

## Equality and Diversity Policy

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Policy author/policy holder: Chief Executive  
Effective date: 26 January 2017

Approved by: KHG & KHA Boards  
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### 1 :: Purpose and anticipated outcomes

Our aim is to make sure that our residents, other service users, staff and the communities we serve are treated fairly, equitably and with respect. Through our Equality and Diversity Policy, we aim to prevent discrimination in any aspect of our work, to advance equality of opportunity, promote good relations and to comply with legal and regulatory requirements.

We want every customer and member of staff to feel that:

- they are valued and treated with courtesy and respect regardless of their background, beliefs or personal circumstances
- they get equal access to our services and to the opportunities we offer and that we make reasonable adjustments where we can to meet their needs
- they trust us as an organisation that really listens, understands their needs and does its best to meet them
- they know we welcome contributions and ideas from everyone to improve our service delivery and are committed to listening and responding to all suggestions.

### 2 :: Scope and definitions

The Equality and Diversity Policy applies to every company in the Knightstone Housing Group and covers all aspects of our work:

- as a provider of housing and supported housing services
- as a housing developer
- as an employer and
- as a purchaser of goods and services.

We expect all Board and Committee members, residents who sit on any of our formal resident involvement groups, staff of all companies within the Group and volunteers to comply with the Policy.

We also expect organisations that work with us, such as contractors, consultants and managing agents to have their own equality and diversity policies and to be able to demonstrate how they put them into practice. We make this a condition of tenders and test compliance through our contract and performance management processes on all major contracts.

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The main types of discrimination defined in the Equality Act 2010 are: direct, indirect, harassment and victimisation:

- direct discrimination - treating a person less favourably than another person because of a protected characteristic
- indirect discrimination - where a condition or requirement is applied which, although applied equally, has a disproportionately adverse effect on people with a particular protected characteristic
- harassment – treating people in a way that violates their dignity, or creates a hostile, degrading, humiliating or offensive environment
- victimisation - treating someone unfairly if they are taking action under the Equality Act (like making a complaint of discrimination) or supporting someone else who is doing so.

The Equality Act also covers associative and perceptive discrimination. These are types of direct discrimination: associative is discriminating against someone because they associate with another person who possesses a protected characteristic and perceptive is where a person is discriminated against because others think they possess a particular protected characteristic. It applies even if the person does not actually possess the characteristic.

The nine protected characteristics of the Equality Act are:

- age
- disability
- gender
- gender reassignment
- race
- religion or belief
- sexual orientation
- marriage and civil partnerships
- pregnancy and maternity.

### **Public sector equality duty**

There are two ways that a body can be subject to the general equality duty. Those bodies listed in Schedule 19 of the Equality Act 2010 are subject to the general duty. In addition, any organisation which carries out a public function is subject to the general duty. In this situation, the duty will only apply to the organisation's public functions, not to any private functions it carries out

Under the equality duty, registered providers of social housing are not listed for the general equality duty (under schedule 19 of the Equality Act 2010). They are therefore not listed for the specific duties (under Schedule 1 of the specific duties regulations).

The general equality duty does apply to certain private or voluntary sector bodies when they are carrying out public functions. This is where an organisation is exercising a function which would otherwise be exercised by the state and where individuals have to rely upon that person for the exercise of that function. This applies to 'any person who has functions of a public nature.

Therefore, the general equality duty applies only to public functions, not to everything that we do. Examples of public functions include: allocation of housing, transfer and exchange of properties, setting rent levels, complaints procedures, tenant participation, consulting and informing tenants, setting terms of tenancy, and the termination of tenancies. It also includes the establishment and application of policies and procedures regarding anti-social behaviour and parenting orders.

### **3 :: About this Policy**

Every company in the Knightstone Housing Group shares a commitment to equality and diversity. We believe that access to housing and the services we provide and to work opportunities should be based on merit, equality, fairness and need. No-one should be treated less favourably on the basis of sex and sexual orientation, gender reassignment, race, religion or belief, disability, age, marriage and civil partnership, pregnancy and maternity. We expect everyone who works for us or with us to share this belief and to support us in trying to achieve this goal.

To help achieve this, we:

- adopt policies, procedures and working practices that assist in creating equality of opportunity and promoting good relations between different groups of people
- provide training for our staff, Board members and resident volunteers
- implement our Equality and Diversity Strategy and plans and monitor our progress against them
- record and analyse access to and satisfaction with our services by diversity group (where this information has been provided) and take appropriate action if we find significant differences
- make sure that people who work with us, such as contractors, are aware of our commitment to equality and diversity and check that they comply with their policies and put them into practice
- take account of equality and diversity issues when we make decisions about changes to our services or employment practices
- take action when we consider that a member of staff, a resident or service user or someone who works with us has acted in a way which is not in keeping with our Equality and Diversity Policy or has caused unlawful discrimination or harassment
- investigate and respond whenever anyone thinks we have not complied with our own Policy and have failed to provide equality of opportunity.

## 4 :: Service standards, monitoring and review

### 4.1 Equality and Diversity Strategy and Plans

The Group has an Equality and Diversity Strategy. The Strategy was approved by the Boards in November 2016. It sets out the areas of our Business Plan with a specific impact in terms of equality and diversity and our plans.

The Equality and Diversity Strategy was developed with input from residents and staff.

Progress in delivering the Strategy is monitored by the Executive Leadership Team who are accountable to the Boards. The Boards review progress on an annual basis.

### 4.2 Responsibility and Accountability

The Chief Executive has a duty to ensure that the policies, procedures and practices of all companies in the Group reflect the Equality and Diversity Policy. The Chief Executive is accountable to the Boards in this regard.

The Chief Executive delegates to each Executive Leadership Team Director, specific responsibility for making sure that the Equality and Diversity Policy is implemented effectively in their functional areas. They are accountable through the Chief Executive to the Boards for ensuring that service standards, planning and service delivery take account of equality and diversity issues, that impact assessments are carried out and that outcomes are monitored.

All Service and Team Leaders are responsible for making sure:

- their staff, residents involved in formal representative groups and volunteers receive appropriate training and understand their responsibilities
- they take equality and diversity impacts into account in decision-making, service and project planning
- they analyse access to and satisfaction with the services they lead and take action to address any significant differences.

Every individual in the Group: staff, involved residents and volunteers has a duty to uphold the Equality and Diversity Policy, by:

- acting and behaving at all times in a way that supports the principles of the Policy,
- treating all customers, colleagues and members of the public with respect and courtesy,
- complying with policies and procedures relating to equality and diversity and
- challenging discrimination or bringing suspected breaches to their line manager's attention.

Breaches of the Policy are taken seriously and can result in disciplinary action up to and including dismissal for staff or barring from resident involvement activities for residents.

### 4.3 Standards

In the majority of our policies, procedures and working practices, both as an employer and a provider of services, we exceed the legal requirements. As a minimum, we aim to comply at all times with the letter and the spirit of the relevant legislation and Codes of Practice. In particular, we aim to comply with the Equality Act 2010 and relevant employment and housing-related legislation.

#### 4.4 Review Period

The Equality and Diversity Policy is reviewed every three years or sooner if necessary because of major changes in legislation. The Chief Executive is responsible for ensuring the review takes place and reported to the Boards.

#### 4.5 Complaints

Any member of the public, resident, homeowner, service user or member of staff can complain if they believe that the Equality and Diversity Policy has not been applied properly. All complaints are taken seriously and investigated promptly.

Information on how to make a complaint is available on Knightstone's website: [www.knightstone.co.uk](http://www.knightstone.co.uk). Alternatively, complaints can be made by phoning, emailing or writing. Complaints will be dealt with under the Complaints Policy and procedure.

Volunteers can complain by following the *Community Volunteer Grievance Procedure*.

Members of staff can use the Grievance Procedure.

### 5 :: Legal considerations

Equality Act 2010  
Equality Act Codes of Practice  
Housing and Regeneration Act 2008  
Localism Act 2011

### 6 :: Linked/associated policies and other references

Equality and Diversity Policy Statement  
Equality and Diversity Strategy  
Housing Services Manual  
Supported Housing Manual  
Development Manual  
Maintenance Manual  
HR Policies and Procedures (including Recruitment Policy)