

# Broadway Living RP

## Equality, Diversity and Inclusion Policy

### 1 Policy purpose

- 1.1 To pro-actively eliminate all forms of discrimination, meet our legal and regulatory requirements and to encourage and grow diversity and its positive impact within our work.

### 2 Policy scope

- 2.1 This policy applies to customers, employees, contractors, consultants, suppliers, volunteers, Board members former staff and job applicants.
- 2.2 The policy applies to all activities undertaken either directly or indirectly by Broadway Living RP.

### 3 Background

- 3.1 Broadway Living RP are committed to welcoming and valuing diversity, promoting equality of opportunity and tackling unlawful discrimination. We will not discriminate against staff, customers, visitors, suppliers or others based on their sex, sexual orientation, marital status, pregnancy and maternity, gender reassignment, race, religion and belief, disability or age (collectively referred to as protected characteristics in this policy and the Equality Act 2010).
- 3.2 We recognise that certain groups in society may experience prejudice, discrimination and less favourable treatment on the grounds of their protected characteristics, and that this limits people's choices and chances in life.
- 3.3 As an employer and purchaser of goods and services in the areas in which we work, we have the ability to make a significant local impact through our commitment to diversity.
- 3.4 We will meet the requirements relating to equality and diversity laid down in the Equality Act 2010 by working to:
- eliminate discrimination, harassment and victimisation
  - advance equality of opportunity
  - foster good relations between all of our residents, service users and staff
- 3.5 We will also meet the requirements of the regulatory framework published by our regulator. Equality and diversity applies across all Standards, particularly the Tenant Involvement and Empowerment Standard.
- 3.6 We will:

- encourage a corporate culture where equality and diversity is treated as a key, integral value for the organisation
- eliminate all forms of unlawful discrimination in our business
- seek to ensure that our governing bodies and our workforce at all levels of the organisation mainly reflect the population we serve
- actively consult the diverse range of customers to ensure that their views form an integral part of the decision making process
- take prompt, responsive action in all cases of discrimination, bullying, harassment or victimisation
- strive to ensure communication actively promotes equality, is non-discriminatory, and is accessible to all
- influence our contractors, partners, consultants and suppliers to meet the highest standards of equality and diversity
- expect all employees, contractors, board and committee members, involved residents and resident Scrutiny Panel members to abide by this policy

## **4 Responsibilities**

- 4.1 Broadway Living RP and its Managing Agent will mainstream equality and diversity into our business and planning mechanisms so that decisions made are relevant to the needs and aspirations of the people we serve.
- 4.2 Our Board has overall responsibility for the effective operation of our equality and diversity policy and ensuring compliance with the statutory framework prohibiting discrimination. Members of the Board are individually and corporately responsible for ensuring that the policy is implemented.
- 4.3 Broadway Living RP's Executive team have day-to-day responsibility for operating the policy and ensuring its maintenance and review.
- 4.4 All staff are responsible for ensuring that the policy is incorporated into their work activities, in all their dealings with customers, colleagues and anyone else they come into contact with during the course of their employment or engagement. This includes work on our premises and in our properties, as well as work related social events, hospitality events, travelling and staying away from home while on business.

## **5 Homes and services**

- 5.1 In providing homes and services to existing and future residents of all tenures we will ensure that our policies do not discriminate and an assessment will be completed against each protected characteristic for each policy which identifies and addresses any areas of concern.
- 5.2 Where residents are suffering from harassment, threats of violence or unfair treatment at the hands of residents living in our homes, we will take action against the perpetrators in line with the tenancy agreement. We will also signpost and provide support to victims of harassment. See the Anti-Social Behaviour policy for more details.
- 5.3 We will make it easy for a resident to make a complaint about our services including any discrimination they have suffered as a result of our activities. Rectification and investigation will follow in line with our Complaints policy.
- 5.4 We aim to be aware of the diverse needs of our customers so that we can provide good quality new housing of the type and design that people need and also carry out an annual review of our lettings activities to ensure fair access to our homes. Where imbalances are identified, we will work in partnership with the relevant Local Authority to address those concerns.
- 5.5 Customers with disabilities may request reasonable adjustments inside their homes or in common parts and we will work with them to try and address their needs. This will include working with occupational health and partner organisations to recommend and fund a solution.
- 5.6 We will provide a range of opportunities for diverse customers and local community groups to have their say on decisions that affect them and scrutinise our performance. We will ensure that input from consultation is an integral part of the decision making process.
- 5.7 We will monitor customers' satisfaction across the range of our services and with the quality of their homes, with the aim of ensuring there are no significant differences across the strands of diversity.
- 5.8 We will ensure our services are accessible to all groups including meeting the requirements of the Equality Act 2010 to ensure that everyone can use the parts of our offices that are open to the public and that our website meets accessibility standards.
- 5.9 Where we are working on a wider community level, we will ensure that diversity is taken into account when planning events and we will involve all parts of the community in the process, including the celebration of diversity where it is key to a community activity.

## **6 Forms of discrimination**

- 6.1 Broadway Living RP will take prompt, responsive action in all cases of discrimination, bullying, harassment or victimisation. We will send out a clear message that harassment of any form will not be tolerated and will tackle all forms of harassment (including racial and homophobic harassment) promptly using a victim centred approach.
- 6.2 Discrimination can take different forms and includes the following:
- direct discrimination - where someone is treated less favourably because of their protected characteristic
  - indirect discrimination – as a result of a seemingly neutral provision, criteria or practice that disadvantages a people with a protected characteristic
  - associative discrimination - as a result of someone being associated with another person who has a protected characteristic
  - discrimination by perception - when someone is perceived to have a protected characteristic
  - dual discrimination - resulting from two separate protected characteristics victimisation. When someone is treated unfairly as a result of making or supporting a complaint of discrimination
- 6.3 We will use a range of methods to resolve harassment and victimisation based on discrimination, including those outlined in our Anti-social Behaviour policy. We will monitor cases, actions taken and outcomes.

## **7 Certain medical conditions**

- 7.1 We will ensure that a staff member or customer is not discriminated against, victimised or treated less favourably due to an illness such as HIV, AIDS and Cancer.
- 7.2 Information about the personal circumstances of staff members and customers with any of the above medical conditions will be handled according to our Data Protection policy and confidentiality will be maintained at all times. Information will only be passed to another staff member where it is necessary for the provision of care and support.
- 7.3 Staff will be mindful of the particular circumstances of people living with any of the above medical conditions, or indeed with any sensitive medical issue, when dealing with complaints of harassment. As with other forms of harassment, we will strive to pursue the perpetrators.

## **8 Contractors, consultants, partners and suppliers**

- 8.1 Broadway Living RP will ensure that consultants, contractors and partners are aware of the importance of equality and diversity to us and are required to comply with our equality and diversity policy when carrying out services for us. We will help them to understand the diverse needs of our customers in order that they are better equipped to provide an efficient service to all our service users.
- 8.2 We will require all significant contractors delivering services to our staff and residents to provide us with their equality and diversity policy and monitoring information on the diversity of their workforce.

## **9 Our people**

- 9.1 Broadway Living RP aspire to a diverse and inclusive workforce that has the skills to achieve the organisation's commitments and strategic goals. We aim to employ a workforce that reflects at all levels the diversity of many of the communities we serve. We are committed to ensuring that all staff have an equal opportunity to develop their potential and progress within the organisation and are treated fairly and without unlawful discrimination.
- 9.2 We will:
- comply with the Equalities and Human Rights Commission's Equal Pay and Employment Codes of Practice and other relevant guidance issued by the EHRC in relation to the Equality Act 2010
  - act within the framework of law and wherever practical, aim to achieve and maintain a diverse workforce which reflects the population of the local communities in which Broadway Living RP provide services
  - recruit, develop and promote staff on the basis of a fair, objective and rigorous assessment of competence and potential
  - ensure that our employment policies and management practices enable the retention of a diverse staff group
  - expect staff to treat all customers and each other fairly and with respect
  - provide diversity awareness training tailored to the needs of new staff, managers and 'front line' service providers
  - inform all our staff that they are required to follow the Equality and Diversity policy at all times
- 9.3 We will monitor staff satisfaction with Broadway Living RP's performance on diversity and will analyse these results across the protected characteristics and seek to act on key issues arising from this analysis.

- 9.4 We will produce BAME and gender pay gap information on an annual basis and put actions in place to address any imbalance identified.
- 9.5 Broadway Living RP will ensure no discrimination exists as a result of its conditions of employment/engagement, benefits and facilities and our grievance and disciplinary procedures will operate without unlawful discrimination.
- 9.6 **Genuine occupational requirement**  
Where a Genuine Occupational Requirement (GOR) exists, this means that an organisation can lawfully discriminate on the grounds of a protected characteristic and seek to appoint someone with a particular protected characteristic.
- 9.7 **Working environment and culture**  
We will actively promote and demonstrate through our behaviour that diversity is encouraged, and we will listen to views from a range of people representing different experiences. These views will be taken into account in the formulating of strategies and approaches to the running of the business.
- 9.8 The behaviours of everyone, but particularly those in senior management or other positions of influence will show that diversity is valued and all forms of discrimination are not acceptable. It will be clear from the actions we take that no one should fear speaking out about feeling threatened or intimidated because of their differences.
- 9.9 We will provide a working environment where harassment and offensive behaviour and discriminatory jokes are unacceptable and where individuals are able to bring complaints without fearing prejudice.
- 9.10 We will work to ensure that colleagues acting in good faith are not victimised for making a claim or complaint of discrimination; supporting others to make a claim by giving evidence or information; whistleblowing; or any other 'protected act' (Equality Act 2010). We will take disciplinary action against anyone committing any form of personal harassment as stated in our Disciplinary policy.
- 9.11 We recognise the need to balance personal and work life and that flexibility with regard to working patterns assists the broadest range of people.
- 9.12 **Employing people with disabilities**  
We aim to ensure that anyone with a disability is protected from any unlawful direct discrimination and, as far as possible, is not disadvantaged by his or her disability. If a staff member is disabled or becomes disabled in the course of employment with us, they are encouraged to tell us about their condition, which will enable us to support them as much as possible.
- 9.13 We are committed to doing everything reasonably possible to enable staff with disabilities to carry out their job. We will make any such adjustments, as far as

are reasonably practicable and proportionate, to ensure no disabled person is placed at an unreasonable disadvantage and to enable anyone who becomes disabled to remain in their job or to be redeployed to a suitable alternative position.

- 9.14 These adjustments may apply to the working environment, working practices, role responsibilities and to the terms and conditions of employment. There may be circumstances where it is not possible for us to accommodate any suggested adjustments in which case, we will ensure that we provide staff with information as to the basis of our decision.

## **10 Monitoring and review**

- 10.1 We will collect the necessary statistical data to ensure the effectiveness of this policy. We will report on progress against the policy objectives to the Executive, Board and Committees as appropriate.

## **11 Review**

- 11.1 This Policy will be reviewed as necessary and formally on a five yearly basis.

<b>Check</b>	<b>Date completed</b>	<b>By whom</b>
Risk map	25 March 2021	John Baldwin
Regulatory compliance	21 April 2021	Devonshires
Equalities impact assessment	25 March 2021	John Baldwin

Date policy approved: May 2021

Date policy due to be reviewed: May 2026