



# NLM Housing Association

## Equality, Diversity and Inclusion Policy

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## **Policy: Equality, Diversity and Inclusion**

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# Equality, Diversity and Inclusion Policy

## 1. Policy Statement

- 1.1 NLM believes that living and working in diverse communities is a life-enhancing experience. We value the differences within our diverse workforce that enable us to deliver a better service to our customers.
- 1.2 We recognise that people are discriminated against because of race, colour, ethnic or national origin, sex, marital status, disability, sexual identity, age and religious belief. We have introduced measures to combat discrimination in both our service delivery and employment practices.
- 1.3 We seek to exceed legal and regulatory requirements on equality of opportunity by doing more than simply ticking the boxes. We do this by putting diversity at the heart of what we do and how we behave. Valuing diversity is part of the core values at NLM.
- 1.4 We are firmly committed to making sure the organisation and communities we serve are places of equality, diversity and inclusion, recognising that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our social purpose which is at the heart of everything we do. We aim to have a positive impact on people's lives by delivering excellent service and looking after the wellbeing of our staff. But our social purpose is undermined if we fail to promote equality, diversity, and inclusion.
- 1.5 We will ensure that equality is embedded in all our activities, policies and decisions and will work with colleagues, our residents, partners and stakeholders to share good practice.

## 2 Purpose of Policy

- 2.1 The purpose of the Equality, Diversity and Inclusion Policy is to set out NLM's commitment to an inclusive and supportive environment for our employees, residents, partners and contractors that is free from discrimination. This enables all to participate and where everyone has the opportunity to fulfil their potential.
- 2.2 NLM is committed to embedding diversity and inclusion in all our business functions. Defining Diversity and Inclusion means
  - **Equality** is about ensuring that every individual has an equal opportunity to make the most of their lives and talents and believing that no one should have poorer life chances because of where, when or whom they were born, or because of other characteristics. Promoting equality is about behaving in a way that tackles inequalities, aiming to ensure that all staff and service users are treated fairly, and do not experience discrimination.
  - Promoting **diversity** is about recognising that everyone is different and creating a working environment that values each customer and employee ensuring that services are delivered that suit all sections of

the community. We are made stronger by having a diversity of experiences among our people and residents

- **Inclusion** is about positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential. We adapt our services so that no one is excluded or ignored.

- 2.3 The Policy promotes positive attitudes towards inclusivity and valuing diversity. It seeks to ensure that all who are subject to NLM's policies, practices and procedures are treated fairly and not less favourably on the grounds of any of the protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.
- 2.4 Equally, the Policy sets out NLM's expectation, where each of us has a responsibility to adhere to and uphold the principles of equality, diversity and inclusion.
- 2.5 Our commitment to an inclusive and diverse community is embraced by our Board and informs all our activities and their impact on our residents, employees and stakeholders.

### **3. Performance Monitoring and Responsibilities**

- 3.1 The Senior Management Team is responsible for:
- leading and supporting the organisation in creating an inspirational inclusive and diverse environment and ensuring NLM meets its legal, statutory and regulatory obligations relating to equality.
  - ensuring an effective policy and service provision infrastructure is in place to support NLM in meeting both its legal responsibilities and fulfilling its Equality, Diversity and Inclusion vision.
  - ensuring that equality analysis is carried out on all policies, proposed policies and decisions where appropriate.
- 3.2 Managers are responsible for:
- fostering a culture in which equality, diversity and inclusion considerations are embedded into their work areas.
  - ensuring that residents are enabled to access excellent service that is consistently high quality and free from discrimination.
  - encouraging and enabling staff to reach their full potential by identifying appropriate development to meet their needs.
  - ensuring procedures relating to staff recruitment, selection, performance management, career development grievance and discipline are carried out in accordance with the statutory duties to promote equality, eliminate discrimination and in the spirit of this policy.

### 3.3 Human Resources is responsible for:

- providing advice, guidance and support on this strategy
- supporting managers in ensuring that procedures relating to staff recruitment, selection, career development, performance management, discipline and grievance are carried out in accordance with the statutory duties to promote equality and eliminate discrimination and in the spirit of this strategy
- advising colleagues in addressing equalities-related employment issues

### 3.4 All Employees are responsible for:

- upholding the principles of this strategy and actively promoting equality of opportunity, diversity and inclusion in the workplace and with residents
- contributing to a safe and inclusive environment that celebrates diversity.

## 4. The Policy – Principles

### 4.1 At NLM, we aim to:

- Prevent discrimination, eliminate prejudice, promote inclusion and celebrate diversity.
- Be fair in our dealings with all people – board members, staff, residents, volunteers and partners – with whom we have relationships considering the diverse nature of their culture and backgrounds
- Ensure Equality, Diversity and Inclusion is embedded in everything we do.

## 5. Scope

5.1 Our Policy applies to everyone who receives a service from us, forms part of our governance, is employed by us or volunteers their services. We will also seek to ensure that anyone who works on our behalf demonstrates commitment to Equality, Diversity and Inclusion.

5.2 The Policy will help us deliver our vision of being a top performing, customer driven business, making a positive contribution to supporting diverse and cohesive communities. It underlines our commitment to support sustainable communities by revitalising our neighbourhoods as well as developing as an open and inclusive organisation.

5.3 This Policy also aims to ensure that we comply with all our legal and regulatory responsibilities; current requirements as set out in the Equality Act 2010, Human Rights legislation and by the Regulator of Social Housing.

## 6. Our Commitment to Equality, Diversity and Inclusion

- 6.1 NLM is committed to achieving an inclusive and diverse workforce and to providing services that are accessible to all. We seek to embed equality and inclusion in all our practices and aim to establish an inclusive culture that celebrates diversity, is free from discrimination and based on the values of dignity and respect.
- 6.2 In applying this Policy we seek to create a working and lived environment free of bullying, harassment, victimisation and unlawful discrimination. We will promote dignity and respect for all and seek to create an environment where individual differences and the contributions of all staff, residents and those for whom we provide a service are recognised and valued.
- 6.3 NLM's employment and operational practices, policies and procedures seek to ensure that no employee, potential employee or resident receives less favourable treatment on the grounds of any of the protected characteristics. These are defined and explained as:
- **Age** – people of all ages are protected under the Equality Act 2010. Some acts of direct or indirect discrimination can be justified if it is 'a proportionate means of achieving a legitimate aim.'
  - **Disability** – a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. There is a duty to make reasonable adjustments to assist in overcoming the disadvantages of the impairment. Individuals are also protected from discrimination arising from something connected with their disability where it could be reasonably expected that NLM would know that the person has a disability. It is also unlawful in most circumstances to request information about the health of job candidates prior to making a job offer. Employees who are disabled or become disabled are encouraged to inform NLM accordingly so that appropriate support can be explored.
  - **Gender Reassignment** – transsexual people who propose to, start, or complete a process to change their gender regardless of whether this involves medical procedures are protected under the Equality Act 2010. An employee who is absent due to such procedures cannot be treated less favourably than if the absence was due to sickness, injury or some other reason.
  - **Marriage or Civil Partnership** – the Equality Act 2010 protects employees who are married or in civil partnerships from discrimination on account of this status.
  - **Pregnancy and Maternity** – female employees and applicants are protected against discrimination on the grounds of pregnancy and maternity during the period of pregnancy and any statutory maternity leave.

- **Race** – individuals are protected against discrimination on the grounds of colour, nationality and ethnic or national origins.
  - **Religion or Belief** – individuals are protected against discrimination on the grounds of their religion or lack of religion and belief or lack of belief. A religion can be any religion that has a clear structure and belief system. A belief can be a religious or philosophical belief that affects a substantial aspect of human life and behaviour. Political beliefs are not protected.
  - **Sex** – refers to both men and women.
  - **Sexual Orientation** – refers to bisexual, gay, heterosexual, and lesbian people. In some cases, there may be a genuine occupational requirement to select employees on the basis of certain protected characteristics because of the nature of the role.
- 6.4 NLM commits to go beyond the protected characteristics and will ensure that no employee or resident will receive less favourable treatment on the grounds of colour or ethnic/national origin, offending behaviour, mental health, social and employment status, domestic circumstances, political affiliation, or other characteristics.
- 6.5 We seek to actively promote best practice in diversity and inclusion across the organisation and to our residents. We will rigorously apply these in areas such as pay and benefits, terms, and conditions of employment, dealing with grievances and disciplinary issues, dismissal, redundancy, requests for flexible working, selection for employment, promotion, training, learning and development opportunities and services to our residents.
- 6.6 We expect our employees to conduct themselves in a manner which is in accordance with NLM's stated values of:
- Valuing people
    - Take our customers into the heart of all we do
    - We go the extra mile to ensure excellent service delivery
  - Taking Responsibility
    - We do what we say – deliver our commitments
    - Ensure we invest in the potential of our organisation
  - Acting with integrity
    - We believe and practice in being fair and ethical
    - We proactively do the right thing based on values and ethics
  - Working together
    - We listen to what our tenants, customers and stakeholders want
    - Trained and enthusiastic staff supported by a committed and knowledgeable Board
  - Being Innovative
    - Think consistently of ways to improve and add value
    - Raise standards and provide equality of opportunity for all

## 7. Translating Commitment / Policy into Practice



7.1 We will seek to bring alive our commitment to equality, diversity, and inclusion in everything we do.

7.2 To do this we will:

- Promote our equality, diversity and inclusion aims with our staff, Board, residents, partners, other stakeholders. We promote in our published documentation, on our website and in all other activities and responsibilities.
- Comply with all legal and regulatory requirements which apply to the Equality Act's protected characteristics (see definitions) and any regulations by the Regulator of Social Housing.
- Ensure that staff are aware of their responsibility in implementing this policy and offer training to enable understanding
- Expect compliance with and commitment to this policy, acting for non-compliance and taking appropriate action to deal with discrimination, harassment, and victimisation by or against staff, Board members, residents, partners, and stakeholders.
- Ensure that the Board, and the Senior Management Team are accountable for the embedding of our approach to equality, diversity, and inclusion and for monitoring our performance.
- Take all reasonable steps to ensure our partners, suppliers and groups connected to us are actively committed to Equality, Diversity, and Inclusion principles.
- Actively encourage customers and staff to engage with us in shaping the organisation and its services.
- Ensure that colleagues comply with our policies on hate crime and harassment, promoting community cohesion in our neighbourhoods.
- Ensure that our commitment to equality, diversity and inclusion is plainly communicated in all policies and procedures and clear in our practices.

## **8. Complaints**

8.1 We will ensure that employees who believe they have received treatment contrary to the principles of this policy can have their grievances dealt with quickly and confidentially in accordance with the Grievance Policy.

8.2 We will ensure that any resident, contractor, volunteer etc. making a complaint due to any incident which occurs contrary to this policy will have such complaints dealt with quickly and confidentially in accordance with our Complaints Policy.

## **9. Legislation and Regulation**

9.1 The legislation listed in this policy is not intended to cover all legislation applicable but was considered at the time of the development of this policy.

Any subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered, and the policy reviewed and adopted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy. Any queries relating to the applicable legislation should be directed to the policy author.

- 9.2 To meet the required RSH Governance & Financial Viability Standard outcome on adherence to all relevant law, NLM will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate
- 9.3 This policy takes into account recent employment legislation and guidance and relevant terms and conditions of employment including the Equality Act 2010.

## **10. Equality and Diversity**

We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

## **11. Review**

We will review this policy in 3 years as a minimum, or sooner if there is a specific legislative, regulatory, or service requirement or change in guidance, law, or practice.