



The Trust

Equality, Diversity
& Inclusion Policy

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TABLE OF CONTENTS

1. INTRODUCTION.....	1
2. SCOPE	1
3. LEGAL & REGULATORY REQUIREMENTS.....	2
4. DEFINITIONS	3
5. OUR POLICY	3
6. EQUALITY, DIVERSITY & INCLUSION	7
7. RESPONSIBILITIES.....	7
8. MONITORING AND REPORTING	8
9. CONSULTATION.....	8
10. REVIEW	8
11. ASSOCIATED DOCUMENTS.....	9
12. POLICY INFORMATION	9

1. INTRODUCTION

1.1 Peaks & Plains Housing Trust (the Trust) is committed to equality, diversity and inclusion (EDI). Our vision is to be and to be seen as an organisation that:

- understands and values the diversity of our customers, communities and staff;
- provides services fairly and flexibly in a way which recognises and respects this diversity; and
- as an employer, promotes inclusion, embraces diversity and creates an atmosphere in which our staff can thrive and others want to join.

1.2 Our policy aims are to:

- To ensure that our commitment to EDI is widely understood by customers, staff, Board and committee members, contractors, consultants and suppliers and other organisations with whom we work;
- To ensure that our homes and services are provided in a fair and transparent way and that services are flexible enough to meet the differing needs of our customers;
- To ensure that our employment and management practices support and enable an inclusive working environment;
- To ensure that our governance arrangements and decision making takes full account of EDI issues;
- To ensure that we are able to assess the effectiveness of this and other policies in tackling issues of inequality, discrimination and exclusion.

1.3 The Trust no longer has a standalone EDI strategy. A three-year standalone EDI strategy ran from 2023 to 2026. To support a renewed emphasis on EDI a decision was taken by the Trust that EDI should be embedded into its key strategies to ensure it is a golden thread in everything we do.

2. SCOPE

2.1 This policy sets out how the Trust will integrate equality, diversity and inclusion in its delivery of services to customers, recruitment and employment practices of staff, and in Board and committee membership and governance arrangements.

2.2 The Trust also has several policies which set out its approach to specific services and which include more detail about each service; these may be referred to in this policy, but the details are not duplicated in it.

2.3 This policy covers equality, diversity and inclusion in relation to the protected characteristics of race, religion and belief, gender, marital status, sexuality, gender identity, disability, pregnancy and maternity and age (as set out in the Equalities Act 2010), but our policy also recognises the wider diversity of our communities and workforce and the differing cultures, backgrounds, social, economic and health circumstances and needs that they may have.

2.4 The Trust will ensure that the principles of equality, diversity and inclusion set out in the law are followed in all our activities including:

- Providing Homes and Services.
- Customer involvement, feedback and consultation.
- Recruiting, employing, training and promoting staff (including terms and conditions and dealing with grievances and disciplinary matters etc.)
- Recruiting and appointing Board and Committee members and governance matters.
- Working with contractors, consultants and suppliers.

3. LEGAL & REGULATORY REQUIREMENTS

3.1 There are legal requirements which the Trust is obliged to meet regarding EDI. The Trust fully embraces the Equality Act 2010's main themes and in all its activities will have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by law.
- Advance equality of opportunity between people from different groups.
- Foster good relations between people from different groups.

3.2 The Regulator of Social Housing (RSH) places increasing emphasis on EDI, particularly within the expectations of social housing providers' governance and service delivery. Here is what the Regulator states and expects in practice:

3.2.1 The Governance and Financial Viability Standard includes an expectation that Boards must ensure their organisations:

- Understand and reflect the diverse needs of tenants
- Ensure fair access to services and consider the impact of decisions on all parts of the community
- Demonstrate diversity in board composition and leadership (in line with good governance practice)

3.2.2 Under the current Consumer Standards, which came into force in April 2024, EDI is embedded explicitly, especially in:

The Tenancy Standard

- Providers must ensure their policies promote fair access and do not discriminate against any protected group.
- Allocation and lettings must be transparent and fair, reflecting the needs of diverse communities.

The Transparency, Influence and Accountability Standard

- Landlords must understand and respond to the needs and priorities of their diverse tenant base.
- Tenants must be empowered to influence services, with specific consideration of inclusion.

4. DEFINITIONS

4.1 The meaning of following words in this policy are:

Equality - Equality is about ensuring everybody has an equal opportunity and is not treated differently or discriminated against because of their characteristics

Diversity - Diversity is about taking account of the differences between people and groups of people and valuing those differences.

Inclusion - Inclusion is about embracing all people irrespective of their individual characteristics or needs and ensuring that everyone feels respected, valued and heard.

5. OUR POLICY

5.1 PROVIDING HOMES AND SERVICES

5.1.1 The Trust will provide homes in a fair and equitable way, recognising the differing needs of individuals and households in the community (see our Allocations, Mutual Exchange and Succession and Assignment Policies).

5.1.2 The Trust will carry out monitoring of lettings, in partnership with Cheshire HomeChoice and other choice based lettings schemes in which it participates to ensure fair and equitable access to housing and to identify and address any barriers to access and/or practices which unfairly disadvantage any group. We will also monitor Mutual Exchanges through Homeswapper, to ensure the process is transparent and accessible. Monitoring will help us to identify any barriers.

5.1.3 The Trust will provide services which are appropriate to the diverse needs of individuals in the communities which the Trust serves.

- We will not tolerate hate crime and discrimination and will take appropriate action against the perpetrators, in partnership with other agencies where appropriate (see our Anti-Social Behaviour and Hate Crime Policy).
- We will provide an efficient repairs and maintenance service which takes into account customers' particular needs and circumstances, for example, regarding the priority for some types of repair (see our Repairs Policy).
- Where tenants require adaptations, alterations and enhancements to their homes as a result of illness or disability, we will provide an efficient and effective adaptation service to help them to enjoy independence, privacy and dignity (see our Adaptations Policy).
- We will provide additional tenancy support and sustainment services where appropriate (see our Safeguarding Policy & Vulnerable Persons Policy).
- In our rent income collection, we will take into account tenant's individual needs in the process of arrears recovery and ensure that where appropriate customers are signposted to advice and support agencies (see our Rent Collection & Arrears Management Policy).
- We will take into account customers individual needs when we have to access their homes in order to maintain the property and keep them safe.

- As part of our approach to the development of new homes, we will consider specification to include consideration of tenants' requirements including culture, for example cooking adjustments, we would also consider accessibility, including the provision to provide level access or different adaptations.
- We also have provided homes for Cheshire Without Abuse (CWA) including low level target hardening and will continue to work in partnership with CWA and other organisations in providing similar support to individuals and households.

5.1.4 We will collect and maintain information about our customers to enable our services to be tailored to different needs (both in planning and in providing services). Customers will be regularly reminded to help us keep this information up to date. Information will be maintained in line with all data protection legislation.

5.1.5 The Trust will also have a system and process for flagging specific customer needs and associated service needs so that customers do not have to repeat this information each time they contact us. Whilst we will ask for details of vulnerability, customers do not have to provide this if they do not want to.

5.1.6 We will ensure that information about the Trust and our services is available in a variety of accessible formats and will respond positively to requests from customers who wish to receive information in different formats.

5.1.7 We will seek feedback from our customers about our services and will use this information to both monitor that our services are provided fairly but also to learn from and help to improve our services.

5.1.8 We aim to ensure that no group of customers is less satisfied with our services than others and will monitor satisfaction feedback and complaints to identify, address and report on any issues relating to equality, diversity and inclusion.

5.1.9 We will provide a range of opportunities and ways which are accessible to all for customers who choose to can be involved in our work and our services. We will identify groups that are underrepresented in our 'engagement structure' and will establish innovative ways of involving them. (See our Customer Voice and Customer Experience Strategy)

5.1.10 The Trust will only support/recognise Tenant and Resident Groups that have clear statements about their support for equality, diversity and inclusion in their constitutions or policies or which agree to adopt the Trust's policy. The Trust will work with groups to help them to be representative of their communities and value diversity within their membership.

5.2 WORKING FOR THE TRUST

5.2.1 The Trust aims to attract, recruit and retain skilled staff at all levels from diverse backgrounds who uphold the Trust's vision and values and the commitment and principles set out in its EDI strategy and People and Culture Strategy and who reflect the diversity of the communities in which we work.

5.2.2 The Trust will have recruitment policies and practices that are demonstrably fair and transparent, and which encourage applicants from a wide range of backgrounds to work for us:

- All vacancies which are not filled internally, will be advertised openly
- Job advertisements will promote our commitment to EDI e.g. through the use of disability confident employer logos etc.
- We will seek to advertise in a range of locations/on a range of platforms to attract applicants from diverse backgrounds
- All applicants will be invited/required to complete EDI monitoring forms to enable monitoring of outcomes and to identify any barriers to inclusion.

5.2.3 The Trust will ensure that EDI monitoring is continued through all stages of employment to enable monitoring of outcomes and to identify any barriers to inclusion and equitable treatment at the recruitment stage and beyond, for example, opportunities for internal promotions, requests for flexible working, training opportunities etc.

5.2.4 The Trust will also have employment policies and practices which promote and support a diverse and inclusive workplace culture where all staff can thrive.

5.2.5 The Trust will create and maintain a working environment free of bullying, harassment, victimisation and unlawful discrimination, in which dignity and respect for all is promoted, and where individual differences and the contributions of all staff are recognised and valued. (As set out in various policies e.g. Harassment and Bullying Policy, Preventing Sexual Harassment Policy).

5.2.6 As part of the induction process, all new staff will be made aware of the Trust's commitment to EDI, relevant strategies and this policy. They will also be made aware of the behaviours expected of them. This induction will be supported by the staff Code of Conduct which all new staff are required to sign and about which regular refresher training is provided.

5.2.7 The Trust will take seriously any complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the Trust work activities or at work related functions.

5.2.8 Any member of staff who feels that they are being discriminated against or have experienced bullying, harassment or victimisation at work can discuss the problem with their manager or a member of the Human Resources Team; make a formal complaint which will be dealt with using the grievance process or submit a "call it out form". The Trust is committed to dealing with any such allegations promptly, fairly and confidentially.

- 5.2.9 Any action found to be bullying, harassment, victimisation and unlawful discrimination will be dealt with as misconduct under the Trust's grievance and/or disciplinary procedures, and appropriate action will be taken. Serious complaints could amount to gross misconduct and lead to dismissal without notice. Some acts/allegations such as sexual harassment or harassment under the Protection from Harassment Act 1997 may be classed as criminal matters and will be dealt with accordingly.
- 5.2.10 Staff will be provided with training about this policy and will receive regular training on equality, diversity & inclusion issues, including annual mandatory refresher training. The Trust will also take steps to raise staff awareness of wider EDI issues through other methods.
- 5.2.11 When an employee resigns from the Trust, we will conduct an exit interview to establish and monitor the reasons so that we can identify and act on any problem areas or areas of concern so that that we can learn from them and make the Trust a better place to work.
- 5.2.12 The Trust takes seriously any instances of non-adherence to the Equality, Diversity & Inclusion Policy and to the Staff Code of Conduct. Any such instances/reported non-adherence will be investigated and where appropriate may be considered under the Trust's Disciplinary Process.

5.3 BOARD AND COMMITTEE MEMBERSHIP AND THE TRUST'S GOVERNANCE

- 5.3.1 The Trust recognises that diversity in its governance arrangements can bring positive benefits and will seek to ensure that, as far as possible, the Board reflects the broader population of the areas in which the Trust operates.
- 5.3.2 When recruiting new Board or committee members, the Trust will take steps to encourage applications from a diverse range of candidates, advertising in a range of ways/places and promoting the Trust's commitment to equality, diversity and inclusion and will follow its recruitment process to ensure a fair selection process. (See our Board Succession, Recruitment & Renewal Policy).
- 5.3.3 Applicants for Board and committee membership will be asked to complete EDI monitoring forms to enable the Trust to monitor outcomes and to identify any barriers to inclusion.
- 5.3.4 Board and Committee member induction will include equality, diversity & inclusion and the Board's responsibilities in relation to EDI. Refresher sessions will also be provided regularly as part of the Board's training and development plans.
- 5.3.5 Reports which are made to the Board or its committees will include clear sections which highlight relevant EDI issues and the EDI implications of any recommendations so that decisions take full account of them.
- 5.3.6 The EDI impacts of all strategies and policies will be assessed before they are approved and when they are reviewed.

5.4 WORKING WITH CONTRACTORS, CONSULTANTS AND SUPPLIERS

5.4.1 The Trust will advise contractors, consultants, suppliers and any other agency working for the Trust of its commitment to equality, diversity and inclusion and will seek assurances that they will abide by it and by the Trust's policy in all their working practices when engaged by the Trust.

5.4.2 The Trust will request details of the contractors', suppliers and consultants' own equal opportunities policies where applicable and this together with questions about their approach to EDI may form part of any selection process for new appointments.

6. EQUALITY, DIVERSITY & INCLUSION

6.1 The Trust is committed to Equality, Diversity and Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion.

6.2 This policy has been subject to an Equality Impact Assessment which has been reviewed by the EDI forum, Challenge Group and the Executive Management Team.

7. RESPONSIBILITIES

7.1 **The Board** – is responsible for demonstrating, individually and collectively, a clear and active commitment to equality of opportunity, diversity and inclusion in all of the Trust's activities and support of this policy and its implementation.

7.2 **The Governance Committee** – is responsible for approving and reviewing this policy (in line with the Trust's Approvals Framework)

7.3 **The Chief Executive** – is responsible for ensuring the effective implementation of this policy and for 'championing' EDI across the Trust.

7.4 **The Executive Team, Assistant Directors, Heads of Service and Managers** – are responsible for:

- Demonstrating, individually and collectively, a clear and active commitment to equality of opportunity, diversity and inclusion in all of the Trust's activities.
- Leading their teams and managing implementation of this policy and actions which support the policy.
- Identifying staff training and support needs in relation to equality, diversity and inclusion and the services they provide and ensuring that these are addressed.
- Ensuring that Equality Impact Assessments (EIAs) are conducted, reviewed, and updated for relevant policies and strategies within their areas of responsibility.

7.5 **The HR Team** - is responsible for:

- Providing guidance and support to managers and staff on EDI relating to employee relations.

- Monitoring disciplinary and grievance cases to identify any inequalities or discrimination.
- Supporting training and awareness initiatives around EDI for employees.

7.6 **All Staff** – are responsible for:

Ensuring they have read and understood the policy.

- Acting in accordance with the policy in the course of their work and their interaction with customers, colleagues etc.
- Participating in training provided for them about equality, diversity and inclusion
- Bringing to the attention of management, areas in which further training or awareness may be necessary to enable greater awareness of equality, diversity & inclusion issues

7.7 **Involved Customers** – are responsible for:

Working constructively with the Trust to encourage a diverse range of customers to actively participate in customer groups and customer consultations.

7.8 **The EDI Forum** – is responsible for:

- Championing EDI across the Trust at Team level.
- Reviewing EDI submissions made.
- Considering changes to legislation which may impact the Trust's approach and to and action on EDI.
- Reviewing equality impact assessments for policies and strategies and recommending improvements where necessary

8. MONITORING AND REPORTING

8.1 The Trust will periodically assess how the EDI strategy, policy and supporting action plans are working in practice and will consider and take action to address any issues arising as and when necessary (reporting requirements are set out in the EDI strategy and action plan and other ad hoc reporting may be required by the Board)

9. CONSULTATION

9.1 The review of the policy will involve customers and staff (via the Health, Wellbeing & Culture Group and the EDI forum).

10. REVIEW

10.1 This policy will be reviewed at least every 3 years, taking into account guidance from the Regulator of Social Housing and any new legislation.

10.2 Any significant changes to legislation or any failings in the delivery of this policy will result in an earlier review.

ASSOCIATED DOCUMENTS

- The Trust's Equality, Diversity & Inclusion Strategy & Action Plan
- All Trust Staff & Service Policies
- Staff and Board Member Codes of Conduct
- The Trust way booklet/TeamApp
- Tenants' Handbook
- Customer Voice and Customer Experience Strategy
- People Strategy
- Leaseholder Handbook
- Allocations Policy
- Transfer Policy
- Mutual Exchange, Succession and Assignment Policy
- Safeguarding Policy
- Vulnerable Persons Policy
- Harassment and Bullying Policy
- Preventing Sexual Harassment Policy
- Board Succession, Recruitment & Renewal Policy

POLICY INFORMATION

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