



## **VHA Policy Document**

### **EQUALITY, DIVERSITY AND INCLUSION POLICY**

**Reviewed: August 2018**

**Next Review Due: August 2021**

## **Vectis Equality, Diversity and Inclusion Policy**

### **1. Introduction**

This policy sets out VHA's commitment to the values of equality, diversity and inclusion (EDI) and to the elimination of discrimination in all our dealings as an employer and provider of housing services. It sets out our commitment to EDI, how we will implement the policy and how we will monitor performance.

This policy needs to be read in conjunction with our EDI Statement and annual EDI Action Plan.

### **2. Aims of the EDI Policy**

- To ensure that we fully understand the characteristics, needs and aspirations of our residents and service users
- To ensure that we provide homes and services which reflect the needs and aspirations of all sections of the communities we serve
- To ensure that our homes and services are accessible and appropriate to the needs of all sections of the communities we serve
- To use our position as a local employer, procurer of goods/services and local stakeholder to promote equality locally.
- To eliminate where we are able, discrimination and harassment as a result of race, gender, gender identity, age, disability, sexual orientation
- To promote awareness, cohesion and harmony within the communities with which we operate.

### **3. To deliver these aims, we will:**

- Identify customer needs through effective data collection and analysis – *profiling surveys and satisfaction*
- Ensure effective engagement with residents and potential service users
- Implement recruitment and governance processes which are open and transparent and reflect the characteristics of the local community
- Ensure that SLAs and partnership arrangements deliver outcomes in line with good practice for EDI
- Benchmark current and future services in relation to EDI good practice
- Deliver effective training which achieves appropriate knowledge about EDI issues
- Implement a service delivery plan which reflects our commitment to EDI
- Undertake a regular and effective process of review

#### **4. Overview**

Our overarching objective is to ensure that there will be no discrimination or unfair treatment on the grounds of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex or sexual orientation as recognised under the Equality Act 2010 'Protected Characteristics'.

We aim to ensure that everybody is treated in such a way as to offer equal opportunity to receive the services and employment opportunities we provide regardless of their social position.

We recognise that there are barriers to achieving inclusion and equality of opportunity, ranging from overt prejudice in favour of, or against, particular groups or individuals to unwitting ignorance of different lifestyles and needs. VHA is committed removing social disadvantage and meeting the needs of both employees and residents.

Discrimination is neither acceptable nor tolerable on any level. Our commitment therefore is to ensure that no group in society is less likely than another to be housed or recruited by us and that the other services we provide, such as housing advice, repairs and rent collection, are carried out fairly.

A positive action culture is embedded throughout VHA to enable and ensure that the achievement of equality underpins everything that we do. To achieve this we will set objectives for our services that reflect the diverse needs of our residents measure our performance and take positive action to deal with any inequalities we find

Our commitment extends to cover:

- everyone involved in VHA, i.e. staff and Board Members
- partners and stakeholders
- contractors
- residents and service users
- customers

The practical measures that we will adopt to support and deliver the outcomes set out in this policy will be set out in a detailed action plan.

#### **5. Our Commitment to EDI**

Our commitment to delivering EDI outcomes is based on key business and value-based criteria:

##### ***5.2.1 The moral case***

The fundamental rationale of the social housing sector and housing associations in recent times has been to deal with and where possible eradicate disadvantage. VHA has fully signed up to this approach and this is endorsed by being at the heart of our core values and business strategy.

### ***5.2.2 The legal requirements on Housing Associations***

Under the Equality Act 2010 discrimination is unlawful whether it is direct or indirect. The law requires us to demonstrate our commitment to equality of opportunity in all that we do. We will meet our Public sector Equality Duty (PSED) by:

- eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not

These legal requirements are also reflected in regulatory requirements set down in the Homes and Communities Agency's code.

### ***5.2.3 The business case***

We work with a diverse range of customers and staff. Our services and delivery plans reflect and respond to a wide range of different physical, cultural and religious needs which impact significantly upon life style preferences. To ensure that we provide effective and efficient services we do all that we can to make reasonable adjustments by understanding and including the views and wishes of our residents.

Our employment practices reflect the benefits of a diverse workforce who provide a wide range of perceptions, experience and skills.

5.3 Our definition of equality is: "To ensure to the best of our ability that all of our residents, customers and potential residents and customers are able to enjoy the same access to VHA opportunities free from discrimination or undue disadvantage."

We view this as process as essentially about breaking down barriers that limit or restrict opportunities for certain individuals or groups of people. We aim to identify and take action to minimise these barriers.

5.4 Our definition of diversity is: "To understand, respect and value the differences between people".

Diversity is about recognising that everyone is different and that we all have a different contribution to make based on our life experiences, skills and knowledge. In our view managing diversity effectively means providing as far as we are able to provide all of our staff, residents and customers with the chance to live and work in the way that is best for them and recognises their diverse characteristics and aspirations.

5.5 Our definition of inclusion is: "Inclusion is a sense of belonging: feeling respected, valued for who you are".

Inclusion is largely about feeling part of and having access to the support, facilities and resources that local communities can offer. The absence of opportunity and aspiration is often a result of marginalisation, isolation and a lack of engagement.

## **6. Legislative Requirements**

Key legislative requirements include:

### **6.1 The Equality Act 2010**

The Equality Act 2010 consolidated previous equality legislation with the aim of making it more accessible and easier to understand. It refers to nine protected characteristics, for which discrimination, harassment and victimisation are prohibited.

Age  
Disability  
Gender Reassignment  
Marriage and Civil Partnership  
Pregnancy and Maternity  
Race  
Religion or Belief  
Sex  
Sexual Orientation

### **6.2 The Public Sector Equality Duty**

The Public Sector Equality Duty (PSED) came into effect from 5 April 2011. It requires public bodies (including Housing Associations in this context) to consider all individuals when carrying out their day to day work – in shaping policy, in delivering services and in relation to their own employees. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.

### **6.3 Regulator for Social Housing Regulatory Framework**

Requires that: “Providers’ governance arrangements and approaches to management and service delivery must incorporate and demonstrate principles of equality and diversity, and apply them in a way that is relevant to their organisation’s purpose and context. It is essential that providers understand tenants’ needs including those within the equality strands.”

Equality and diversity is integral to all standards that registered providers have to meet, but is also incorporated specifically in the updated cross-cutting Tenant Involvement and Empowerment Standard which reads as follows:

“Registered providers shall:

- treat all tenants with fairness and respect
- demonstrate that they understand the different needs of their tenants, in relation to the nine protected characteristics as defined by the Equality Act 2010 and tenants with additional support needs”

Registered providers are expected to produce an annual report to tenants each year outlining how they comply with the standards, including the Tenant Involvement and Empowerment Standard.

#### **6.4 Human Rights Act 1998**

Poor housing can affect a person's health, work, education, relationships and life chances, which is why the right to respect for a person's home is covered in the Human Rights Act (HRA). The HRA applies to all of the United Kingdom, so if a social housing provider carries out 'public functions' in providing social housing, it must comply with the Act in doing so. Recently, the Court of Appeal decided that a housing association (London & Quadrant Housing Trust) was performing public functions when allocating and managing social housing.

### **7. Vectis and EDI**

We recognize that to develop and implement an effective EDI Policy we need fully to understand the make-up and characteristics of our residents and service users. To date we have general and historical contextual information including Census Data, intelligence from the IoW Observatory, past EDI mapping exercises, and data sets from the National Statistics Office, etc. From a VHA perspective, we have a range of information derived from STATUS survey analysis, satisfaction responses and Tenant Profiling. However, this is incomplete and our operational focus is to fill the gaps in this knowledge.

#### **7.1 What we do know**

##### **7.1.1 *The Isle of Wight community is:***

- predominately white in ethnic terms
- relative balanced between male and females
- older than the national average
- has high levels of disability and long term limiting illness
- economically polarised, with a significant body of poverty and unemployment
- has lower than average levels of skills and qualifications.
- Some religious and faith diversity, but no significant critical mass other than Christian

There is much less information available on equality strands such as sexual orientation and gender status.

**Population:** 140,500

<b>2010</b>	<b>Isle of Wight (000's)</b>	<b>SE Region (000's)</b>	<b>UK (000's)</b>
<b>All people</b>	140.5	8,523.1	64,642.6
<b>Males</b>	68.3	4,183.2	29,758.9
<b>Females</b>	72.2	4,339.8	30,703.7

(Source: ONS mid-year estimates)

### **7.1.2 Religion or Belief:**

At the time of the 2011 CENSUS, approximately 138,000 Island residents gave an indication of their religious faith. There was a drop in the population reporting as 'Christian' from 73.7% in 2001 to 60.5% in 2011, which represents a reduction of 13.2%. This was mainly due to a decline in religious affiliation as those residents responding with 'no religion' rose by 12.3 % to 26.9%.

## **7.2 Our Tenant Profile**

### **7.2.1 VHA's residents largely conform to this profile.**

The results of a Residents Survey indicated the following key headline indicators.

Receipt of Housing Benefit	64%
Employment	28% (18% part time)
Internet access	49%
Working Age	55%
Over working age	30%
Limiting health problem	64%

However, this was on a 26% response rate and so may not give a fully accurate picture of the resident body.

### **7.2.2 Age**

The indication from both our Tenant survey and recent profiling exercise is that between a third and a half of our tenants are above working age or retired. However, there are also an increasing number of younger residents, either as tenants or as members of households. Service expectations are usually very different at these opposite ends of the age spectrum and we need to ensure that we understand and where possible respond to their respective needs. In many instances this will not come down to VHA providing additional services in isolation, but rather looking to develop partnerships with agencies having specialist knowledge and expertise in appropriate.

### **7.2.3 Gender**

From current profiling data, the indication is of a fairly balanced situation in relation to male/female headed households.

However, we understand that it is often the case that women shoulder the caring responsibility for both children and other relatives and this places a greater burden on them and often limits their opportunities for employment. We need to be mindful of areas where we can put facilities in place to support residents in this position.

Issues such as domestic violence and harassment are often disproportionately experienced by women and we must have adequate and up-to-date measures in place to address them. We also recognise that there may be legitimate instances where service users request contact with staff of a specific gender. In such instances we will accommodate where appropriate and possible.

#### **7.2.4 Ethnicity**

From what we currently know, VHA residents are overwhelmingly White-British. The ethnic profile of our lettings to new tenants over the past eight years indicates a very low level of ethnic diversity within our stock, less than 2%. This has been a consistent position over a number of years. Our knowledge about ethnicity is built up from a combination of 2011 Census data, two BME mapping exercises of the Isle of Wight in 2003 and 2006, CORE returns, STATUS survey and routine profiling data.

We recognise that being a member of a small, minority community can present significant challenges in relation to potential discrimination, harassment and isolation. We will therefore continue to maintain an on-going dialogue with our BME households to understand their diverse needs as a basis for delivering tailored services and additional assistance where required.

#### **7.2.5 Disability**

Health and disability is a key theme amongst our tenants.

We recognise that the projected demographic profile for the Isle of Wight is for an older population, with significant increases in the over 75's. As such, it is likely that the trend in frailty and poor health will continue.

We will look to reflect the needs of older people in the publication of our materials, which includes using braille, spoken word and large print facilities where appropriate. We will also ensure that any future consultation events are structured and delivered in such a way as to accommodate different kinds of disability. We have already started to record tenant preferences for materials in larger print, audio materials, braille, etc.

In terms of service delivery, we have an active approach to delivering aids and adaptations, which is set out below.

### **8. Inclusion**

Social and financial exclusion are major concerns among the Island community. A 2014 report by the Childrens' Society indicates that IoW families suffer much higher levels of debt than any other area in the South –East of England. In common with many other housing associations VHA has a large number of residents who are at the lower end of the economic scale and who are among the poorest households on the Island. Social housing has for some time been the only option for those on limited income. This is particularly the case on the Island, where nearly 80% of homes are owner-occupied. The fact that approximately 60% of our residents are in receipt of benefits and the majority are on incomes of less than £300 per week, illustrates the extent of the problem.

Within these overall statistics, there are some households who are even more prone to poverty, such as older people on fixed incomes, disabled people and single parents. From our knowledge, we

have a significant number of each of these household amongst our residents. We understand the need to provide advice, support and where possible enhance their quality of life and standard of living. We can do this by ensuring they maximise their benefit entitlements, reduce living costs through fuel efficiency and enhance life chances through skill development and training.

We also recognise our obligations under the Social Value Act 2012 to operate in such a way as to deliver social value through sensitive procurement, offering targeted employment opportunities and supporting the local economy.

We recognise that by supporting and promoting social and financial inclusion we improve the life chances of our residents and of the Island community, but also address our business imperative of collecting rent.

## **9. Policy Implementation**

- 9.1 We will seek to embed this Policy throughout VHA and all that we do. We will look to work closely with partners, stakeholders and community representatives to ensure we are fully aware and reflect the needs of local communities.
- 9.2 We will adopt annual EDI action plans that will inform our VHA Annual Plan, the objectives of which will be regularly reviewed.

We will review this policy on a three-year cycle in accordance with our policy review programme.