



RCH Group Policy: Equality, Diversity and Inclusion

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Approval Body	RCH Board
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This policy is available, on request, in different languages and in other formats such as large print, audio format and braille as required.

1. Scope

1.1 This is a Group policy and therefore applies to Staff, Board and Committee members of The RCH Group of companies. At September 2023, the RCH Group consists of River Clyde Homes and its subsidiary, Home Fix Scotland Ltd.

2. Introduction

2.1 The River Clyde Homes Group is committed to promoting equality, valuing diversity and challenging prejudice and discrimination in all its forms.

2.2 This policy ensures that we:

- meet our legal obligations concerning equal opportunities in respect of both employment matters and service delivery.
- promote good practice guidance throughout our work practices and customer services delivery.
- sustain and support our aim of being an inclusive organisation where customers and staff have a real sense of belonging.
- meet the requirements of the Scottish Housing Regulator (SHR) Regulatory Standards ([Regulatory Framework | Scottish Housing Regulator](#)) and legislation as follows:

- [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](#)
- [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](#)
- [The Human Rights Act | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

2.3 This policy links to the documents below and should be read in conjunction with them:

- Equality, Diversity and Inclusion Strategy- [RCHG Equalities Diversity Inclusion Strategy.docx](#)
- The RCH Organisational Development Strategy (to be included when completed)
- RCH Group Employment Policies and Procedures - [Recruitment & Selection](#)
- RCH Group Code of Conduct for Staff - [RCH Group Code of Conduct for Staff](#)
- RCH Group Code of Conduct for Board Members - [RCH Group Code of Conduct for Board Members.pdf](#)
- RCH Group Data Protection Policy - [Data Protection Policy \(March 2021 update\).pdf](#)
- RCH Group Procurement Strategy - [Procurement-Strategy-.pdf](#)
- RCH Group Notifiable Events Policy - [Notifiable Events Policy.pdf](#)
- RCH Group Unacceptable Behaviours Policy - [RCH-Group-Unacceptable-Behaviours-Policy.pdf](#)

3. Definitions

- **Protected Characteristics:** The Equality Act 2010 specifies nine protected characteristics which are the grounds on which discrimination is prohibited by law. Claims of discrimination cannot be made on any grounds other than age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex & sexual orientation.
- **Diversity:** This means valuing individual differences. The RCH Group is committed to valuing and managing people's differences to enable all employees and governing body members to contribute and realise their full potential. We recognise that people with different backgrounds, skills, attitudes, and experiences, can bring fresh ideas that can enhance our organisation and the services we provide.
- **Equality:** This means making sure people are treated fairly and given fair chances. It is not about treating everyone in the same way but recognising that different needs may have to be met in different ways.
- **Discrimination:** The term discrimination refers to the unfavourable or unfair treatment of people who are different, or from minorities within society. Challenging discrimination is a principle of equality, and central to the ethos of the RCH Group.
- **Direct Discrimination:** This means treating someone less favourably than others based on a protected characteristic.
- **Indirect Discrimination:** This can occur where a policy, procedure or practice applies to everyone in the same way, but might disadvantage a particular protected group, and cannot be objectively justified.
- **Associated Discrimination:** This is discriminating against a person because they have an association with someone with a protected characteristic. For example, a non-disabled person is discriminated against because of the action they need to take to care for a disabled dependent.
- **Perceptive Discrimination:** This is when a person is discriminated against because the discriminator thinks the person possess a protected characteristic. For example, a person is not shortlisted for a job because the recruiter assumes that they don't have the correct Visa to work in the UK as they have a foreign looking name on their application form.
- **Harassment:** This is conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive environment. The intention of the perpetrator is irrelevant; it is the impact on the individual which determines whether harassment has taken place.

- **Victimisation:** This is treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.
- **Positive Action:** This means addressing imbalances, for example in the workforce by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets.
- **Failure to make Reasonable Adjustments:** This is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

4. Policy Statement and Responsibilities

4.1 The policy is based on the principles set out below and if the policy is breached in a way that would cause the organisation to be brought into disrepute, or whether there are any potentially serious breaches of equalities and human rights duties, we will notify the SHR.

- a) We will put equality at the centre of our service provision so that our tenants have their individual needs recognised, are treated fairly and with respect and receive fair access to housing and housing services.
- b) We will include equality in our policies so that the people we employ share our values and that our recruitment processes attract applicants who reflect the diversity of the communities we serve. We ensure that all new employees and Board members receive induction on this policy.
- c) We will undertake Equality Impact Assessments of organisational documents including policies and strategies where appropriate to ensure our policies, practices and decision-making processes are fair and do not present barriers or disadvantage any protected groups. This covers both strategic and operational activities.
- d) We will collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, Board members, and staff.
- e) We will ensure that we consider equality and human rights issues properly when making decisions, in the design and review of internal and external policies, and in our day-to-day service delivery.
- f) We will endeavour to create and maintain an inclusive organisational culture that enables all staff to thrive.
- g) We will promote equality of opportunity with our partners and contractors to tackle discriminatory practice.

- h) We process information that we collect in line with our Data Protection Policy.
- i) We will deliver equality training to support staff members to undertake their roles in an inclusive and respectful way. We will make sure that existing staff receive appropriate training and guidance to promote equality and diversity and compliance with the Equality Act 2010. We expect discriminating behaviour to be challenged and consider any form of discrimination on the grounds of age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex & sexual orientation, to be unacceptable.
- j) We will ensure that our procedures and practices for appointments to our Board are open and accessible to all.
- k) We will respect the privacy of our staff and tenants and will take necessary steps to ensure that the equality information we collect, store, and analyse is held securely and that confidentiality is maintained.
- l) We will take a zero-tolerance approach to hate crime in any form, and we will take an anti-racist approach to our work.
- m) We will encourage people who witness or experience discrimination in any aspect of our activities, to raise these with us. We will treat all concerns and complaints seriously.

4.2 It is the responsibility of all employees and Board members to mainstream equality and diversity, and to work towards embedding Equality, Diversity and Inclusion into everything the Group does. Overall key areas of responsibility for the implementation of the Equality, Diversity and Inclusion Strategy and Policy are outlined below:

a) **The Board:**

- Have ultimate responsibility for Equality, Diversity and Inclusion within the Group.
- Will monitor to ensure that statutory and regulatory obligations are met.
- Set out the Group's Equality, Diversity and Inclusion Strategy and ensure compliance is achieved.

b) **The Chief Executive:**

- Ultimately responsible for the control and implementation of this Policy at all levels of the Group and ensuring the provision of adequate resources for equality, diversity and inclusion requirements.
- Provide leadership to encourage employees to be conscious of equality, diversity and inclusion at all times.

- Ensure that responsibility for the implementation of, and compliance with, this Policy is properly assigned and accepted by the Executive Leadership Team and all employees under their control.

c) The Executive Leadership Team:

- Will implement the Equality, Diversity and Inclusion Strategy and Action Plan.
- Review progress of the Strategy against the Action Plan.
- Ensure through the development of Equality Impact Assessments, that policies clearly identify any adverse Equality, Diversity and Inclusion implications against any protected characteristic.
- Ensure that adequate resources are available for implementation of the Equality, Diversity and Inclusion Strategy and Policy and for developing the organisational culture in which the Strategy and Policy can operate.
- Promote a working culture that respects and values differences, and promotes dignity, equality and diversity.

d) Managers:

- Will promote a culture of Equality, Diversity and Inclusion for staff and communicate the importance of adherence to Equality, Diversity and Inclusion provisions.
- Implement the Equality, Diversity and Inclusion Strategy ensuring all actions within the Strategy and Action Plan are delivered.
- Ensure all aspects of their area of service comply with the Equality, Diversity and Inclusion Strategy and Policy.
- Challenge discrimination in their area of service delivery.
- Will use tenant profiling data to proactively meet the needs of customers by ensuring that equality and human rights issues are considered properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery

e) Staff:

- Will ensure that they comply with the principles, aims and objectives outlined in the Equality, Inclusion and Diversity Strategy and Policy in order to encourage diversity and eliminate discrimination, victimisation and harassment.
- Will promote equality, diversity and inclusion and ensure that their actions do not contribute to the unfair or discriminatory treatment of others.
- Will challenge and report any unfair, discriminatory or otherwise unwelcome treatment to their line manager or the Director responsible for their business area.
- Will use tenant profiling data to proactively meet the needs of customers.
- Take part in mandatory training with regards to Equality, Diversity and Inclusion.

f) **Customers:**

- Will be expected to adhere to this policy and treat all staff and stakeholders with fairness, dignity and respect and avoid behaviours which are discriminatory.

Scottish Housing Regulator (SHR) Regulatory Standards

4.13 The SHR's Regulatory Framework sets out Regulatory Standards of Governance and Financial Management to be achieved by all Registered Social Landlords (RSLs). Social Landlords must meet the requirements of relevant equalities and human rights legislation. The Board accepts that it is responsible for ensuring that the RCH Group complies with these standards.

4.14 The standards of direct relevance to this policy are noted below:

- Standard 1: The Governing Body leads and directs the RSL to achieve good outcomes for its customers and other service users.
- Standard 2: The RSL is open and accountable for what it does. It understands and takes account of the needs and priorities of its customers and stakeholders. And its primary focus is the sustainable achievement of these priorities.
- Standard 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
- Standard 5: The RSL conducts its affairs with honesty and integrity.
- Standard 6: The governing body and senior officers have the skills and knowledge they need to be effective.

4.15 We report on our performance against the Scottish Social Housing Charter (SSHC) quarterly to our Board, and annually to our customers and the SHR via the Annual Return on the Charter (ARC).

4.16 The regulatory requirements also require social landlords to collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members, staff members and job applicants.

5. Equality, Diversity and Inclusion

5.1 The RCH Group will apply this policy fairly and consistently. In implementing this policy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion or belief, gender, disability, age, sexual orientation, or any other grounds. Our commitment to equality and fairness will apply irrespective of factors such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

6. Review

- 6.1 This policy will be reviewed in its entirety every 3 years, unless an earlier review is required due to changes in legal, regulatory or best practice requirements, or because monitoring and reporting reveals that a change in policy is required sooner.