

## Equality, Diversity and Inclusion Policy

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## **1. Our Commitment**

- 1.1 Clyde Valley Group (CVG) are committed to tackling the inequalities and barriers that hold our communities back by responding to the needs of our customers. We believe that by embracing diversity and challenging discrimination we will ensure that people from all backgrounds are treated equally and fairly.
- 1.2 CVG is committed to promoting an inclusive environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all.
- 1.3 This policy confirms our commitment to equality, diversity and inclusion (EDI) in employment and service delivery.
- 1.4 We will help ensure fair treatment for all members of our community regardless of race, ethnic origin, nationality, gender, disability, religion, marital status, maternity, sexuality or sexual orientation, or age.

## **2. Our Legal Duties**

- 2.1 Under the Equality Act 2010 we have a responsibility as a social housing provider to promote equality of opportunity. The Act makes discrimination unlawful in relation to the nine 'protected characteristics' outlined below:

- Age
- Disability
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Whilst CVG is not a public body, we take account of the Public Sector Equality Duty when delivering services that are public in nature. The public equality duties consist of a general duty and further specific duties. The general duty takes the form of broad equality requirements. Under this Duty we must give due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act 2010 (further details of which can be found at appendix 1)
- Advance equality of opportunity
- Foster good relations (tackling prejudice and promoting understanding)

- 2.2 Under Section 39 of the Housing (Scotland) Act 2010 we, as a social landlord, are required to encourage equal opportunities. We are also regulated by the Scottish Housing Regulator (SHR) which sets out the regulatory standards for Registered Social Landlords (RSLs) to respond to the diverse needs and treat all tenants with fairness and respect including those with protected characteristics and those with additional support needs.

- 2.4 Under the SHR regulatory requirements we are required to have assurance and evidence that we are meeting our legal obligations and that we collect data relating to the protected characteristic of our existing tenants, new tenants, people on our waiting lists, governing body members and staff.
- 2.5 CVG recognises that the collation and analysis of the specified equality data will enable us as an organisation to understand the needs of individual customers and use that data to provide appropriate services and treat individuals with respect.

### **3. Our Approach**

- 3.1 We will embed our EDI Policy through our EDI Strategy and Action Plan.
- 3.2 We will work to ensure that all of our customers, employees, visitors, contractors and Board as well as those that apply to work with us are treated fairly and are not subjected to discrimination, victimisation, harassment or any other prohibited conduct under the Equality Act 2010, (further details of which can be found at appendix 1).
- 3.3 We require all of our customers, employees, visitors, contractors and Board to treat each other fairly and do not subject each other to discrimination, victimisation, harassment or any other prohibited conduct under the Equality Act 2010.
- 3.4 We recognise that overcoming barriers to equal opportunity can require positive action.
- 3.5 We will consider measures where we believe we can address such barriers within our EDI Action Plan.
- 3.6 CVG will follow appropriate search and selection provides, giving due consideration to matters of fairness, transparency, equality, diversity and inclusion, when undertaking recruitment exercises.
- 3.7 We are committed to creating a positive and inclusive culture with a well-trained people.
- 3.8 Diversity is celebrated within the CVG community and as such, a range of events and activities is supported each year for our people.
- 3.9 Equality Impact Assessments (EIA) are conducted to assess the implications of decisions on the CVG community and to prevent and tackle inequality.

### **4. Our Responsibilities**

- 4.1 All our people and customers are responsible and accountable for implementing and adhering to this policy.
- 4.2 Our Terms and Conditions of Employment, Section B2, recognise personal responsibility of everyone in ensuring equality of opportunities for all and outlines the responsibilities of our employees.

- 4.3 This policy is approved by the Board of CVG, who are responsible for ensuring that CVG complies with its statutory obligations under the Equality Act 2010 and our regulatory requirements with the SHR. They will regularly consider equal opportunity issues and review the policy and action plans. The People Director has overall responsibility for EDI across the CVG Group and is ensuring it is delivered in line with strategic priorities.
- 4.4 The Executive Leadership Team are also responsible for ensuring that the policy and the subsequent action plans are implemented and supported across CVG and that all our people understand their responsibilities in terms of equality.
- 4.5 The EDI Group is chaired by the People Director and has representation of employees from across CVG. Customer participation is invited to the group as required. The CVH Equality Group is key to the promotion and integration of equality diversity and inclusion across CVG.
- 4.6 CVG will not tolerate discrimination, harassment and/or victimisation of any kind. All allegations of prohibited conduct will be investigated and, if appropriate, disciplinary action will be taken which could be up to and including dismissal, in line with the appropriate CVG Policies and Procedures which includes but is not limited to:
- Recruitment and Selection Policy
  - Disciplinary Policy
  - Grievance Policy
  - Redundancy Policy
  - Dignity at Work Policy
  - Complaints Handling Procedure
  - Whistleblowing Policy
  - Gender Based Violence Policy
  - Menopause Policy

All Policies and Procedures applicable to colleagues are available on SharePoint.

## **5. Employment**

- 5.1 We are committed to creating a positive and inclusive culture with a well-trained people. To help achieve a diverse workforce we monitor recruitment and progression against protected characteristics.
- 5.2 EDI training is included in training for all colleagues and Board members and specific training is provided appropriate to roles. The People Director is responsible for EDI training.
- 5.3 It is CVG's policy that all recruitment decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.
- 5.4 A fair recruitment process will remove barriers to the employment of people of different backgrounds. This will enable CVG to recruit from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving.

- 5.5 A more diverse workforce will improve the organisation's service delivery, as it will include staff with more knowledge and experience, meet and aid in meeting the needs and aspirations of service users and potential service users.
- 5.6 To highlight CVG's commitment to promoting EDI from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy within CVG will state that an equality and diversity policy is in place. In addition, the advert will also display any signs of equality bodies that CVG is affiliated with. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply CVG will ensure that all applications have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.
- 5.7 CVG will ensure all staff involved at any stage in the recruitment and selection process will receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.
- 5.8 Equality, diversity and inclusion will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image and of equality of opportunity.

## **6. Positive Action**

- 6.1 We recognise that overcoming barriers to equality of opportunity can require positive action. We will consider measures where we believe we can address such barriers, for example:
- Ensuring opportunity for representation of minority communities in the workforce and governance structure
  - Taking steps to support opportunity for recruitment of under-represented groups
  - As a 'disability committed' employer support recruitment of people with disabilities
  - Use apprenticeships and other training opportunities to encourage applications from under-represented groups.

## **7. Complaints**

- 7.1 If anyone feels they have a grievance or a complaint under this policy they may, in the first instance and if they wish and feel comfortable to do so, make the issue known to the person responsible for the behaviour and request that it should cease. Individuals may also, as an alternative, seek the direction and guidance of their manager or member of the People team in attempting to resolve matters in an informal manner.

7.2 Individuals should make any concerns known to a director, manager or a member of the People team as soon as possible. Where it does not prove possible to reconcile issues informally, or if a person does not want a matter dealt with informally, employees should raise a grievance in line with the Grievance Policy.

7.3 Any customer or member of the public who has concerns should raise the matter in accordance with our Complaints Policy which can be found on our website <https://cvha.org.uk/customer-complaints/> or our complaints handling procedures [CVHA Complaints Handling Process.docx](#).

## **8. Procurement**

8.1 We are committed to achieving best value in procurement while upholding our equality, diversity and inclusion principles. We will ensure this policy is reflected in all suppliers or contractors working on our behalf and our principles are maintained in their dealings with customers and colleagues. Where appropriate, we will use opportunities that arise through procurement to achieve social value and inclusive outcomes.

## **9. General Data Protection Regulations**

9.1 The use of personal information will be treated with full regard to data protection legislation and our own Privacy Policy Information regarding how your data will be used and the basis for processing your data is provided in CVG's Staff Privacy Notice. We will ensure data is processed lawfully, accurate, secure, relevant and retained for the appropriate period.

## Appendix 1 - Key Definitions

- 1.1 Equality is about treating people fairly, impartially and without bias and creating conditions in the workplace and wider society that encourage and value diversity and promote dignity and inclusion. Equality is not about treating everyone in the same way but recognises that their needs are met in different ways. Equality focuses on those areas covered by the law, and described as the protected characteristics of race, sex, disability, age, gender reassignment, marriage & civil partnership, pregnancy & maternity, religion or belief and sexual orientation.
- 1.2 Diversity is recognising, respecting and celebrating each other's differences. A diverse environment is one with a wide range of backgrounds and mindsets, which allows for an empowered culture of creativity and innovation. CVG is committed to valuing and managing people's differences to enable all employees to contribute and realise their full potential. CVG recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit CVG and its customers.
- 1.3 Inclusion means creating an environment where everyone feels welcome and valued. To be inclusive we must take positive action to include everyone in society when planning and making decisions.
- 1.4 **Discrimination** - occurs when someone is treated less favourably because they have or are associated with someone else who has one or more protected characteristic. This is referred to as direct or indirect and it may occur intentionally or unintentionally.
  - 1.4.1 **Direct discrimination** occurs when someone is put at a disadvantage because of one or more protected characteristics. For example, rejecting an applicant of one race because it is considered they would not "fit in" because of their race could be direct discrimination.
  - 1.4.2 **Indirect discrimination** - occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a height requirement would be likely to eliminate proportionately more women than men. If this criteria cannot be objectively justified for a reason unconnected with sex, it would be indirectly discriminatory on the grounds of sex.
  - 1.4.3 **Associated Discrimination** - is discrimination against a person because they have an association with someone with a particular protected characteristic.  
e.g. a non-disabled person is discriminated against because of the action they need to take care of disabled dependent.
  - 1.4.4 **Perceptive Discrimination** - is discrimination against a person because the discriminator thinks the person possess that characteristic. E.g., a person is not shortlisted for a job on the bases that the recruiter assumes the applicant does not have the correct VISA to work in the UK as they have a foreign looking name on their application form.



- 1.5 **Harassment** - is unwanted conduct related to sex, gender reassignment, race or ethnic or national origins, disability, sexual orientation, religion or belief, age or any combination of these, or any other personal characteristic or any perception of particular characteristic (s) which:
- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
  - is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.
- 1.6 **Victimisation** - is treating someone less favourably than others because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them worse work.
- 1.7 **Positive Action** - the Equality Act 2010 allows employers to take "positive action" as a proportionate means of enabling or encouraging people with a protected characteristic to overcome or minimise disadvantage or participate in activity where they are underrepresented. This includes allowing employers to recruit or promote employees because of their protected characteristic if they are "as qualified as" other candidates, provided this is done on a case-by-case basis rather than as a matter of policy.
- 1.8 **Failure to make Reasonable Adjustments** - where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

## Policy Change History

<b>Version No:</b>	<b>Substantive Change</b>	<b>Author of Change</b>	<b>Approval</b>	<b>Date</b>	<b>Website</b>
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