



SAXON WEALD

EQUALITY, DIVERSITY & INCLUSION POLICY

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1.0 Introduction

- 1.1 Saxon Weald is committed to promoting and embedding a culture of equality, diversity, and inclusion (EDI) underpinned by a 'whole organisation approach'. This policy supports Saxon Weald in delivering its corporate values.
- 1.2 Equality, diversity, and inclusion affects all aspects of our business and, as such, its principles are integral to everything we do. As a charitable Community Benefits Society, we contribute to the social good of the communities we operate in and its people.
- 1.3 The aim is for our Board, Leadership Team, and colleagues to be, at the minimum, representative of our customers and the communities we serve. Evidence shows that having greater diversity, including background and life experience, brings different insights, creates challenge, and encourages change and innovation. This in turn produces better decisions and outcomes because we are more attuned to the needs and interests of colleagues and customers. We will ensure that Board Recruitment and Succession Planning policies also reflect our commitment to achieving a diverse and inclusive Board.
- 1.4 The principles of equality, diversity and inclusion are critical to Saxon Weald being an effective and successful housing provider, employer, and business. Our ambition is for equality, diversity, and inclusion to be embedded organisation-wide, in everything we do, including policy development, service delivery, procurement, decision-making, and employment.
- 1.5 We want our people to feel they can be themselves at work, valued for the perspective they bring and able to progress as far as their talents will take them – irrespective of their sex, gender identity, ethnicity, sexual orientation, disability, faith, age, or socio-economic background.
- 1.6 Saxon Weald will not tolerate bullying, harassment, sexual harassment, or victimisation of any kind by managers, employees, contractors, or anyone engaged to work with us. Any allegations will be taken seriously, investigated, and dealt with under the disciplinary procedure.
- 1.7 We know that continuous focus on ED&I will be required over the longer term to embed the right culture and achieve the transformation we want, and that everyone has a role to play in creating an inclusive culture and making Saxon Weald a truly great place to work.

2.0 Definitions

- 2.1 Although equality, diversity and inclusion are often used interchangeably, they have different meanings. The definitions used by the National Housing Federation (NHF) in their report 'Equality, diversity and inclusion – An insight review of housing association staff in England' are as follows:

Equality is the absence of discrimination based on a person's protected characteristics. The Equality Act 2010 was designed to legally put an end to all types of victimisation and to advance equality of opportunity.

Diversity is the recognition and value of difference between people. Diverse workplaces create cultures and practices that value the differences of their staff.

Inclusion refers to an individual's experience within the workplace and in wider society.

- 2.2 Whilst equality, diversity and inclusion are different, they need to be progressed together as one cannot exist without the other.
- 2.3 The Equality and Human Rights Commission state 'Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents. It is also the belief that no one should have poorer life chances because of the way they were born, where they come from, what they believe or whether they have a disability. Equality recognises that historically certain groups of people with protected characteristics such as race, disability, sex, and sexual orientation have experienced discrimination.'
- 2.4 Disability as described in the Equality Act, is a physical or mental health impairment that has a 'substantial' and 'long-term' negative effect on a person's ability to carry out or participate in normal day-to-day activities.
- 2.5 A substantial effect is one that is more than a minor or trivial effect. Where an impairment is subject to treatment or correction, the impairment is to be treated as having a substantial adverse effect if, but for the treatment or correction, the impairment is likely to have that effect.
- 2.6 Long term is an impairment which has lasted at least 12 months or is likely to last 12 months or last the rest of the life of the person affected.
- 2.7 **Direct Discrimination** is treatment of an individual or group less favourably than others, and this treatment is because of a protected characteristic. An example of this would be to refuse to employ somebody for example, because of their ethnicity, or if they had an impairment, which had no relevance to their ability to carry out the job they had applied for.
- 2.8 **Associated Discrimination** is direct discrimination against someone because they are associated with another person who possesses a protected characteristic. For example, a person is discriminated against because they need to take care of a dependent with a disability.
- 2.9 **Discrimination by Perception** is direct discrimination against someone because others think they possess a particular protected characteristic. They do not have to possess the characteristic, just be perceived to. For example, a person is not

shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct visa to work in the UK as they have a foreign looking name.

2.10 **Indirect Discrimination** is when an apparently neutral requirement or condition impacts adversely or has a disproportionate effect on a particular equality group. An example of this could be holding meetings at times which are inconvenient for people with childcare responsibilities and not providing crèche facilities.

2.11 **Bullying** is offensive, intimidating, malicious or insulting behaviour and/or an abuse or misuse of power that is meant to undermine, humiliate, or injure the person on the receiving end. It is often an expression or abuse of power designed to intimidate employees who are subordinate to the bully.

2.12 **Harassment** is any unwanted conduct relating to relevant protected characteristics: sex, gender reassignment, race (including colour, nationality, and ethnic/national origins), disability, sexual orientation, religion or belief and age which:

- Has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- Is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

2.13 **Sexual harassment** is different to harassment outlined above which is related to a person's protected characteristic. Sexual harassment is unwanted conduct of a sexual nature. The unwanted conduct amounts to:

- Having the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- Being considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

2.14 **Victimisation** is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying, harassing, or sexually harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

2.15 **Protected characteristics** were introduced in the Equality Act 2010. There are nine specific characteristics which are protected from discrimination.

3.0 Legal and regulatory requirements

3.1 Equality Act 2010

3.2 This Act brings together previous anti-discrimination and equality legislation to protect employees and service users across the nine protected characteristics which are:

- Age
- Disability (including physical or mental impairment)
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic and national origins)
- Religion or belief (including lack of religion or belief)
- Sex (gender)
- Sexual orientation

3.3 The Equality Act prohibits all employers, service providers and providers of education, from discriminating against, harassing, or victimising individuals with protected characteristics.

3.4 Unlawful discrimination would be things like:

- refusing to recruit a person because of their race.
- refusing to provide training to a member of staff because of their gender or age.

3.5 The Equality Act 2010 says that there is a duty to make reasonable adjustments if a member of staff is placed at a substantial disadvantage because of their disability compared to people who do not share the same disability. Substantial means more than minor or trivial.

3.6 Any individual who believes that they have been discriminated against, harassed, or victimised as defined by the Equality Act 2010 can take a claim to a tribunal or court.

3.7 *Public Sector Equality Duty (2011)*

3.8 Although Saxon Weald is not a public body, we seek to comply with this Duty. The Public Sector Equality Duty is a duty on public authorities to consider and think about how their policies or decisions affect people who are protected under the Equality Act. The three main aims of the Duty are to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by or under the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

3.9 *The Worker Protection (Amendment of Equality Act 2010) Act 2023*

3.10 The Act introduces a new positive legal obligation for employers to take reasonable steps to protect their workers from sexual harassment. If an employer breaches the preventative duty, the EHRC (Equality and Human Rights Commission) will have the power to take enforcement action against the employer. An individual can take a claim to a tribunal with compensation claims being uplifted by 25%.

3.11 Other legislation includes:

- The Data Protection Act 2018
- Modern Slavery Act 2015
- Localism Act 2011

3.12 *Regulatory Framework*

3.13 The Regulatory Framework, published by the Regulator of Social Housing (RSH), requires registered providers to acknowledge and respond to the needs of diverse residents. Under the Tenant Involvement and Empowerment Standard 2017 organisations must provide tenants with a range of opportunities to influence and get involved in shaping policy, decision making and, in the services, offered. The standard requires a positive approach to the diverse needs of tenants and that housing providers must:

- Treat all tenants with fairness and respect.
- Demonstrate that they understand the different needs of their tenants, including in relation to the quality strands and tenants with additional support needs.

3.14 The Consumer Standards that came into effect from 1 April 2024 include many ED&I related requirements Housing Associations must demonstrate including:

- Assisting tenants seeking housing adaptations to access appropriate services.
- Taking action to deliver fair access to, and equitable outcomes of, housing and landlord services for all tenants.
- Engaging with tenants and providing accessible support that meets diverse needs.
- Maintaining shared spaces and responding to the diversity of different communities to ensure fair and equal access to neighbourhood and estate management services.
- Assessing the diverse needs of residents in how they report ASB and hate incidents.
- Allocating and letting homes in a fair and transparent way, holding reliable data about our homes and the characteristics of people who live in them. Having an allocations and lettings process that is fully understandable by, and accessible to, the full range of actual and potential residents, including those with support needs, those who do not speak English as a first language and/or have difficulties with written English.

3.15 *National Housing Federation Code of Conduct 2022*

3.16 This Code sets standards for housing associations that are members of the National Housing Federation and is for use by individual staff, Board members and certain involved residents. It is a companion document to the NHF Code of Governance (2020). Part 3 of the Code is particularly relevant – Conducting yourself professionally and treating others well: professionalism, consideration, and respect for others, and a commitment to the principles of equality, diversity, and the delivery of social purpose.

3.17 *National Housing Federation Code of Governance 2020*

- 3.18 The 2020 Code of Governance is designed to help housing associations achieve the highest standards of governance and board excellence. The code is built around the key values that good governance is based on – accountability, integrity, openness, and equality, diversity, and inclusion.
- 3.19 Changes in society and the focus brought by movement such as Black Lives Matter have drawn attention to the continuing need for almost all organisations to increase the diversity of their people, including those who populate their boards and executive teams, and to more strongly, and effectively, embed inclusivity in their organisational culture is essential to bring about change in attitude and culture. There are, of course, legal requirements placed upon organisations with regard to equality, as well as a moral imperative to drive change. But there is also a well-recognised business case; diversity and inclusivity reap great rewards for organisations that fully embrace them. (National Housing Federation Code of Governance 2020, Additional guidance).

4.0 Policy

- 4.1 As a landlord and an employer, Saxon Weald aims to recognise and respond positively to people’s differences, while providing equality of opportunity in relation to the services, support, and careers we provide. This means that no person or group of people, either working for Saxon Weald or seeking housing, services, employment, or contracts from us, will be treated less favourably, because of their or their partner’s, family’s, friends, or associated person’s protected characteristics.
- 4.2 As a responsible landlord and employer, Saxon Weald will:
- Appreciate that everyone is different and treat people as individuals.
 - Recognise and value the diversity and talents of all individuals.
 - Actively promote and encourage EDI amongst our colleagues, customers, communities, stakeholders, and supply chains.
 - Focus on inclusion to build a culture and reputation as an employer that attracts, develops, retains, and fully engages all the diverse talent across our organisation.
 - Strive to have a diverse workforce (at all levels of the organisation including the Board and leadership) representative of the communities we serve.
 - Continue to seek to increase under-represented groups at all levels across Saxon Weald.
 - Provide EDI training for the Board, leadership, staff and involved residents.
 - Actively involve colleagues and customers by setting up EDI network groups open to people who want to have their voice heard and help to drive change.
 - Understand and be responsive to the diverse needs of our residents and local communities by delivering appropriate, accessible, and flexible services.
 - Seek to understand and address inequalities that may exist for our customers and staff.
 - Have a zero-tolerance approach to bullying, harassment, sexual harassment, victimisation, and unlawful discrimination.
 - Challenge unacceptable and subtle behaviours that may leave someone feeling marginalised or excluded.
 - Use EDI data to help shape and adapt our services to meet different needs, monitor and report on progress, and inform decisions and actions.
 - Assess how this policy and any supporting action plan are working in practice and take action to address any identified issues.

- Continue to collaborate with other organisations regarding EDI and continuously learn.

4.3 Saxon Weald is committed to ensuring equality of opportunities in the provision of its services. Further details of these commitments are set out below.

Meeting Housing Need

- Liaising with statutory agencies to share assessments of the housing needs of local communities and any groups facing discrimination.
- Reviewing how our organisation can contribute to meeting these needs [***this reflects requirement 2.3 of the Tenant Involvement and Empowerment Standard***].
- Partnering with specialist agencies where appropriate to meet the needs of disadvantaged groups.
- Considering the needs of a diverse range of communities when designing and developing new homes [***this reflects requirement 2.3 of the Tenant Involvement and Empowerment Standard***].
- Ensuring new homes are suitable for people with disabilities and following approved guidance on this.

Access to Housing

- 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.
- Ensuring systems for housing or rehousing residents reflects our equality principles.

Services

- Ensuring all residents are treated with fairness and respect [***this reflects requirement 1.3.1a of the Tenant Involvement and Empowerment Standard***].
- Ensuring staff receive appropriate equality, diversity, and inclusion training in relation to the provision of housing services.
- Consulting with residents and obtaining their views particularly in relation to our equality, diversity, and inclusion commitments [***this reflects requirement 1.2.1 of the Tenant Involvement and Empowerment Standard***].
- Ensuring any resident involvement and participation activities promote involvement from all groups of residents [***this reflects requirement 1.2.1 of the Tenant Involvement and Empowerment Standard***].
- Ensuring procedures e.g., complaints procedures are clear, simple accessible to all, including using community languages where appropriate [***this reflects requirement 1.1.1b of the Tenant Involvement and Empowerment Standard and the Housing Ombudsman Complaint Handling Code***].
- 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) [***this reflects requirement 1.1.1a and 2.3 of the Tenant Involvement and Empowerment Standard***].

- 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 [***this reflects requirement 1.3.1b of the Tenant Involvement and Empowerment Standard***].

5.0 Implementation

- 5.1 Saxon Weald’s Board, Executive and Leadership Team are fully committed to championing equality, diversity, and inclusion in all aspects of Saxon Weald and its operation.
- 5.2 We will take a whole system approach towards EDI, with active involvement and accountability across the Leadership Team. We will measure and be transparent about progress, taking evidence-based action and evaluating impact, and ensuring accountability for driving progress is shared across the leadership team.
- 5.3 We have an EDI steering group, consisting of the Chief Executive and four Assistant Directors from across the business who contribute to and are accountable for the EDI policy and action plan.
- 5.4 Progress against the EDI action plan is shared with colleagues throughout the year, and an annual report produced for the Board. The steering group will also seek input and feedback from The Pulse regarding the EDI Action Plan.
- 5.5 EDI staff networks will be set up to provide a safe space for airing concerns and representing the views and interests of different people and groups. The networks will be encouraged to play a key role in reviewing the progress we are making, ensuring work remains grounded and helping to make EDI meaningful to people working in different roles. Themes will be shared confidentially with the EDI Steering group.

6.0 Communicating this policy

- 6.1 Once approved, the EDI policy will be communicated:
- at People Partnership Meetings with Managers.
 - on Workplace and SharePoint.
 - as part of our onboarding and induction process for new colleagues.
 - throughout contract tendering and review processes; and
 - on Saxon Weald’s website.

7.0 Dignity at work

- 7.1 Saxon Weald is committed to being a great place to work, and creating and sustaining an open, inclusive, and welcoming work environment. Our aim is to enable and promote a culture where everyone is treated with dignity and respect, and we recognise and value a diverse workforce.
- 7.2 All colleagues and Board members have the right to feel safe, welcome, and comfortable as they carry out their day-to-day work. We will not tolerate bullying, harassment, sexual harassment, or victimisation of any kind by managers,

employees, contractors, agency staff and anyone else engaged to work with Saxon Weald. This includes bullying, harassment or sexual harassment that may take place in the workplace or in any work-related setting outside the workplace, for example, business trips and work-related social events.

- 7.3 Bullying and harassment may be misconduct that is physical, verbal, or non-verbal. Examples of unacceptable behaviour include (but are not limited to):
- Unwelcome jokes, comments, or nicknames of a sexual or racial nature or about an individual's age, disability, gender reassignment, sexual orientation, or religion.
 - Isolating someone, being non-cooperative at work, or excluding them from social activities.
 - Spreading malicious rumours or insulting them.
 - Excluding someone because they are associated or connected with someone with a protected characteristic, for example, their child is gay, or parent has a disability.
- 7.4 Harassment may also occur if there is unwanted conduct towards a person because:
- They are related to or associated with someone who possesses a relevant protected characteristic, for example, their child has a disability, or friend is a devout Christian.
 - Another person incorrectly perceives them to possess a relevant protected characteristic, for example, they are gay or deaf.
- 7.5 Sexual harassment may be misconduct that is physical, verbal, or non-verbal. It can be a one-off incident or an ongoing pattern of behaviour. Examples include, but not limited to:
- sexual images displayed or shared.
 - offensive words or comments, sometimes referred to as "banter".
 - demeaning or humiliating behaviour or language.
 - references to someone's body.
 - intrusive questions about someone's private life.
 - stalking, including online stalking.
 - sexual gestures, such as simulating sexual acts.
 - unwanted touching, such as putting hand on someone's knee or hugging them.
 - unwanted sexual attention whether verbal or physical.
 - coercing someone into sexual relations through pressure, manipulation or threats, or offering rewards in exchange for sex (pay, workload, career development).
 - sexual violence, including rape, or threatening to carry out sexual violence or unwanted sexual acts.
- 7.6 Conduct may be harassment or sexual harassment regardless of whether the person behaving in that way intends to offend. Something intended as a "joke" may offend another person and different people find different things acceptable. Everyone has the right to decide what behaviour is acceptable and to have their feelings respected by others.
- 7.7 Saxon Weald want staff and Board members to feel able and willing to challenge any unacceptable behaviour, directly with the person concerned, with support from the People Team and/or managers or through the grievance procedure.

- 7.8 Saxon Weald's Dignity at Work Procedure explains the informal/formal approach colleagues, workers, contractors and Board members can take if they have been subjected to bullying, harassment, sexual harassment or victimisation and the support that is available to them. We would urge staff and Board members to talk to a manager or a member of the People Team and share their experiences and concerns, so they can provide appropriate support and assistance to resolve the issue.
- 7.9 Any allegations will be taken seriously, investigated, and where appropriate, dealt with under the disciplinary procedure. Bullying, harassment, sexual harassment and victimisation may be considered as gross misconduct which could lead to dismissal without notice.
- 7.10 If a member of staff or worker at Saxon Weald feels that they have been bullied, harassed, or sexually harassed by a "third party" such as a customer, supplier, contractor or visitor, they should report the behaviour to their manager who will take appropriate action. If an employee is accused of bullying, harassing, or sexually harassing a customer, supplier, contractor, or visitor, it will be investigated and could potentially be dealt with through Saxon Weald's disciplinary procedure.
- 7.11 We all have a responsibility to help create and maintain a work environment that is free of bullying and harassment. Saxon Weald's aim is to "be inclusive", bringing together different people with different perspectives, celebrating, and valuing our differences and treating everyone equally and with respect.
- 7.12 The Board has a responsibility to:
- Agree the EDI strategy and provide leadership in its implementation. Oversee delivery of our EDI objectives.
 - Play an active role in shaping the culture of the board as well as the wider organisation.
 - Promote EDI both internally and externally and actively support EDI in everything they do.
 - Receive quarterly updates on progress against the Equality objectives.
- 7.13 Managers have a responsibility to:
- Set a good example by their own behaviour.
 - Ensure there is a supportive working environment.
 - Make sure staff know what standards of behaviour are expected of them.
 - Intervene to stop bullying, harassment, or sexual harassment.
 - Report promptly to their people partner any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them; and
 - Actively support EDI in everything they do.
- 7.14 Employees have a responsibility to:
- Be aware of how their own behaviour may affect others and change it, if necessary.
 - Treat their colleagues with dignity and respect.
 - Take a stand if inappropriate jokes or comments are being made.
 - Intervene, if possible, to stop harassment sexual harassment or bullying.
 - Make it clear to others when they find their behaviour unacceptable.

- Report promptly to an appropriate manager or member of the People Team any complaint of bullying, harassment or sexual harassment and/or any incident of bullying, harassment or sexual harassment witnessed by them and support Saxon Weald in the investigation of complaints; and
- Actively support EDI in everything they do.

8.0 Training

8.1 Saxon Weald provides equality, diversity, and inclusion training to **all** colleagues and this will include topics on bullying, harassment and sexual harassment, and victimisation to ensure there is a clear understanding of:

- what bullying, harassment, sexual harassment and victimisation is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been bullied, harassed, or sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.

8.2 Saxon Weald will ensure that managers understand the ED&I Policy and Dignity at Work Procedure, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported.

8.3 Saxon Weald will regularly review the effectiveness of training and provide refresher training as appropriate.

8.4 Saxon Weald requires all third-party contractors to ensure their managers and staff are fully trained and understand the expectations of working with Saxon Weald colleagues and customers.

9.0 Data protection, information exchange and confidentiality

9.1 Saxon Weald will ensure customer and staff EDI data is managed in accordance with General Data Protection Regulations (GDPR). All information will be stored securely and used for the purposes it was collected for.

9.2 When reporting customer and staff EDI data, information is anonymised.

9.3 We treat complaints of bullying, harassment, and sexual harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. Some details may also have to be given to potential witnesses, but this will be limited, as far as possible, while ensuring a fair and sufficiently thorough investigation. All personal data relating to informal complaints and grievances will be treated confidentially by staff involved.

10.0 Monitoring and review

10.1 This policy will be reviewed at least every three years to ensure that it reflects the needs of our Board, staff, customers, good practice and changes to legislation or regulation.

- 10.2 The steering group and Board will monitor and review progress against the action plan for year one at least once a year.
- 10.3 All formal incidents of harassment, including sexual harassment, will be recorded confidentially by the People Team for monitoring and review of practice.

Version	Amendment	By	Date
1.0	New Equality, Diversity & Inclusion Policy incorporating Dignity at Work	Steven Dennis	December 2022
1.1	Inserted Board Responsibilities, 7.12	Anne Wildeman	February 2023
1.2	Updated to reflect preventative duty under The Worker Protection (Amendment of Equality Act 2010) Act 2023 – Saxon Weald to take reasonable steps to prevent sexual harassment and to include reference to the Consumer Standard	Sarah Thomas Ruth Skipper	October 2024