



ATRIUM GROUP

Equality, Diversity & Inclusion Policy

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Compliant with Scottish Housing Regulator’s Regulatory Framework:	1.1, 1.2, 1.4, 1.6, 2.2, 2.4, 4.1, 4.3, 5.1, 5.2, 5.3
Compliant with Legislation:	Equalities Act 2010 The Housing Scotland Act 2010 The Scottish Social Housing Charter
Compliant with Tenant Engagement and Empowerment Strategy:	Yes
Compliant with Equal Opportunities:	Yes
Equality Impact (EDI Assessment) Status:	This document has not been EI Assessed (but is considered free of any unfair impact). (EI Assessment records are held by the Chief Executive’s Office and can be accessed on request.)
Compliant with Business Plan:	Yes
Tenants/customers consulted:	
Date Approved	Sep 2023
Date for Review:	Sep 2026 or earlier if required by changes in legislation or guidance, or if the Governing Body sees fit
Responsible Officer:	Chief Executive

The Equality, Diversity & Inclusion Policy has a direct link to the following Atrium policies and procedures:	<ul style="list-style-type: none"> Atrium’s Rules and Membership Policy Anti-Social Behaviour Policy Codes of Conduct for Staff and Board Members Common Allocations Policy Complaints Policy Data Protection Policy Debt Management Policy Design Brief & Standard Spec Policy Dignity at Work Policy Disciplinary Procedures Estate Management Policy Equality & Diversity Policy (Human Resources) Flexible Working Policy Grievance Procedures Recruitment & Selection Policy Tenancy Sustainment Policy Tenant Engagement and Empowerment Strategy Tenants’ Handbook Terms and Conditions of Employment Unacceptable Actions Policy
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1. Useful definitions

- 1.1. **Equality** is about treating everyone fairly and ensuring they are given fair access to opportunities. It is not about treating everyone in the same way, but ensuring that there is equality of opportunity for all people, taking their needs into account.
- 1.2. **Diversity** is the term used to encompass the fact that people vary in many different ways. Even though people have many things in common with each other they are also different in all sorts of ways. Differences include visible and non-visible factors, for example, visible factors may refer to variables such as gender, skin tone, age and hair colour. Invisible factors refer to differences such as educational attainment, life experience, sexual orientation, religious or other beliefs, values, skills, social or geographical background.
- 1.3. **Managing Diversity** is about recognising, respecting and valuing differences in people. Ensuring the organisation is aware of the composition of the society and communities it exists to provide services to and working to understand how to, as far as is feasible, mirror that composition in the mix of people it contains to provide those services. To manage diversity effectively the organisation will need to ensure it has appropriate human resource management practices that positively encourage and enable people from a wide range of backgrounds with differing needs to work within the organisation or to join any governing body, board or committee. It will also need to ensure it has appropriate service management and delivery practices which enable people with different needs to access the services being provided with the same level of ease.
- 1.4. **Inclusion** refers to an individual's experience within his/her workplace and in society, and the extent to which he/she feels valued and included.

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2. Introduction

Atrium is committed to equality of opportunity in all aspects of our 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.

In Atrium, we are committed to keeping equality and diversity principles and kindness at the heart of all the decisions we make as an organisation.

We respect and highly value individual difference. Everybody is different and we will work to understand, value, respect and celebrate differences; to enable all customers and colleagues to contribute and realise their potential, to make Atrium a safe, open working environment and to ensure that we provide an excellent service for all stakeholders.

All of our customers and colleagues are equally important, however, we recognise that everyone has different needs which we respect and aim to meet different services and engagement.

We will work to ensure that no individual or group experiences unlawful discrimination in the provision of our services, in recruitment or in any of our actions. To do this we will challenge our ways of working and thinking to identify and remove potential barriers, through learning and development, through our service design and delivery and in our day to day-to-day work.

For our customers and tenants, one of the key barriers to equality can be in relation to poverty and deprivation. Poverty and deprivation leads to inequalities in health, employment opportunities and life chances. As a community housing association, we understand that we play an important role in the alleviation of hardship and we are committed to using our services and our wider influence to reduce inequalities where we can.

We are committed to ensuring that all of our customers and colleagues enjoy the same opportunities and receive excellent services. We will proactively design our services and ways of working so that everyone can participate and feel like they belong.

We will not tolerate less favourable treatment on the grounds of sex, gender, gender reassignment, age, race, colour, nationality, ethnic or national origin, disability, marital / civil partnership status, sexual orientation, pregnancy or maternity, responsibility for dependents, trade union or political activities, criminal record, place of residence, religion, faith or other beliefs, health status or any other reason which cannot be shown to be justified.

We will reach out to seek input from those who are seldom heard, to see things from other perspectives, to listen, understand, design, act and learn. In everything we do, we work with our values:

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- Service - provide a quality service to customers
- Excellence - strive for excellence, innovation and improvement
- Respect - respect diversity and others' input
- Integrity - be open, honest, fair and inspire trust
- Accountability - stand by decisions and take ownership of your actions
- Commitment - be committed to your role and proud of what we do
- Enjoyment - enjoy your role, and making a difference

3. The Equality, Diversity & Inclusion Policy underpins our Mission Statement:

We will listen to understand our customers' needs; work with them to sustain and grow their communities; and use our resources to create opportunities for positive change. Together we will build strong foundations for the future.

Equality, Diversity and Inclusion also lie at the heart of our vision that Atrium Homes is synonymous with *quality affordable homes, sustainable communities and life chances for people*. We will achieve this by focussing on four elements which are inter-connected:

- Taking care of our Customers
- Taking care of our Housing
- Taking care of our Communities
- Taking care of the Business

We will ensure we place our 'Customer First'.

4. 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

5. Policy Statement

- 5.1. 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

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or background. It is expected that the policy will have a positive impact for all, including those who have protected characteristics under the Equality Act.

- 5.2. When managing equality and diversity, we may process personal data collected in accordance with Atrium Group's 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 Atrium Group's Data Protection Policy immediately.
- 5.3. Atrium is fully committed to enacting its ethical, legal and regulatory responsibility to ensure that we promote equality and the effective management of diversity in all aspects of our work – as an employer, a landlord, a provider of services, a purchaser of goods and services and through our dealings with other organisations.
- 5.4. Atrium will aim to reflect, in all aspects of its organisational structure, a similar diversity to that of the communities in which it operates.
- 5.5. Atrium will seek to promote diversity in its organisation and embraces the position that business effectiveness can best be achieved by viewing as a positive benefit, differences in the people who work in the organisation and promoting policies, procedures and working practices that support the diverse needs of staff and customers.
- 5.6. In all areas of our activity no-one will be treated less favourably on the basis of any unfair criteria, but specifically the protected characteristics of:
 - age;
 - disability;
 - gender reassignment;
 - marriage and civil partnership
 - pregnancy and maternity;
 - race;
 - religion or belief;
 - sex; and
 - sexual orientation.

These are the defined protected characteristics detailed in the Equality Act 2010 to give specific groups of people protection against being treated unfairly and we are committed to ensuring that throughout our organisation there will be a consistent approach to promoting equality and diversity.

- 5.7. We will not tolerate any form of prejudice, direct or indirect discrimination, harassment or victimisation.
- 5.8. We expect everyone who works for us or with us to share this value set and to support us in its application.

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6. Responsibilities under the Policy

- 6.1. The Board will have ultimate responsibility for Equality, Diversity and Inclusion Management within Atrium, ensuring that statutory and regulatory obligations are met.
- 6.2. The Chief Executive and Executive Management Team members will implement the Equality, Diversity and Inclusion Policy and Action Plan whilst promoting a working culture that respects and values differences and promotes dignity, equality and diversity.
- 6.3. Line Managers will be responsible for ensuring all aspects of their area of service comply with this policy and that all actions assigned to them within the Action Plan are delivered.

Line Managers are responsible for ensuring that the values of the Atrium Group and the Equality, Diversity and Inclusion Policy is communicated to new employees during induction training.

- 6.4. All staff have a personal responsibility for the implementation of this policy and to ensure they treat others with respect and dignity in both employment and service delivery.

All employees have a responsibility to be alert to, and to challenge behaviours and practices which result in unfair discrimination when they occur. Where a member of staff believes such behaviour is occurring, they must draw the matter to the attention of their Line Manager to ensure the matter is dealt with immediately.

7. The Application of Equality, Diversity and Inclusion across the Atrium Group

We will ensure that the effective management of equality, diversity and inclusion will be widely promoted and integrated into all of Atrium Homes' policies and procedures and included in the following areas of activity.

7.1 Access to Services and Service Provision

- 7.1.1 Being aware of, and proactive about, managing the diverse needs of customers will ensure that we are able to provide the right services and meet the right needs. We will, as far as practical, make sure that access to our premises, meetings and housing complies with the provision of the Equality Act 2010.

7.1.2 We will meet the needs of our customers and stakeholders by:

- creating a work culture which values diversity, inclusiveness and respect, and empowers our employees to reflect those values in their dealings with the people who use our service and all other stakeholders;
- ensuring that we provide an accessible service to all of our customers;

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- providing clear, meaningful information about what we do and how we do it to our customers, potential customers and other stakeholders, in ways that best suit their individual needs;
- identifying as early as possible any individual requirements that may need to be met in order for a customer to fully access our service;
- being responsive to changing needs and requirements.

7.1.3 The Atrium Group provides services with regard to applications for housing tenants through the Common Housing Register. Atrium is committed to ensuring good practice with regard to equalities across all services it provides. The Scottish Social Housing Charter came into effect on 1 April 2012 and its aim is to help to improve the quality and value of services that social landlords provide to tenants and customers. Social landlords are required to perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services. This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation.

7.1.4 The Atrium Group is committed to communicating in simple terms that are understandable to all and free of jargon and / or colloquialisms. The content will be open and inclusive and will not discriminate against any group or individual. Our website will be easily accessible to all our service users and stakeholders.

7.1.5 Information can always be provided in various formats: Braille, CD, Large Font and different languages can be requested. We will communicate regularly to current service users, tenants, employees and stakeholders through newsletters and our Annual Report. We are members of “Happy to Translate” as a tool to overcome barriers to information and services by those who speak little or no English. We will use the “Happy to Translate” logo on all our publications.

7.2 Tenancy Allocations

7.2.1 Atrium will ensure that anyone applying for housing is dealt with fairly and without discrimination. We will adhere to our Common Allocations Policy and monitor it, and continue to review and improve the service we give to our tenant and applicants.

7.3 Customer Engagement and Empowerment

7.3.1 The Atrium Group recognises the value of customer engagement in shaping and delivering the services it provides and will seek to actively involve customers in the management of their homes and our services at a variety of levels.

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7.4 Community Support Activities

7.4.1 The Atrium Group seeks to work in a variety of ways to promote and support community activities, from leading on activities to working in partnership with others. We recognise that how we deliver services may need to be different to meet diverse needs but are committed to taking a proactive approach to work with local community organisations to enhance community cohesion and social inclusion. A positive approach to diversity will promote understanding and good relations between people who have different backgrounds and experiences, and this will enhance the quality of life in local areas.

7.5 New Build, Acquisition and Asset Management Strategy

7.5.1 Atrium is committed to building and delivering services, facilities and resources that are accessible, relevant and of use to the individuals and communities where we work.

8. Monitoring Diversity and Equality

8.1. Atrium will collect and collate data relating to the diversity of the communities in which it operates and then compare this to internal data relating to the diversity of its customers/tenants, staff, Board members, and other key stakeholders. Data relating to the diversity of our customers / tenants will be collected on an anonymised basis when required for consideration in a new major project or review of our services, and no special category data (data which records the protected characteristics of stakeholders) which is not needed to manage our relationships will be stored in our databases.

8.2. This data will be analysed to identify any anomalies in the distribution of diversity factors and these in turn will be investigated to ensure no unfair discrimination is taking place and positive action taken, where possible, to redress any imbalances.

8.3. The type of data which might be used will include information about:

- ethnicity
- age
- gender
- disability
- beliefs
- sexual orientation

8.4. Data will be collected about key processes carried out by the Atrium Group where a risk of unfair discrimination might exist, specifically:

- Recruitment and selection processes
- Allocation processes

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- Service complaint management processes
- Anti-social behaviour complaint management processes
- Disciplinary management processes
- Grievance management processes

8.5. Customer/Tenants Diversity Management and Review

8.5.1. We ask our customers to advise Atrium of their needs and record where it is provided any relevant information to tailor services to their needs e.g. communication preferences, access requirements, visual/hearing aid requirements.

9. Managing Allegations and Complaints

9.1. Complaints about inappropriate (e.g. racist or sexist) behaviour by staff towards service users, colleagues or contractors will be dealt with under Atrium's complaints process and if necessary the Disciplinary Procedure. All complaints will be treated seriously and investigated with all possible speed, confidentiality and sensitivity. If a complaint about a member of staff is substantiated it will be dealt with as serious or gross misconduct and a possible outcome could be dismissal.

9.2. Complaints about the Atrium Group or its component organisations as separate entities will be dealt with under Atrium's Complaints Policy and Procedure.

10. Human Resource Management and Employment

10.1. Atrium demonstrates its commitment to effective equality, diversity and inclusion management in all aspects of employment, including recruitment, training, performance and development management processes and pay.

10.2. Atrium operates a comprehensive Recruitment and Selection Policy to ensure that fair and just employment practices are in place and that people are recruited solely on the basis of their own merit, experience, ability and potential. All vacancies will be advertised in a way that does not discourage traditionally disadvantaged or under-represented groups from applying for posts. Specific qualifications or experience will only be asked for where essential to the post. All applicants with disabilities who meet the minimum requirements for a suitable job will be interviewed.

10.3. Positive Action

The composition of applicants for roles in the organisation, the Board and the workforce will be monitored. Should data indicate a lack of equality and where appropriate and permissible under legislation, positive action will be taken to redress the imbalance by encouraging under-represented groups to apply for roles in Atrium.

10.4. Terms and Conditions of Employment

All contracts of employment will be issued in accordance with the job roles and not

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the job holder. Terms and conditions will be standard across all employees and employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and grade it attracts. Atrium has a comprehensive set of policies which are accessible to all employees, and these include the Equality, Diversity & Inclusion Policy.

10.5. Disability Arising During Employment

The Atrium Group is committed to ensuring equality of opportunity for those members of staff who are disabled or become disabled for the purposes of the Equality Act 2010 during their employment with Atrium. If you are disabled or become disabled, we encourage you to tell us about your condition so that Atrium may support you as appropriate. (Please refer to the Terms and Conditions of Employment for further details).

10.6. Religious Observance Needs

Some employees and job applicants may have particular religious observance needs (e.g. the opportunity to observe prayer time or other religious festivals or ceremonies). Whenever it is practicable to do so, Atrium will endeavour to meet such needs. If it is not practicable to grant a request on any of these grounds (e.g. because of pressing work commitments) a reasoned explanation will be provided, in writing.

10.7. Support for Employees

As an employer committed to effective equality, diversity and inclusion management, Atrium Group recognises the requirement of a working environment which supports the diverse needs of its staff with a framework of policies and procedures to ensure appropriate assistance is available to staff who need it.

10.8. Work/Life Balance

Atrium Homes is committed to helping its employees fulfil their potential at work whilst finding the right work/life balance by offering: a Flexible Working Policy and Flexible Working Hours Arrangements, as well as opportunities to job share where appropriate, a Right to Request Flexible Working, Special Leave to help with caring responsibilities and domestic emergencies, and a Career Break (Sabbatical) Policy.

Atrium is committed to supporting employees with carer/family commitments by offering a carer/ family-friendly approach to working patterns.

10.9. Training and Development

It is crucial that all Board Members and employees are able to participate and benefit from any training opportunities or development activities without discrimination or fear of harassment. Equality of access will apply to all training activities with training and development opportunities available to all employees according to their job role.

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10.10. Salaries and Benefits

Atrium operates a contribution pay and benefits structure that is fair, transparent and affordable with no disparities in salary due to protected characteristics.

10.11. Performance Management

Every employee of the Atrium Group receives, regular 1:1s and Performance & Development Reviews. Within these reviews employees are given the opportunity to receive coaching and support, discuss performance, good working practices and areas for improvement.

10.12. Redundancy Management

Redundancy selection will be made in line with Redundancy Procedures in the Terms & Conditions of Employment. This will ensure that employees selected for redundancy are selected according to the chosen selected criteria and not in any discriminatory way, either directly or indirectly.

11. Membership

Atrium will ensure that participation in the organisation is open to all, irrespective of sex, sexual orientation, gender re-assignment, race, religion/belief, disability, sexuality, age, marriage/civil partnership or pregnancy/maternity.

Atrium aims to retain a broad membership base and all applications for individual membership will be treated equally and considered in line with the Rules and Membership Policy.

11.1. Board Membership

The principles in this policy will be applied in the recruitment and development of Board Members. Board Members are required to be aware of Atrium's commitment to effective equality, diversity and inclusion management and must comply with this policy in carrying out their duties.

11.2. Governance Arrangements

Within our Board and Management Teams we will ensure that we have a diverse range of people with the right knowledge and skills to lead the organisation.

11.3. Procurement of Goods and Services

The Atrium Group will ensure that there is no discrimination in terms of allocation of work to contractors and consultants or in purchasing from suppliers. Atrium will ensure that our suppliers are aware of this policy and will encourage them to have similar objectives. The Atrium Procurement Policy and Procedures have built-in checks and balances to ensure equality and diversity issues are addressed during procurement exercises. This position will be maintained.

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11.4. Engagement of Contractors and Consultants

Where services are provided by external contractors and consultants, they are expected to adhere to and work in accordance with this policy whilst providing services on behalf of the Atrium Group.

11.5. Policy Management

Equality Impact Assessments will be carried out on key Atrium Group policies, where applicable. The Equality Impact Assessment (EIA) process is a systematic review of the Atrium Group's Policies and Procedures which will ensure that equality and diversity management is built into everything we do as an organisation.

12. Managing Breaches of the Policy

12.1. Breaches of this policy will be managed using the Atrium Group's Code of Conduct for Governing Body Members for Board members, and the Disciplinary Procedure contained in the Terms & Conditions of Employment in relation to employees.

12.2. Serious acts of unfair discrimination or harassment of any kind may be treated as gross misconduct.