



Policy Outline

Equality, Diversity and Inclusion Policy

Overall purpose of policy

To ensure everyone who comes into contact with us, including employees, customers and stakeholders, understands our commitment to equality, diversity and inclusion and to fair treatment and respect for everyone.

How the policy will be implemented

A commitment to equality, diversity and inclusion is embedded throughout our organisation. Employees are provided with regular guidance and training and receive consistent messages on the principles of fairness, dignity and respect. All our policies and procedures are assessed to ensure equality and inclusion for all our customers and employees.

The policy will be implemented through the work of the Total Inclusion Group, who are responsible for identifying diversity objectives and the coordination, monitoring and delivery of appropriate strategies and action plans.

Performance measures, aspirations and rationale

If our performance falls, is on a downward trajectory and is below target, this will trigger positive action to be taken and potentially a full review of this policy. The performance measures, aspirations and rationale will be reviewed on an annual basis.

Protected characteristic	Current performance	Aspiration	Rationale
Age Employees	8.4% of employees are 16 to 25 years old.	10% of employees to be 16 to 25 years old.	We aim to narrow the gap between our younger employees (aged 16 to 25) and our older employees (over the age of 26). Employees who are 16 to 25 years old account for 8.4% of our workforce. The age of our workforce is more evenly spread across other 10 year age brackets (26 to 35, 36 to 45, 46 to 55, 56 to 65), with approximately 20% of our workforce occupying each bracket.

Protected characteristic	Current performance	Aspiration	Rationale
Sex Employees	46.1% of all employees are women.	47% of all employees to be women.	Within the Wakefield district, 47% of the workforce are women (Wakefield Council, 2021). We aim for gender equality in the workplace and have set an aspirational target to have 47% women across all our organisation, including the senior levels of Directors and Board members.
	42% of all Business Leaders and above are women.	47% of all Business Leaders and above to be women.	
	33.33% of all Directors are women.	47% of all Directors to be women.	
	36.36% of all Board members are women.	47% of all Board members to be women.	
Disability Employees The Equality Act (2010) defines a disability as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities.	2.75% of employees have declared that they have a disability.	5% of employees to declare that they have a disability.	We have set an aspirational target to almost double the current number of disabled employees, as we are aware that 15% of the population has a disability (World Health Organisation, 2021). We are dedicated to recruiting people with disabilities and are exploring how we advertise job vacancies, to attract more disabled applicants. For example, we are currently exploring advertising our vacancies in Jobcentre Plus, and through local disability charities and groups.
Race Employees	3.56% of employees are BAME. The term BAME refers to Black, Asian and minority ethnic groups. Minority ethnic groups includes all categories apart from White British. ¹	10% of employees to be BAME.	We are keen to reflect the community we serve. 9.84% of our tenants are BAME (with an aspirational target of 10%) and so our aspirational target is to have a workforce where 10% is BAME. This will ensure the BAME community is represented in our workforce.

¹ * The government have recently recommended movement away from the term 'BAME.' The recommendation is to use the term 'ethnic minorities' instead. Therefore, in future reports we will use the term 'ethnic minorities' to refer to this group.

Protected characteristic	Current performance	Aspiration	Rationale
Race Tenants	9.84% of tenants are BAME.	10% of tenants to be BAME.	There is a growing number of BAME people within the Wakefield district, this aspirational target reflects this growing number. ^{*2}
Sexual Orientation Employees	0.37% of employees are lesbian, gay or bisexual (LGB).	3.2% of employees to be LGB+.	We are keen to reflect the community that we serve. 3.2% of our tenants identify as lesbian, gay, bisexual or 'other'. Our aspirational target is for our workforce to reflect this figure, ensuring the LGB+ community is represented in our workforce.
Sexual Orientation Tenants	3.2% of our tenants are lesbian, gay, bisexual or 'other' (LGB+).	3.2% of our tenants to be LGB+.	Within Yorkshire and the Humber 3% of the population is LGB (Wakefield Council, 2021). To recognise this, we are wanting to maintain our current performance of 3.2%. ^{*3}
All protected characteristics	100% of new employees receive mandatory diversity and inclusion training, within the first six months of employment.	100% of new employees to continue to receive mandatory diversity and inclusion training, within the first six months of employment.	Every employee needs to be aware of our commitment to diversity and inclusion, which includes our legal obligations, as set out in the Equality Act, 2010. Training ensures that all employees take individual responsibility for diversity and inclusion. Collectively, this enables us to be a truly diverse and inclusive organisation.
	100% of employees complete diversity and inclusion e-learning, at least every two years.	Every two years, 100% of employees to continue to complete diversity and inclusion e-learning.	

² Our properties are allocated based on housing needs. However, having these aspirational targets for tenants will enable us to assess the diversity of our tenants.

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Resident engagement targets

We strive for proportional representation in all customer engagement, involvement and scrutiny. This ensures that our input from customers is reflective of our customer demographic. For example, 9.84% of our customers are BAME, therefore we ensure that 9.84% of our engagement is with BAME customers.

Protected characteristic	Tenant demographic	Resident engagement target
Age	Under 34: 16%.	Age 16 – 24: 2.7% . Age 25 – 44: 33.2% . Age 45 – 64: 34.7% . Over the age of 65: 29.4% .
Sex	39% men. 61% women.	39% men 61% women
Race	9.84% BAME.	9.84% BAME.
Sexual orientation	3.2% LGB+.	3.2% LGB+.
Faith	2.89% non- Christian.	2.89% non- Christian.

Date Approved by CMB: 19 July 2022
Date Approved by Board: 28 July 2022
Date Due for Review: 28 July 2025
Responsible Officer: Organisational Development Service Manager

Equality, Diversity and Inclusion Policy

1 Statement of intent

- 1.1 Equality, diversity and inclusion is at the heart of everything we do. We are committed to equality, diversity and inclusion in all areas of employment and business, and to the provision of inclusive services, processes and procedures. All our employees are encouraged to reach their full potential and we seek to reflect the community we serve, fulfilling our legal obligations as a minimum.
- 1.2 We recognise the nine protected characteristics as defined by the Equality Act 2010, which enables people from all groups to achieve their potential and not be subject to prejudice and discrimination. The nine protected characteristics are:
- sex;
 - disability;
 - sexual orientation;
 - age;
 - gender reassignment;
 - race;
 - religion or belief;
 - pregnancy and maternity; and
 - marriage and civil partnership.
- 1.3 We recognise discrimination creates barriers to achieving equality and to people achieving their potential.
- 1.4 We strive to ensure everyone who has contact with us, including employees, customers and stakeholders, understands our commitment to diversity, inclusion, fair treatment and respect for everyone.
- 1.5 We define equality as:
- eliminating unlawful discrimination of any type through regular customer profiling and completion of equality assessments;
 - treating people fairly, with dignity and respect;
 - making decisions or judgements about people based on individual merit and without bias, prejudice, assumptions or stereotyping;
 - creating an environment where everyone has fair and equal access to employment and promotion opportunities through inclusive policies and procedures;
 - developing a working environment which is free from discrimination, harassment, victimisation or bullying; and
 - ensuring our services are accessible to all, are delivered to high standards and fit our customers' needs by carrying out regular customer profiling.
- 1.6 We define diversity as:
- recognising and respecting differences;
 - striving to achieve equality for an increasingly diverse customer and employee group;

- providing appropriate services that match differing needs and preferences; and
 - providing training on and promoting good relations between people who have different backgrounds and experiences.
- 1.7 We define inclusion as a coordinated response to overcome systems, policies, processes and procedures that prevent individuals and whole communities of people from accessing rights, opportunities and resources that are normally available to members of society.
- 1.8 We are committed to:
- the principle that all customers have the right to the same high standards of provision and services;
 - ensuring all employees are treated with dignity and respect;
 - equality, diversity and inclusion and recognise the nine protected characteristics as defined by the Equality Act 2010;
 - ensuring this policy complies with all legal and statutory requirements, including the Equality Act 2010;
 - ensuring no unlawful or unfair discrimination takes place against an individual or a group, directly or indirectly, because of their protected characteristics; and
 - placing equality, diversity and inclusion at the core of all our business activities.

2 Outline of service

Policy implementation

- 2.1 We will ensure the principles of respect, equality, diversity and inclusion apply across all our business and employment activities and are an integral part of business planning and service delivery.
- 2.2 We will ensure any personal monitoring information collected will be stored securely and confidentially and only shared with the relevant employees. It will be explained to any individual providing information, exactly who the information will be shared with and for what purpose.

Governance

- 2.3 Our Board is fully committed to promoting equality, diversity and inclusion across all business activities and is united in tackling discrimination of any type. The Board will ensure:
- it provides effective leadership and delivers a clear vision on our principles of equality, diversity and inclusion;
 - its composition and leadership arrangements reflect and represent the diversity of the communities we serve;
 - it adopts a [Recruitment Policy](#) and related procedures ([Recruitment and Selection Procedures](#)) that reflect and promote equality, diversity and inclusion objectives, continually reviewing their effectiveness;

- its recruitment policy for appointment to the Board is reflective of the communities we serve;
- it develops training and support programmes for new and existing Board, Committee and Panel members to assist them in leading the promotion of equality, diversity and inclusion within the organisation;
- its principle of achieving equality, diversity and inclusion is given appropriate attention by setting targets, actions and performance indicators to measure our effectiveness;
- all Committees and Panels adhere to the principles of equality, diversity and inclusion as set out in this policy;
- our Total Inclusion Group comprises of panel members from our neighbourhood estates, employee Diversity Champions, the Board Champion and WDH senior representatives, to identify diversity objectives and assess progress against the Diversity and Inclusion Action Plan; and
- the Board recognises diversity and inclusion data as special category data and needs to be processed appropriately.

Employment

- 2.4 We will develop an employee profile that reflects the diversity of local communities. We will set targets and adopt recruitment, support and retention practices to ensure this profile remains representative of local communities in the future.
- 2.5 Our [Recruitment Policy](#) is to employ the most suitable person for each position. Equality, diversity and inclusion are central to this process.
- 2.6 We will eliminate all forms of unlawful discrimination in our recruitment and employment process. We will take positive measures to encourage employees and potential employees, from underrepresented groups to engage in employment and promotion opportunities; this may include lawful positive action.
- 2.7 We will ensure all candidates who consider themselves to have a disability, and meet the essential criteria for a post, will be selected for interview. Action will be taken to meet individual needs wherever possible.
- 2.8 We will ensure job applicants and employees are provided with suitable access to buildings and premises, complying with current legislation.
- 2.9 Further information is contained in our [Recruitment Policy](#).

Training and development

- 2.10 We will provide mandatory equality, diversity and inclusion training, including the nine protected characteristics, to all employees within the first six months of employment as part of their induction. Further role specific training will be provided when required, including communicating new legal or good practice developments on equality, diversity and inclusion and raising awareness of the requirements of hard-to-reach groups.

- 2.11 We will ensure all employees, regardless of their working arrangements, have equal training opportunities and receive appropriate support from their line manager, based on individual training needs. Our selection criteria and procedures for courses leading to qualifications will ensure equality and diversity for all employees, please see our [Learning and Development Policy](#). Training and development opportunities will be identified through the appraisal process.
- 2.12 We will make reasonable adjustments to accommodate individual needs.
- 2.13 We will implement measures to monitor, analyse and evaluate all training programmes delivered, assessing the opportunities we provide and considering the protected characteristics.

Allocations

- 2.14 We will work closely with Wakefield Council to identify and address the housing and related needs of local communities, through a range of options and initiatives, to provide affordable housing.
- 2.15 We are committed to allocating homes in a way that offers choice, considers individual needs and promotes the development of sustainable, confident and inclusive communities.
- 2.16 We will work with Wakefield Council in developing housing strategy that ensures our [Choice Based Lettings Policy](#) and related procedures do not discriminate, directly or indirectly, unless measures taken are a proportionate means of achieving a legitimate aim.
- 2.17 We will ensure our Local Lettings Strategies comply with this policy and the Health and Medical Rehousing Panel adheres to the principles of the policy and related procedures in carrying out its function.

Services

- 2.18 We are committed to delivering the highest standards of housing and related services in meeting the diverse needs of local communities. We will achieve this by:
- treating people fairly and taking the nine protected characteristics into consideration in all aspects of service delivery and access to services;
 - promoting good relations between people;
 - responding to and investigating all reports of bullying, harassment, discrimination, victimisation or hate crime;
 - periodically monitoring demographic changes in all protected characteristics;
 - carrying out equality analysis for all policies and procedures that impact individuals, to ensure they do not have a negative impact on any of the nine protected characteristics;
 - setting diversity performance indicators for key service areas;
 - promoting social inclusion by working in partnership with Wakefield Council and other registered social landlords to establish housing support needs and preferences and meet the diverse needs of local communities;

- providing reports to the Board and Total Inclusion Group on how existing and future services meet the diverse needs of local communities;
- providing services that meet and are sensitive to the diverse needs of individuals, groups and local communities; and
- ensuring customers, stakeholders and service users have suitable access to our services.

Resident involvement

- 2.19 We place customer involvement and participation at the heart of our business activities, this includes incorporating residents' views, expectations and aspirations of our services.
- 2.20 We will deliver the highest standards of service to people living in our communities within a framework of empowerment, engagement and value for money.
- 2.21 We will offer all residents the opportunity to participate in developing and monitoring our corporate Diversity and Inclusion Action Plan.
- 2.22 We will reflect the views and expectations of residents in our business planning and service review processes, in monitoring performance and improving services.
- 2.23 We will work with community groups, including tenants and residents associations to ensure equality, diversity and inclusion values are integrated into their terms of reference and are followed.
- 2.24 In our approach to resident involvement, we will develop and support structures that ensure groups related to each of the protected characteristics are able to be involved in our activities.
- 2.25 We will provide opportunities to consult with a diverse range of customers, from the nine protected characteristics, who are underrepresented at community involvement events, to learn how they want to participate and be consulted in relation to service delivery and review, removing any potential barriers to involvement.
- 2.26 We will provide support, for example translation and interpretation, to encourage and facilitate involvement from all our customers, stakeholders and service users. These services will be publicised and promoted to all our employees.
- 2.27 Further information can be found in our [Resident Involvement and Scrutiny Plan 2020 to 2025](#).

Contractors, consultants, partners and suppliers

- 2.28 We will ensure contractors, consultants, partners and suppliers adhere to this policy.

- 2.29 As a criterion for award of work or contracts and a condition for doing business we have specified the requirements of contractors, consultants, partners and suppliers. They must meet equal opportunities legislation and eliminate all forms of discrimination as detailed in our [Equality and Fairness in Contracts](#) document.
- 2.30 We will set performance indicators in promoting equality, diversity and inclusion in service areas where contractors, consultants and partners are employed.
- 2.31 We will develop standard contract agreements with contractors, consultants, partners and suppliers that meet equality, diversity and inclusion principles.
- 2.32 Further information is available in our [Procurement Procedures and Guidance](#).

Communication

- 2.33 We will involve customers, employees and stakeholders in setting standards, monitoring performance and evaluating, reviewing and developing our policies and services in a variety of ways, including our service review groups.
- 2.34 We will ensure all information provided for service users is in Plain English and important information is available, on request, in a variety of different formats and languages including Braille, large print and audio CD. The Language Line and Text Relay Services are available and induction loops are provided at our hubs. Recite Me is available on our website to improve accessibility, through tools which include translation, text to speech and customisation of languages, fonts and colours. We will promote awareness and encourage use of our accessibility tools.

3 Specific needs

- 3.1 We will take into account the specific needs of all employees, customers and other stakeholders which may arise in accordance with this policy. These needs relate to taking account of all differences, whatever they may be. We will particularly promote equality and inclusiveness, in line with our Equality Diversity and Inclusion Policy, based on the nine protected characteristics. During the review and development of this policy an equality assessment has been completed to consider those with protected characteristic and mitigate any impact on them from delivery of this policy.

4 Consultation

Internal

- 4.1 During the review of this policy consultation has taken place with all WDH3 managers and the Total Inclusion Group.

External

- 4.2 Consultation has taken place with the Customer Panel and the Housing Diversity Network (HDN).

5 Responsibility for implementation

- 5.1 Our Board and Chief Executive are responsible for ensuring that this policy is implemented.
- 5.2 Under the delegated authority contained within our [Standing Orders](#) it is the responsibility of all employees and those working on our behalf to ensure that their work is carried out in line with this policy and any related procedures.
- 5.3 If customers are dissatisfied with the service that they have received or with the application of this policy, they should refer to our Complaints Policy.

6 Monitoring

- 6.1 Our Board will receive regular monitoring reports to evaluate the effectiveness of this policy in meeting customer expectations.
- 6.2 We will undertake surveys to monitor the satisfaction of our tenants with the service provided and will publish the results.
- 6.3 Where relevant information is available we will benchmark our performance against other organisations to ensure the highest standards of service delivery.

7 Review

- 7.1 We will undertake a review of this policy whenever there are any relevant changes to legislation, regulatory requirements, case law or good practice that would impact on this policy or in the light of any required service improvements identified through internal audits, service reviews, learning from complaints or regulatory judgements. Considerations will also be made where performance against the policy's measures and targets meet or are forecasted to hit the trigger identified.
- 7.2 We will regularly review service provision and will undertake reviews, when appropriate, to ensure continuous improvements and value for money in the delivery of our services.
- 7.3 Our Board and / or the Corporate Management Board will be responsible for ensuring that reviews of this policy are carried out and that the policy contributes to, and complements, our strategic objectives.

8 Risk

- 8.1 The potential risks relating to this policy have been identified and are being managed in line with our Risk Management Policy.
- 8.2 ER1 - Not having an appropriately skilled workforce with the right competencies for current and future business needs.
ER2 - Failing to deliver an effective employee base.
GLR6 – Failing to adhere to Equality and Diversity legislation, ensuring a diverse workforce and providing inclusive services that value differences of our customers.

GLR7 – Failing to ensure DFPR / Data Protection compliance.

9 Legislation and other documents

9.1 We will ensure that this policy complies with all relevant legislation and takes account of current best practice.

- Equality Act 2010 and other relevant legislation.
- General Data Protection Regulation (GDPR).
- Data Protection Act 2018.
- [Adoption Leave Policy](#)
- [Choice Based Lettings Policy](#)
- [Code of Conduct](#)
- [Dignity at Work Guidance](#)
- [Equality and Fairness in Contracts](#)
- [Fertility Treatment Policy](#)
- [Flexible Retirement Procedure](#)
- [Learning and Development Policy](#)
- [Maternity Leave Policy](#)
- [Maternity Support and Paternity Leave Policy](#)
- [Menopause Policy](#)
- [Procurement Procedures and Guidance](#)
- [Recruitment and Selection Procedures](#)
- [Recruitment Policy](#)
- [Resident Involvement and Scrutiny Plan 2020 to 2025](#)
- [Transgender and Gender Reassignment Equality Policy](#)