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Please note that this is a template Equality, Diversity and Inclusion Policy only and should not be adopted until it has been completed where indicated and considered by the Board of an organisation. The template has been prepared to be compliant with legal requirements and the National Housing Federation (NHF**) Code of Governance 2020 requirements in relation to equality, diversity and inclusion only. We cannot confirm compliance with any other code of governance and/or the entirety of the NHF Code of Governance 2020. If an organisation, or*

any other organisations within a group structure, has adopted another code of governance then appropriate amendments may need to be incorporated. Furthermore, it is compliant with the requirements of the Regulator of Social Housing’s Regulatory Standards in relation to equality, diversity and inclusion, in particular under the Tenant Involvement and Empowerment Standard, as at July 2021.

We have **highlighted** where provisions should remain unamended to demonstrate compliance with the both the NHF Code of Governance 2020 and/or legal requirements and/or the Regulatory Standards.

Text in **bold italic** make-up comments and guidance and do not form part of the policy.

[INSERT ORGANISATION NAME]
Equality Diversity and Inclusion Policy [and Statement]

Version: [1]		Ref: [xxx]	
Lead officer	[Name and Title]	Approval date:	
Approved by	[e.g. Group/Parent Board]	Review Date:	
Other relevant policies and/or procedures	*[Board succession policy [and procedures]] [Whistleblowing policy [and procedures]] [Workforce safety and wellbeing policy [and procedures]] [Resident engagement and influence policy] <i>*suggested policies only. Please add and amend as appropriate</i>		
Other relevant documents			

1. Purpose and Commitment

Discuss the purpose of this policy and your organisation’s commitment – adapt the suggested wording as necessary as a starting point. Our suggested wording mirrors the language used within the NHF Code of Governance 2020 (and particularly principle 1.3) requiring organisations to adopt a policy on equality, diversity and inclusion and to show a clear and active commitment to embedding a culture of equality, diversity and inclusion and we would advise that any changes you make remain consistent with the wording set out in the NHF Code of Governance 2020. You may also wish to include a foreword from your Chief Executive or Chair or Equality, Diversity & Inclusion Group (or equivalent) etc. to reinforce the commitment from leadership to equality diversity and inclusion:

[Insert organisation's name] is actively committed to promoting and embedding a culture of equality, diversity and inclusion. [Insert organisation's name] is 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.

[insert organisation's name] 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
- if a registered provider of social housing registered with the Regulator of Social Housing, the Regulatory Framework,

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

2. Defining equality, diversity and inclusion

This section allows you to set out what is meant by equality diversity and inclusion within your organisation. Often an area of concern can be that it isn't clear what we mean by these terms and so we have included a suggested narrative wording for you to consider and adapt.

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, taking into account 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. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to 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

This section should not be amended because it refers to your legal duties:

[Insert organisation's name] 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

We suggest this section is adopted as drafted as it refers to your legal duties:

[Insert organisation's name] 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

We have included a further commitment to championing diversity and challenging discrimination beyond the protected characteristics set out in the Equality Act 2010 above to include characteristics such as socio-economic background etc. This list can be adapted and you can add other characteristics that you feel are appropriate.

[Insert organisation's name] 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 are committed to tackling inequality in its widest sense and 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

[Insert organisation's name] has agreed a set of objectives and commitments that reflect our strategy for embedding an equal, diverse and inclusive culture in the organisation for [insert time period e.g. 2021-2023]. We have set these out [in the Appendix] [below].

The strategy is our long-term commitment to equality, diversity and inclusion and progress will be reported regularly to board as in section 7 below.

You may also wish to consider including a narrative on the sentiments behind and background to these objectives and commitment including how these objectives and commitments were agreed upon e.g. consulting any equality, diversity and inclusion groups within your organisation, sounding boards, and tenant advisory/scrutiny panels if appropriate.

7. Review and monitoring

We have included some suggested ways in which your organisation can review and monitor its progress:

[Insert organisation's name] shall develop a set of metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least once every [insert time period e.g. 12 months], review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order 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 once every [insert time period e.g. 12 months], 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 (see section 8 below for further detail). It shall also be used effectively to identify best practice as well as gaps or shortcomings within our organisation and to tailor our approach in correcting these.

Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure [insert organisation's name] has the best quality of data to inform our progress on our objectives and commitments and also to aid better decision making.

Include any other methods your organisation will implement to review and monitor performance on equality, diversity and inclusion and to aid being able to publish information on progress annually.

8. Accountability and Reporting

[Insert organisation's name] shall annually 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. This information will include:

[list of examples you can adapt for your organisation:

- ***Progress reports on areas such as any schemes or initiatives you 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

We have included further narrative of the Board's role in promoting equality, diversity and inclusion within your organisation for you to consider and adapt as necessary. We have highlighted particular sections which we would advise you retain as drafted as these sections directly link to the wording used in the requirements of the NHF Code of Governance 2020. Under the Tenant Involvement and Empowerment Standard, there is the requirement for

organisations and in turn their Boards to demonstrate they understand the needs of their tenants and treat them with fairness and respect, and that should span the range of equality strands.

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

[Insert organisation's name] 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 Management 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 [insert organisation's name] is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice and at least once every 12 months 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 as set out at Section 7, above.

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 particular insight into) the communities we serve shall also be meaningfully engaged in our governance structures.

[You may also want to include a list of what effective Board leadership behaviours would look like, some suggestions you might want to adapt could include:

- ***modelling behaviour and building an inclusive board culture;***
- ***providing support and challenge to executive colleagues;***
- ***setting strategy with EDI embedded;***
- ***including an assessment of board culture with regard to EDI in board reviews;***
- ***regularly reviewing how the Board embeds EDI in its work.]***

10. Staff

Our suggested wording reflects legal requirements and principle 2.5 of the NHF Code of Governance 2020 and we advise that the highlighted sections are retained as a minimum. We have also assumed that your organisation is likely to have other policies which set out your organisation's recruitment policies and procedures in further detail as well as measures to ensure equal opportunities. We would suggest that you include references to the appropriate policies here and that these policies reflect the organisation's values and commitments to equality, diversity and inclusion and ensuring equality of opportunities.

All [insert organisation's name] staff and job applicants shall be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation with regard to 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 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. We shall also consult staff diversity networks when making changes to workforce related codes of conduct, policies, practices and procedures where appropriate.

[Insert organisation's name] will not tolerate any forms of unlawful discrimination, harassment, victimisation or bullying.

All employees, Board members and committee members of [insert organisation's name] are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing [insert organisation's name]. 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 or committee members of [insert organisation's name] will result in disciplinary action, in line with the [Disciplinary Policy and Procedure (please include reference to the relevant employee policy and relevant Board/Committee member policy/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 [insert organisation's name] 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

This section directly links to the requirements of the NHF Code of Governance 2020 and particularly principle 3.4 (board composition) and we have highlighted

the wording which demonstrates compliance with this requirement. You may wish to insert further details on your recruitment and succession planning procedures and any strategies you are implementing to achieve a diverse Board and/or refer to any relevant Board succession policy. As above, this also supports the requirement under the Tenant Involvement and Empowerment Standard for organisations and in turn their Boards to demonstrate they understand the needs of their tenants, and that should span the range of equality strands.

[Insert organisation's name] is committed to ensuring that our committee(s) and 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 policies also reflect our commitment to achieving a diverse and inclusive Board.

12. Training

Consider here if you want to include further details on your training programme and also how often training is received and refreshed e.g. every two years?

[Insert name of your organisation] is committed to ensuring all staff 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 of staff will be made aware of this policy as part of their induction. All staff will also [regularly] receive refresher training on equality, diversity and inclusion.

[We are also committed to providing unconscious bias/[insert other learning approaches or training your organisation uses] 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

We have included some wording around ensuring equality of opportunity to residents and customers below. This section is for you to adapt and adopt as necessary. You may feel that these areas are better suited to being set out in another policy as this relates to your service delivery to customers and residents:

[Insert organisation's name] is committed to ensuring equality of opportunities in the provision of its housing services. Further details of these commitments are set out below.

Meeting Housing Need

Set out how you will ensure equality of opportunities when meeting housing needs. We have set out some examples you can consider and build upon. You may also wish to reference other linked policies here:

- 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***]; and
- Ensuring new homes are suitable for people with disabilities and following approved guidance on this.

Access to Housing

Set out how you will ensure equality of opportunities and promoting fair access to housing. We have set out some examples you can consider and build upon. You may also wish to reference other linked policies here:

- 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 reflects your equality principles.

Housing Services

Set out how you will ensure equality of opportunities, tackle discrimination and promote fair access to your housing services. We have set out some examples you can consider and build upon. You may also wish to reference other linked policies here:

- 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 [and unconscious bias 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***]; and
- Ensuring housing and associated services take into account 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***].

14. Projects and Initiatives/Partnerships etc.

[include details of any projects, initiatives, schemes, partnerships your organisation is part of]

If you have any questions about this policy please contact [insert details of lead officer].

Appendix: Our Commitments/Objectives:

[Insert here your organisation's commitments and objectives in respect of equality, diversity and inclusion. We have included some suggestions for you to consider and adapt or remove as appropriate for your organisation. You should also note that you will be required to report on the progress against any objectives you have set so it is important to make sure that these are in some way "measurable" and that progress can be tracked]

- To create a working environment free of bullying, harassment, victimisation and direct or indirect unlawful discrimination;
- To promote dignity and respect for all where individual differences, backgrounds, experiences and contributions are all recognised, celebrated and valued;
- To take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities;
- A commitment to a zero tolerance approach to bullying, harassment, victimisation and unlawful discrimination;
- To have a representative Board, committee and workforce, reflecting the communities we serve;
- To embed a culture of equality, diversity and inclusion, ensuring that this is considered in all of the organisation's activities and all policies and procedures within the organisation are subject to effective equality, diversity and inclusion analysis, including when making changes to policies and procedures;
- To adopt procurement practices to ensure contractors and suppliers demonstrate a genuine culture of inclusion and equality of opportunity;
- To maintain fair and transparent recruitment, promotion and reward processes;
- To make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation;
- Where members of staff with a certain protected characteristics are currently under-represented at particular levels, to carry out an analysis of the causes of the under representation so that we may remove any barriers that exist, including providing positive action training to equip them to apply for promotion opportunities or reviewing recruitment/promotions processes etc.

- To continually review employment practices and procedures when necessary to ensure fairness, and also update them and this policy to take account of changes in the law or best practice;
- To seek to monitor the make-up of our workforce regarding protected characteristics such as age, sex, ethnic background, sexual orientation, gender reassignment, religion or belief, and disability in the interests of encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this equality, diversity and inclusion policy;
- To assess how this equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them at least annually, and considering and taking action to address any identified issues;
- To report on gender and ethnicity pay gaps and produce action plans to address any issues of imbalances identified;
- [***Consider including details any schemes or programmes you have signed up to or pledges you have committed to.***]