



**City of London Corporation**  
**Department of Community & Children's Services**  
**Housing Service**

**Equality, Diversity and Inclusion (EDI) Policy**

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<b>Approved by:</b>	<b><i>Housing Management &amp; Almshouses Sub-Committee</i></b>
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## 1. Purpose

This policy provides an overview of the Housing Division's commitment to promoting equality and diversity in the services it provides to households living in homes managed by us.

The Equality Act 2010 has nine protected characteristics which are:

- Race
- Gender
- Gender Reassignment (including Gender Identity)
- Disability
- Sexual Orientation
- Religion or Belief
- Age
- Marriage and Civil Partnership
- Pregnancy and Maternity explicitly.

The Public Sector Equality Duty (Section 149 of the Equality Act 2010) applies across Great Britain to public bodies, and to other organisations when they are carrying out public functions.

The duty requires organisations to have due regard to equality in the way it conducts its business. We must take steps to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act
- Advance equality of opportunity between people
- Foster good relations between people.

This policy outlines our approach to implementing EDI principles in relation to housing services.

## 2. Scope

This policy applies to the delivery of services by the City of London Corporation's Housing Division, to residents and other users of services provided by us.

External parties commissioned to provide services are responsible for ensuring that their workers and sub-contractors work to this policy and other relevant City Corporation policies regarding equalities.

## 3. Aim of Policy

The Housing Division is committed to delivering excellent customer service. We recognise the different needs of our residents, service users and employees and actively work to minimise potential issues of exclusion and to challenge discrimination.

The City Corporation's Equality Objectives are aligned to the Corporate Plan 2024-2029 and People Strategy 2024-2029. These are to deliver:

- **Inclusive and Trustworthy Leadership** - The commitment to making systemic change through championing and advancing equity, equality, diversity, and inclusion (EEDI) in everything we do.
- **Inclusive and Diverse Community** - Representation and experience ensure the City Corporation is an employer of choice where people thrive.
- **Accessible and Excellent Services** - Equity, equality, diversity, and inclusion (EEDI) is integral in the design, development, implantation and evaluation of our services. This aligns to our ambition to be world class through providing excellent services to all.
- **Socio-Economic Diversity** - This focus is external and internal including social mobility and social inclusion. Activities are cognisant with the Social Mobility Index recommendations for improvement.
- **Cross-cutting activity** - focussing on data and evidence to inform and deliver the Equality Objectives 2024 – 2029. Robust data is integral to the effective delivery of equity, equality, diversity, and inclusion (EEDI) and requires building from a very low baseline

We will support the achievement of our Corporate objectives around equality, diversity and inclusion.

#### 4. Definitions

**Diversity:** Being inclusive. Understanding, respecting and valuing differences between individuals.

**Equality:** Treating people fairly, in ways that are free from discrimination and providing the same opportunities for all. Taking positive action to create a fairer society where everyone has the same chance to fulfil their potential, have access to services to meet individual needs and participate in the community.

**Inclusion:** Creating an environment where everyone feels welcomed and valued as an individual.

**Protected Characteristics:** The Equality Act 2010 defines nine protected characteristics that protect employees and customers from discrimination. It is against the law to discriminate against someone because of a protected characteristic.

**Vulnerability:** A person with vulnerability or individual service needs is someone who may have difficulties managing their tenancy or affairs as a result of health,

disability, learning, behavioural or mental health issues, family, social and financial or other circumstances, or any combination of these. Any person or household can experience needs or vulnerabilities at some point in their life.

## 5. Regulator for Social Housing – Regulatory Standards

The following regulatory standards are relevant to this policy:

- Transparency, Influence and Accountability Standard
- Neighbourhood and Community Standard
- Tenancy Standard

The Housing Division will comply with regulatory requirements and respond to residents' differing needs in the way we provide services.

In relation to the above standard, we will:

- Treat tenants (and prospective tenants) fairly and with respect
- Take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants
- Ensure our services, and communications, are accessible

## 6. Policy Statement

The Equality Act requires that people with one or more protected characteristics are not discriminated against and are able to access services.

To achieve the policy aims, we will:

- Ensure that decision-making structures consider equality and diversity, through a process of Equality Impact Assessing.
- Ensure the widest possible representation and involvement of residents and service users
- Collect data to enable us to understand the diverse needs of residents and assess whether our services provide fair and equitable outcomes
- Take account of individual needs when providing or planning services
- Ensure that equality and diversity is a fundamental principle in policies and procedures and that policies are equality impact assessed.
- Ensure that all employees are supported in developing the skills and abilities they require to deliver their functions with due regard to equality, diversity and inclusion
- Ensure that our staff understand and follow the standards of behaviour that are required for the appropriate management of equality and diversity.

The Housing Division wants to make sure that our commitment to equality and diversity is reinforced by the organisation's values and embedded in day-to-day working practices.

We recognise that everyone is different and should be treated as an individual. Fair treatment, inclusion and valuing diversity are paramount to reducing inequality and discrimination. We do not tolerate any discriminatory or offensive behaviour, including harassment, bullying or victimisation.

## **7. Vulnerabilities**

When providing services, we will have due regard to residents' vulnerabilities, which may or may not include a person's disability, and which may or may not fall directly under the Equality Act 2010.

Vulnerability may not be a permanent status; however, people may have periods of their life when they experience vulnerability. We recognise that some people may not see themselves as vulnerable and must ensure staff members can manage these situations with sensitivity.

Any person or household can experience needs or vulnerabilities at some point in their life and may have difficulties managing their tenancy or affairs as a result of health, disability, learning, behavioural or mental health issues, family, social and financial or other circumstances, or any combination of these.

Without the right support in place, the following groups of people may potentially be vulnerable:

- Frail elderly people
- People with a physical or sensory disability including those with long term, fluctuating or progressive illness
- People with mental health issues
- People with learning disabilities or difficulties
- People who are isolated
- People who neglect themselves
- People at risk of abuse and harassment (including domestic abuse and hate crime)
- People with challenging or antisocial behaviour
- People with literacy difficulties
- Rough sleepers and those with a history of street homelessness
- People who misuse alcohol
- People who misuse drugs
- People moving from supported accommodation
- People discharged from institutional care
- Refugee/asylum seekers
- Ex-offenders or people who are vulnerable as a result of having served a custodial sentence.

- Young people leaving care or evicted by parents
- Those who are made vulnerable due to circumstance (e.g. recent bereavement or relationship breakdown)
- Those who are vulnerable due to domestic violence, harassment, or victims of repeat burglary or crime

## **8. Policy Exceptions**

In exceptional circumstances, we may consider making a variation to this policy. Our reasoning can be provided to the affected parties on request.

## **9. Monitoring and Performance**

We will monitor our use of this policy and the way in which it is implemented, ensuring that any relevant information is reported at appropriate intervals.

## **10. Training**

We will provide all staff responsible for implementing this policy with comprehensive training as required.

## **11. Equality and Diversity**

This Policy has been subject to a full Equalities Analysis and will be implemented in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010.

## **12. Accessibility**


We will ensure that tenants' needs are considered when implementing this Policy to ensure that they are treated fairly. We will make appropriate arrangements to ensure that customers with distinct communication needs are not unreasonably and disproportionately affected. This could involve providing communications in alternative languages or formats, or providing interpretation or transcription as appropriate.

## **13. Data Protection and Information Exchange**

We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely.

## **14. Legislation**

- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- Mental Capacity Act 2005

<b>Department of Community &amp; Children's Services</b>  <b>Housing Service</b>		
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