

**1 Policy statement**

- 1.1 At Rooftop) we are committed to creating and sustaining a positive and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues, and the wider community. Our commitment to our customers, colleagues and communities focus on leadership and governance and are detailed in our Equality, Diversity and Inclusion (EDI) Strategy and supported by an annual action plan.
- 1.2 Equality, Diversity and Inclusion requires a strong commitment and concerted action to build an inclusive environment where opportunities are open to all, diversity is valued and where everybody can reach their full potential without fear of harassment, prejudice, judgement, or discrimination. We will not tolerate discrimination or prejudicial treatment of any kind. We will challenge and act on it.
- 1.3 Rooftop requires all colleagues to maintain standards of conduct and behaviour and will not tolerate inappropriate behaviour which might include discrimination, bullying or harassment. The Colleague Code of Conduct outlines the standards of conduct and behaviour expected. When conduct and behaviours fall below the expected standard, the Disciplinary Policy and Procedure will be applied.
- 1.4 We will deal firmly, fairly, and promptly with any alleged cases of discrimination or harassment.
- 1.5 It is important to ensure that any management action taken is fair, consistent and in keeping with our Equality, Diversity and Inclusion Policy and practice.
- 1.6 We aim as an employer and landlord for our colleagues, board members and volunteers, wherever possible, to reflect the community that we serve. We believe that good representation is essential to the high level of performance to which we aspire and to meet the future needs of the communities we serve. We accept that it is, therefore, vital that we take positive action to eliminate discrimination and remove barriers that exist wherever possible.
- 1.7 We will advise suppliers, contractors, consultants, and other agencies working for Rooftop of our commitment to equality, diversity and inclusion as part of our procurement and contractor monitoring processes. Evidence of how they comply and embed the Equality Act will be requested.
- 1.8 Supported by our EDI Strategy we will continue to build on our inclusive culture and workplace where difference is accepted and celebrated with both our customers and colleagues.
- 1.9 We value the visible and invisible qualities of all individuals. As an inclusive employer, we want our colleagues to feel free to bring their whole, authentic selves to work.

**2 Statutory and Regulatory context**

- 2.1 The Regulator of Social Housing Consumer Standards (2024) covering Safety and Quality, Transparency, Influence and Accountability, Neighbourhood and Community and Tenancy set out specific requirements and expectations which have implications to this Policy. The Governance and Viability Standard (2015) also has relevance in terms of Board oversight.

2.2 This Policy is in line with, and goes beyond, the 2010 Equality Act, current employment law and good practice.

### **3 Demonstration through Our Values**

3.1 We are an organisation that values diversity, champions equality and demonstrates inclusion. We will demonstrate this through the activities and the services we provide. This means living by, working to and acting on our values. There is a legal, moral, and business case to seek to develop new thinking and new approaches because it is not only **the right thing to do**, but it is the smart thing to do. Diverse organisations are more innovative and better positioned to succeed.

3.2 We can instigate change to **make things better** by empowering individuals and through developing and delivering equitable services and provision for our customers and our colleagues.

3.3 We will **work together** to get the best from every individual, valuing their unique contributions and developing the networks to grow together better.

### **4 Policy principles**

4.1 Equality, fairness and respect can be expected by all in our employment whether temporary, part time or full time and not unlawfully discriminate on any basis including, but not limited to, the Equality Act 2010 protected characteristics:

- 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.

4.2 We will also avoid all forms of discrimination including, but not limited to:

- pay and benefits
- terms and conditions of employment
- dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents
- requests for flexible workin.
- selection for employment, promotion, training or other developmental opportunities.

### **5 Equality, Diversity and Inclusion: Principles**

5.1 At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

### **6 Vulnerability: Reasonable Adjustments**

6.1 There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where there are several complexities present, or where customers have vulnerabilities that may lead us to make

reasonable adjustments to the way we apply this Policy. In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy.

## 7 Data Protection: Principles

7.1 Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

## 8 Experiencing discrimination or harassment

8.1 There are many types of discrimination and harassment some of which are detailed below which are detailed below. Any colleague experiencing discrimination or feeling harassed in the workplace must seek advice from a member of the Human Resources team. (Please see section 6. Working Environment below).

- **Direct discrimination:** discrimination that occurs when someone is treated less favorably than another person because of a protected characteristic they have or are thought to have.
- **Discrimination by association:** this applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex. This is direct discrimination against someone because they are associated with another person with a protected characteristic. This includes carers of disabled people and elderly relatives who can claim they were treated unfairly because of duties that had to be carried out at home relating to their care work. It also covers discrimination against someone because, for example, their partner is from another country.
- **Perception discrimination:** this applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex and is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.
- **Indirect discrimination:** applies to age, race, religion or belief, sexual orientation and civil partnership, disability and gender reassignment and can occur when you have a rule or policy that applies to everyone but disadvantages a person with a protected characteristic.
- **Harassment:** unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This applies to all characteristics except for pregnancy and maternity, marriage, and civil partnership. Colleagues can claim they find something offensive even when it is not directed at them.
- **Harassment by a third party:** this applies to age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. Employers are potentially liable for the harassment of colleagues or customers by people they do not directly employ, such as a contractor.
- **Victimisation:** discrimination against someone because they made or supported a complaint under Equality Act legislation, or they are suspected of doing so.

## **9 Working environment**

- 9.1 Rooftop is dedicated to have a working environment which is free from harassment and bullying and to ensure that all colleagues are treated with dignity, respect, and courtesy. This principle also extends to events organised by the Group.
- 9.2 The Harassment and Bullying Policy and procedure supports us to provide a method for colleagues to raise concerns and for those concerns to be dealt with fairly, consistently and as speedily as possible. The Policy applies to all those who undertake any type of work for the Group and is supported by the Dignity at Work Statement: We all have a responsibility to create a working environment free from harassment and bullying including intimidation, victimisation, discrimination, negative or demeaning behaviour. Our colleague and employer commitments are detailed in the Harassment and Bullying Policy.
- 9.3 Employment matter advice and management action will be fair, consistent and in keeping with our Equality, Diversity and Inclusion Policy. All policies and procedures will be applied to all colleagues.

## **10 Service delivery**

### **10.1 Allocations and lettings:**

- We will allocate homes in a way that is non-discriminatory.
- Rooftop will seek to avoid restrictions on access to housing, for example, which are irrelevant to housing and support needs.
- We will review and monitor nomination arrangements including the outcome of Local Lettings Plans to ensure fairness and equality of access.

### **10.2 Customer service:**

- We will ensure service delivery is non-discriminatory, identify trends and take targeted corrective action if appropriate.
- We will provide services which reflect the social, cultural and linguistic needs of the local community delivered by a workforce that broadly reflects the community it serves.
- We will undertake an Equality Impact Assessment for all customer or colleague facing policies and all board decisions.

### **10.3 Supporting our customers:**

- We will develop an understanding of our customer base using appropriate sources of information and customer profiling.
- We will support sustainable and cohesive communities through our understanding of our communities and use of local lettings plans.

### **10.4 Working together:**

- We will seek to secure the involvement of all relevant groups for consultation and participation in the planning and provision of services.
- We will provide opportunities for our customers to be actively involved in service delivery through our Customer Influencing Framework.
- We will consult with and involve customers and other stakeholders on our Annual Plan to ensure we understand the needs of the communities we serve.

### **10.5 Working in communities**

- We will work to build capacity within local communities to enable engagement and participation.

- We will advise contractors, consultants and other agencies working for Rooftop of its commitment to equal opportunities.
- We will set clear expectation of all contractors on their compliance with the Equality Act 2010 in their own practices.
- We will consider the extent to which our customer and resident groups are representative and work to ensure that all customers are encouraged to participate.

#### **10.6 Communication:**

- We will develop our recording of the preferred methods of communication for customers to address issues of language, literacy, hearing and visual impairment and support. This information will be visible on our systems for the benefit of colleagues and contractors where appropriate.

#### **10.7 Building more homes:**

- We will take account of the particular requirements of local communities in the planning and design of new and improved social housing.
- We will consider the significance for households of the size and type of accommodation planned or improved and the need to take account of any requirements and ways of making services more culturally sensitive.

### **11 Recruitment and promotion**

11.1 We will employ the most suitable person for each role having made reasonable adjustments if necessary. We are also committed to valuing diversity and ensuring equality of opportunity and access in employment.

11.2 We will take action to eliminate discrimination including the following:

#### **a) Recruitment vacancy advertising**

- Advertise vacancies in a way that does not discourage disadvantaged groups to apply for roles.
- Actively seek to promote knowledge of vacancies to reach under-represented groups internally and externally.
- All vacancy advertisements will include an appropriate statement on equal opportunity either in the advert text or the recruitment pack.
- Wherever possible and appropriate, all vacancies will be advertised simultaneously internally and externally.

#### **b) Selection and recruitment**

- When recruiting, specific qualifications or experience will be called for only where they are necessary to the role.
- Selection criteria (role descriptions) will be kept under constant review to ensure that they are justifiable as being essential for the effective performance of the role.
- Reasonable adjustments will be made whenever we are advised that an applicant has need for one.
- Reasons for selection and rejection of applicants for vacancies will be recorded.
- Training will be made available to all colleagues involved in recruitment to ensure they understand this Policy.

- More than one person will be involved in the selection interview and recruitment process and all should have received training in line with our aims on Equality, Diversity and Inclusion.
- A statistical profile of the gender and ethnicity of the workforce and Board membership will be kept and published so that action can be taken where this does not reflect progress towards the objective of ensuring the workforce and Board membership reflects the composition of the population it is responsible for.

## **12 Data collection and monitoring**

- 12.1 We will collect and appropriately maintain data to enable us to ensure that services are appropriate and are being delivered fairly and effectively.
- 12.2 Particular care will be taken not to deter people from making declarations about sensitive personal information by making clear the links between collecting the information and improving services. In support of this, people will also have the option of 'prefer not to answer' whenever data is collected or have the right to withdraw consent to its use where this is the lawful basis for collection or withdrawal is allowed by law.
- 12.3 All information provided to us will be treated in confidence and in accordance with all current and appropriate data protection legislation, guidance, and company policy.
- 12.4 Our Employee Privacy Notice sets out our commitments to colleagues to processing employee data securely and in a lawful, fair and transparent way.

## **13 Consent**

- 13.1 If information is requested via a form, the person's signature (or electronic confirmation where this is done electronically) will be sought to recognise that the information will be used and that steps will be taken to treat the information properly.

## **14 Access/storage of data**

- 14.1 Access to data will be restricted to those with a need to know, and used or applied within the constraints of what is required for effective and appropriate service delivery.
- 14.2 We will put in place safeguards on who can amend the data ensuring that all colleagues will know who to contact if they acquire information that they feel should be added because of its impact on our ability to deliver the service effectively.
- 14.3 We will undertake regular exercises to validate and update the information held.
- 14.4 Where equality data is influencing policy and strategy or used for monitoring purposes, statistics will be amalgamated so that individual information cannot be identified.

## **15 Monitoring – service delivery**

- 15.1 We will monitor our commitments through:
- Identifying and publishing targets for improving diversity and inclusion across the organisation.
  - Publishing our annual performance on what we have achieved and improvements we intend to make through our Annual Report to Tenants.
  - Developing a system of monitoring service delivery decision related Equality Impact Assessments that are both qualitative and quantitative.

- We will proactively engage with the Inclusion Action Group to ensure that our customers are involved in reviewing our effectiveness.
- We will report on the breakdown of customers actively involved through our Customer Engagement Framework.

## 16 Training

16.1 New colleagues as part of their induction, are required to read, understand, and adhere to the Equality, Diversity and Inclusion Policy. All colleagues receive equality and diversity training as part of their induction and ongoing refreshers.

## 17 Review

17.1 Rooftop will regularly review its practices and procedures to ensure that they do not discriminate, whether directly or indirectly and changes will be made where it is found that they are, or may be, contravening relevant legislation or good practice.

17.2 This Policy will be reviewed every three years unless there are significant changes in legislation or good practice.

## 18 Consultation

18.1 Leadership Team subgroup May 2024

18.2 Executive Team April 2024

## 19 Responsibilities

### Responsible body

19.1	Formulation, amendment and approval of Policy	Board of RHG
	Monitoring of Policy	Executive Team
	Operational management of Policy/Policy author	Executive Director - Operations
19.2	<b>Date of formulation of Policy</b>	September 2002
19.3	<b>Dates of Policy reviews</b>	May 2024
		March 2023
		March 2022
		January 2019
		January 2016
		January 2013
19.4	<b>Date of next review</b>	May 2027

### Associated documents

#### Internal

- Reasonable Adjustment and Understanding and Supporting Vulnerability Policies
- Equality, Diversity and Inclusion Strategy
- Policies and procedures on harassment, Anti-Social Behaviour, allocations, appointment of contractors and consultants, recruitment and selection (including those for the appointment of board members), work/life balance and learning and development
- Customer Information leaflets
- Colleague Code of Conduct
- Board Member Code of Conduct
- Disciplinary Policy
- Grievance Policy
- Capability Policy
- Family Life Policy
- Harassment and Bullying Policy and Procedure
- Employee Privacy Notice
- Customer Consultation Policy
- Volunteering procedures
- Business Plan
- Data Protection and Privacy Policy - GDPR
- Community Support Service Practice Handbook
- Community Support Service Customer Handbook
- Safeguarding Adults and Children Policy

#### External

- Regulatory framework for social housing in England
- Customer Service Excellence criterion
- Equality and diversity - A framework for review and action 3<sup>rd</sup> edition (NHF publication)
- The Equality Act 2010
- General Data Protections Regulations 2018
- Employment Act 2008
- Equalities and Human Rights Commission revised Code of Practice on Racial Equality in Housing - 2006
- Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002)
- Housing Acts 1985, 1996 and 2004
- Human Rights Act 1998
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000)
- Protection from Harassment Act 1997
- Employment Relations Act 1999
- Work and families Act 2006
- Modern Slavery Act 2015