

Camden Living Housing Association Limited

Equality and Diversity Policy

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1. Introduction

- 1.1. The purpose of this policy is to set out how Camden Living Housing Association Limited (“**CLHA**”) will ensure that it delivers services that are inclusive, accessible to all, and which respond to and support the range of needs of our customers. We recognise the value of diversity to the workplace, and we seek to ensure that our board, employees, contractors and sub-contractors reflect and represent a wide range of views and backgrounds.
- 1.2. We are committed to the principles of Equality and Diversity in service delivery and employment and seek to adhere to the provisions of the Equality Act 2010. We will do this through opposing discrimination, victimisation and harassment on the grounds of any and all protected characteristics.
- 1.3. The practical application of this policy will be reflected in all our recruitment, employment and service delivery policies and procedures as they are developed and implemented.

2. Legal and Regulatory Requirements

- 2.1. This policy meets its legal obligations outlined in the following legislation:
 - Equality Act 2010

3. Scope

- 3.1. All board members, potential board members, third party agents and customers are to be made aware of our commitment to equal opportunities.
- 3.2. This policy applies to all board members, customers, suppliers and managing agents; and covers employment, service delivery and all business activities, including for example:
- access to information and advice;
 - sales, lettings, leaseholds and estate management;
 - customer engagement;
 - dealing with incidents like harassment (including domestic violence);
 - procurement and supply;
 - governance;
 - development and regeneration; and
 - asset management.
- 3.3. We expect that everyone will abide by the principles set out in this policy.
- 3.4. CLHA will seek to incorporate the principles outlined in this policy into all of its policies and procedures.

4. Policy Aims

- 4.1. The policy will enable CLHA to:
- Deliver a good regulatory compliant standard of customer service which ensures all customers are treated fairly and with respect;
 - Actively research and provide suitable services sensitive to diverse customer needs;
 - Ensure that all board members understand and exhibit equality and diversity principles;
 - Provide an environment where people feel included and can make choices; and
 - Ensure that at work all employees can grow and develop.

5. Policy Statement

- 5.1. In order to meet the aims of this policy, we will:
- oppose direct and indirect discrimination of any kind;

- support board members and customers who challenge inappropriate behaviour;
- follow guidance from regulatory bodies or from the Equality and Human Rights Commission;
- meet statutory and regulatory responsibilities;
- seek to influence positively the practices of key stakeholders and partners;
- make explicit reference to equality and diversity issues in our business plans, strategies and policies; and
- deal promptly, firmly and consistently with any cases of discrimination or harassment reported by customers or employees.

5.2. In employment we will:

- Provide equal employment opportunities through fair recruitment and selection procedures so the best people are appointed;
- Communicate our recruitment advertising to a diverse range of potential applicants;
- Work to recruit employees who ideally reflect the diversity of our communities;
- Treat all employees on their merits and abilities, making any reasonable adjustments to enable them to do their job;
- Apply equality and diversity to learning and development opportunities; and
- Provide a safe working environment where differences are recognised and valued.

5.3. In appointing suppliers, contractors and consultants we will:

- Require our contractors and consultants to apply our equality and diversity principles; and
- Work with our contractors and consultants to encourage them to recruit people who reflect the diversity of the communities in which they work.

6. Protected Characteristics

6.1. The protected characteristics identified in the Equality Act 2010 are as follows:

- Age;
- Disability;
- Race;
- Religion or belief;
- Sex;
- Sexual orientation;
- Gender reassignment;
- Marriage or civil partnership; and

- Pregnancy or maternity.

6.2. Information on each protected characteristic is provided below:

6.3. **Age** – people of all ages are protected under the Equality Act 2010. Some acts of direct or indirect discrimination can be justified if it is ‘a proportionate means of achieving a legitimate aim’.

6.4. **Disability** – a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. There is a duty to make reasonable adjustments to assist in overcoming the disadvantages of the impairment. Individuals are also protected from discrimination arising from something connected with their disability where it could be reasonably expected that the Business would know that the person has a disability. It is also unlawful in most circumstances to request information about the health of job candidates prior to making a job offer. Employees who are disabled or become disabled are encouraged to inform the Business accordingly so that appropriate support can be explored.

6.5. **Race** – individuals are protected against discrimination on the grounds of colour, nationality and ethnic or national origins.

6.6. **Religion or belief** – individuals are protected against discrimination on the grounds of their religion or lack of religion and belief or lack of belief. A religion can be any religion that has a clear structure and belief system. A belief can be a religious or philosophical belief that affects a substantial aspect of human life and behaviour. Political beliefs are not protected.

6.7. **Sex** - refers to both men and women.

6.8. **Sexual orientation** – refers to bisexual, homosexual, heterosexual, and asexual people.

6.9. **Gender reassignment** – transsexual people who propose to start or complete a process to change their gender regardless of whether or not this involves medical procedures are protected under the Equality Act 2010. An employee who is absent due to such procedures cannot be treated less favourably than if the absence was due to sickness, injury or some other reason.

6.10. **Marriage or civil partnership** – the Equality Act 2010 protects employees who are married or in civil partnerships from discrimination on account of this status.

- 6.11. **Pregnancy and maternity** – female employees and applicants are protected against discrimination on the grounds of pregnancy and maternity during the period of pregnancy and any statutory maternity leave.

7. Types of Discrimination

- 7.1. The six types of discrimination referred to by this policy have been described below:

- 7.2. **Direct Discrimination** - constitutes less favourable treatment of one person than another, or than another would be treated, because of one or more of the protected characteristics outlined above. Equally, direct discrimination can occur where there is less favourable treatment of an individual because they have, or are thought to have a protected characteristic (perceptive discrimination) or because they associated with someone who has a protected characteristic (associative discrimination).

- 7.3. **Associative Discrimination** - is direct discrimination involving less favourable treatment of a person because they are associated with someone who possesses one or more of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex and/or sexual orientation.

- 7.4. **Perceptive Discrimination** - is direct discrimination involving less favourable treatment of a person because it is perceived that they have one or more of the following protected characteristics even though they do not: age, disability, gender reassignment, race, religion or belief, sex and/or sexual orientation.

- 7.5. **Indirect Discrimination** - is when a provision, criterion, rule, policy or practice of the Business which is applicable to all staff or applicants equally, is applied but has a disproportionate effect on an individual or group of individuals who share one or more of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation and/or marriage and civil partnership and cannot be shown by the Business to be a proportionate means of achieving a legitimate aim.

- 7.6. **Victimisation** - is when a person is treated less favourably than another employee or candidate because the individual has made or supported a complaint or raised a grievance under the Equality Act 2010 or is suspected of doing so.

- 7.7. **Harassment** - is 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. Relevant protected characteristics are as follows: age, disability, gender reassignment, race, religion or belief, sex

and/or sexual orientation. Employees can complain of harassment even if the offending behaviour is not directed at them and even if they do not have the protected characteristic themselves.

- 7.8. **Third Party Harassment** - is harassment as described above, of employees by other individuals who are not employees of the Business e.g. clients and suppliers etc. The Business may be liable when harassment has occurred on at least two previous occasions and is aware of the incidents and yet steps have not been taken to resolve the matter.

8. Monitoring and Compliance

- 8.1. The board has overall responsibility for this putting this policy into practice. In addition, every board member has a personal responsibility to conduct themselves in a suitable manner, without invoking or supporting any discrimination as outlines in this policy.
- 8.2. The board will promote fairness and the elimination of prejudice in all the activities of CLHA so that its demonstrably exceeds the minimum legal requirements for equality. It also recognises that everyone is different and will therefore ensure that products and services are appropriately shaped to be attractive to the range of customers we serve.
- 8.3. This policy will be reviewed at least every two years, unless legislation, business or sector developments require otherwise – to ensure that it continues to meet the stated objectives and to take account of good practice developments.

9. Training and promotion

- 9.1. We will publicise this policy to our staff, suppliers, consultants and managing agents through:
- Our website; and
 - Briefings and training.

10. Policy management and review

- 10.1. The board has overall responsibility for this policy and it will be reviewed as required or at least every two years to incorporate any changes in legislation, regulation or good practice.