

Habitare Homes Limited: Equality and Diversity Policy

Version:	4.0
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Policy Owner:	Board
Date adopted:	March 2025
Date of next review:	March 2027
Approved by:	Board

1 | Introduction

- 1.1. This policy sets out Habitare Homes Limited (Habitare) commitment to Equality and Diversity in employment and service delivery. Habitare will deliver services that are inclusive, accessible to all and which respond and support the needs of our customers. We also recognise the value that diversity brings to the workplace and want to ensure that our Board, our managing agents and our contractors reflect and represent a wide range of views and backgrounds.

2 | Scope

- 2.1. This policy applies to all board and committee members, customers, visitors and suppliers; and covers employment, service delivery and all business activities, including for example:
- access to information and advice;
 - sales, lettings and property management;
 - customer engagement;
 - dealing with incidents like harassment (including domestic violence);
 - procurement and supply;
 - governance;
 - development and regeneration; and
 - asset management.

3 | Purpose

- 3.1. Habitare will adhere to the provisions of the Equality Act 2010, by opposing discrimination, victimisation and harassment on the grounds of all recognised protected

characteristics. Habitare will provide leadership and accountability in promoting equality and diversity. Equality ensures people are treated fairly and given fair chances. It recognises different needs and promotes fair and inclusive opportunity, access, participation and contribution. Diversity acknowledges and respects differences within and between groups of people.

4 | Definitions

4.1. The protected characteristics that are covered by the Equality Act 2010 are as follows:

- age;
- disability;
- gender reassignment;
- race;
- religion or belief;
- sex;
- sexual orientation;
- marriage and civil partnership; and
- pregnancy and maternity.

4.2. Some brief information about each characteristic is outlined below:

4.3. Age – people of all ages are protected under the Equality Act 2010. Some acts of direct or indirect discrimination can be justified if it is ‘a proportionate means of achieving a legitimate aim’.

4.4. Disability – a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. There is a duty to make reasonable adjustments to assist in overcoming the disadvantages of the impairment. Individuals are also protected from discrimination arising from something connected with their disability where it could be reasonably expected that the Business would know that the person has a disability. It is also unlawful in most circumstances to request information about the health of job candidates prior to making a job offer. Employees who are disabled or become disabled are encouraged to inform the Business accordingly so that appropriate support can be explored.

4.5. Gender reassignment – transsexual people who propose to start, or complete a process to change their gender regardless of whether or not this involves medical procedures are protected under the Equality Act 2010. An employee who is absent due to such procedures cannot be treated less favourably than if the absence was due to sickness, injury or some other reason.

4.6. Marriage or civil partnership – the Equality Act 2010 protects employees who are

married or in civil partnerships from discrimination on account of this status.

- 4.7. Pregnancy and maternity – female employees and applicants are protected against discrimination on the grounds of pregnancy and maternity during the period of pregnancy and any statutory maternity leave.
- 4.8. Race – individuals are protected against discrimination on the grounds of colour, nationality and ethnic or national origins.
- 4.9. Religion or belief – individuals are protected against discrimination on the grounds of their religion or lack of religion and belief or lack of belief. A religion can be any religion that has a clear structure and belief system. A belief can be a religious or philosophical belief that affects a substantial aspect of human life and behaviour. Political beliefs are not protected.
- 4.10. Sex – refers to both men and women.
- 4.11. Sexual orientation – refers to bisexual, gay, heterosexual and lesbian people.
- 4.12. Direct Discrimination - constitutes less favourable treatment of one person than another, or than another would be treated, because of one or more of the protected characteristics outlined above. Equally, direct discrimination can occur where there is less favourable treatment of an individual because they have, or are thought to have a protected characteristic (perceptive discrimination) or because they associated with someone who has a protected characteristic (associative discrimination).
- 4.13. Associative Discrimination - is direct discrimination involving less favourable treatment of a person because they are associated with someone who possesses one or more of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex and/or sexual orientation.
- 4.14. Perceptive Discrimination - is direct discrimination involving less favourable treatment of a person because it is perceived that they have one or more of the following protected characteristics even though they do not: age, disability, gender reassignment, race, religion or belief, sex and/or sexual orientation.
- 4.15. Indirect Discrimination - is when a provision, criterion, rule, policy or practice of the Business which is applicable to all staff or applicants equally, is applied but has a disproportionate effect on an individual or group of individuals who share one or more of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation and/or marriage and civil partnership, and cannot be shown by the Business to be a proportionate means of achieving a legitimate aim.
- 4.16. Victimisation - is when a person is treated less favourably than another employee or candidate because the individual has made or supported a complaint or raised a grievance under the Equality Act 2010 or is suspected of doing so.

- 4.17. Harassment - including sexual harassment is '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'. Relevant protected characteristics are as follows: age, disability, gender reassignment, race, religion or belief, sex and/or sexual orientation. Sexual harassment specifically refers to unwanted behaviour of a sexual nature that either violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Employees can complain of harassment even if the offending behaviour is not directed at them and even if they do not have the protected characteristic themselves.
- 4.18. Third Party Harassment - is harassment as described above, of employees by other individuals who are not employees of the Business e.g. clients and suppliers etc. The Business may be liable when harassment has occurred on at least two previous occasions and is aware of the incidents and yet steps have not been taken to resolve the matter.

5 | Relevant Legislation

- 5.1. This policy should be read in conjunction with the legal and regulatory documents listed below:
- Equality Act 2010;
 - Worker Protection (Amendment of Equality Act 2010) Act 2023
 - Equality Duty 2011; and
 - Human Rights Act 1998.

6 | Our responsibility

- 6.1. The Board has overall responsibility for putting this policy into practice. In addition, every Board Member has a personal responsibility to conduct himself or herself in a suitable manner, without invoking or supporting any discrimination as outlined in this policy.
- 6.2. The Board will actively promote fairness and the elimination of prejudice in all the activities of Habitare so that we demonstrably exceed the minimum legal requirements for equality. It also recognises that everyone is different and will therefore ensure that products and services are appropriately shaped to be attractive to the range of customers we serve.
- 6.3. We will:
- oppose direct and indirect discrimination of any kind;
 - support board members and customers who challenge inappropriate behaviour;

- follow guidance from regulatory bodies or from the Equality and Human Rights Commission;
- meet statutory and regulatory responsibilities;
- seek to influence positively the practices of key stakeholders and partners;
- make explicit reference to equality and diversity issues in our business plans, strategies and policies; and
- deal promptly, firmly and consistently with any cases of discrimination or harassment reported by customers or employees.

6.4. In appointing suppliers, contractors and consultants we will:

- require our contractors and consultants to apply our equality and diversity principles;
- work with our contractors and consultants to encourage them to recruit people who reflect the diversity of the communities in which they work.

6.5. Any complaints of discrimination (direct, indirect, associative or perceptive), victimisation or harassment in respect of this policy will be dealt with appropriately. The information in any complaint will be treated in strictest confidence. No individual will be penalised in any way for raising such issues.

7 | Stakeholders

7.1. This policy will be jointly implemented with our managing agents. All board members, potential board members and customers are to be made aware of our commitment to equal opportunities.

8 | Monitoring and Performance

8.1. Habitare will endeavour to monitor data regarding the nine protected characteristics from time to time to ensure no direct or indirect discrimination is taking place.

8.2. The board is responsible for ensuring this policy is kept up to date, implemented within the organisation and monitored and evaluated.

8.3. This policy will be reviewed every two years or when there is a change in circumstances, in work practices or the introduction of new legislation.

8.4. Our managing agents will be consulted when this policy is reviewed.

Version Control

Date	Amendment	Version
March 2025	Updates to the Policy to include sexual harassment	V4.0

