



Equality Diversity and Inclusion Policy and Statement (Feb 2024)

Version: [3]			
Lead officer	Claire Warren	Approval date:	23 July 2024
Approved by	Board of Directors	Review Date:	July 2025
Other relevant policies and/or procedures	<ul style="list-style-type: none"> • Board diversity and succession statements • Whistleblowing policy • HR strategy • Resident engagement strategy 		
Other relevant documents	EDI Strategy		

1. Purpose and Commitment

PFH is actively committed to promoting and embedding a culture of equality, diversity and inclusion. We are an organisation which values differences, where individuals can be their authentic selves. The aim is for our organisation to be truly representative of all sections of the society and communities we serve and for each member of our staff, residents, and other stakeholders to feel respected and valued.

PFH also has responsibilities under legislation, regulation and codes of governance including, but not limited to:

- the Equality Act 2010 (incorporating the Public Sector Equality Duty).
- the Human Rights Act 1998.
- the National Housing Federation Code of Governance 2020; and
- the Charity Commission and Regulator of Social Housing Regulatory Frameworks,

and any relevant amendments to such legislation or further codes/frameworks of practice.

2. Defining equality, diversity and inclusion

While the terms equality, diversity and inclusion often go hand in hand, they are not one and the same.

Equality is the fair and unbiased treatment of others, considering systemic and structural inequalities. This ensures equal opportunity and access for all groups which are protected by legislation.

Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they were born with or have acquired. These differences can go beyond the protected groups set out in legislation.

Inclusion goes further and is where people's differences are valued and used to enable everyone to thrive at work and in general. An inclusive working environment and service provision ethos is one in which everyone feels that they belong without having to conform, that their contribution matters, and they can perform to their full potential or participate and influence, no matter their background, identity, or circumstances. An inclusive organisation has fair policies and practices in place and enables a diverse range of people to either access services or work together effectively.

These terms are interdependent and go hand in hand in promoting a culture that is actively equal, diverse, and inclusive.

3. Duties under the Equality Act 2010

PFH is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation (as defined in the Equality Act 2010). The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion/belief
- Sex
- Sexual orientation

4. Duties under the Public Sector Equality Duty

PFH is mindful of its duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:

(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.

(b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

(c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

5. Other Duties

PFH also understands that diversity and risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010 and that it has a moral duty to address discrimination as an employer, a landlord and as a provider of services. We aim to tackle inequality in its widest sense, challenging discrimination based on a variety of social and cultural characteristics such as the protected characteristics above, but also including:

- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation
- any other matter which causes a person to be treated with injustice.

6. Our Objectives and Commitments

PFH has agreed a set of objectives and commitments that reflect our strategy for embedding an equal, diverse, and inclusive culture in the organisation. We have set these out in PFH's corporate plan and EDI strategy.

The strategy is our long-term commitment to equality, diversity and inclusion and progress will be reported regularly to board.

7. Review and monitoring

PFH has developed metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least annually, review and monitor our progress against our equality, diversity and inclusion commitments and objectives to ensure we are meeting organisational, legal, regulatory, and best practice requirements. We shall also use this information to ensure our services are accessible to all and free from discrimination.

We shall regularly, and at least annually, carry out workforce surveys relating to equality, diversity and inclusion and the working environment to ensure all data is as up to date as possible and to gain the views of all staff. These surveys will help to inform our progress against our commitments and objectives.

All data and information collected will be used to track progress and monitor performance on our equality, diversity and inclusion objectives and commitments. We shall also collect information to understand the different needs of our customers. This information will form part of our regular reporting to the Board. It shall also be used effectively to identify best practice as well as gaps and to tailor our approach in addressing these.

Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure PFH has the best quality of data to inform our progress on our objectives and commitments and to aid better decision making.

8. Accountability and Reporting

PFH will publish information about the work we have done to deliver on our equality, diversity and inclusion commitments and objectives, and the progress we have made within our annual reports. This information will include:

- *Progress reports on areas such as any schemes or initiatives we have implemented (e.g., equality schemes, plans or action plans)*
- *Performance on employment practices (e.g., recruitment, promotion, turnover, retention figures, grievances etc.)*
- *Progress report against objectives and commitments set*
- *An analysis of diversity statistics across key protected characteristics or disadvantages/underrepresented groups.]*

9. The Board's Role

The Board is dedicated to taking a clear and *active* lead in its commitment to achieve equality of opportunity, diversity, and inclusion. This is in all the activities of our organisation, including understanding the needs of our staff, residents and communities, as well as the composition of the Board and committee(s).

PFH recognises a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board shall provide leadership on this policy and, working with the Executive Team, ensure that it is implemented.

The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements. It shall seek regular updates on how PFH is meeting its commitments and objectives in relation to equality, diversity, and inclusion and how these are being delivered in practice and annually will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation.

All reports to the Board shall include appropriate and robust considerations of equality, diversity and inclusion issues. Equality, diversity, and inclusion shall regularly feature

as an agenda item for Board meetings and decisions shall be made with effective equality, diversity and inclusion analysis.

People with direct lived experience of (or insight into) the communities we serve shall also be meaningfully engaged in our governance structures.

10. Staff and contractors

All PFH staff and job applicants shall be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation regarding the protected characteristics set out in the Equality Act 2010 as well as membership or non-membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We shall also make reasonable adjustments where necessary to overcome any disadvantages due to disabilities.

All workforce related codes of conduct, policies, practices, and procedures shall reflect our values and commitments to equality, diversity and inclusion and our aims to recruit and retain a diverse and inclusive workforce reflecting the communities we serve.

PFH will not tolerate any forms of unlawful discrimination, harassment, victimisation or bullying.

All employees and board members are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the organisation. All our employees have a responsibility to champion our values of equality, diversity, and inclusion.

Acts of discrimination or harassment by employees or board members will result in disciplinary action, in line with the respective Disciplinary Policy and Procedure, failure to comply with this policy will be treated in a similar fashion.

Any external contractors, sub-contractors, agents or third parties providing services to, for or on behalf of PFH are responsible for complying with this policy and we shall take action against and actions of behaviours of non-compliance as appropriate

11. Board and committee recruitment

PFH is committed to ensuring that our Board's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve. Our Board recruitment and succession planning statements also reflect our commitment to achieving a diverse and inclusive Board.

12. Training

PFH is committed to ensuring all staff and board members receive appropriate equality, diversity and inclusion training on a regular basis and that all staff are aware of this policy. Equality, diversity and inclusion training forms part of our induction training programme and all new members will be made aware of this policy as part of

their induction. All staff and board members will regularly (at least every 2 years) receive refresher training on equality, diversity, and inclusion.

We are committed to providing unconscious bias and equality impact assessment training to all staff including those who are involved in the provision of housing services to our customers, management and recruitment decisions.

13. Commitments to Our Residents/Customers

PFH is committed to ensuring equality of opportunities in the provision of its housing services.

- Reviewing how our organisation can contribute to meeting a diverse range of local housing needs for older people
- Continuously monitoring allocations to ensure direct or indirect discrimination is not occurring.
- Working with local authorities to eliminate direct or indirect discrimination in the nominations processes; and
- Ensuring systems for housing or rehousing residents reflect equality principles.
- Ensuring all residents are treated with fairness and respect.
- Consulting with residents and obtaining their views particularly in relation to our equality, diversity, and inclusion commitments
- Ensuring any resident involvement and participation activities promote involvement from all groups of residents
- Ensuring procedures e.g., complaints procedures are clear, simple accessible to all, including using community languages where appropriate
- Zero tolerance on harassment of residents and pro-active working with other agencies to tackle all forms of harassment.
- Ensuring all forms of information and communication are accessible to residents (e.g., big text, audio tapes, translation, or interpretation services)
- Ensuring housing and associated services consider the sensitivities and needs of different groups including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs