Equity, Diversity and Inclusion Policy

Policy reference	FV-POL-ED1
Version number	3
Date applies from	November 2022
Policy owner	Head of EDI
Next review Date	November 2025

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

UNCONTROLLED IF PRINTED

Aim of policy

ForHousing aims to provide employment opportunities, housing and other services that challenge inequity, promote diversity and empower people and communities to improve their circumstances and fulfil their potential. This Policy supports this ambition by aiming to increase equity of opportunity, address division and discrimination, and recognise ForHousing's responsibility in creating a diverse and inclusive environment in which everyone can thrive.

This Policy aims to ensure that equity, diversity and inclusion (EDI) is a guiding principle in everything we do, with everyone, including tenants, customers, colleagues and Board Members, treating each other with respect. This is required to ensure that no individual or group of people with shared characteristics is treated less favourably and that the benefits of diversity to ForHousing and our workforce and communities are realised.

This Policy applies to all tenants, customers, colleagues, agency staff, contractors, our supply chain and other stakeholders of ForHousing. It aims to help colleagues understand their responsibilities in implementing ForHousing's EDI ambitions.

What is equity? Equity is the fair treatment of all people, including the identification and elimination of barriers that have prevented equal opportunities and advancement for some.

What is diversity? Diversity is the creation of communities between people with different perspectives, work and life experiences, and cultural differences.

What is inclusion? Inclusion is the organisational effort that provides us with a sense of belonging - where all contributions and opinions are valued, and people can be themselves. Equity, diversity and inclusion are different and need to be applied together. Understanding and reducing inequity will only be achieved when we value difference and work together to create more inclusive environments.

Related Legislation and Regulation

The Equality Act (2010)
The Regulator of Social Housing – Equality Objectives (2020)
National Housing Federation Code of Governance 2020

Policy

ForHousing recognises that tenants, customers, colleagues, Board Members and partners come from many diverse backgrounds, bringing with them different experiences, opinions, strengths and needs. We celebrate the diversity that every person brings to ForHousing and recognise the benefits increasing diversity among our workforce, supply chain and partnerships will bring to the organisation and our ability to find innovative solutions to achieve our mission of making more things possible for more people.

We recognise that all people must be protected from discrimination, victimisation and harassment on the following grounds:

- Age
- Disability
- Gender identity
- Marital / civil partnership status
- Pregnancy / maternity
- Race / ethnicity / nationality
- Religion or belief
- Sex
- Sexual orientation

In-line with our organisational approach to EDI, which has been developed collaboratively with colleagues and involved tenants, ForHousing will also ensure that people do not experience disadvantage due to their socio-economic background or circumstances, educational attainment, employment status, digital exclusion, or wider determinants of inequity - irrespective of whether these related to one of the legally protected characteristics that are listed above.

ForHousing is actively working to embed EDI in everything we do and to centre equality considerations at the heart of our decision-making. We will adopt and maintain the following practice to identify and remove systemic and organisational barriers to equity of opportunity and maximise the benefits of EDI:

- Ensure EDI is driven from the top through strong leadership from the Board and ForHousing Executive Management Team (EMT), within a coherent and functioning EDI governance structure
- Create meaningful vehicles for the staff voice, amplifying and providing appropriate platforms for the voice of colleagues from under-represented and minoritised groups
- Involve tenants in shaping and scrutinising services, developing bespoke engagement opportunities for lesser-engaged and seldom-heard people and communities
- Ensure EDI informs business planning, investment decisions, the design and delivery of value for money services, procurement and relationships with partners, suppliers, contractors, tenants, customers and communities
- Consider the principles of inclusive design in all organisational functions, to increase accessibility for all people and reduce unnecessary retrofitting or adaptations
- Ensure all language, imagery and publicity is accessible, inclusive and representative of diverse communities and provide information in alternative formats if required
- Undertake meaningful equality analysis as part of inclusive decision-making, follow the Inclusive Decision-Making Framework for organisational changes, support colleagues and embed learning across the organisation
- Improve quality of tenant EDI monitoring data and use to substantiate tenant customer insight and develop fair and accessible services to existing and future tenants and customers
- Work with partners and the communities ForHousing serves to advance equity of opportunity, foster good relations between different groups, eliminate discrimination, and tackle harassment, hate incidents, hate crime and domestic violence
- Support a diversity enriched culture, both in work and the community. Including improving the quality of applicant and staff data we hold and removing barriers and addressing biases in recruitment and selection, to achieve colleague and Board profiles that reflect the communities we serve
- Ensure EDI shapes ForHousing's culture through colleague development and engagement

- Ensure that our aims and ambitions around EDI are transparent and well communicated, informed by good practice, up-to-date sector knowledge and a detailed understanding of our own areas for improvement
- Ensure that adequate resources are made available to fulfil the objectives of this Policy.

Equity statement

We value diversity and work hard to create an environment of inclusion and equity for our customers and colleagues. We welcome the requirements to comply with various legal and regulatory requirements that relate to equity, diversity and inclusion and aim to do more.

Through our activities we expect to eliminate all forms of discrimination, harassment, and victimisation. By fostering good relations with all stakeholders, we will tackle prejudice, systemic barriers that people face and promote equity.

We will make reasonable adjustments to this policy to ensure individual requirements are met and staff can fully meet their potential.

How the policy will be delivered

Board Members and ForHousing's Executive Management Team are responsible for ensuring that ForHousing takes every opportunity to challenge inequity, promote diversity and empower people and communities, and are responsible for the consistent application of this Policy. In addition to supporting ForHousing's EDI ambitions and ensuring that EDI efforts are appropriately resourced, the Board will provide leadership and visibility around EDI, including a demonstrable commitment to their own development and learning in this area.

Managers are responsible for setting a good example by their own behaviour, to ensure colleagues, involved tenants and other customers understand the standards required at ForHousing, intervening promptly to stop any form of unacceptable behaviour and escalating any EDI-related issues, as required. Managers must recruit to and manage their teams fairly, working to recognise disparities in team opportunities and seek advice and develop their own understanding to address these.

All colleagues are responsible for their own behaviour and actions ensuring that they adhere to this Policy and challenge unacceptable behaviour in the course of employment. Colleagues are responsible for completing mandatory training and raising or escalating any EDI-related issues that they become aware of in the delivery of their role.

If colleagues become aware that there are problems with effective operation of this Policy, they should report this to the Policy Owner. This feedback will be incorporated into the policy and procedural review process.

ForHousing will ensure that tenants (under the tenancy agreement) and involved customers (under the relevant code of conduct and LIVEIT Framework) are aware of their EDI responsibilities.

ForHousing will ensure appropriate training, guidance and advice is provided to deliver this Policy.

Related documents

- HR Policies and Contract of Employment
- LIVEIT Framework
- Tenancy Agreement
- Procurement Policy
- Anti-Social Behaviour Policy
- Domestic Abuse Policy
- Safeguarding Policy

Inclusive Decision-Making Framework (IDMF) analysis

Date of approved IDMF analysis	13.12.2022
Actions taken forward to mitigate any potential negative impact	No mitigations are required, as positive equality impacts were identified across all characteristics. Additional determinants of equity, such as educational attainment, employment status and digital exclusion have been added to expand the reach of this Policy. Impactful communications and robust monitoring through the established channels are required to ensure positive impacts are realised.

Data Protection Impact Assessment

Data Protection Impact Assessment (DPIA)

Under the UK GDPR and the Data Protection Act 2018, you are required to carry out a DPIA when developing or reviewing a Policy or Procedure that will have a widespread or serious impact on data held on individuals. Careful consideration should be given as to whether the policy or process will have an impact on any processing of personal information that is large scale, involves profiling or monitoring, decides on access to services or opportunities, or involves sensitive data or vulnerable individuals. Information and support regarding this can be obtained from the Data Protection Officer (DPO).

Has a DPIA been completed?	Yes
If a DPIA has been completed, was the DPO consulted?	Yes

If a DPIA has been completed, were any risks identified?	Yes
If risks were identified as part of the DPIA process, have mitigation actions been identified?	Yes – see DPIA risk assessment

Consultation and business intelligence

This policy is informed by consultation with staff and tenants, as part of the development of the Equity, Diversity and Inclusion Strategy 2022-2025.

Engagement and review of the Policy has also been conducted by the EDI Excellence Group and the Staff Forum.

Business intelligence used to inform the Policy includes staff and tenant monitoring information, staff and tenant satisfaction surveys and tenant insight measures.

Monitoring arrangements

We will collect, analyse and monitor diversity information in relation to recruitment and selection and our staff and tenant populations. Monitoring will be used to ensure that our policies and activities are fair, transparent and promote equity of opportunity and so that we can monitor progress towards being more representative of the communities in which we serve.

Monitoring information will be used to help us understand where we might need to do things differently to maximise equitable outcomes in areas such as recruitment and staff development and retention. It will help shed light on potential barriers or biases within our processes and practices that could disadvantage people with shared protected characteristics, and therefore will help us develop bespoke EDI interventions where these will have the most impact.

EDI information overlaid on operational data dashboards across the organisation will provide tenant insight and will contribute to equality analysis of service delivery. EDI analysis of HR data dashboards will be reported at every People Committee, and staff satisfaction with be further monitored via EDI analysis of the bi-annual staff wellbeing survey.

This data will inform and improve employment practices, service delivery and partnership working. If through monitoring any discrimination is identified, ForHousing will take necessary corrective actions to eliminate it. The Inclusive Decision-Making process will be completed on all strategies, policies and changes regarding EMT approval. This process will be supported and monitored by the EDI Excellence Group.

No information will be published or used in any way that allows any individual to be identified. Individuals can request to have equality information that they have provided to be removed at any time.

Policy summary for the intranet

This Policy outlines ForHousing's approach to Equity, Diversity and Inclusion, and the practice we are committed to follow to embed EDI in everything we do and centre equality considerations at the heard of our decision-making.

Words linked to this policy for intranet searches

Equity, equality, inequality, inequity, diversity, diverse, inclusion, inclusivity, equalities legislation, Equality Act, Equality Act 2010, Public Sector Equality Duty, PSED, discrimination, harassment, victimisation, equal opportunities, respect

Where this policy should be accessible

- ✓ ForHousing owned
- ✓ ForHousing managed

Control data and approval history

Action	Approved by	Date
Approval	Relevant lead or director	18.10.22
Approval	Executive Management Team representative(s)	07.11.22
Approval	Relevant board / committee	15.11.22
Inclusive Decision-Making Framework review and advise	Relevant director	15.11.22
Health and Safety review and advise	Health and Safety	N/A
Data protection impact assessment	Data Protection Officer	26.04.23
Legal review and advise	Legal Services Executive	N/A
Human Resources review and advise	Human Resources (Trade Union and staff consulted when required)	N/A

Annual check history

Date annual check completed	Version number	Non substantive changes (Where non-substantive changes have been made the policy/procedure will have a minor version number, for example V1.1)

Document revision history

Date approved	Version number	Version history
2.6.16	V1	• New Group Policy
Date amended	**Version number**	**Key changes**
March 2019	V2	• Now called Equality, Diversity and Inclusion Policy- added 'Inclusion' • Added 'Tenant' • Updated SMT with GELT • Explanation about 'Inclusion' and ED&I • Added an ED&I statement • Ref to GDPR and collecting profiling
November 2022	V3	•To bring the policy in-line with ForHousing's approach to EDI •Updated the language of the policy to make it more inclusive, including removing terms that can have negative connotations for minoritised groups (such as 'profiling') •Bring in a focus in the policy, not just on managing risk, but also maximising the opportunities associated with equality •Update the actions detailed in the policy, so these reflect progress over the last 5-years and changes in level of understanding, prioritisation and ambition •Strengthen messaging around the positive responsibility on the organisation in relation to equality, as well as for different staff groups •Increase messaging around ambition and accountability •Update to reflect new monitoring processes, progress on data collection, and groups, etc. •Update with new legislation, regulations, etc. •Add information on related internal documents, etc.