



# Equality, Diversity, & Inclusion Policy

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## **POLICY SUMMARY**

At EPIC we are committed to promoting and encouraging equal opportunities both in the provision of services and in our employment practices. This policy sets out our vision for equality, diversity, and inclusion across EPIC.

### **1. APPLICABILITY**

The Policy applies to Board members, colleagues, agency workers, and contractors.

### **2. INTRODUCTION**

We are committed to promoting equality and preventing discrimination, both in the provision of services and in our employment practices. We value diversity and recognise the benefits of employing a diverse workforce in relation to our customer service and growth as an organisation.

Through our work in providing affordable housing, and as an employer, we will help ensure fair treatment for all members of the community, regardless of race, ethnic origin or nationality; gender; disability, whether mental or physical; religion; marital or family status; sexuality or sexual orientation; HIV status; age or physical appearance. We recognise that because some groups or people experience prejudice and discrimination, to make opportunities readily available, we have to make an extra effort. We will strive to ensure that no one receives less favourable treatment or is disadvantaged by any conditions, requirements, provisions criteria, procedures or practices that cannot be justified, or victimised for taking action against discrimination or harassment.

Our vision is that by valuing diversity and being inclusive it will enable the communities we serve to achieve highly.

### **3. MEETING HOUSING NEEDS**

- 3.1 We will liaise with statutory agencies to share their assessment of the housing needs of local communities, especially those groups facing discrimination so that these are recognised and prioritised.
- 3.2 We will regularly review how we can contribute to meeting these needs by using our existing stock or looking for opportunities to acquire new stock that meets the needs of our communities.
- 3.3 We will consider working in partnership with specialist agencies where we feel they are better equipped than ourselves to meet the needs.
- 3.4 In looking for opportunities to acquire new stock, we will ensure that the design of homes meets the cultural and other (security) needs of the households (where these are known) we are going to be rehousing.
- 3.5 In developing new homes, we will ensure that we follow guidance for people with disabilities (e.g., RNIB guidance for people with visual impairments), that all ground-floor accommodation is accessible to people in wheelchairs, and is developed to lifetime home standards.

#### **4. ACCESS TO HOUSING**

We will promote fair access to housing by:

- 4.1 Monitoring the allocation of our homes, including the quality of accommodation, to ensure that discrimination does not occur.
- 4.2 Ensuring that our priority system for assessing the rehousing needs of our own residents reflects equality principles.
- 4.3 Working with our local authority partners to eliminate any discrimination in the nominations of households for rehousing.

#### **5. OUR HOUSING SERVICE**

- 5.1 We will ensure that we consult all residents effectively (especially those facing discrimination), individually through surveys and through mechanisms such as residents' engagement groups to ensure that the housing service meets their needs.
- 5.2 We will ensure that tenant involvement and participation activities promote the full and active involvement of all groups of residents in residents' engagement groups and we will challenge residents voicing discriminatory views.
- 5.3 We will ensure that our complaints procedure is accessible to all, and feedback about the service given proper consideration.
- 5.4 We will not tolerate harassment of residents and will take the strongest possible action against perpetrators. We will be proactive in co-operating with other agencies in dealing with all forms of harassment.
- 5.5 We will provide appropriate means of communication such as the provision of an interpreting service and key information on alternative formats as required.
- 5.6 We will ensure that the housing service responds sensitively to the needs of vulnerable residents and direct support will be provided by the allocated Housing Officer. Where financially possible, extra services will be provided in response to the needs of vulnerable residents.
- 5.7 We will maintain up-to-date information on the translation or other communication needs of all residents.

#### **6. EMPLOYMENT AND TRAINING**

- 6.1 We will actively seek to ensure equality of opportunity and treatment for all current and potential employees.
- 6.2 We will conduct and monitor our recruitment in an open and accountable way and according to equal opportunities practices and will regularly review our practices to ensure fairness is evident at all stages.
- 6.3 We will seek to deal with any underrepresentation of particular groups among employees, including underrepresentation at Manager, Director, and Board level, and make full use of positive action provisions permissible within legislation.

- 6.4 We will prevent bullying, harassment, victimisation and unlawful discrimination of staff by other staff or residents and if and when it occurs take swift action to stop it. Such acts will be dealt with as misconduct under EPIC's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- 6.5 Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- 6.6 All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
- 6.7 We will seek to ensure that within our overall aim of gearing our training effort to meet the business needs of the organisation, we will regularly review the distribution of training opportunities to ensure that all staff are being treated fairly.
- 6.8 We will ensure that selection for employment, career development opportunities, access to benefits, facilities and services are fair and equitable and based solely on merit.
- 6.9 We will train staff to ensure everyone has a basic awareness of equality and diversity issues, as well as training to meet the specific needs of their post.

## **7. USE OF CONTRACTORS, CONSULTANTS AND PARTNER AGENCIES**

- 7.1 We will only use contractors, consultants and partner agencies who have an equality and diversity policy, which is broadly consistent with our own aims.
- 7.2 We will only use contractors in occupied dwellings who operate in line with our own values in relation to the treatment of our tenants. We will not give them any more work if there is a substantial and unresolved breach of these standards.
- 7.3 We will ensure that our selection of consultants and contractors is fair and non-discriminatory.

## **8. EPIC'S BOARD**

- 8.1 EPIC will try to ensure that our Board is fully representative of the local community by having an open and accountable recruitment process and by the use of positive action to recruit members from underrepresented groups.
- 8.2 Board members will be regularly briefed on equality issues and will receive regular monitoring reports on key areas of activity, both on service delivery and employment.

## **9. RAISING YOUR CONCERNS**

- 9.1 Colleagues are encouraged to speak to their line manager in the first instance, or a member of the Executive Team if the concerns involve their line manager, in relation to any concerns around equality, diversity and inclusion both in relation to our housing services and employment.

9.2 You can also refer to the Whistleblowing Policy, Bullying & Harassment Policy and Grievance procedure detailed in the Staff Handbook.

## 10. RESPONSIBILITIES

The roles and responsibilities of key stakeholders across EPIC are detailed below.

**The Board** – The Board have corporate responsibility for ensuring that this Policy underpins all aspects of EPIC’s work. Regular reports to the Board will include an update on equality and diversity issues, including relevant performance information.

**Executive Team** – The Chief Executive has responsibility for developing the organisational culture in which this Policy can operate effectively, and for ensuring that it is implemented. Directors are individually and corporately responsible for ensuring that the Policy is implemented in their particular area(s) of responsibility. The Head of Business Support Services is responsible for the operation, monitoring and review of this Policy in relation to employment and training.

**Colleagues** – All Staff have responsibility for ensuring that this Policy is put into practice. We expect a personal commitment from all employees in making it effective, and in setting an exemplary standard for others to follow. Additional and specific responsibilities apply to those who manage staff and to those who are involved in recruitment, training, and development. All members of staff have a contractual responsibility to:

- Ensure that they understand the values and benefits of equality and diversity.
- Familiarise themselves with this Policy, follow it, and ensure that any staff for whom they are responsible do so as well.
- Draw to the attention of their line manager any instances of apparent discrimination or harassment, or any perceived problem in relation to employment or to the provision of services.
- Try to understand other peoples’ points of view and help them understand yours.
- If you challenge others, do so in a respectful way.
- Be aware of different cultures and customs, and respect the benefits that diversity can bring.
- Respect confidentiality.
- Deal with others in an ethical and lawful way and with respect at all times.

## 11. TRAINING

This policy forms part of the standard induction for all new employees, including agency workers, contractors, and Board members and will be read within the induction period.

Regular training will be provided to all staff to ensure awareness of this policy is maintained at all times.

The policy will also be available to our tenants on our website and will be distributed with tender information and contracts for work undertaken for us by external organisations and individuals.

## 12. DATA VALIDATION, REVIEW AND MONITORING

Overall responsibility for monitoring the effectiveness of this policy lies with the CEO, Executive Team and the Board.

We will measure and report on the effectiveness of our service delivery and employee policies and processes in relation to these principles, by building performance monitoring and management

information and reporting on this on a regular basis. This information will be used to inform future policy changes and to enhance business processes.

### **13.EQUALITY AND DIVERSITY IMPLICATIONS**

- 13.1 This Policy sets out EPIC’s approach to Equality, Diversity, and Inclusion.
- 13.2 We will undertake an Equality Impact Assessment (EIA), which is captured as part of the policy template, albeit not referring directly to it as an EIA, but does provide space and the requirement for the policy owner to consider. EIAs are not a legal requirement, but it is recognised that they are an effective tool to help EPIC meet its responsibilities under equalities law. The principles of an EIA will be used that includes the nine protected characteristics as defined by the Equalities Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race and ethnicity, religion or belief, biological sex and sexual orientation.

The use of EIAs will support and help EPIC avoid discrimination, particularly indirect discrimination. Indirect discrimination is when a policy, process or action disproportionately disadvantages a protected group. For example, if employees are required to have 10 years of work experience in their field, this could be indirectly discriminating based on age. Young people who may be suitable for the role would be excluded due to this hiring policy decision. They are unable to realistically have 10 years’ experience due to their age.

- 13.3 We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which each individual can make. We will ensure our approach to accessing properties is considerate of people’s individual needs. We also adhere to the Equality Act 2010.
- 13.4 EPIC Housing recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or group of persons is treated with injustice due to their personal circumstances. EPIC will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.

### **14.MONITORING / REVIEW**

This policy will be reviewed every 3 years. A review may be conducted earlier if there are significant changes to either legislation or EPIC’s operating practices or data highlights a need to review the policy and working practices sooner.

### **15.ASSOCIATED DOCUMENTS**

- Whistleblowing Policy
- Bullying & Harassment Policy
- Disciplinary process
- Grievance process

### Version Control

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March 2023	Head of Business Support Services	1.0	New Policy	March 2026	Board