

Equality, Diversity and Inclusion Policy

1. Our vision

1.1 Although Town & Country Housing (TCH) exhibits many of the traits associated with an exemplary equality, diversity and inclusion culture, we are ambitious and recognise the need for continuous self-improvement and examination of our current practices. Our vision is to further embed equality, diversity and inclusion in every single aspect of the organisation. In other words, it must be a priority consideration in all that we do, including when delivering, reviewing or designing new or existing services, processes, policies and procedures.

We also aspire to better understand, reflect and meet the needs of the communities we serve by delivering accessible and inclusive services. Equality is about treating everyone as an individual and where barriers do exist, we are fully committed to providing innovative solutions which facilitate similar and consistent outcomes for all residents.

2. Scope

2.1 This policy sets out TCH's approach to equality, diversity and inclusion applies to TCH employees, residents and contractors. The legislation most relevant to this policy is the Equality Act 2010.

3. Aims and objectives

- 3.1 The aims and objectives of this policy are as follows:
 - Ensure a robust commitment to equality, diversity and inclusion through strong governance, leadership and effective external and internal communication
 - Deliver high quality, consistent services which are accessible to all residents
 - Improve resident data and ensure it is used appropriately to better understand needs and inform services
 - Facilitate resident engagement opportunities and use the outcomes to positively influence and improve services
 - Recruit, develop and retain a talented workforce which broadly reflects the communities we serve.

4. Policy

Organisational culture

- 4.1 As detailed at 1.1, we will continue to firmly embed a strong organisational commitment to equality, diversity and inclusion and ensure it is a priority consideration in all that we do. Staff members will adopt a 'human and kind', empathetic approach and regardless of role, must first and foremost consider the impact of their actions from the resident perspective.
- 4.2 Residents are individuals and will always be treated in a fair and equitable manner. We will meet their needs by providing high-quality services that are inclusive, responsive and non-discriminatory. We will also provide services that are

- continuously improving and evolving, including through digital means where appropriate.
- 4.3 We will deliver frequent, mandatory equality, diversity and inclusion awareness training for staff, board members and involved residents. We will also deliver unconscious bias training where appropriate.
- 4.4 Equality, diversity and inclusion, including the stigma issues that exist around social housing residents will be a frequent discussion topic at team meetings, staff briefings and a regular feature in internal communications. Staff will also be encouraged to positively challenge behaviours which are inconsistent with our values.
- 4.5 Our commitment to equality, diversity and inclusion will be an important feature in recruitment packs to ensure we attract applicants with the right values and attributes. An awareness of and commitment to equality, diversity and inclusion will be an essential requirement in all job descriptions and will be assessed during the interview and selection process. Equality, diversity and inclusion will also be a key part of the induction programme for new starters.
- 4.6 We will analyse and monitor the equality, diversity and inclusion of staff and board members to ensure it is broadly reflective of the communities we serve. The gender split of board members will be 50/50 and there will continue to be an equality, diversity and inclusion board member champion. We will also publish information about the gender pay gap.
- 4.7 As part of our corporate social responsibility commitment, all staff members will be encouraged to undertake volunteering activities that benefit local communities and charities, for up to two days per annum.
- 4.8 Community investment activities including pre-employment training and financial inclusion initiatives will continue to benefit residents and local communities. Likewise, tenancy sustainment interventions, including sign posting and referrals to external services will be targeted at residents where a need is identified.
- 4.9 In accordance with GDPR requirements, we will continue to improve the quality of resident data, including diversity information, if it can be meaningfully used to better understand needs and inform services.
- 4.10We will continue to identify the proportion of residents who are digitally excluded. We know this can be for a variety of reasons but will work to address gaps in technology and skills.
- 4.11We will ensure that relevant and proportional equality, diversity and inclusion considerations are taken into account when procuring and commissioning services. Equally, we will ensure that all contractors share and demonstrate our values and we will treat our contractors with these same values.
- 4.12 We will undertake equality impact screening assessments and full assessments as required, when all policies, strategies or services are developed or reviewed. This will be an integral part of the process. In addition, all new or revised strategies and policies will contain an equalities statement.

4.13 We will maximise accessibility in all TCH owned buildings, in accordance with the Equality Act 2010.

External communications

- 4.14 We will ensure that communications are accessible to all residents by:
 - Delivering services in a wide variety of formats, including via the TCH and 'Love Living Homes' websites, 'My Home Online', the email newsletters, in writing, over the telephone and in-person where appropriate
 - Providing digital support over the telephone
 - Providing accessibility and translation resources as required
 - Providing an interpreter to assist where a resident does not speak English over the telephone
 - Meeting a resident with a face-to-face interpreter where translation from a family member or friend is unavailable or deemed inappropriate (including cases of domestic abuse)
 - Translating printed communications into different languages or putting them into different formats (e.g. large print, braille or audio tape) when requested
 - Writing to residents in a way that is human and kind, by using language that is simple, clear, mindful and free of jargon.
- 4.15 We will regularly report on and raise the profile of equality, diversity and inclusion matters with residents, through the TCH website and email newsletter, including about important topical issues such as 'Black Lives Matter'.

Resident involvement

- 4.16 We will continue to facilitate a range of resident involvement opportunities and regularly report how the outcomes have influenced and improved services. This will be in a variety of formats, including on the TCH website, in the email newsletter and in the annual report for tenants.
- 4.17 Resident involvement is the responsibility of all staff members and feedback obtained during day-to-day service delivery and activities, including through the complaints process, will equally be used to influence and improve services for all residents.
- 4.18 Examples of current resident involvement opportunities include:
 - The resident scrutiny panel
 - The digital strategy and policy group
 - The sheltered housing panel
 - Focus and consultation groups for specific service areas.

Reasonable adjustments

- 4.19 TCH is committed to making reasonable adjustments to enable residents with disabilities to access services. While we do not seek to explain our approach to every situation, this policy serves as a statement of intent.
- 4.20 Under the Equality Act 2010, the legal duty to make reasonable adjustments arises in three circumstances:
 - Where there is a provision, criterion or practice which puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled
 - Where a physical feature puts a disabled person at a substantial disadvantage, in comparison with persons who are not disabled
 - Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.
- 4.21 There is no prescribed list of reasonable adjustments. We will seek to determine individual requirements on what may be reasonable in the circumstances. We will not make assumptions about whether a resident or staff member requires any reasonable adjustments or about what those adjustments should be. However, we will give residents and staff the opportunity to discuss any reasonable adjustments they require. Examples may include:
 - Providing information in alternative formats (e.g. large print, braille or audio tape)
 - The use of hard copy letters in preference to email or the telephone
 - Providing specialist equipment or additional support at meetings or during events, such as through a sign language interpreter
 - The use of plain English in all written information
 - Communication through a nominated representative or intermediary.

5. Equalities statement

5.1 An equality impact screening assessment is undertaken when all TCH policies, strategies or services are initially developed or reviewed. This enables TCH to determine any potential negative impacts on the nine protected characteristics and plan any mitigations to reduce or eliminate these as required. Given this is an equality, diversity and inclusion policy, designed to set out TCH's commitment to this subject matter, no negative impacts have been identified.

6. Consultation

6.1 Residents will be invited to comment on the main principles of the equality, diversity and inclusion action plan, via a digital focus group, to ascertain if we have overlooked any areas of note. The policy will then be published on the TCH website, with progress against the action plan reported to TCH Board at least annually.

7. Policy review period

7.1 Subject to any regulatory, organisational or sector wide changes, this policy will be reviewed every three years to ensure it continues to meet its stated aims and objectives and reflects best practice developments.