

Equality, Diversity, and Inclusion Policy

Policy Owner:	Executive Director of People and Culture
Policy Lead:	Head of Policy and Inclusion
Approved by:	Board
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Purpose and scope of the policy

The purpose of this policy is to set out our commitment to being an inclusive organisation that treats everyone with courtesy, empathy, fairness and respect and enables customers and colleagues to thrive.

It applies to all aspects of our work as a housing provider and landlord, a service provider, an employer, a contractor and partner, and a procurer of goods and services.

1. Policy

- 1.1 We're committed to being an inclusive organisation that treats everyone with courtesy, empathy, fairness and respect and enables customers and colleagues to thrive.
- 1.2 We welcome the requirements placed upon us to comply with various legal and regulatory requirements that relate to equality, diversity and inclusion and aim to do more. We'll proactively seek, listen to and act on feedback and suggestions from customers and colleagues.
- 1.3 Through our activities as a housing provider and landlord, a service provider, an employer, a partner and in procurement we seek to:
 - a) embrace and celebrate diversity,
 - b) eliminate discrimination, harassment, and victimisation, and
 - c) advance equality of opportunity, foster good relations, tackle prejudice, and promote understanding and community cohesion.
- 1.4 We'll:
 - a) Take a zero-tolerance approach to all forms of discrimination, harassment, victimisation and bullying.
 - b) Treat everyone with courtesy, empathy, fairness and respect.
 - c) Work in partnership with our contractors and suppliers to ensure that all customers (and, where applicable, their representatives or advocates), colleagues and partners are treated with courtesy, empathy, fairness and respect.
 - d) Work with customers (and, where applicable, their representatives or advocates), colleagues and partners with the aim of being an inclusive organisation that enables customers and colleagues to thrive - whatever their needs, identity or background including socio-economic background, age, disability, mental health, neurodiversity, race, ethnicity, colour, nationality, religion or belief, sex, gender identity, gender expression, sexual orientation, marital or civil partnership status, pregnancy and caring responsibilities.
 - e) take into account diverse needs in the design and delivery of our homes, services, activities and communications with the aim of making them reasonably inclusive by design.
 - f) Aim to recruit and retain a diverse board (including sub-committees) and workforce that are representative of the local areas in which we work.
 - g) Provide appropriate equality, diversity and inclusion training for board members, colleagues, and actively involved customers – This will include training to improve colleagues' understanding of LGBTQ+ lives in line with the commitment we've made by signing up to the HouseProud Pledge¹.

¹ stonewallhousing.org/houseproudpledge

- h) Ensure that our services, facilities, complaints process and opportunities for customer and colleague engagement and influence are accessible and inclusive.
- i) Comply with all of the legal and regulatory requirements placed on us by the Equality Act 2010 including the duty to make reasonable adjustments for disabled people / people with disabilities, the Human Rights Act 1998, and the Regulatory Framework for Social Housing in England.
- j) Make reasonable adjustments where required to meet the needs of disabled people / people with disabilities – While we'll aim to ensure that our homes, services, activities and communications are reasonably inclusive by design, there will be times when we need to make reasonable adjustments to meet an individual's specific needs. We'll discuss the individual's specific needs with them (and / or, where applicable, their representatives or advocates) with the aim of agreeing what reasonable adjustments we'll make to meet their needs. We won't make assumptions about whether a disabled person / person with disabilities needs adjustments or about what those adjustments should be.
- k) Assist customers seeking housing adaptations to access appropriate services, clearly communicate to customers and relevant organisations how we'll do this, and cooperate with customers, appropriate local authority departments and other relevant organisations so that a housing adaptations service is available to customers where appropriate.
- l) Allocate and let our homes in a fair and transparent way that takes the needs of tenants and occupiers and potential tenants and occupiers into account.
- m) Allocate homes that are designated, designed or adapted to meet specific needs in a way that is compatible with the purpose of the housing.
- n) Work in partnership to deter and tackle domestic abuse and support customers, colleagues and others affected in line with our Domestic Abuse policies.
- o) Work in partnership to deter and tackle hate crimes and hate incidents and support customers, colleagues and others affected in line with our Hate Incidents Policy.
- p) Assess whether our housing and landlord services deliver fair and equitable outcomes for tenants.
- q) Maintain a governance structure that actively and effectively scrutinises performance in relation to equality, diversity, and inclusion.

Definitions

- **Community cohesion:** Community cohesion can be defined as establishing shared values and building better relationships by bringing people together.
- **Discrimination:** Discrimination can be **direct discrimination**, **discrimination arising from disability** or **indirect discrimination**.
- **Direct discrimination** means treating someone less favourably:
 - because of a protected characteristic they have or
 - because of a protected characteristic you think they have (perception discrimination) or
 - because they associate with someone who has a protected characteristic (discrimination by association)

(Please see definition of 'protected characteristic' below).

- **Discrimination arising from disability** means treating a disabled person unfavourably because of something connected with their disability. This can only occur where the employer or service provider (or the person acting for them) knows, or can reasonably be expected to know, that the person is disabled / has a disability.
- **Indirect discrimination** can occur when there is a condition, rule, policy, or practice that applies to everyone but particularly disadvantages people who share a protected characteristic. It can be justified if it can be shown that it is a proportionate means of achieving a legitimate aim. (Please see definition of 'protected characteristic' below).
- **Equality:** Equality is "the state of being equal, especially in status, rights or opportunities" (www.oxforddictionaries.com). Equality is fair treatment for everyone. It's not about treating everyone the same and ignoring differences. It's about recognising and respecting diversity and difference and not treating people unfairly because of their differences.
- **Harassment:** Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. (Please see definition of 'protected characteristic' below).
- **LGBTQ+** means Lesbian, Gay, Bisexual, Trans, Queer and other sexual orientations, and gender identities.
 - **Sexual orientation** describes a person's sexual attraction to other people or lack thereof, for example:
 - **Lesbian** – refers to a woman who has a romantic and / or sexual orientation towards women. Some non-binary people may also identify with this term.

- **Gay** – refers to a man who has a romantic and / or sexual orientation towards men. Gay is also a generic term for lesbian and gay sexuality – some women define themselves as gay rather than lesbian. Some non-binary people may also identify with this term.
 - **Bisexual (or bi)** is an umbrella term used describe a romantic and / or sexual orientation towards more than one gender. Similarly **pansexual** is an umbrella term used to describe a romantic and / or sexual orientation towards other people that is not limited by sex or gender.
- **Gender identity** describes a person's innate sense of their own gender – whether male, female, or non-binary, for example:
 - **Non-binary** is an umbrella term for people who don't identify as only male or only female and may identify as both.
 - **Trans** is an umbrella term used to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.
- **Queer** is a term used by some people to describe their sexual orientation and / or gender identity.
- **Neurodiversity:** Neurodiversity refers to the different ways a person's brain processes information. 'Neurodivergent people' is a collective term used to refer to people who have a neurodivergent processing difference such as dyslexia, dyspraxia, dyscalculia, dysgraphia, ADD (Attention Deficit Disorder), ADHD (Attention Deficit Hyperactivity Disorder), ASC (Autistic Spectrum Condition) / Autism.
- **Prejudice:** A negative attitude toward a person or group formed in advance of any experience with that person or group, often based on assumptions.
- **Protected Characteristic:** Under the Equality Act 2010 it is unlawful to discriminate against, harass or victimise someone on the basis of any of the following nine 'protected characteristics': age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- **Socio-economic background:** Socio-economic background relates to a combination of an individual's income, occupation, and social background.
- **Victimisation:** Victimisation means treating someone badly because they've done something in relation to the Equality Act, such as making or supporting a complaint or raising a grievance about discrimination (or because you suspect they may have done or may do this).

Equality, Diversity, and Inclusion

An Equality Impact Assessment was completed for this policy and considered as part of the approval process. We're clear that successful implementation of this policy will be dependent on us ensuring that the development and delivery of all our strategies, policies and procedures support the delivery of this policy.

Data protection

This policy will be delivered in accordance with our Data Protection Policy. A Data Impact Assessment was completed for this policy and considered as part of the approval process.

Related legislation and regulations

- Equality Act 2010
- Human Rights Act 1998
- Regulatory Framework for Social Housing in England

Related policies and procedures

All of our policies and procedures, including those listed below, must comply with this policy. To help ensure that this happens, we'll ensure that an Equality Impact Assessment is completed for all policies and considered as part of the approval process.

- Code of Conduct
- Complaints Policy
- Disciplinary Policy
- Domestic Abuse policies
- Grievance, Harassment and Bullying Policy
- Hate Incidents Policy
- Housing Adaptations Policy
- Unreasonable Behaviour Policy
- Whistleblowing Policy

Customer engagement

On 11 October 2023, we contacted our Customer Advocates to invite them to comment on a draft of this policy by completing a survey. The survey, which closed on 27 October 2023, asked the following questions, and invited them to provide comments:

- Did you find the policy clear and easy to understand?
- We are keen to remove jargon and buzzwords wherever possible. Were there any words, phrases, or sections that you feel we should change to ensure it is plain English?
- How far do you agree that these reflect the right key areas of focus for Moat and our EDI policy?
- Our EDI policy sets out what these activities mean in practice in section 1.4. How far do you agree with the approaches detailed and that they include all key areas?
- Thinking more generally about this policy, is there anything you would change?
- Would you support Moat's adoption of this policy?

We also invited our Customer Advocates to participate in a workshop on 25 October 2023 to contribute to the development of our new Equality, Diversity, and Inclusion Strategy.

Feedback, comments, and suggestions provided by customers through the survey and workshop have been used to improve the policy.

You can help us to be an inclusive organisation that treats everyone with courtesy, empathy, fairness and respect and enables colleagues and customers to thrive, by:

- Making a complaint if we've failed to act in line with this policy – This will help us to put things right and improve our customer service.
- Getting involved to help us review and improve our services and policies – We'll review this policy in 2027, or sooner if customer feedback shows that we need to.

For more information about how to make a complaint and how to get involved, please visit our website www.moat.co.uk, call us on 0300 323 0011, text us on 07786 202 505, visit us at one of our offices or write to us at Mariner House, Galleon Boulevard, Crossways, Dartford, Kent, DA2 6QE.

Document Revision History (Record of any changes made to the policy)

Date	Changes approved by	Details of changes made