



# HORIZON

## EQUAL OPPORTUNITIES POLICY DOCUMENT

### OUR COMMITMENT AND VISION

Horizon Properties is fully committed to ensuring equality of opportunity and fairness in all areas of employment and to valuing the diversity of our colleagues, clients and people living within the local community. This document has been written to demonstrate Horizon Properties' firm commitment to promoting equal opportunities and diversity in employment and delivery of services.

Our commitment lies at the heart of our promise to provide outstanding client service by maintaining the highest standards of professional excellence. We are committed to recruiting, training and promoting the best people for the job and encouraging all of our colleagues to reach their full potential, regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities and the Welsh Language.

We are also continuously striving to create a working environment which supports our vision, and which is free from any form of discrimination, harassment or bullying and within which all individuals are treated with respect, dignity, fairness and courtesy.

Any breach of this policy may be treated as a disciplinary offence resulting, if appropriate, in disciplinary action

The Policy sets out a clear commitment to work towards eliminating direct and indirect discrimination, harassment and victimisation, to promote equality of opportunity and to develop good relations between people from different groups.

The Policy is proof that equal opportunities are very important to Horizon Properties' values and the delivery of services.

This Policy Statement also indicates how Horizon complies with the Equality Act 2010.

**SCOPE** This Policy Statement applies to all employees of the Horizon and Directors. This policy covers the following matters:

- Principles
- Recruitment
- Policy Statement
- Being Responsible
- Discrimination, victimisation and harassment
- Our legal obligations
- Complaints procedure (found via our Complaints Procedure document)
- Monitoring

### PRINCIPLES

This Policy Statement aims to ensure that Horizon Properties is an organisation that values diversity and takes proactive steps to remove discrimination and maintain good relations. This will be achieved by promoting equality in all of Horizon's activities.

### RECRUITMENT

Horizon Properties will ensure that information about job opportunities is circulated visibly online and make clear all applications are welcomed and are considered for selection on the relative merits of the applicant against the job and/or person specification for the position regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins.

We retain the discretion to invite applications from individuals whose job may be at risk of redundancy or who require redeployment for health or disability reasons before advertising the vacancy more widely.

Position promotion within Horizon Properties is based on merit and the reasonable requirements of the job only.

### THE POLICY STATEMENT

Horizon Properties believes in creating a fair, just and inclusive society. As an employer and provider of services, we will not discriminate against people on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, belief or non-belief, sex, sexual orientation or Welsh language.

We are committed to ensuring that services are relevant and responsive to the needs of all communities. We recognise that all members of the community have specific needs and will strive to meet those needs.

We value all members of the community and will treat people with dignity and respect. We will not tolerate discrimination, harassment or victimisation of our service users or communities.

We will ensure that our contractors and others who deliver our services share our values.

We will work closely with local people, voluntary and community groups and other partners to build a respectful place in which we can all live and work.

We recognise that we work in a diverse community and understand the importance of achieving a diverse workforce. We will ensure that our recruitment practices are fair and consistent.

We will develop our employees by valuing their varied skills and experiences; by investing in learning and development; by treating employees fairly; by combating harassment, discrimination and victimisation at work; and by encouraging a culture which values the difference between us.

In summary, Horizon Properties is committed to ensuring that:

- The services we provide meet the needs of our service users
- Service users and employees are treated with dignity and respect
- Discrimination, harassment and victimisation are not tolerated
- Equality becomes a part of all we do.

## **BEING RESPONSIBLE**

The Director and the team are responsible for implementing this Policy Statement and ensuring that equality is mainstreamed throughout Horizon Properties.

Take reasonable steps to ensure that the working environment, working practices, terms and conditions of employment and terms of engagement do not prevent disabled people from taking up positions for which they are suitably qualified and the best person for the job.

Ensure that any colleague who becomes disabled whilst in employment will be given the full support of Horizon Properties to continue in their own job (where practicable and having put in place any reasonable adjustments) or is offered a move to an alternative job appropriate to his/her experience and abilities, if available.

Respond swiftly (within 10 working days) to requests for reasonable adjustment from our colleagues albeit further discussions and investigations could be required.

Provide an open and transparent consultation with disabled colleagues on action to make sure they develop and use their abilities at work.

All managers, at all levels of the organisation, are responsible for actively promoting equality, removing discrimination and fostering good relations between different groups in employment and service delivery.

All employees, at all levels of the company, are responsible for following the principles in this policy; we all have an important role to play in ensuring Horizon Properties carries out its commitment to equality and diversity.

## **MONITORING THE POLICY**

This policy will be reviewed annually or at any time where legislation is introduced or altered to ensure the policy is kept up-to-date.

This policy also outlines the steps that will be taken to implement this policy.

This policy outlines Horizon Properties' commitment to prevent discrimination, promote equal opportunities and maintain good relations between different groups. If an employee feels that this policy is not being followed, they should raise this with the Lettings Manager. If matters cannot be resolved by the Lettings Manager or where the complaint relates to the Lettings Manager, the complaint can be referred directly to the Director.

If an employee has questions about this policy, they should discuss them with the Director.

Disciplinary matters that arise from this policy will be dealt with using the Horizon's Discipline Policy & Procedure.

If a member of the public feels that this policy is not being followed, they can make a complaint through the Horizon's Complaints Procedure. This is available by contacting Horizon Properties on 02920 342 299 or via email to [enquiries@horizonproperties.org.uk](mailto:enquiries@horizonproperties.org.uk).

## COMPLIANCE WITH THE EQUALITY ACT 2010

It is unlawful for an employer to discriminate directly or indirectly in recruitment and/or employment because of any of the nine "protected characteristics" in the Equality Act 2010. The 'protected characteristics' are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Staff involved with management or recruitment have and will continue to train, subject to any legislative changes, on the main provisions of the Equality Act 2010 and recruitment processes should be reviewed and amended to ensure that any health-related questions asked are lawful under the Act. The Act further sets out the different types of discrimination – such as direct, indirect, harassment and victimisation. A person has been discriminated against if they are treated less favourably than another on the grounds of age, gender, marital status, race or ethnicity, nationality, disability of any kind (including physical, sensory and mental disability), religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

What constitutes a disability can be variable and very difficult to define. Horizon Properties has considered and has made it policy to ensure that:

- A reasonable adjustment is a change or adaptation to the physical or working environment that has the effect of removing or minimising the impact of the individual's impairment in the workplace, so they can undertake their job duties, and;
- We are accountable for deciding what, if any, reasonable adjustments will be made. We understand it is good practice to seek governmental and/or legal advice in coming to this decision. We will ensure that our focus is on the employee's ability to function on a day-to-day basis rather than on medical diagnosis, we highly value our employees and will ensure to make all necessary reasonable adjustments where our advice indicates it is best practice and necessary. Discrimination also includes harassment, bullying or victimisation on any of these grounds. Harassment is wholly unjustified, unreasonable or inappropriate treatment of, or behaviour towards another person which causes them distress, anxiety or discomfort. Harassment may include bullying. Harassment could be discriminatory when it is on the grounds of another's age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Harassment will be unlawful discrimination if:

- Unwanted conduct takes place
- It is discriminatory in nature
- It intends to violate the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Where it is reasonable to formulate the opinion that this is the impact of the behaviour in question.

The following types of behaviour could constitute to harassment:

- Physical assault or verbal abuse
- Verbal threats
- Inappropriate comments
- Suggestive or obscene emails
- Insulting and/or degrading behaviour or comments
- Exclusion from work opportunities or social events
- Continued criticism or humiliation
- Unfair allocation of work or responsibilities.

This list gives examples only and is not a comprehensive list but intends to provide an idea of what would be classified as harassment.

Sexual Harassment is a type of harassment and could be experienced as follows:

- Physical contact of a sexual nature and sexually-natured conduct.
- Unwanted physical contact or conduct even if not obviously sexual including unnecessary touching.
- Verbal conduct of a sexual nature including unwelcome sexual advances, continued suggestions outside of work after it has been made clear that this is unwelcome, suggestions that a sexual favour may influence career opportunities.
- Behaviour or treatment towards a person because they will not accept invitations of a sexual nature or unwelcome advances.
- Insults or bullying of a sexual nature, insults related to gender, relationship status or sexual orientation, offensive comments about appearance or dress, talk or jokes of a sexual nature which a person present has indicated they dislike.
- Display of sexually suggestive or pornographic imagery, or sending such items electronically sending sexually harassing messages or images through email.

This list gives examples only and is not a comprehensive list but intends to provide an idea of what would be classified as sexual harassment.

Bullying can be focussed on gender and sexual orientation; homophobic bullying and gender bullying could be experienced as follows:

- Making gender-based or homophobic insults and threats.
- Making unnecessary and degrading references to an individual's gender identity or sexual orientation.
- Making jokes which are degrading to a person's sexual orientation or gender identity.
- Disclosing that an individual is lesbian, gay, bisexual (LGB) or other identified orientation without their permission.
- Ignoring or excluding a colleague from activities because of their gender identity or sexual orientation.

- Spreading rumours about an individual's sexual orientation.
- Asking a colleague probing or invasive questions regarding gender identity or sexual oriented questions about their private life.
- Making assumptions and judgements about a colleague based on their sexual orientation.
- Using religious beliefs to justify anti-gay bullying and bullying relating to gender identity or sexual orientation.

This list gives examples only and is not a comprehensive list but intends to provide an idea of what would be classified as bullying focussing on gender and sexual orientation

## **HANDLING DISCRIMINATION AND HARASSMENT**

Any behaviour involving discrimination or harassment of another, whether this be an employee, client or service user, on the grounds of age, gender, marital status, race or ethnicity, nationality, disability of any kind (including physical, sensory and mental disability), religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities or use of the Welsh language will not be tolerated in any form.

Any such behaviour could be viewed and treated as gross misconduct in which case disciplinary action (including dismissal for the most serious offences) will be taken against any person breaching this policy.

## **MAKING A COMPLAINT**

If you feel you have experienced or are experiencing any form of discrimination, harassment or bullying, please consider in the first instance whether it is appropriate to raise the matter directly with the person concerned.

If it is not appropriate to do this or should you feel unable to do so please escalate the issue to the Lettings Manager. If the issue concerns the Lettings Manager, please email the Director.

Following initial discussions with the Lettings Manager or Director, you will be asked to choose one of the following options:

- No further action is necessary.
- Discuss the complaint directly with the individual who is alleged to have caused offence.
- Ask the Lettings Manager or Director to help you resolve the matter through informal approaches.
- Make a formal written complaint to the Director. Once the Director is aware of the issue a full investigation into the complaint will commence and if appropriate, recourse to the disciplinary procedure.

If the alleged discrimination, victimisation or harassment involves a client or an employee of a client, or if an employee of a client is alleged to have acted in a discriminatory or harassing manner, appropriate action and, if available, routes to deal with the problem will be discussed with the person making the complaint and will be formally agreed prior to taking any action.

## **INVESTIGATING A COMPLAINT**

Once a formal written complaint has been submitted either to the Director the first step is to investigate the allegations thoroughly and carefully. This will involve hearing detailed accounts from both (or all) parties.

Electronic evidence such as emails, texts or other electronic communication may also be considered. A full record of the progress and outcome of the investigation and any steps taken will be reported to the complainant at the earliest opportunity. The investigation will be conducted by the Director who will lead the investigation.

## **THE DISCIPLINARY PROCEDURE**

Should the investigation find that on the balance of probability there is weight to the Complainant's argument or statement it will likely be necessary to start disciplinary action.

Horizon's Disciplinary procedure is held internally. All complaints will be dealt with swiftly whilst ensuring fairness and impartialness.

We will protect individuals who make a complaint or assist in an investigation from harassment. Any acts of retaliation or intimidation against the complainant will be treated as a disciplinary matter. Where we believe acts are potentially criminal South Wales Police will be informed.

In the event a complaint is not upheld we will ensure the Complainant is fully informed and we will provide a thorough explanation as to why the complaint was not upheld will fully disclose all reasons behind the decision. In the event an individual is abusing the complaints procedure, such as by making an unfounded complaint, a complaint designed to purposely damage the reputation of another, or a complaint which may be defamatory in nature as defined within s.1 of the Defamation Act 2013 may be subjected to disciplinary action.