



MANNINGHAM HOUSING ASSOCIATION

EQUALITY, DIVERSITY & INCLUSION POLICY

1. Purpose and Commitment

As Bradford's only Black and Minority Ethnic (BME) housing association, Manningham Housing Association (MHA) is actively committed to promoting and embedding a culture of equality, diversity and inclusion. MHA is an organisation which values differences and enables individuals to be their authentic selves. Our aims are for the organisation to be a leading voice for BME communities, to be truly representative of all sections of the society and communities we serve, and for each member of our staff, residents and other stakeholders to feel respected and valued.

MHA has responsibilities under legislation, regulation and codes of governance including, but not limited to:

- the Equality Act 2010 (incorporating the Public Sector Equality Duty);
- the Human Rights Act 1998;
- the National Housing Federation Code of Governance 2020; and
- the Regulator of Social Housing Regulatory Framework,

and any relevant amendments to such legislation or further codes/frameworks of practice.

2. Defining equality, diversity and inclusion

While the terms equality, diversity and inclusion often go hand in hand, they are not one and the same.

Equality is the fair and unbiased treatment of others, taking into account systemic and structural inequalities. This ensures equal opportunity and access for all groups which are protected by legislation.

Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they were born with or have acquired. These differences can go beyond the protected groups set out in legislation.

Inclusion goes further and is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.

These terms are interdependent and go hand in hand in promoting a culture that is actively equal, diverse and inclusive.

Detailed definitions and examples of other relevant terms (including the protected characteristics delineated in the Equality Act 2010, different types of discrimination, and unconscious bias) can be found in the attached glossary [below].

3. Duties under the Equality Act 2010

MHA is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation (as defined in the Equality Act 2010). The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion/belief
- Sex
- Sexual orientation

In addition MHA recognises that socio-economic circumstances of households are the biggest determinant of successful outcomes so we are determined to tackle inequality in our communities as a whole.

4. Duties under the Public Sector Equality Duty

MHA is mindful of its duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

We believe that fostering good relations and promoting cohesion between different groups is at the heart of our work in our areas of operation. We are determined to tackle segregation and bring communities together.

5. Other Duties

MHA also understands that diversity and risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010 and that it has a moral duty to address discrimination as an employer, a landlord and as a provider of services. We are committed to tackling inequality in its widest sense and challenging discrimination based on a variety of social and cultural characteristics such as the protected characteristics above, but also including:

- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Political affiliation

6. Our Objectives and Commitments

MHA has agreed a set of objectives and commitments that reflect our strategy for embedding an equal, diverse and inclusive culture in the organisation for 2021-2022. We have set these out in our 2021-2022 Equality, Diversity and Inclusion (EDI) Action Plan, the contents of which has been informed by: feedback received from our EDI Assessment in August 2020 by the Centre for Assessment, our HR Strategy, and our Community Investment Strategy.

The action plan is our long-term commitment to equality, diversity and inclusion and progress will be reported regularly to board as in section 7 below.

7. Review and monitoring

MHA shall develop a set of metrics to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least once every **12 months**, review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order to ensure we are meeting organisational, legal, regulatory and best practice requirements. We shall also use this information to ensure our services are accessible to all and free from discrimination.

We shall regularly, and at least once every **12 months**, carry out workforce surveys relating to equality, diversity and inclusion and the working environment to ensure all data is as up to date as possible and to gain the views of all staff. These surveys will help to inform our progress against our commitments and objectives.

All data and information collected will be used to track progress and monitor performance on our equality, diversity and inclusion objectives and commitments. We shall also collect information to understand the different needs of our customers. This information will form part of our regular reporting to the Board (see section 8 below for

further detail). It shall also be used effectively to identify best practice as well as gaps or shortcomings within our organisation and to tailor our approach in correcting these.

Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure MHA has the best quality of data to inform our progress on our objectives and commitments and also to aid better decision making.

8. Accountability and Reporting

MHA shall annually publish information about the work we have done to deliver on our equality, diversity and inclusion commitments and objectives, and the progress we have made. This will include an annual update to our HR and remuneration committee as well as the board.

9. The Board's Role

The Board is committed to taking a clear and *active* lead in its commitment to achieve equality of opportunity, diversity and inclusion. This is in all of the activities of our organisation, including understanding the needs of our residents and communities, as well as the composition of the Board and committee(s).

MHA recognises a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board shall provide leadership on this policy and, working with the Executive Management Team, ensure that it is implemented.

The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements. It shall seek regular updates on how MHA is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice and at least once every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation as set out at Section 7, above.

All reports to the Board shall include appropriate and robust considerations of equality, diversity and inclusion issues. Equality, diversity and inclusion shall regularly feature as an agenda item for Board meetings and decisions shall be made with effective equality, diversity and inclusion analysis.

People with direct lived experience of (or particular insight into) the communities we serve shall also be meaningfully engaged in our governance structures.

10. Staff

All MHA staff and job applicants shall be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation with regard to the protected characteristics set out in the Equality Act 2010 as well as membership or non-membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We shall also make reasonable adjustments where necessary to overcome any disadvantages due to disabilities.

All workforce related codes of conduct, policies, practices and procedures reflect our values and commitments to equality, diversity and inclusion and our aims to recruit and retain a diverse and inclusive workforce reflecting the communities we serve. We shall also consult staff diversity networks when making changes to workforce related codes of conduct, policies, practices and procedures where appropriate.

MHA will not tolerate any forms of unlawful discrimination, harassment, victimisation or bullying.

All employees, Board members and committee members of MHA are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing MHA. All our employees have a responsibility to champion our values of equality, diversity and inclusion. MHA also conduct annual value-based appraisals which take into account how staff demonstrate their commitment to EDI in their daily work.

Acts of discrimination or harassment by employees or Board members or committee members of MHA will result in disciplinary action, in line with the MHA Disciplinary Policy (amended 2020). Failure to comply with this policy will be treated in a similar fashion.

Any external contractors, sub-contractors, agents or third parties providing services to, for or on behalf of MHA are responsible for complying with this policy and we shall take action against and actions of behaviours of non-compliance as appropriate

11. Board and committee recruitment

MHA is committed to ensuring that our committee(s) and Board's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve. Our Board Recruitment and Succession Planning policies also reflect our commitment to achieving a diverse and inclusive Board.

12. Training

MHA is committed to ensuring all staff receive appropriate equality, diversity and inclusion training on a regular basis and that all staff are aware of this policy. Equality, diversity and inclusion training forms part of our induction training programme (in the form of a compulsory EDI module on SkillGate) and all new members of staff will be made aware of this policy as part of their induction. All staff will also regularly receive refresher training on equality, diversity and inclusion.

We are also committed to providing unconscious bias training to all staff (and Board), including those who are involved in the provision of housing services to our customers, management and recruitment decisions.

13. Commitments to Our Residents/Customers

MHA is committed to developing and maintaining an understanding of its tenant base in terms of EDI through customer insight data, and ensuring equality of opportunities in the provision of its housing services. Further details of these commitments are set out below.

Meeting Housing Need

- Liaising with statutory agencies to share assessments of the housing needs of local communities and any groups facing discrimination;
- Reviewing how our organisation can contribute to meeting these needs
- Partnering with specialist agencies where appropriate to meet the needs of disadvantaged groups;
- Considering the needs of a diverse range of communities when designing and developing new homes; and
- Ensuring new homes are suitable for people with disabilities and following approved guidance on this.

Access to Housing

- Continuously monitoring allocations to ensure direct or indirect discrimination is not occurring;
- Working with local authorities to eliminate direct or indirect discrimination in the nominations processes; and

- Ensuring systems for housing or rehousing residents reflects our equality principles (as illustrated for instance in our Choice Based Lettings Policy).
- Training our staff team to help eliminate bias in the allocation process

Housing Services

- Ensuring all residents are treated with fairness and respect
- Ensuring staff receive appropriate equality, diversity and inclusion training and unconscious bias training in relation to the provision of housing services;
- Consulting with residents and obtaining their views particularly in relation to our equality, diversity and inclusion commitments;
- Ensuring any resident involvement and participation activities promote involvement from all groups of residents;
- Ensuring procedures e.g. complaints procedures are clear, simple accessible to all, including using community languages where appropriate;
- Zero tolerance on harassment of residents and pro-active working with other agencies to tackle all forms of harassment (see also MHA Anti-social Behaviour Policy);
- Ensuring all forms of information and communication are accessible to residents (e.g. big text, audio tapes, translation or interpretation services); and
- Ensuring housing and associated services take into account the sensitivities and needs of different groups including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs

14. Projects and Initiatives/Partnerships etc.

If you have any questions about this policy please contact Ulfat Hussain.

- MHA is involved with the National Housing Federation EDI Group
- MHA is a member of Housing Diversity Network (HDN), and our CEO is Vice Chair. We also actively participate in the HDN Staff Mentoring Programme
- MHAs Vision and Values are clear- staff are aware of these and one of our Core Values is around Embracing Diversity.

- MHA actively participates in National Inclusion Week
- MHA has successfully achieved the Centre for Assessment BS76005 Diversity and Inclusion Certification
- MHA are a Hate Crime reporting centre, and our staff are trained to deal with this

Appendix I: Our Commitments/Objectives:

MHA have the following commitments:

- To create a working environment free of bullying, harassment, victimisation and direct or indirect unlawful discrimination;
- To promote dignity and respect for all where individual differences, backgrounds, experiences and contributions are all recognised, celebrated and valued;
- To take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities;
- A commitment to a zero tolerance approach to bullying, harassment, victimisation and unlawful discrimination;
- To have a representative Board, committee and workforce, reflecting the communities we serve;
- To embed a culture of equality, diversity and inclusion, ensuring that this is considered in all of the organisation's activities and all policies and procedures within the organisation are subject to effective equality, diversity and inclusion analysis, including when making changes to policies and procedures;
- To adopt procurement practices to ensure contractors and suppliers demonstrate a genuine culture of inclusion and equality of opportunity- as referenced for instance in our Repairs and Maintenance Policy;
- To maintain fair and transparent recruitment, promotion and reward processes;
- To make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation;
- Where members of staff with a certain protected characteristics are currently under-represented at particular levels, to carry out an analysis of the causes of the under representation so that we may remove any barriers that exist, including providing positive action training to equip them to apply for promotion opportunities or reviewing recruitment/promotions processes *etc.*
- To continually review employment practices and procedures when necessary to ensure fairness, and also update them and this policy to take account of changes in the law or best practice;

- To seek to monitor the make-up of our workforce regarding protected characteristics such as age, sex, ethnic background, sexual orientation, gender reassignment, religion or belief, and disability in the interests of encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this equality, diversity and inclusion policy;
- To assess how this equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them at least annually, and considering and taking action to address any identified issues;
- To report on gender and ethnicity pay gaps and produce action plans to address any issues of imbalances identified;

Appendix II: Extended Glossary of Definitions and Examples:

The nine protected characteristics

Age:

Age is defined in the Equality Act with reference to a person's age Association. An age Association can mean people of the same age or people of a range of ages. Age Associations can be wide, narrow or relative. For example, people of the same age i.e. 18 year olds, a range of ages i.e. 18-30 or people over 30, people under 30, people in their 30's.

Disability:

A person is considered as having a disability if they have "a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities." A physical or mental impairment includes sensory impairments such as those affecting sight or hearing, as well as mental health conditions. Long-term means the impairment has lasted, or is likely to last, for at least 12 months or the rest of the affected person's life.

Gender re-assignment:

A transgender person refers to a person who has the protected characteristic of gender reassignment. Gender Reassignment occurs when an individual experiences gender dysphoria, a strong sense that their gender identity does not match their birth gender and begins the process that may lead to permanently living in the gender that matches their gender identity. The Equality Act 2010 broadened 'gender reassignment' protection to an individual who plans to undergo, is undergoing or has undergone a personal process to reassign their sex (transitioning) by changing physiological or other attributes of sex. To have legal protection, there is no requirement to be under medical supervision or to have had any surgery. A person needs to have only started the process to be protected i.e. seeing a GP, psychotherapist or counsellor or started to dress as their preferred gender. This means a person is protected even if they only occasionally present themselves in the other gender. Gender reassignment is not the same as gender reassignment surgery. The Gender Recognition Act 2004 enables a person who has permanently transitioned i.e. lived fulltime for the preceding two years in their acquired gender to acquire a Gender Recognition Certificate confirming their new gender status 'for all purposes'. This means that she or he is legally recognised for all purposes in their acquired gender.

In 2020, it was also confirmed by the courts that non-binary/gender-fluid individuals (those who do not identify as strictly one gender) are protected under this same gender re-assignment legislation in the Equality Act.

Marriage and civil partnership:

In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between same-sex couples. Same sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples except where permitted by the Equality Act.

Pregnancy and maternity:

Pregnancy is the condition of expecting a baby. Maternity is the leave period after the birth in the employment context. Outside of the employment setting, in relation to non-work cases, protection against maternity discrimination is for the first 26 weeks after giving birth and includes treating a woman unfavourably because she is breastfeeding for example asking her to stop breastfeeding in a public space i.e. coffee shop, restaurant, on a bus, or asking her to leave.

Race (includes colour, nationality, ethnic or national origins):

The Equality Act defines 'race' as an Association of people defined by their colour, nationality (including citizenship) and ethnic or national origins. A person has the protected characteristic of race if they fall within a particular racial Association. A racial Association is an Association of people who have or share a colour, nationality or ethnic or national origins. For example, a racial Association could be 'British' people. A racial Association can also be made up of two or more distinct racial Associations, for example 'Black British' (people who are Black and British citizens) or 'South Asian' (people from India, Pakistan, Bangladesh, and Sri Lanka etc.). Nationality (or citizenship) is the specific legal relationship between a person and a state through birth or naturalisation. It is distinct from national origins. National origins must have identifiable elements, both historic and geographic, which at least at some point in time indicate the existence or previous existence of a nation. For example, as England and Scotland were once separate nations, the English and the Scots have separate national origins. The provisions of the Equality Act only apply where a person belongs to an ethnic Association as defined by the courts. The courts have confirmed Sikhs, Jewish people, Romani Gypsies, Irish Travellers, Scottish Gypsies, and Scottish Travellers as protected ethnic Associations.

Religion or belief (includes non-belief):

Under the Equality Act, religion includes any religion that has a clear structure and belief system. Protection under the Act also includes those who do not have a religion. This means that employees or job applicants are protected if they do not follow a particular religion or if they have no religion at all. Belief means any religious or philosophical belief or a lack of belief. To be protected, a belief has to meet certain conditions. It must be 'a weighty and substantial aspect of human life and behaviour' and should affect your life choices or the way you live for it to be included in the definition. Humanism and Atheism are protected philosophical beliefs, but political beliefs are not protected under the act.

Sex (man or woman):

Under the Equality Act, sex refers to a man or a woman. As in previous legislation, both men and women are protected from discrimination under the Act.

Sexual orientation (lesbian, gay, bisexual and heterosexual):

Under the Equality Act this refers to a person's sexual orientation or attraction toward:

- persons of the same sex (a gay man or a lesbian);
- persons of the opposite sex (someone who is heterosexual);
- persons of either sex (someone who is bisexual).

Types of discrimination

Direct discrimination:

This is where someone is treated less favourably than another person because of a protected characteristic. Examples of direct discrimination:

- Male employees get paid more than their female colleagues doing the same job;
- A gay employee is overlooked for promotion because of their sexuality.

A different approach applies to the protected characteristic of age, because some age-based rules and practices are seen as justifiable. And less favourable treatment of a person because of their age is not direct discrimination if it can be shown that the treatment is a 'proportionate means of achieving a legitimate aim'.

Direct discrimination by association (associative discrimination):

This is direct discrimination against someone because they associate with another person who has a protected characteristic. Examples of discrimination by association:

- An employee is not offered a promotion because they are the parent of a disabled child;
- An employee is being discriminated against at work because they are the parent or partner of somebody undergoing gender re-assignment.

Direct discrimination by perception (perceptive discrimination):

This is direct discrimination against someone because they are thought to possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. Examples of discrimination by perception:

- Someone is refused accommodation at a hotel because he/she is perceived to be gay
- A job application is rejected because the employer assumes the candidate is Black as they have an African name

Indirect discrimination:

This is a less obvious form of discrimination than direct discrimination. This occurs when an apparently neutral criterion i.e. a rule, provision, policy or procedure that is applied or put in place for everyone that adversely affects or places at a disadvantage people with a particular protected characteristic compared to people who do not share that characteristic and, applying the criterion cannot be objectively justified. Examples of indirect discrimination:

- Requiring that the employee be 6 feet tall would disproportionately disadvantage women;
- Uniform requirements stating employees may not wear headwear would indirectly discriminate against for example Rastafarians (head dress), Sikh men (turban), Jewish men (yarmulke) etc. unless the dress code can be objectively justified.

Bullying and harassment:

Under the Equality Act, harassment is defined as 'unwanted conduct related to a protected characteristic, which has the purpose or effect of violating an individual's dignity or creating a degrading, hostile, humiliating, intimidating or offensive environment for that individual'. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying or harassment may occur between two individuals, or it may involve Associations of people. It may not necessarily be face to face, it can also occur through e-mail, text, telephone or over the internet. Whatever form it takes, it is unwelcome to the individual. Examples of harassing and bullying behaviour:

- Spreading malicious rumours, or insulting someone by word or behaviour;
- Making inappropriate jokes or using offensive language;
- Putting up offensive posters, graffiti, flags, bunting and emblems;
- Deliberately excluding or isolating people;
- Setting unachievable or impossible targets /deadlines

Note, individuals can now complain of behaviour that they find offensive even it is not directed at them. The individual does not have to possess the characteristic themselves.

Victimisation:

This occurs when an employee is treated badly because they have made a complaint or supported a colleague to make a complaint or, raised a grievance or supported a colleague to do so or, are suspected of doing either. Protection against victimisation is lost if the employee makes a complaint that is found to be untrue or malicious. An example of victimisation:

An employee raised a grievance against her manager because she felt he had discriminated against her as she is in a civil partnership with a woman. The complaint is resolved through the grievance procedure. The employee feels she is subsequently excluded by her colleagues and her manager for making the claim.

Examples of lawful actions to overcome or minimise disadvantage Duty to make reasonable adjustments

Where a disabled person is at a substantial disadvantage in comparison with people who are not disabled, there is a duty to take reasonable steps to remove that disadvantage by:

- (i) changing provisions, criteria or practices;
- (ii) altering, removing or providing a reasonable alternative means of avoiding physical features, and
- (iii) providing auxiliary aids More favourably

To treat somebody better than someone else is unlawful under the Equality Act except in very limited circumstances e.g. the duty to make reasonable adjustments for a disabled person. The law can also require pregnant workers to be treated more favourably in some circumstances.

Further Definitions

Objectively justified:

When something can be shown to be a proportionate means of achieving a legitimate aim or, to achieve the aim is appropriate and necessary.

Positive action:

The Equality Act permits employers to take a range of lawful actions that seek to overcome or minimise disadvantages e.g. in employment opportunities or to meet the different needs experienced by people who share a particular protected characteristic. For example, an

employer might decide to take positive action if they find that the make-up of their workforce or in a particular area of the business does not reflect the make-up of their local population. They decide to target their advertising to encourage people from the local community who share the particular underrepresented protected characteristic i.e. women or LGBT to apply for vacancies.

Proportionate:

Whether something is proportionate in the circumstances will be a question of fact and involve weighing up the discriminatory impact of the action against the reasons for it, and asking if there is any other way of achieving the aim.

Reasonable:

What is considered reasonable will depend on all the circumstances of the case including the size of an organisation and its resources, what is practicable, the effectiveness of what is being proposed and the likely disruption that would be caused by taking the measure in question as well as the availability of finances.

Unconscious Bias:

Unconscious bias occurs when people favour others who look like them and/or share their values. For example a person may be drawn to someone with a similar educational background, from the same area, or who is the same colour or ethnicity as them. Another form of unconscious bias is known as the halo effect. This is where a positive trait is transferred onto a person without anything really being known about that person. For example those who dress conservatively are often seen as more capable in an office environment, based purely on their attire. It is believed that everyone has unconscious biases. The brain receives information all the time from our own experiences and what we read, hear or see in the media and from others. The brain uses shortcuts to speed up decision making and unconscious bias is a by-product. There are times when this sort of quick decision making is useful, for example if faced with a dangerous situation, however it is not a good way to make decisions when dealing with recruiting or promoting staff.

Unconscious bias at work can influence decisions in recruitment, promotion, staff development and recognition and can lead to a less diverse workforce. Employers can overlook talented workers and instead favour those who share their own characteristics or views. Where unconscious bias is against a protected characteristic, it can be discriminatory. For example if during a recruitment process an employer ignores the skills and experience of a candidate who is a different race than them and appoints another candidate who is the same race, this could be discriminatory. Unconscious thoughts can be based on stereotypes and prejudices that we may not even realise we have. Stereotypes surrounding tattoos may subconsciously suggest a person is unlikely to conform and follow rules. Stereotypes surrounding mothers may lead to unconscious bias against women who apply for a role which involves regular travel away from home

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Other relevant policies & procedures;

- Disciplinary Action Policy
- Anti-Social Behaviour Policy
- Choice Based Lettings Policy
- Repairs and Maintenance Policy

Policy Name	Equality, Diversity & Inclusion Policy
Ref No.	HR13
Date approved by HR&R Committee	October 2021
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Lead Officer	MHA CEO