



Equality, Diversity and Inclusion Policy

**Approval Date May 2019
Review Date May 2022**

This policy applies to

- Link Group
- Link Housing
- Link Living
- Link Property
- Horizon
- Larkfield
- West Highland
- Lintel Trust

Policy Summary

The Link group of companies [Link] believes that equality, diversity and inclusion are about recognising differences, respecting each other as individuals and tailoring our approach to meet differing needs. We aim to promote an atmosphere where people are valued and respected.

Link’s policy outlines its commitment to equality, diversity and inclusion based on the regulatory and legal framework. It sets out how its commitment will be brought to life through the principles Link will apply and includes key areas of responsibility for all employees, Link Board members and stakeholders.

Equalities

The Equality, Diversity and Inclusion Policy provides a guiding framework for the application of policies and practice. Practically, this means that the policy is intended to positively engage with all individuals irrespective of their personal characteristics or background. An Equality Impact Assessment has been completed. It is expected that the policy will have a positive impact for all including those who have protected characteristics under the Equality Act.

Privacy

When managing equality and diversity, Link may process personal data collected in accordance with its data protection policy. Data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of managing requests, monitoring and reporting. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with Link’s data protection policy immediately.

Revision History		
Date	Version Number	Comments

Policy Owner
 Director of Human
 Resources and Business
 Support

Review Manager

Approved By
 Senior Management
 Group

1. INTRODUCTION

Link is committed to equality of opportunity in all aspects of its work. We will not tolerate any form of discrimination and will challenge all acts of discrimination, prejudice, harassment and victimisation which occur within the workforce or within the communities in which we work.

We are committed to the promotion of equality and embrace diversity and inclusion across the group because we believe that this makes us stronger as an organisation. This underpins two key elements of our Mission Statement: “Working Together” and “Valuing People”.

Equality, diversity, inclusion and fairness for all are core to our business. Our values are based firmly on respect for all individuals:

- Responsibility – we all take responsibility for our actions
- Empathy – we work hard to understand how people feel as individuals and treat them with dignity
- Social Impact – we strive to ensure there is a positive social impact from our activities and work with others who share these aims
- Participation – we are proactive in providing opportunities for people to engage with us and help us to improve our services
- Equality – we are all equal and different, and we aim to provide inclusive environments for work and for living
- Challenge – we challenge ourselves and others towards excellence and innovation in all that we do
- Transparency – we aim to be open and honest about what we do and how we do it.

Link is an Investor in Diversity. We will promote actively to the organisations and individuals with whom we work, the rights they have not to face discrimination on any grounds.

1.1 Legislative and Regulatory Framework

We acknowledge the Equality Act 2010 and will act within this legislation at all times. Everyone is protected under the Act and it sets out the following “protected characteristics”:

- Age (which may relate to a person’s age or age group at any stage of life)
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion and belief (and no belief)
- Sex
- Sexual orientation

The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 require all organisations with 250 or more employees to publish gender pay gap findings. Link companies do not meet the threshold which requires gender pay gap findings to be published. However, in seeking to adhere to these principles, Link has and will continue to monitor pay gaps and seek to positively address these where necessary.

The Equality Act 2010 created the public sector equality duty (the 'equality duty'). In summary, those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity and foster good relations between people who have protected characteristics and those who do not

The equality duty applies to private or voluntary sector organisations when carrying out public functions. The Equality and Human Rights Commission provides the following examples of public functions in relation to registered social landlords:

- Allocation of housing
- Setting rent levels
- Complaints procedures
- Tenant participation
- Termination of tenancies
- Terms of tenancy
- Policies and procedures regarding anti-social behaviour

In addition to the above outcome the Scottish Housing Regulator's Regulatory Framework (February 2019) requires social landlords to:

- Have assurance and evidence that it considers equality and human rights issues 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.
- To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people of waiting lists, governing body members and staff.

The Scottish Housing Regulator has also confirmed it will support the development of guidance around equalities and human rights in social housing. It will start assessing landlords' compliance with its requirements from April 2021

2. PRINCIPLES

The following principles govern the operation of this policy:

- Be clear and understood by all employees, agents, partners (e.g. other organisations and contractors), customers and stakeholders
- Be fair, equitable, inclusive and non-discriminatory

- Reflect the needs of our diverse organisation
- Reflect statutory requirements and best practice
- Be flexible and adaptable to changing needs

3. OBJECTIVES

The objectives of this policy are set out in our commitments to those who work with us and to those who we provide services and homes:

3.1 Our commitment as an employer

Objectives	Related policy or provision
a) To provide a working environment in which everyone feels valued, respected and has their dignity maintained.	Code of Conduct Dignity at Work Anti-social Behaviour
b) To set clear expectations that all employees will treat people respectfully, politely and in a way that maintains their dignity.	
c) To aim to have a workforce where people from different groups are represented at all levels in Link's structure.	Recruitment Family Friendly and Work Life Balance policies. Training Retirement
d) To act swiftly in dealing with employees who fail to display the positive behaviours we expect which may include formal disciplinary action up to and including dismissal.	Grievance, Dignity at Work, Performance Improvement and, Disciplinary, policies.
e) To ensure that employees understand their role in valuing diversity and how they can contribute to delivering better quality services, thereby reducing inequality.	EDI Induction and Training.
f) To provide fair access to learning and development opportunities, encouraging and supporting employees in fulfilling their potential.	Training
g) To develop an effective communication strategy that involves and communicates actively with employees.	Business Strategy, Involvement of Trade Union, EDI Group.
h) To provide support to any employees who may experience any form of discrimination or unfair treatment whilst at work and take appropriate action against people involved in discriminatory or unfair practices.	Grievance, Dignity at Work, and, Disciplinary, policies. Confidential Counselling & Support Service
i) To ensure that our employment practices are non-discriminatory and supportive of employees who may have specific needs.	Sickness Absence Management EDI Group
j) To monitor our employee profile, assess the impact of major operational and strategic decisions on specific groups and take action where required to improve	EDI Group, HR, Pay and Benefits Policy

Objectives	Related policy or provision
access and remove barriers to employment, training or promotion.	

3.2 Our commitment as a service provider and provider of homes

Objective	Relevant related policy
a) To treat people respectfully, politely and in a way that maintains their dignity and to provide or secure assistance for individuals should they require it.	Code of Conduct
b) To seek to build accommodation and other facilities that are accessible to all.	Development Strategy
c) To understand better who our customers are so that we are able to provide appropriate services and resources which are accessible and relevant to all people within the communities we serve.	Customer Survey
d) To promote and market housing and other products and services to a range of different communities.	
e) To monitor allocation of properties and evaluate services to ensure they do not discriminate against, or exclude, individuals or people from different groups.	Lettings Policy
f) To comply with the equality duty when carrying out public functions.	
g) To consult actively with our customers to ensure that the services we deliver are appropriate to customers' needs.	Customer Survey
h) To deal effectively with complaints of unfair treatment, personal interaction and/or in the provision of services.	Complaints Handling Procedure
i) To provide clear, meaningful information about Link services in ways that are accessible and meet the diverse needs of our communities.	Happy To Translate
j) To deal effectively with complaints about the behaviour of people to whom we provide services where this fails to comply with the principles set out in this policy and to involve other agencies where such behaviour is of a serious concern.	Anti-social Behaviour Policy Tenancy Agreement Complaint Handling Policy

3.3 Commitment to others

Objective	Related relevant policy
a) To treat all board members and volunteers in line with the principles stated in this policy	Code of Conduct
b) To work with partners, contractors and suppliers to ensure that they understand our commitments, and ensure that their approach will support our aims.	Procurement Policy

4. APPROACH AND METHOD

The Link Group Board in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All employees, workers volunteers and where relevant, contractors and suppliers have a responsibility to ensure that they act in accordance with this policy.

This policy enables Link to send out a strong message of commitment, both internally and externally. A commitment to this policy is required from, and made to, all employees (whether part-time, full-time, permanent or temporary), workers and volunteers (our 'people'), Board members and others with whom we may work (for example contractors, consultants, suppliers). We also expect the same commitment from all those who receive a service from us and will promote this expectation of mutual respect in all our dealings with them.

The policy will be implemented using the following approaches.

4.1 Continual Action

The policy is supported by a clear programme of continual action which consists of four stages: planning, implementing, monitoring and reviewing this policy.

4.2 Equality, Diversity and Inclusion in the Employment Policy Framework

Link's Equality, Diversity and Inclusion Policy has links to many other policies across the group as it sets out the fundamental principles that govern how we will carry out all aspects of our business as a provider of services and as an employer.

The policies which detail how the equality, diversity and inclusion policy relates to key areas of employment are listed against our objectives in section 3. This list is not exhaustive.

Equality Impact Assessment is part of the development of all strategies and policies to ensure that we are embedding these principles in our plans and activities. It involves considering the impact of decisions on people with protected characteristics.

Link adopts a 'zero tolerance' approach to behaviour and actions which fail to support individuals' dignity. This means that we will take action to stop such behaviour whether it is displayed by our people, customers or partners. This extends to events where there is a clear connection with work even if it is away from work premises or outside normal working hours but where there is sufficient connection with work – for example, at team building days, social events to which our people are invited, business trips or client events. In taking appropriate action, we may liaise with a range of partners including Police Scotland.

4.3 Responsibilities

If we are to be successful in embedding an inclusive and supportive approach in all of our activities, all our people must take responsibility for making a positive contribution towards this aim.

All Employees, Workers and Volunteers

- To encourage equality, diversity and inclusion within Link and ensure that their actions do not contribute to unfair or discriminatory treatment of others
- To support colleagues who may be experiencing unfair or discriminatory treatment by encouraging the recipient to take appropriate action and/or through bringing this to the attention of their line manager or HR
- To challenge unacceptable behavior which impinges on a person(s) sense of dignity and/or work practice where these are identified
- To refresh and maintain their knowledge of their responsibilities in relation to equality legislation and Link's approach to ensuring equality of opportunity (this includes participating in training and completing any other learning resources made available)
- To take responsibility for making a positive contribution towards achieving the aims and objectives of this policy.

Tenants/service users

- To provide feedback to allow us, and/or other organisations or individuals to take action to remove unfair treatment of others.
- To understand and meet Link's commitments in this policy.

Contractors/Agents/Partners

- To treat people respectfully, politely and in a way that maintains their dignity and aiming to access assistance for individuals should they require it
- To be familiar with and abide by the relevant commitments under this Policy
- To ensure that their employees/workers carrying out activities understand and apply Link's Policy commitments and are appropriately trained
- To deal effectively and quickly with any behaviours/practices that fail to meet Link's aims and to report such actions to the appropriate Link contract
- To fulfil any agreed community benefit clauses in the contract and exceed these where possible

Managers

In addition to our people responsibilities to:

- communicate the importance of adherence to the Equality, Diversity and Inclusion Policy
- promote equality of opportunity for our people and to deal quickly and effectively with any complaint of unfair treatment (allowing time & resources for adjustments required to assist in dealing with complaints)
- ensure that all employees are given the opportunity to reach their full potential
- use appropriate measures to address inequality
- ensure that the services which are provided are responsive and reflect the diversity of need
- monitor and review services in line with equality standards
- implement, monitor and review equality, diversity and inclusion action plans
- ensure that staff are fully trained to perform their roles and attend mandatory programmes of training on equality, diversity and inclusion.

- ensure that Link's expectations in respect of contractors, partners and customers are clearly communicated to them and understood

Chief Executive Officer

- To have lead responsibility for equality, diversity and inclusion and ensure the Senior Management Group promote the equality, diversity and inclusion agenda

Senior Management Group

- To role model Link's values and behaviours
- To communicate the importance of equality, diversity and inclusion at group level
- To support and promote equality, diversity and inclusion initiatives and ensure the Equality, Diversity and Inclusion Policy is applied
- To refresh and maintain their knowledge of their responsibilities in relation to equality legislation and Link's approach to ensuring equality of opportunity
- To ensure equality, diversity and inclusion commitments are reflected in policy and practice within their own area of responsibility and to deal effectively with any issues of non-compliance
- To ensure the completion of Equality Impact Assessment on policies, strategies and decisions
- To review performance against improvement plans (including the Investors in Diversity action plan) associated with this policy
- To support managers in equality activities within their area of responsibility
- To ensure that customers, contractors and partner organisations are made aware of Link's Equality, Diversity and Inclusion Policy and our expectations of them in meeting our approach.
- To assess performance in equality, diversity and inclusion activities during our procurement processes and incorporate (where appropriate) clauses to provide opportunities for development/work experience for individuals who are less able to access mainstream opportunities.
- To implement this policy in all areas of responsibility

Link's Equality, Diversity and Inclusion Group

- To promote and lead on equality, diversity and inclusion objectives
- To review equality, diversity and inclusion as relevant to Link, develop plans for approval by the Senior Management Group, promote and support implementation and monitor progress
- To refresh and maintain their knowledge of their responsibilities in relation to equality legislation and Link's approach to ensuring equality of opportunity
- To monitor the Investors in Diversity action plan
- To support colleagues in implementing this policy and actively share knowledge within their teams
- To recommend appropriate training to meet the objectives outlined in this policy
- To comply with the terms of reference set for the EDI Group.

Human Resources

- To introduce all new people and board members to Link's Equality, Diversity and Inclusion Policy via their induction, intranet and webpages.
- To ensure agreed programmes of equality, diversity and inclusion training are properly implemented
- To ensure any new legislation or updates/amendments to existing legislation are implemented and communicated as they come into force.
- To provide equality, diversity and inclusion information to assist in the delivery of action plans

Board Members

- To ensure that this policy is applied across Link
- To ensure compliance with equality legislation
- To refresh and maintain their knowledge of their responsibilities in relation to equality legislation and Link's approach to ensuring equality of opportunity
- To aim to have our boards reflect the profile of the communities we operate within

5. MONITORING OF THE POLICY

The following areas will be subject to monitoring:

- Risk management
- Provision of training and/ or information to staff
- Compliance with policy requirements and procedures
- Investors in Diversity Action Plan

Our monitoring includes equalities information relating to:

- Applicants for employment
- Employees
- Board Members
- Applicants for housing
- Allocation of housing
- Service users
- Complaints
- Feedback from people leaving our employment or who stop using our services.

We will analyse our performance against relevant national and local data to check for areas of under-representation which may require our attention and/or action.

These will be monitored by appropriate managers within each company and/ or function and reported to the relevant director. If any significant issues of concern arise, these will be dealt with by the director who will report such matters to his/ her Board.

We will evaluate the effectiveness of the approach documented in this policy, and the impact of our Investors in Diversity and related action plans, by reviewing qualitative and quantitative data gathered on our performance as a service provider, partner and employer.

Any matter which demonstrates a serious failure of internal controls should be reported immediately to the Chief Executive.

6. COMPLAINTS AND APPEALS

6.1 Employees

Link recognises that employees may have issues or concerns about their work, the environment or working relationships that they may wish to raise and have addressed. Employees are encouraged to raise a concern, in the first instance, with their line manager in an attempt to resolve the matter informally. Should this course of action prove unsatisfactory, however, then an employee may raise a complaint under the Grievance Policy with reference to the Dignity at Work Policy, as appropriate. They may also wish to seek advice and support from the Human Resources Team, UNITE representatives or the Staff Concerns Panel.

6.2 Customers

Link welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The CHP allows for most complaints to be resolved by front line staff within a five day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20 day limit (second stage). At the end of the second stage our response will be made by a director. If the customer remains dissatisfied he/ she may then refer the matter to the SPSO. The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the Homeowner Housing Panel.

Anyone receiving care or support service from us has the right to complain either direct to the Care Inspectorate or to us.

At each stage Link will advise the customer how the complaint should be taken forward, and advise which agency would be most appropriate to consider the case.

Significant Performance Failure

A significant performance failure occurs if Link fails to do something or takes action that puts tenants' interests at risk; it will affect many or all of Link's tenants. If a tenant is aware of a significant performance failure he/she should report this to the Chief Executive. If the tenant is dissatisfied with Link's response he/she may then refer the matter to the Scottish Housing Regulator.

6.3 Workers or volunteers

Any worker or volunteer who has a complaint under this policy should address it via the complaints handling procedure noted at section 6.2 above.

7. POLICY AVAILABILITY

A summary of this policy can be made available in a number of other languages and other formats on request.

8. POLICY REVIEW

Link Group undertake to review this policy regularly, at least every three years, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

Privacy Impact Assessment Screening Questions

Carrying out a Privacy Impact Assessment [PIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

Please tick the applicable statement(s) below. Will your project involve:

- | | | |
|---|------------------------------|--|
| 1. A substantial change to an existing policy, process or system that involves personal information | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. A new collection of personal information | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. A new way of collecting personal information (for example collecting it online) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. A change in the way personal information is stored or secured | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. A change to how sensitive information is managed | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Transferring personal information outside the EEA or using a third-party contractor | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. A decision to keep personal information for longer than you have previously | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. A new use or disclosure of personal information you already hold | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. A change of policy that results in people having less access to information you hold about them | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 10. Surveillance, tracking or monitoring of movements, behaviour or communications | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 11. Changes to your premises involving private spaces where clients or customers may disclose their personal information (reception areas, for example) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Privacy Impact Assessment. If you have answered 'No', you need take no further action in completing a Privacy Impact Assessment.

Equality Impact Assessment Screening Questions

Will the implementation of this policy have an impact on any of the following protected characteristics?

- | | | |
|-----------------------------------|---|-----------------------------|
| 1. Age | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Disability | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Gender reassignment | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Marriage and Civil Partnership | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. Pregnancy and Maternity | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Race | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Religion or belief | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 8. Sex | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 9. Sexual orientation | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.