

HYELM – DIVERSITY, EQUITY & INCLUSION

Policy Statement

1. Our Commitments

1.1 HYELM is fully committed to the promotion of equity, diversity and inclusion and to challenging discrimination and building an inclusive culture. These concepts are embedded in our culture and practices and form an important part of our ethos and values.

1.2 Everyone is entitled to an environment that promotes dignity, equality and respect for all. We have a zero-tolerance approach to any acts of unlawful or unfair discrimination (including harassment or victimisation) committed against a resident, member of staff, volunteer, Member, Board Member, contractor or visitor because of a protected characteristic.

1.3 This is in relation to the following nine protected characteristics as set out in the Equality Act 2010:

- Age
- Disability
- Gender reassignment (including Transgender)
- Marital or Civil Partnership Status
- Pregnancy or maternity
- Race (including nationality, colour and ethnic or national origin)
- Religion or belief
- Gender / sex
- Sexuality / sexual orientation

1.4 We acknowledge that people can be discriminated against for reasons other than protected characteristics. We are committed to challenging discrimination and injustice beyond legal responsibilities. This can include the following: socio-economic group, caring responsibilities, appearance, experience of homelessness, social class or any other matter that would cause someone to be discriminated against.

1.5 We are committed to promoting equal opportunities in employment and creating a culture in which diversity and inclusion is valued, and everyone is treated with dignity and respect.

We will take all reasonable steps to:

1.6 Promote awareness and provide training to all staff on all aspects of equality and diversity in the workplace.

1.7 Apply the principles of equity to all residents, all housing applicants, all staff and all job applicants so that there is equality of opportunity. Our aim is that no individual is denied housing or employment opportunities for reasons unrelated to ability or suitability.

1.8 Establish recruitment and employment processes that ensure a diversity of candidates beginning with recruitment, development and training and promotion of talent through to the appointment of senior leadership.

1.9 That policies and procedures designed to allocate housing are non-discriminatory and ensure equitable access to all those who meet HYELM's eligibility criteria.

1.10 Implement all internal policies and procedures on a fair and impartial basis.

1.11 Create an inclusive environment that is sensitive to the needs of residents and staff of differing cultures, religions and beliefs. For example, in connection with festivals, religious observance and dress.

1.12 Make reasonable adjustments to enable employees with disabilities to function effectively and to their full potential.

1.13 Ensure that work environments are free from all forms of discrimination, harassment, intimidation or bullying.

1.14 Monitor how this policy is working in practice.

1.15 We are a learning organisation and recognise that there may still have areas where development and improvement is required. Where errors are made these will be addressed and practices reviewed to prevent re-occurrence.

1.16 This Policy, and others if requested, are available in different formats, such as languages, large print and recorded form.

1.17 This Policy does not form part of any employee's contract of employment and may be amended at any time. However, all employees are expected to comply with its principles and failure to do so may result in disciplinary action.

2.0 Anti-Racism Statement

At HYELM, we are committed to being an actively anti-racist organisation. We recognise that racism—both overt and systemic—harms individuals, communities, and the integrity of our sector. As a social housing provider, we have a responsibility to ensure that our services, policies, and culture promote equity, dignity, and respect for all.

2.1 Our Commitment

We stand against all forms of racism and discrimination, and we will not tolerate racist behaviour in any part of our organisation.

We are committed to creating a safe and inclusive environment for our residents, staff, and partners, where race and identity can be discussed openly and respectfully.

We will listen to and amplify the voices of Black, Asian and Minority Ethnic communities, especially those with lived experience of racism in housing.



We will review and improve our policies, practices, and services to ensure they are equitable and inclusive.

We will train and support our staff to understand racial bias, challenge discrimination, and embed anti-racist practices in their work.

We will collaborate with sector partners to share learning and drive systemic change.

2.2 Accountability and Action

We understand that being anti-racist is not a one-time declaration but a continuous journey. We will:

Invite feedback from residents and staff.

Hold ourselves accountable through transparent reporting and independent review.

Together, we can build a housing sector that is fair, inclusive, and free from racism.

3.0 Purpose

3.1 The purpose of this policy is to set out our approach to diversity, equity and inclusion. Our aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination.

3.2 It applies to all aspects of employment with us, including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

3.3 It applies to aspects of HYELM's role as a housing provider and in delivering an excellent service to its residents.

3.4 Hyelm complies with relevant legislation, regulation and codes of practice. In particular, this Policy has been devised with reference to the following:

- Equality Act 2010.
- Homes and Communities Agency Regulatory Framework.
- Equality and Human Rights Commission – Employment Statutory Code of Practice.

4.0 Scope

4.1 This Policy sets out our approach to diversity, equity, and inclusion and how we will fulfil our responsibilities.

4.2 This Policy aims to set out the relevant definitions of what constitutes discrimination and harassment, to whom the Policy applies and how the Policy will be applied with cross-reference to other related policies and procedures, where applicable.

4.3 This Policy applies to all Board members, Members of HYELM, staff (regardless of level or grade), residents, consultants and contractors. Everyone is expected to be aware of and



observe this Policy and to display standards of behaviour that treat all people with respect and dignity at all times.

5.0 How we will meet our commitments:

5.1 Operate a zero-tolerance approach to any form of discrimination and will be pro-active in its approach to ensuring that all systems and services fully reflect our Policy.

5.2 Our approach to equity, diversity and inclusion covers all aspects of its activities and is integral to the provision of its services. Key business areas include:

5.3 Policy and Practice: ensuring that equity, diversity and inclusion are embedded in all our key policies and procedures to ensure fairness and equity for all. Competing Equality Impact Assessments for key policies and consulting staff and residents on policies that affect them.

5.4 Recruitment and Selection of Staff, Board Members and Members of HYELM: ensuring that no job or Board/HYELM Membership post applicant suffers discrimination because of any of the protected characteristics by regularly reviewing recruitment and selection procedures to ensure that individuals are treated on the basis of their relevant merits and abilities. Further steps will be taken to ensure that our vacancies are advertised to a diverse recruitment pool and where relevant, to particular groups that we have identified as disadvantaged or underrepresented in our staff, or Board.

5.5 Staffing, Employment, Board Membership and Membership of HYELM: ensuring that our arrangements for staffing, Board Membership and Membership of HYELM adequately reflect the diversity within our communities and that all staff, Board Members and Members of HYELM understand and are committed to diversity, equity and inclusion principles and practices.

5.6 Training: ensuring that all staff, especially those involved in management, recruitment, lettings, service delivery and/or resident involvement, are trained on how to manage equality and diversity issues in the workplace and to ensure that such training is regularly updated and that staff are kept up-to-date with legal developments. Ensuring that all Board members are trained to an extent that it is appropriate to their governance function and responsibilities.

5.7 Referrals and Lettings: providing fair access to our services and preventing discrimination.

5.8 Service Delivery: focussing and reflecting on need and offering a fair and equal service to all.

5.9 Access to Information, Advice and Services: removal of barriers through language, literacy, ability or any other matter to ensure fair access for all.

5.10 Participation and Satisfaction: seeking, promoting and responding to views of all people and ensuring opinions are gained from adequate representation of all communities within our housing.

5.11 Responding to Comments, Suggestions and Complaints: in a fair and systematic way, ensuring that complaints relating to discriminatory behaviour are thoroughly investigated and dealt with promptly.

5.12 Managing and Recording Incidents: of discrimination or harassment in a systematic and fair way to learn from them and reduce the likelihood of re-occurrence.

5.13 Dealing with Harassment and Discriminatory Behaviour: operating within a zero-tolerance approach to challenge unacceptable behaviour and promote an atmosphere of understanding and respect.

5.14 Support and reasonable adjustments: promoting fair and equitable access to reasonable adjustments for staff and residents. Ensuring that adaptations are made to workspaces / equipment for employees in order to carry out their jobs.

5.15 Asset Management: ensuring that adaptations are made to properties to improve access for people with disabilities who are otherwise eligible for our housing and keeping accurate records of these to which to refer to for future lettings.

5.16 Procurement: purchasing and monitoring of external services (contractors, suppliers and consultants) to ensure that they share our commitment to equity, diversity and inclusion and adequately reflect the diverse mix that makes up our community.

6. Discrimination

6.1 It is unlawful to discriminate against or harass other people including current and former employees, job applicants, housing applicants, residents, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with residents, suppliers or other work-related contacts), and on work-related events, trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a Protected Characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a Protected Characteristic.

Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.

Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

5.3 Intersectionality: We recognise that individuals may face multiple and intersecting forms of discrimination and will take an intersectional approach to equity and inclusion.

5.4 Impact of discrimination. We recognise the impact of discrimination on staff, Board Members, Members of HYELM, residents and HYELM as a whole and will ensure that there is sufficient awareness, planning, action and monitoring to deal with such issues. A lack of awareness, understanding and respect of diversity amongst our client group can jeopardise residents right to live peacefully and without fear of discrimination and/or harassment.

Any form of discrimination or harassment can have a damaging and long-term effect on someone's personal development, health and mental well-being.

Without an understanding of the diverse needs of the residents within our schemes, we would not be adequately meeting our residents' cultural, religious, social and emotional needs, which would affect them in negative ways. Barriers would be placed to specific groups of people, resulting in a lack of fair access to services and equal chances to benefit from them.

6. Breaches of the Policy

6.1 If you believe that you have been discriminated against or have been the subject of harassment, you are encouraged to raise the matter with us.

6.2 Allegations regarding potential breaches of this Policy will be treated in confidence and fully investigated.

6.3 People who make such allegations in good faith will not be victimised or treated less favourably as a result.

6.4 Any person or body associated with HYELM who is found to have committed an act of discrimination or harassment will be subject to disciplinary or other appropriate action. We will take a strict approach to serious breaches of this policy.



7. Roles and Responsibilities

7.1 We are committed to continuously improving our practice. We are a learning organisation and where we identify that our policies or procedures could be improved, we will change them.

7.2 We value and respond to feedback from our residents, partner agencies and all other stakeholders, particularly in relation to good practice. This Policy will be reviewed regularly and where any changing legislation has an impact.

7.3 The Board has overall responsibility in agreeing HYELM's Diversity, Equity, and Inclusion Policy and for the effective operation of this policy but has delegated day-to-day responsibility for overseeing its implementation to the Chief Executive. Questions about the policy or suggestions for change should be referred to the Chief Executive.

7.4 We expect Board Members to actively and constructively challenge any form of discriminatory behaviour, regardless of their own personal beliefs.

7.5 It is therefore imperative that Board members are adequately trained and aware of equity, diversity and inclusion principles and good practice.

7.6 All leaders within the organisation must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to diversity, equity and inclusion.

7.7 Our staff have a particular responsibility in delivering our equity, diversity and inclusion commitments.

7.8 We expect colleagues to actively and constructively challenge any form of discriminatory behaviour, regardless of their own personal beliefs.

7.9 Failure to do so could result in staff, at any level, being discriminatory in their practice, therefore being liable to disciplinary action. It is therefore imperative that colleagues are adequately trained and aware of equity, diversity and inclusion principles and good practice.

7.10 This policy is reviewed by the Chief Executive, with the involvement of the HYELM team and residents.

8. Training and Development

Staff will be given appropriate training on recognising and avoiding discrimination, harassment, victimisation, unconscious bias and promoting equality of opportunity in the workplace and as a housing provider. The Chief Executive overall responsibility for equality training for staff and managers, as appropriate.

We will provide regular training to ensure that everyone is aware of and understands the contents of this policy and the Anti-harassment and Bullying Policy.

Approval

Version Number:	V3
Approval Date:	June 2025
Approved By:	Board
Review Due:	May 2027
Responsibility:	Chief Executive

Version Control

Date	Amendment	Version
June 2025	Updated Policy statement Inclusion of Anti-racism statement Inclusion of our Commitments Updated language to reflect good practice in promoting equity, diversity and inclusion Inclusion of who is responsible for this Policy and its review Inclusion of expectations for Training Updated Discrimination section	V3