

EQUALITY DIVERSITY AND INCLUSION POLICY

Equality Diversity and Inclusion Policy

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1. Purpose

This policy sets out how The Riverside Group is committed to supporting and promoting Equality, Diversity and Inclusion (ED&I). This commitment is embraced by our governing boards and committees and informs all our activities and their impact on our customers, colleagues and other stakeholders.

2. Scope

Our policy applies to everyone who receives a service from us, forms part of our governance, is employed and contracted by us or volunteers their services. We will also seek to ensure that anyone who works on our behalf demonstrates commitment to ED&I.

The policy will help us deliver our vision and uphold all our values. It underlines our commitment to develop as an open and inclusive organisation, a key priority set out within our Corporate Plan.

It aims to ensure that we comply with all our legal and regulatory responsibilities; current requirements are set out principally in the Equality Act 2010, Human Rights legislation, Scotland Act 1998 and any subsequent legislation and by the English and Scottish Housing Regulators. It helps us to ensure we comply with the National Housing Federation's Code of Governance 2020.

It also aims to ensure we are mindful of our duties under the Public Sector Equality Duty (Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012) so far as it should apply to our organisation as a Registered Social Landlord in Scotland.

As a Group wide policy, it has been the subject of consultation with customers, board members, colleagues and colleague networks and sets out to reflect their requirements and priorities.

3. Principles

Riverside aims to:

- Prevent discrimination, eliminate prejudice, promote inclusion and celebrate diversity within the organisation.
- Be fair in our dealings with all people - board members, colleagues, customers, volunteers and partners - with whom we have relationships, taking into account the diverse nature of their culture and backgrounds.
- Ensure that ED&I is embedded in everything we do.

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Our policy covers all aspects of equality including race, religion or belief, sex, age, gender reassignment, disability, sexual orientation, marriage and civil partnership and pregnancy and maternity, as specified as protected characteristics by the Equality Act 2010.

Policy

The policy will help us deliver our vision and uphold all our values. As an employer and service provider we promote, value and respect ED&I and our commitment is explicitly set out in our Corporate Plan.

We will:

- Develop a strategy owned by the relevant Boards.
- Collect performance data and report against it.
- Embed delivery through policies, processes and procedures.
- Actively support our governance community, colleagues and contractors through training, guidance, advice and establishing support networks such as colleague groups.
- Provide the resources needed to support our activities.
- Comply with the law and regulatory standards.

To achieve this, we will:

Adopt clear strategies and use information and analysis to drive strategy and action

- Devise an overarching group-wide strategy and action plan which addresses customers, the governance community and colleagues, and review it each year, reporting the outcomes to Group Board, Executive Team, ED&I Best Practice Group, colleague networks and Unite.
- Develop a Scottish equalities strategy and action plan to meet all legal and regulatory obligations and provide assurance and evidence to the Board of Riverside Scotland as necessary.
- Use ED&I demographic modelling to establish the profile of our customers, governance community and colleagues compared to national and local benchmarks, using this information to enable local and departmental action planning and customer engagement.
- Consider positive action where we identify significant underrepresentation of groups with protected characteristics within our wider base of customers, board/committee members or colleagues.

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- Carry out equality impact assessments on all policies and significant change programmes, making changes where necessary to ensure they deliver our ED&I objectives.
- Collect, review, and measure data on a regular basis to inform us on ED&I performance and outcomes including lettings, complaints, satisfaction, governance, recruitment, colleagues, pay (though pay gap reporting).
- Summarise the data gathered, within a demographic context where relevant, and report to Executive Directors, Group Board and the Board of Riverside Scotland (as required) with appropriate recommendations to support assurance and management of risk.
- Identify where positive action is required to address a different customer or colleague experience across protected characteristic.
- Provide a full explanation of why information is collected and what we use it for, treating sensitive personal data confidentially and only for the purposes of promoting and ensuring equality and fairness and improving outcomes.
- Publish a report each year summarising relevant data and activities relating to ED&I and publish pay gap reports as required by law.

Embed best practice

- Recruit and retain a diverse governance community and workforce, reflecting the makeup of the communities we serve.
- Ensure that Group Board, the boards of any subsidiaries and the Leadership Team are accountable for the embedding of our ED&I approach in our policies, procedures and practices and for monitoring our performance and decision making.
- Ensure that all board and committee members, colleagues and volunteers receive regular, relevant and up to date training and support to enable them to champion and meet the organisation's policy objectives
- Promote equality through all our activities as an employer, a service provider, a partner and an influencer.
- Take all reasonable steps to ensure our partners, contractors, suppliers (including trainers) and groups connected to us are actively committed to ED&I principles.
- Help colleagues understand how to address prejudice and unconscious bias.
- Put in place training and support, such as mentoring programmes, to assist the development of colleagues with protected characteristics. This will help ensure that the profile of colleagues at all levels of the organisation reflects the makeup of the communities in which we work.
- Ensure that through our procurement processes we appoint partners and suppliers with a robust and compliant approach to ED&I.
- Establish and maintain an ED&I Best Practice Group of colleagues from across the Group (including customer representation) to act as a forum to exchange good practice and identify improvements.

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- Support and promote a network of ED&I colleague groups, allocating resources which are sufficient for their remit and ensuring they have Executive level sponsorship.
- Provide guidance and support on all aspects of ED&I through a dedicated Equality and Diversity Manager, supported by the ED&I Best Practice Group.
- Celebrate diversity by supporting initiatives marking key cultural events and embedding this in our communications.
- Ensure our communications, including the images we use, reflect the diverse makeup of our colleagues and customers.
- Support individual commitment to and ownership of ED&I objectives by ensuring that appraisal conversations focus on Riverside's values.
- Participate in sector-wide best practice forums and initiatives.

Have in place reasonable and accessible procedures and approaches to support ED&I

- Provide a range of ways for customers to access our services and contact us, shaped to customers' requirements, including effective use of digital services.
- Make a clear commitment to customers on how we meet service requirements
- Involve a diverse range of customers in shaping our policies and activities by putting in place actions which encourage those from under-represented groups to participate in ways which reflect and meet their preferences.
- Ensure that no current or potential customer is discriminated against by letting or selling a property on less favourable terms due to a protected characteristic.
- Have procedures in place to ensure our properties comply with our legal obligations to meet requirements arising from disability and other protected characteristics including Aids and Adaptations procedures for customers.
- Ensure we make reasonable adjustments to the way we deliver services to customers based on their protected characteristics.
- Not tolerate any form of discrimination, harassment or bullying against customers or colleagues, including that based on a protected characteristic, making it easy for victims to report incidents, ensuring we investigate promptly and take appropriate action where required.
- Have up to date and recognised procedures for the management of incidences of domestic abuse, hate crime and harassment and other forms of abuse and discrimination.
- Recognise that some vulnerable groups of people may need support and address this by having robust procedures in relation to Safeguarding/Adult Support and Protection, Child Protection and Modern Slavery.
- Ensure that colleagues comply with our policies on hate crime and harassment, promoting community cohesion in our neighbourhoods.
- Ensure that our workplace is both compliant with legislation and welcoming to those with requirements regarding accessibility and that this extends to use of other venues and conduct of meetings.

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- Ensure that all policies and procedures conform with the ED&I Policy.
- Have procedures in place to ensure reasonable adjustments are provided when required by colleagues with disabilities to enable them to work, recognising that disability includes mental health and that not all disabilities are visible.
- Ensure that all people services and recruitment procedures reflect the principles in this policy including equality of opportunity; this includes flexible working arrangements to help maximise the potential of all current and potential colleagues and relevant procedures for board and committee members.

Definitions

Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents and believing that no one should have poorer life chances because of where, when or whom they were born, or because of other characteristics. Promoting **equality** is about behaving in a way that tackles inequalities, aiming to ensure that all colleagues and service users are treated fairly, and do not experience discrimination.

Promoting **diversity** is about recognising that everyone is different and creating a working environment that values each customer and colleague, ensuring that services are delivered that suit all sections of the community.

Inclusion is about positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.

Protected characteristics within the Equality Act 2010 are: race, religion or belief, sex, age, gender reassignment, disability, sexual orientation, marriage and civil partnership and pregnancy and maternity, as specified by the Equality Act 2010.

Equal Opportunities within the Scotland Act 1998 refers to the elimination, regulation and prevention of discrimination across a number of areas: sex, marital status, race, disability, age, sexual orientation, language, social origin or other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

Section 39 of the Housing (Scotland) Act 2010 requires social landlords, when performing housing services, to: “... *act in a manner which encourages equal opportunities and in particular the observance of the requirements of the law for the time being relating to equal opportunities.*”

We are committed to championing diversity in its widest sense and challenging discrimination based on a variety of social and cultural characteristics. Whilst not explicitly covered by this policy this includes:

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- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation
- Trade Union affiliation

4. Further Information & Support

Further information and support can be obtained from the Equality and Diversity Manager and the Director of Strategy and Public Affairs.

Associated policies include:

- Hate Crime and Harassment Policy and procedures
- Domestic Abuse Policy and procedures (for both staff and customers)
- Aids and Adaptations Policy and procedures
- Safeguarding/Child Protection and Adult Support and Protection Policies
- Modern Slavery statement
- Recruitment Policy
- Dignity at Work Policy
- Code of Conduct for Colleagues

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5. Roles and Responsibilities

Group Board and Executive Directors

- Providing overall leadership, championing ED & I across the organisation and approving the policy
- Setting the overall ED&I strategy and monitoring our approach and performance against agreed objectives

Director of Strategy and Public Affairs

- Leading the implementation of the policy and the strategy, ensuring there are clear expectations for colleagues
- Ensuring adequate resources are made available to enable policy and strategic objectives to be met

Equality and Diversity Manager

- Supporting the delivery of the key policy objectives and associated actions
- Monitoring legislative and regulatory changes and ensuring they are reflected in Riverside's policy, strategy and actions
- Providing advice and support to colleagues, and servicing the Best Practice Group

Colleague network Chairs

- Championing the policy with network group members
- Working with their colleague groups to ensure that group activities support the delivery of Riverside's strategy.

All colleagues

- Taking responsibility for delivering positive ED&I outcomes, by being aware of the policy and knowing how it affects their relationships with other colleagues and their work and service delivery to customers

6. Risk Thresholds

Riverside's risk appetite in relation to ED&I is low. It is fundamental to our values and the reputation of the organisation, and the risks associated with breaking the law or failure to meet regulatory standards are significant.

This policy helps mitigate these risks by setting out requirements:

- To develop a strategy owned by the Board.
- Collect performance data and report against it.
- Embed the delivery of this strategy through policies, processes and procedures.
- Actively support our governance community, colleagues and contractors through training, guidance, advice and establishing support networks such as colleague groups.

7. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity and Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion.

This policy has been subject to an Equality Impact Assessment.

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