



EQUALITY AND DIVERSITY POLICY

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Policy Owner: [People / Human Resources]

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1. **SCOPE / PURPOSE**

1.1 The Equality Act 2010 provided a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all whilst updating, simplifying and strengthening the previous legislation. The Act delivers a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

In line with the Equality Act 2010 and the Public-sector Equality Duty, Adra will give due regard to the need:

- To eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
- To advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This policy sets out Adra's commitment to the values of Equality and Diversity to enable our staff, tenants, Board Members and partners achieve their potential. Adra aims to create an inclusive organisation and community in which we work:

- Where people are treated with dignity and respect
- Where inequalities are challenged
- Where we anticipate, and respond positively, to different needs and circumstances

The Equality and Diversity Policy applies to all aspects of Adra's work including Service Delivery, Recruitment and Employment, Learning and Development, Partnerships, and Procurement.

The relevant protected characteristics are:

- Age
- Gender reassignment
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability (including symptoms of the menopause)
- Pregnancy and maternity
- Sexual Orientation
- Religion or belief (including lack of belief and ethical veganism)
- Marriage and Civil Partnerships (due regard to eliminate discrimination)

People with caring responsibilities are also protected from discrimination by virtue of their association with people with protected characteristics.

It is Adra's policy that everyone will have equal opportunity and that no person or group, whether accessing services or applying for a job or advancement, will be disadvantaged.

2. POLICY DETAIL

Commitment

Adra acknowledges and accepts its corporate responsibility to promote a culture of equality, and recognises the value of diversity and the strengths that it brings to our services and communities.

Adra will take positive steps to ensure that it does not discriminate unlawfully and is committed to providing a workplace that is free from harassment, victimisation and discrimination.

Adra will ensure that the importance of equality and diversity is embedded within all of its plans, policies and procedures as a core element.

Adra will commit the necessary resources in terms of people, time and money to make sure that it complies with its statutory duties and that its Strategic Equality Plan is implemented effectively and on time.

Adra will commit to having effective internal arrangements for ensuring its compliance with the statutory duties and for monitoring and reviewing progress

Leadership and Internal Governance

Adra shall ensure that equality permeates the democratic process, with the Board nominating an Equalities Champion with the responsibility of ensuring that attention is given to equality throughout all services provided by Adra.

Adra shall have an internal structure that ensures equality and diversity permeates the whole work of Adra and that equality and diversity issues are taken into account when Adra develops plans, policies and procedures; makes decisions; and prioritises resources.

Adra shall nominate a designated Staff Equalities Lead Officer to coordinate the implementation of its Equality Objectives and Strategic Equality Plan, and to ensure equality related processes, including assessing impact, monitoring, and reviewing activities, are mainstreamed. This is in addition to the responsibility of individual managers for achieving progress within their direct areas of responsibility.

Adra acknowledges and accepts that it has a leading role to play within communities and a responsibility to foster, and where possible, promote good relations based upon equality between Adra, its communities and its partners.

Recruitment and Employment

Adra declares its commitment to achieving and promoting equality and diversity as an employer. It acknowledges and accepts its corporate responsibility to ensure equality of opportunity and

mutual respect for all its staff, job applicants and Board members to foster a culture of equal opportunity within Adra.

Adra recognises the benefits of drawing on a broad range of talent to better represent the community we serve.

Adra will take positive steps to ensure that any person employed by Adra or who applies for a post with Adra shall be treated in a non-discriminatory manner.

Adra shall consider equality issues and the importance of promoting diversity when developing employment policies and procedures. Every employment policy and procedure shall be reviewed regularly to ensure that it conforms to current legislation, relevant codes of practice and accepted best practice. Adra shall ensure that there is no unlawful discrimination against any group whether direct or indirect.

Recruitment is inclusive of Adra Board Member Recruitment to ensure equality of opportunity and mutual respect for all applicants and to foster a culture of equal opportunity within Adra. All Board Member applicants shall be treated in a non-discriminatory manner and Adra shall consider equality issues and the importance of promoting diversity.

Learning and Development

Adra shall make appropriate arrangements to:

- Promote knowledge and understanding of the general duty and specific duties amongst its employees and Board Members in relation to this policy
- Develop an awareness of the needs of specific groups and individuals so that all staff and Board Members are aware of their responsibility towards all colleagues and customers
- Ensure that all new members of staff and new Board members receive induction training which shall include an introduction to Adra's equality and diversity policy
- Communicate its Equality Objectives effectively to all staff and Board Members.

Relevant training will be identified in the Corporate Training Plan and training shall be provided to Board Members and Staff as appropriate to their role.

Adra shall raise awareness of the Adra's Equality and Diversity Policy with tenants groups and the public generally. Tenants who are active members of Adra's Tenant Partnership will receive additional equality training as appropriate.

Adra will adopt fair practices for all its staff and Board Members in recognising individuals' development and training needs. All staff will be given equal opportunity for career development, assessment and promotion based on their ability.

Service Delivery

Adra recognises that an organisation that is able to provide services to the diverse needs of its users should find that it carries out its core functions more effectively as services appropriately designed for its users is more cost effective.

Adra shall ensure that all its services commit to and take practical steps, such as using Self Assessment tools, to achieve equality and the effective management of diversity in its delivery of services.

Adra acknowledges and accepts its duty to deliver services consistently and fairly with trained staff working according to good practice equality and diversity guidelines.

In developing its services, Adra shall take into account the needs of specific groups and individuals and aims to ensure that it recognises the effect that unfair discrimination and disadvantage can create. Where possible it aims to take steps to redress those effects and tackle inequality in the way its services respond to their needs.

Adra shall use Equality Objectives in aiming to address the needs profile of its tenants in the design and delivery of its services.

Accessible Information and Services

Adra is committed to ensuring that our services are fully accessible to everyone who is eligible or has a legitimate interest in accessing these services.

Adra shall aim to facilitate access to services by recognising and avoiding whenever possible, any barriers, be they physical, cultural, bureaucratic or linked to perception or lack of knowledge or information.

Consultation and Engagement

Adra recognises the value of using the knowledge and experience of service users and other people interested in our work in eliminating discrimination, advancing equality of opportunity and fostering good relations.

When developing policies and services Adra shall consult with relevant interested individuals, groups and communities about their design, content and implementation. The evidence gathered shall be used to improve decision making and identify priorities for action.

Adra shall engage with appropriate parties to fill gaps in our information base and help interpret existing information. It shall also gather views, experiences and ideas of those affected by our decisions in order to identify solutions, overcome barriers, or mitigate any adverse impact on certain groups.

Adra shall engage with service users to prioritise our Equality Objectives by identifying which are most likely to make the biggest difference to tackling inequality. Engagement shall also be used to monitor performance on equality objectives.

To the best of its ability, Adra shall work to foster good relations and ensure community cohesion and shall demonstrate that it shall not tolerate any unlawful discrimination, harassment or victimisation within our communities.

Partners and Procurement

Adra shall build equality considerations into its procurement processes. Each Service shall aim to ensure that agreements with organisations and agencies working on behalf of Adra include equality and diversity requirements appropriate to the size and nature of that agreement.

Adra shall expect and encourage any contractor, partner or organisation which receives financial support from Adra to demonstrate a commitment to equality and diversity.

Assessing Impact

Adra shall consider relevant evidence in order to understand the likely effects of policies and practices on protected groups to:

- Ensure the policy or practice does not unlawfully discriminate
- Identify any adverse impacts on protected groups
- Consider how the policy or practice could better advance equality of opportunity
- Consider whether the policy will affect relations between different groups.

In order to achieve a proportionate and consistent approach, the designated Staff Equalities Lead shall be responsible for establishing whether a policy has relevance to the general duty. The designated Staff Equalities Lead shall be responsible for assembling a crosscutting team of trained staff to assess impact, and for recording the assessment using the EDf03 Equalities Impact Assessment.

Assessing Impact shall be carried out according to the Equality and Human Rights Commission Guidance 'Assessing Impact: A guide for listed public authorities in Wales'.

The documented assessment shall be reported to Senior Management Team who shall consider and take decisions whether or not to support any recommendations to implement changes to the policy or practice.

Equality Objectives

Adra shall set measurable Equality Objectives based on evidence of the greatest effect it can have on its identified equality challenges.

In drawing up equality objectives, Adra shall include an objective in relation to addressing any gender pay difference identified, and an objective that addresses the causes of any difference in pay between employees who are from any protected group and those who are not.

Adra shall review its Equality Objectives at least every 4 years.

Strategic Equality Plan

A Strategic Equality Plan shall be developed that will include an action plan for implementing Equality Objectives. The action plan will contain measurable outcomes.

Progress against the Strategic Equality Plan actions shall be regularly reviewed with a view to taking any necessary corrective action to ensure that the Plan is properly implemented.

Adra shall review the effectiveness of its Strategic Equality Plan regularly taking due regard to relevant information held by Adra and any other information likely to help in the review.

Monitoring and Reporting

Adra recognises that it needs to collect and use equality information in order to provide a sound base to take informed decisions.

Adra shall make appropriate arrangements to periodically identify the relevant information it holds, and identify and collect the data it does not have.

Adra's Board will note and publish the organisation's Equalities and Diversity successes on an annual basis.

Adra shall monitor complaints profiles to identify areas where they do not reflect the population and to identify whether there are causes of complaints associated with protected groups.

Adra shall monitor, evaluate and review the impact of changes to policies or practices that have relevance to equality to ensure that the actual impact matches the anticipated impact, and to ensure that relevant actions are implemented.

Adra shall monitor workforce profiles and tenant profiles to identify areas where they do not reflect the population of the areas in which it works. Where the profiles do not match it shall devise strategies to overcome any gaps or deficiencies.

Differences in pay, and the causes of such differences, between employees who have a protected characteristic and those who do not shall be monitored.

Participation in training shall be monitored to identify areas where Adra could help to improve this, e.g. non-residential courses for staff with domestic responsibilities

Complaints about any contractor, or other delivery partner, shall be monitored and prompt and appropriate action shall be expected to be taken in relation to complaints.

Dealing with Discrimination, Bullying, Harassment and Victimisation

All staff, tenants and Board Members have a right to complain about discrimination, bullying, harassment and victimisation whether by members of staff, Board Members, members of the public or staff from other organisations.

Staff may raise the matter directly with the person involved, their own line management, their trade union representative or HR. Any complaint of discrimination, bullying, harassment or victimisation will be dealt with under our agreed Discipline and Grievance Procedure.

Tenants may raise their complaint using Adra's Complaints procedure or using Adra's Anti Social Behaviour procedure.

Board Members may raise the matter directly with the person involved, the Head of Governance, Chief Executive, Chair of the Board or using Adra's Complaints procedure.

3. PROCEDURES

Assessing Impact

Adra shall consider relevant evidence in order to understand the likely effects of policies and practices on protected groups to:

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The documented assessment shall be reported to Senior Management Team who shall consider and take decisions whether or not to support any recommendations to implement changes to the policy or practice.

4. RESPONSIBILITIES AND ARRANGEMENTS

4.1

Role	Responsibility
Director of People and Communication	Ensure this policy is adhered to

Board members	Responsibility of all Board Members to behave according to this policy
Adra Staff	Responsibility of all staff to behave according to this policy
Staff Equalities Lead	Ensure all records required to evidence Adra's compliance with its equality duties are securely saved in the appropriate electronic folders and published as appropriate.

5. DEFINITIONS

[Terms specific to this policy that may be confusing to or misconstrued by the reader. Jargon or acronyms used should be clearly defined in this section]

Harassment - Harassment can arise when an individual is subjected to unwanted verbal abuse or physical advances or abuse related to the characteristics noted in paragraph 3.2 of this policy

Victimisation - Victimisation occurs when a person is given less favourable treatment than others in the same circumstances because that person has, or is believed to have, invoked, or have been involved in, proceedings under Employment Law or has lodged a complaint under Adra's grievance procedure or through the Equality and Human Rights Commission. Victimisation can also be discrimination against someone because they made or supported a complaint under Equality Act 2010 legislation. Victimisation applies to all the protected characteristics.

6. ASSOCIATED DOCUMENTS

- Equality Act 2010
- Equality and Human Rights Commission guidance documents (www.equalityhumanrights.com)
- Adra Procurement Strategy / policy
- Adra Local Tenant Participation Strategy

7. RECORD OF REVISIONS TO THIS PROCESS

[Provide information of any revisions made to the policy including detail of what has been changed since the previous version and who made the revision.]

Issue	Date	Comments (What has been revised?)	Written By	Approved for content
1	12/14	Major revision due to mainstreaming E&D project	DW	DW
2	09/18	Revision to include Members of Board	HF	DW
3	09/19	Revision due to the symptoms of the menopause being recognised as a disability and therefore is a protected	DW	DW

		characteristic under the Equality Act		
4	01/20	Revisions due to an Employment Tribunal case that decided that ethical veganism is a genuine belief and therefore protected under the Equality Act 2010	DW	DW
5	04/23	General review and update	DW	DW
6	07/24	General review and update	DW	DW

8. EQUALITY AND DIVERSITY

- 8.1. This policy sets out how Adra will be committed to treating all persons fairly
- 8.2. We aim to respond promptly and sensitively to the needs and rights of an individual, and protected groups
- 8.3. As part of reviewing this policy, its impact on equality has been screened for relevance and no detriment has been identified.

9. GENERAL DATA PROTECTION REGULATIONS (GDPR)

- 9.1. Adra will administer all relevant documents within the legal framework of the *Data Protection Act 2018*.

10. COMPLAINT

10.1 Adra recognises your right to bring forward a complaint in relation to the exercise of this policy. Any such complaint will be dealt with under the CCpol01 – Complaints and Concerns Policy

10.2 Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation.

11. REVIEW OF DECISIONS

11.1 Adra recognises the right to request a review of any decision relating to this policy. Any such review will be dealt with following our CCp04- Review of Decision process.

11.2 Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation

