



Equality Diversity and Inclusion Policy

Version Number	6
Revision Date	August 2023
Department	Business Support & Transformation
Author	HR Business Partner
Reason for Policy Creation/Revision	Equality Diversity and Inclusion for Customers included.
Data Protection	This policy complies with our data protection policy and procedure.
Equalities	This policy ensures that we have equal protection in place for our employees and customers. Hanover is committed to the development of positive policies and initiatives to promote equal opportunities, inclusion and diversity in employment and housing opportunities regardless of any protected characteristics.
Sustainability	N/A
Proof Read By	Head of HR & Organisational Development
Date Approved	31 August 2023
Approved By	SMT
Next Review Due	31 August 2026
Audience – Training and Awareness Approach	Manager training will be required.
Effective Date	7 September 2023
Internal References – Policies & Procedures (Located on The Hub)	<ul style="list-style-type: none"> Grievance Policy and Procedure Maximising Attendance Procedure Disciplinary Policy and Procedure Recruitment Policy Dignity at Work Policy Data Protection Policy Hanover Equality Impact Assessment Policy Unacceptable Actions Policy

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	Anti-social behaviour policy Complaints Policy Whistleblowing Policy Hanover Equality Impact Assessment Form
External References	SFHA Equalities toolkit ACAS XpertHR The Disability Discrimination Act (DDA) 1995 as amended by the Disability Discrimination Act (DDA) 2005 Equality Act 2010 Equality and Human Rights Commission's statutory code of practice, The Duty to Promote Equality Housing (Scotland) Act 2006

1. Policy Purpose

1. 1. The Equality Diversity and Inclusion Policy sets out Hanover's commitment to encouraging equality, diversity, and inclusion among our workforce, and to eliminating unlawful discrimination.
1. 2. It also sets out Hanover's position on protecting any customer or their family from discrimination on the basis of a protected characteristic as to how it relates to the Housing and Care services provided by Hanover.
1. 3. Hanover is committed to promoting equal opportunities and treating all people, regardless of their background, with dignity and respect –this includes our employees, those with whom we interact e.g., our customers and other stakeholders.

2. Policy Scope

2. 1. Our culture at Hanover, as demonstrated through our values is:
 - show RESPECT
 - be ACCOUNTABLE
 - support COLLABORATION
 - promote INCLUSION

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2. 2. These values ensure that we provide equality, fairness, and respect for all in our employment, whether permanent, temporary, part-time or full-time or otherwise working flexibly. It is to ensure we treat anyone engaging with us with equality, fairness, and respect.
2. 3. This policy applies to all aspects of our relationship with employees while they remain under Hanover's employment and the term 'employee' refers to all workers who are either employed or contracted to undertake work for Hanover.
2. 4. This policy ensures compliance with the applicable provisions contained within the Equality Act 2010 and Hanover's responsibilities as a landlord.

3. Definition

3. 1. The Equality, Diversity and Inclusion policy is aimed to oppose and avoid all forms of unlawful discrimination under the Equality Act 2010's protected characteristics of:
 - age
 - disability
 - gender reassignment
 - marriage or civil partnership
 - pregnancy and maternity
 - race (including colour, nationality, and ethnic or national origin)
 - religion or belief
 - sex
 - sexual orientation
3. 2. The policy is also aimed to work in conjunction with the Dignity at Work policy in creating and maintaining a working environment free of bullying, harassment, and victimisation.
3. 3. Equality is about ensuring that every individual has an equal opportunity. We aim to create an equal opportunity environment for everyone based on their potential.
3. 4. Diversity acknowledges and values all the possible ways in which people are different. We aim to consider all aspects of the Equality Act 2010 protected characteristics within our policies and practices.
3. 5. Inclusion refers to everyone getting the opportunity to get involved, valued, and treated with respect. We aim to create a working environment where diversity is valued, and everyone is respected and included, coherent with our values.

4. Responsibilities as an Employer

4. 1. **Employees** - Employees have a responsibility to put this policy into practice. Employees are asked for their commitment to treat each other with dignity and respect and set an excellent standard of behaviour for others to follow. Employees must report any bullying, harassment, victimisation, and unlawful discrimination within the workplace and in the manner in which Hanover provides its services.
4. 2. **Board**- Hanover is committed to ensuring Equality, Diversity, and Inclusion among its Board members with the aim to promote equality within its overall decision-making.
4. 3. **Hanover**- will take seriously complaints of bullying, harassment, victimisation, and unlawful discrimination by fellow employees, volunteers, customers, suppliers, and any others in the course of our service delivery. We will ensure that our contractors are aware of this policy and agree to comply with it.

Responsibilities as a Landlord

5. Definition of Discrimination When Letting and Managing Accommodation

5. 1. A landlord must not unlawfully discriminate against any person on the basis of a protected characteristic. For rented property these are:
 - Disability;
 - Race;
 - Religion or belief;
 - Pregnancy or maternity;
 - Gender;
 - Gender reassignment;
 - Sexual orientation
5. 2. The 2010 Act makes it unlawful for the landlord to discriminate against a disabled person:
 - by offering a property on worse terms than for a non-disabled person
 - by refusing to let a property
 - by treating a disabled person less favourably in the maintenance of housing waiting lists
 - by treating the disabled person differently in the way in which s/he is allowed to make use of facilities
 - by preventing the disabled person from using benefits or facilities

- by evicting the disabled person or subjecting them to any other form of disadvantage (eg physical attack, damage to property, verbal abuse) affecting their peaceful enjoyment of the premises
5. 3. You are disabled under the Act if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities
- 'substantial' is more than minor or trivial, eg it takes much longer than it usually would to complete a daily task like getting dressed
 - 'long-term' means 12 months or more, eg a breathing condition that develops as a result of a lung infection
5. 4. A progressive condition is one that gets worse over time. People with progressive conditions can be classed as disabled.

6. Direct and indirect Discrimination

6. 1. Direct discrimination occurs when the landlord
- refuses to provide or deliberately not to provide a service which is normally offered to other people;
 - offers a lower standard or worse manner of service;
 - offers less favourable terms
6. 2. Indirect discrimination is where a policy or practice which seems neutral actually puts a person with a protected characteristic at a particular disadvantage.
6. 3. There are limited circumstances where it may be justifiable for Hanover to act in a way which is less favourable to a disabled person for a reason which relates to his/her disability.
6. 4. These circumstances are:
- a) Health and Safety. In order not to endanger the health and safety of any person, including the disabled person.
 - b) Incapacity to contract. Refusal to enter into a contract with a disabled person if they are unable to understand some or all of the terms and conditions of it.
 - c) Otherwise unable to provide the service. Refusing a service where it would prevent Hanover from providing it to other customers.

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- d) To enable the service to be provided. Providing a service to a lower standard, in a worse manner or on worse terms if it is necessary in order for Hanover to provide the service.
- e) Greater expense and additional cost of providing the service. Where the service is individually tailored by Hanover to meet the needs of a disabled customer Hanover can charge more for it.

7. Monitoring and Evaluation

- 7. 1. Hanover will monitor its workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in this policy.
- 7. 2. Hanover plans to evaluate the effectiveness of its commitments toward Equality, Diversity, and Inclusion by engaging with its EDI working group.
- 7. 3. Hanover is reviewing its plans to use the Equality Monitoring Data towards shaping its Equality, Diversity, and Inclusion action plans, including employee and management consultations on any agreed improvements.

8. Review

- 8. 1. The policy will be reviewed every three years or earlier as required.