social Behaviour and Harassment Policy

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