

LHP

**EQUALITY &
DIVERSITY POLICY**

2024-2026



Equality & Diversity Policy

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Formal Review of Policy by:	PGC
Policy Links:	<p>This policy links to all policies, procedures and strategy documents adopted by LHP.</p> <p>Specific reference is made to the following documents:</p> <ul style="list-style-type: none">• Disciplinary and Grievance Procedures• Complaints Procedure• Pay Policy• Dignity at Work Policy

Brief Policy Summary:

This policy sets out how Lincolnshire Housing Partnership will achieve its aims to promote equality and diversity as an employer and housing provider.

It outlines how Equality & Diversity will underpin all areas of the organisation's work and service provision, including the communities within which it operates.

Contents

Purpose.....	4
Objectives	4
Scope.....	5
Key Equality & Diversity Concepts	6
Management and delivery of this policy.....	7
Selection, Recruitment and Retention	8
Service Delivery	10
Procurement.....	11
Monitoring and Evaluation	12
Review Cycle	13
Equality Impact Assessment.....	14

Purpose

Policy Statement

1. Lincolnshire Housing Partnership (LHP) recognises that its customers and colleagues come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring equality and diversity is embedded into our day-to-day working practices. LHP actively promotes fairness, respect, equality, diversity, inclusion and engagement and is committed to continuous improvement.
2. Through our policies and in our day-to-day work and fulfilment of our legal responsibilities, LHP is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of gender reassignment, race, disability, religion or belief, sex, sexual orientation, age, pregnancy and maternity or marriage and civil partnership.

Objectives

3. In order to effectively implement its commitment to being an equitable and diverse organisation, LHP has set the following objectives, ensuring compliance with the **Equality Act 2010** and other relevant EDI guidelines:
 - **Embed Equality, Diversity, and Inclusion (EDI) into Leadership** - Provide organisational leaders with the necessary skills and knowledge to fully embed fairness, respect, equality, diversity, inclusion, and engagement into LHP's culture, strategy, and processes.
 - **Mandatory Equality and Diversity Training** - Provide comprehensive equality and diversity training to all colleagues, focusing on their responsibilities under the Equality Act 2010 and other relevant legislation.
 - **Equal Treatment in Service Delivery** – LHP is committed to fair treatment for all customers while acknowledging that some may need additional support due to vulnerabilities such as disabilities, financial hardship, or complex needs. We actively identify and prioritise these individuals to ensure they receive equitable access to services, while ensuring no customer or prospective customer is disadvantaged due to a protected characteristic, as defined by the Equality Act 2010.
 - **Accessible Opportunities for All** - Ensure that all opportunities provided by LHP are accessible to everyone, making reasonable adjustments where necessary to ensure compliance with UK accessibility standards, including the Public Sector Equality Duty (PSED).
 - **Promote Fairness, Dignity, and Respect** - Foster an inclusive environment where colleagues and service users are treated fairly and with dignity and respect.

- **Fair Recruitment and Selection Practices** - Ensure that recruitment processes are free from bias and promote fair treatment for all job applicants.
- **Talent Management and Workforce Development** - Maximise the potential of LHP's workforce through effective talent management, supporting the professional development of colleagues from diverse backgrounds, and ensuring fair access to progression opportunities.
- **Safe and Inclusive Working Environment** - Create a safe, supportive, and welcoming environment for colleagues and customers where everyone can contribute to their fullest potential.
- **Challenge Discrimination and Foster Diversity** - Actively challenge all forms of discrimination, ensuring that policies and practices are aligned with the Equality Act 2010 and relevant diversity standards.
- **Data Collection and Monitoring for EDI** - Gather, analyse, and report on diversity data to understand the workforce and customer base, in compliance with the GDPR and the Equality Act 2010. This data will be used to track LHP's progress in service delivery, employment, and recruitment, identifying any negative trends based on protected characteristics.
- **Measure and Address Disparities** - Use collected data to monitor and measure disparities in key areas, including service usage, customer satisfaction, and colleague recruitment. This will enable LHP to proactively address any trends of discrimination or unequal outcomes, ensuring compliance with EDI standards.
- **Zero-Tolerance Policy on Discrimination, Harassment, and Bullying** - Enforce a zero-tolerance approach to discrimination, bullying, harassment, and any inappropriate behaviour, investigating all reported incidents.
- **Ongoing EDI Training for Colleagues** - Ensure regular training for colleagues on LHP's commitment to equality and diversity, with a particular focus on zero tolerance for discrimination, bullying, and harassment, and the specifics of this EDI policy.
- **Conduct Equality Impact Assessments (EIA)** - Undertake regular **Equality Impact Assessments (EIAs)** for all policies, processes, and procedures to ensure they are compliant with EDI legislation and do not result in direct or indirect discrimination.

Scope

4. This policy applies to all aspects of the organisation, including colleagues (Board members, employees, and involved customers), partners, customers,

leaseholders, and any external stakeholders who engage with or are supported by the organisation, such as through the procurement process. This policy extends to any individual or entity providing services to or on behalf of the organisation.

- **Obligations and Responsibilities** - Equality, Diversity, and Inclusion (EDI) imposes both rights and responsibilities on every colleague and all stakeholders associated with the organisation.
- **Statutory Compliance** - This policy ensures compliance with statutory duties as set out in the **Equality Act 2010** and, where applicable, the **Disability Discrimination Act 2005**.
- **Due Regard** - In line with the Public Sector Equality Duty (PSED) under the **Equality Act 2010**, due regard requires that the organisation:
 - Eliminate Disadvantages
 - Meet the Needs of People from Protected Groups
 - Encourage Participation
- **Protected Characteristics:** As outlined by the **Equality Act 2010**, the protected characteristics are:
 - Age
 - Disability
 - Gender Reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
 - Race
 - Religion or Belief
 - Sex
 - Sexual Orientation
- The organisation is committed to ensuring that no individual, whether a colleague, customer, customer, or external stakeholder, experiences discrimination on the basis of any of these protected characteristics.

Key Equality & Diversity Concepts

5. **Equality** - ensuring that everyone is treated fairly, with dignity, and respect, in compliance with the **Equality Act 2010**. This involves actively challenging discrimination and removing barriers, so that all individuals have equal access to opportunities and are supported in achieving their potential. It recognises that treating people equally may require making **reasonable adjustments** to create a level playing field, particularly for individuals with disabilities or other

protected characteristics.

6. **Equity** - recognising that different people have different needs and starting points, and taking steps to eliminate disparities by ensuring that resources and opportunities are distributed fairly. Equity ensures that everyone, regardless of their background or circumstances, has the opportunity to succeed, by addressing systemic barriers and historical disadvantages.
7. **Diversity** - recognising and valuing the unique contributions that different individuals bring to the organisation. This means acknowledging and celebrating the differences in values, perspectives, backgrounds, and abilities, and promoting an environment where diverse backgrounds, thinking, skills, and experiences are welcomed.
8. **Inclusion** - providing an environment where all individuals, regardless of their background, can fully access opportunities and resources and feel valued and accepted.
9. **Discrimination** - refers to unequal treatment of an individual because of a **protected characteristic**, as defined by the Equality Act 2010.
 - **Direct discrimination** occurs when someone is treated less favourably than another person due to:
 - Their actual or perceived protected characteristic.
 - Their association with someone who has a protected characteristic.
 - The organisation's failure to provide reasonable adjustments for individuals with disabilities.
 - Direct discrimination is unlawful under the Equality Act and cannot be justified.
 - **Indirect discrimination** occurs when a provision, criterion, or practice applies equally to everyone but places individuals with a protected characteristic at a disadvantage.
 - **Harassment or bullying** defined as unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, or offensive environment. In compliance with the **Equality Act 2010**, harassment applies to all protected characteristics, including race, sex, disability, and sexual orientation.
 - **Enforcement and Accountability** - Any breach of this policy will result in appropriate action, which may include disciplinary measures, legal action, or termination of contracts with external parties.

Management and delivery of this policy

10. At LHP, promoting Fairness, Respect, Equality, Diversity, Inclusion, and Engagement (FREDIE) is a shared responsibility. All colleagues and

stakeholders are accountable for upholding these principles, ensuring they are reflected in everything we do.

11. **Leadership Commitment** - The Leadership Team at LHP is fully committed to embedding **Equality and Diversity** across all areas of the business.
12. LHP is committed to promoting equal opportunities throughout the procurement process, ensuring that our partners and external stakeholders share our equality objectives. We require them to deliver services that reflect the same inclusive ethos.
13. **Chief Executive's Role** - The Chief Executive of LHP has the responsibility to oversee the **implementation, monitoring, and evaluation** of this Equality and Diversity Policy. This encompasses both employment practices (such as selection, recruitment, and retention) and service delivery.
14. In particular, the Board is required to give due regard to how their decisions and policies might impact the organisation's equality objectives.
15. Colleagues are expected to familiarise themselves with and follow the guidelines set out in LHP's Dignity at Work policy, ensuring a respectful and inclusive working environment for all.
16. **Handling Complaints and Grievances** - LHP has established robust procedures to address complaints related to **discrimination, harassment, or bullying**:
 - For **colleagues**, complaints will be handled through the **Disciplinary and Grievance** procedures.
 - For **customers** and those using our services, the **Complaints** procedure will be utilised.
17. Any complaint will be thoroughly investigated, and appropriate action will be taken in line with LHP's **zero-tolerance approach** to discrimination.
18. When representing LHP - whether attending committees, meetings with external stakeholders, or interacting with customers – colleagues must ensure that the principles and practices of **Equality and Diversity** outlined in this policy are consistently adhered to.
19. When representing LHP on the committees of external organisations, colleagues will endeavour to promote and encourage the adoption of equality and diversity principles by these organisations.

Selection, Recruitment and Retention

20. LHP is dedicated to promoting equality and diversity as an employer. We ensure that no job applicant or employee receives less favourable treatment or faces disadvantages due to conditions or requirements that cannot be justified within the context of this policy.

21. Selection, recruitment, training, promotion, and employment practices will be regularly reviewed to ensure compliance with this policy. Specifically, the selection and recruitment procedures will be assessed annually to continuously enhance equality and diversity practices and respond to changes in legislation. LHP will monitor data on all applicants, as well as those who are successful, to identify any practices that may unintentionally discriminate against specific groups.
22. Where under-representation of any particular group occurs in recruitment, we will take appropriate positive action. This may include offering training and encouragement to employees from under-represented groups.
23. Employees involved in the selection and recruitment process, as well as those managing colleagues, will receive appropriate training to recognise and avoid making stereotypical assumptions or judgments about individuals.
24. LHP regards discrimination, harassment, abuse, victimisation, or bullying of colleagues, clients, or others in the course of work as serious disciplinary offences, potentially leading to gross misconduct. Condoning such behaviour will also be treated as a disciplinary offence. LHP will provide support to individuals who report harassment or discrimination, ensuring they feel safe and supported.
25. We will accommodate requests for flexible working arrangements, including part-time roles, provided that such arrangements align with organisational needs. Initiatives to support colleagues returning from career breaks will also be encouraged.
26. Our terms and conditions allow for paternity leave and partner leave in addition to standard maternity leave, in compliance with current legislation.
27. We recognise our duty to make reasonable adjustments for disabled individuals. LHP will proactively make adjustments in service provision and for job applicants and employees, aiming to remove barriers to participation, regardless of whether there is a legal obligation to do so.
28. LHP will ensure that employees are not discriminated against based on their race, religion, or belief. This includes allowing time and, where possible, space for prayers during the working day, considering dietary requirements in catering, allowing time off for religious observances, and arranging meetings to avoid clashes with significant religious dates.
29. As part of our talent management strategy, LHP will operate an annual appraisal system for colleagues. Where appropriate, training and development opportunities will be provided to enhance potential within existing roles, with considerations for paid or unpaid leave for educational purposes.
30. LHP will regularly review pay structures and work towards eliminating any unfair pay gaps identified through mechanisms like Gender Pay Gap Reporting.

31. All training opportunities will be widely publicised through internal communications and made accessible to all eligible employees. We will ensure that reasonable adjustments are made for participants where necessary to avoid excluding any particular group.

Service Delivery

32. LHP is committed to ensuring that its services are fully accessible to all members of the community. We aim to ensure that no individual or group receives less favourable treatment based on any protected characteristic.
33. In particular, we will ensure that services are accessible to those facing social, economic, or educational disadvantages, in alignment with the **Equality Act 2010**.
34. We are dedicated to using a variety of methods to regularly consult with our customers to ensure our services reflect their needs. This includes gathering feedback on current and proposed services, including any changes in service provision. Customer input will be used to improve service delivery and accessibility, ensuring a responsive approach to evolving community needs.
35. LHP will make its commitment to combating discrimination clear by widely publishing this policy. It will be made accessible to all colleagues, partners, recognised trade unions, and external stakeholders, using formats suitable for different needs, such as accessible digital formats, large print, and translated versions where required.
36. We are committed to conducting regular reviews of our services to ensure that they remain accessible to everyone. This includes:
 - Providing support for people whose first language is not English through translation and interpretation services.
 - Ensuring our services and communications accommodate individuals with visual or hearing impairments by offering assistive technologies and other necessary adjustments.
 - Ensuring that individuals with mobility challenges or those who cannot easily travel can still access services through digital options or home visits, where feasible.
 - We will take all reasonable steps to ensure that activities are conducted in premises that are fully accessible.
 - We will operate a wide range of communication channels to allow individuals to contact colleagues.
 - LHP will prioritise the needs of disadvantaged and excluded communities, finding ways to represent their interests effectively.

Procurement

37. LHP is committed to working with a diverse range of suppliers and contractors, from local businesses to large multi-national companies, across various types of contracts and purchases. In line with our commitment to **Equality, Diversity, and Inclusion (EDI)**, we will ensure that these principles are embedded throughout the procurement process.
38. Equality, Diversity, and Inclusion will be integral to the procurement process. During the award of contracts, LHP expects all contractors and suppliers to comply with the relevant EDI legislation. This includes:
 - Non-discrimination based on protected characteristics such as race, disability, age, gender, and sexual orientation.
 - Commitment to equal opportunities in employment and service delivery.
 - Compliance and Certification Requirements
39. Each contractor engaging in the LHP procurement process will be required to:
 - Hold the appropriate certifications and qualifications relevant to the works and services they are bidding to deliver.
 - Provide evidence of a formal equality and diversity policy, demonstrating that they have established procedures to prevent discrimination and promote inclusivity.
 - Submit evidence of EDI training delivered to their colleagues, supported by documentation of ongoing support and further training.
40. The nature and extent of compliance requirements will depend on the size and scope of the contractor's work. However, key compliance areas will include:

Examples of Compliance Requirements:

- **Accessible Information:** Contractors may be required to provide published materials in **alternative languages** or **accessible formats** to ensure their services are inclusive.
 - Contractors will be expected to conduct **equality and diversity monitoring** of their workforce, identifying any under-representation of specific groups, and take proactive steps to address these imbalances.
 - Contractors must demonstrate their ability to implement **reasonable adjustments** in delivering services to LHP customers, particularly those with disabilities.
 - Contractors will be encouraged to **establish a fully inclusive workforce**, offering employment and skills development opportunities to local disadvantaged groups, including the long-term unemployed.
41. LHP will regularly review the compliance of suppliers and contractors to ensure

they are upholding the principles of this policy. Failure to meet the EDI standards outlined in this procurement policy may result in:

- Contract reviews or termination.
- Exclusion from future procurement opportunities.

Monitoring and Evaluation

42. LHP is committed to systematically evaluating its services and the effectiveness of its Equality, Diversity, and Inclusion (EDI) policy. We will employ a variety of methods to monitor and evaluate how well the policy is being implemented and to ensure compliance with EDI principles.
43. To effectively monitor the implementation of this policy, LHP will gather data on the **protected characteristics** of its customers and colleagues.
44. This data will be critical in assessing the representation of diverse groups and identifying areas for improvement in recruitment, service delivery, and internal policies.
45. LHP is fully compliant with the **General Data Protection Regulation (GDPR)**. When gathering sensitive information related to protected characteristics, LHP will:
 - Be transparent about the **purpose** of collecting this information.
 - Explicitly inform individuals that they have the right to withhold such information by selecting the option '**prefer not to say**'.
 - Ensure that individuals understand the **benefits** of providing data on their protected characteristics, such as enabling LHP to improve its services and employment practices to better support diversity and inclusion.
 - All data collected will be securely stored, aggregated, and anonymised before being analysed to protect individuals' privacy.
46. Data gathered from recruitment processes, customer feedback, complaints, grievances, disciplinary proceedings, and other relevant processes will be analysed by **protected characteristics**, where such information is available. This analysis will help identify:
 - Any **trends** indicating under-representation or potential discrimination.
 - Areas where **improvements** in service delivery or employment practices may be required.
 - If any **negative trends** are identified, they will be thoroughly investigated, and appropriate recommendations will be made to the Board for corrective action.
47. LHP will provide an **annual report** to the Board detailing the outcomes of monitoring and evaluation activities. This report will include:

- Analysis of trends related to specific protected characteristics.
 - Recommendations for addressing any issues identified.
 - Progress on implementing EDI initiatives and achieving organisational diversity goals.
48. In order to effectively monitor and evaluate the effectiveness of the implementation of this policy, we will monitor the diversity of our customers and colleagues through the gathering of data on protected characteristics.
49. We will be sensitive to groups and individuals and will have due regard for the principles of GDPR when seeking information. Where sensitive information is gathered, those responding will be explicitly informed of the purpose and that they are at liberty to withhold the information (i.e. be given the option of 'prefer not to say').
50. Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by protected characteristics where this information is available to identify any particular trends. Where any negative trends are identified, these will be investigated fully and recommendations made.

Review Cycle

51. Responsibility for review of this policy sits with the People and Governance Committee (PGC).
52. A formal review will be completed 2-yearly.
53. Additionally, an interim review would be conducted in the following circumstances:
- A change is made to relevant legislation, including but not limited to the Equality Act 2010.
 - The investigation into a negative trend indicates a review of this policy is appropriate.
 - An external review of our services identifies the need for a policy review.

Equality Impact Assessment

Equality & Diversity Policy – July 202 Version

The Equality & Diversity policy has been reviewed in line with policy review schedule requirements. The policy has also been updated to reflect Investors in Diversity recognition being sought.

This policy aims to:

- Promote an inclusive and equitable environment that respects diversity across all protected characteristics
- Ensure fair treatment and equal opportunities for all individuals.
- It seeks to eliminate discrimination, foster good relations, and create a positive impact on workplace culture.

Completed By:

Abigail Iyaho

Date: October 2024

STAGE 1 SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e., on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e., have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

This policy is specific to all colleagues, third party organisations, customers and any individual associated with LHP. The EDI policy applies to all employees, volunteers, service users, and stakeholders. It has the potential to impact:

- **Race and Ethnicity:** Supporting fair access and eliminating bias, particularly for minority ethnic groups.
- **Gender (including transgender):** Addressing gender equality and recognising the needs of transgender and non-binary people.
- **Religion/Faith/Belief:** Promoting respect for diverse religious beliefs and accommodating reasonable adjustments (e.g., prayer spaces).
- **Sexual Orientation:** Ensuring an inclusive environment free from discrimination for LGBTQ+ individuals.
- **Age:** Considering intergenerational equity and removing age-based barriers.

- Disability: Addressing accessibility needs and providing reasonable adjustments.
- Socioeconomic Background: Although not a protected characteristic, the policy promotes inclusion for individuals from all backgrounds.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

No significant negative impacts are foreseen as the policy is equality neutral and will particularly have a positive impact on protected groups. However, care must be taken to ensure that the focus on specific groups does not inadvertently exclude others or create perceptions of preferential treatment. This can be done through:

- Monitoring and Feedback: Ongoing data collection to monitor the policy's impact on various groups.
- Consultation: Regular engagement with employee networks and stakeholder groups to identify concerns early.
- Flexible Policy Review: The policy will be reviewed annually, with any identified gaps or issues addressed promptly.
- Training: Colleagues will receive continuous training on unconscious bias, inclusive leadership, and cultural competence.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or overrepresented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

LHP collects data on its employees, customers and third party suppliers, which is held within secure files with limited, protected access. Data collection continues on an ongoing basis and is regularly reviewed to ensure it's suitability and relevance. Where gaps exist, the organisation is working hard to collate the data, ensure those impacted are reassured of the relevance and importance of holding such data on file.

Types of data that will be collected to assess the policy's effectiveness:

- Employee Demographics: Analysis of workforce diversity data.
- Complaints and Grievances: Monitoring EDI-related complaints.
- Engagement Surveys: Feedback from colleagues, service users, and stakeholders.
- Progress on Targets: Tracking progress against EDI action plan goals.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements/plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Data is collected using internal resources.

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If

not, will there be monitoring and review to assess the level of impact over a period of time? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

There is no requirement for a full impact assessment. However, the processes used around EDI and collating EDI data will be reviewed on a regular basis. Should a full impact assessment be required, this will be carried out and relevant documents updated.

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.

Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality