

Equality, Diversity and Inclusion Policy

Document Owner	Head of HR & Facilities
Prepared by	Head of HR & Facilities
Approved by	Board
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Date of next review	November 2027
Lines of Defence/how is the document audited?	1. The Diversity Working Group monitor the implementation of this policy. 2. An annual report will be produced on this policy. 3. Departmental annual reviews must include update on equality and diversity. 4. The Board have corporate responsibility for this policy. 5. The policy will be reviewed at least every 2 years.

1. Scope and Aims

- 1.1. Hexagon Housing Association (Hexagon) is committed to promoting equal opportunities both in the provision of services and in our employment practices. Hexagon serves diverse communities in South East London and the surrounding areas. We value diversity and recognise the benefits of employing a diverse workforce in relation to our customer service and growth as an Organisation.
- 1.2. Through our work in providing affordable housing, and as an employer, we will help ensure fair treatment for all members of the community, regardless of race, ethnic origin or nationality; gender; disability, whether mental or physical; religion/belief; marital or family status; sexuality or sexual orientation; HIV status; age; physical appearance; pregnancy/maternity or gender reassignment.
- 1.3. We also acknowledge the duty to protect other groups of people who may experience discrimination, for example, based on their socio-economic backgrounds, caring responsibilities, and the link to intersectionality factors.
- 1.4. We recognise that because some groups of people experience prejudice and discrimination to make opportunities available, we have to make an extra effort. We will strive to ensure that no-one receives less favourable treatment or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified, or victimised for taking action against discrimination or harassment.
- 1.5. We will create a culture where discrimination, harassment and victimisation are unacceptable. We will take complaints seriously and enforce consequences to ensure a safe and respectful environment for everyone.
- 1.6. We will ensure that our policies and practices are in keeping with the Equality Act 2010.
- 1.7. We will carry out equality impact assessments to ensure that our policies, practices and key projects do not discriminate against individual persons or specific groups of customers/colleagues.
- 1.8. This Policy applies to colleagues, Board and Committee members, agency and casual workers, contractors, managing agents and involved residents and partners.

2. Meeting Housing Needs

- 2.1. We will liaise with statutory agencies to share their assessment of the housing needs of local communities, especially those groups facing discrimination so that these are recognised and prioritised.
- 2.2. We will regularly review how we can contribute to meeting these needs by using our existing stock or developing new housing.
- 2.3. We will consider working in partnership with specialist agencies where we feel they are better equipped than ourselves to meet the needs.
- 2.4. In developing new homes, we will ensure that the design of homes meets the cultural and other (security) needs of the households (where these are known) we are going to be rehousing.

3. Access to Housing

- 3.1. We will promote fair access to housing by
 - 3.1.1. Monitoring the allocation of our homes, including the quality of accommodation, to ensure that discrimination does not occur.
 - 3.1.2. Ensuring that our priority system for assessing the rehousing needs of our own residents reflects equality principles.
 - 3.1.3. Working with our local authority partners to eliminate any discrimination in the nominations of households for rehousing.

4. The Housing Service

- 4.1. We will ensure that we consult all residents effectively (especially those facing discrimination), individually through surveys and through mechanisms such as residents' groups to ensure that the housing service meets their needs.
- 4.2. We will ensure that resident involvement and participation activities promote the full and active involvement of all groups of residents in residents' groups and participatory forums and we will challenge residents voicing discriminatory views.
- 4.3. We will ensure that our complaints procedure is accessible to all, and feedback about the service given proper consideration.
- 4.4. We will not tolerate harassment of residents and will take the strongest possible action against perpetrators. We will be proactive in co-operating with other agencies in dealing with all forms of harassment.

- 4.5. We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.
- 4.6. We will try to ensure that the housing service responds sensitively to the needs of vulnerable residents. Where financially possible, extra services will be provided in response to the needs of vulnerable residents.
- 4.7. We will ensure we have an Aids and Adaptations Policy which sets out how we will work to try and provide additional support and/or physical infrastructure to customers with additional needs, in their homes.
- 4.8. We will maintain up to date information on the translation or other communication needs of all residents.

5. Employment and Training

- 5.1. Hexagon will actively seek to ensure equality of opportunity and treatment for all current and potential employees.
- 5.2. We will conduct and monitor our recruitment in an open and accountable way and according to equal opportunities practices and will regularly review the results of the monitoring to ensure fairness is evident at all stages.
- 5.3. We will seek to deal with any under representation of particular groups among employees, including under representation at Manager and Director level, and make full use of positive action provisions permissible within legislation.
- 5.4. We will strive to prevent harassment of staff by other staff or residents and when it occurs take swift action to stop it.
- 5.5. We will seek to ensure that within our overall aim of gearing our training effort to meet the business needs of the organisation, we will regularly review the distribution of training opportunities to ensure that all staff are being treated fairly.
- 5.6. We will ensure that selection for employment, career development opportunities, access to benefits, facilities and services are fair and equitable and based solely on merit.
- 5.7. We will make reasonable adjustments to enable employees with disabilities to perform their jobs and applicants to participate in the recruitment process in a way that minimises the impact of their disability.

- 5.8. We will ensure fair and equitable pay by implementing our job evaluation, pay structure and Remuneration Policy.
- 5.9. We will train staff to ensure everyone has a basic awareness of equalities and diversity issues, as well as training to meet the specific needs of their post.

6. Contractors, consultants, and partner agencies

- 6.1. We will only use contractors and consultants and agents who have an equality and diversity policy, which is broadly consistent with our own aims.
- 6.2. We will hold anybody representing Hexagon to account and ensure they adhere to our policy.
- 6.3. We will only use contractors in occupied dwellings who are prepared to sign up to our 'Customer Care' guidelines and will not give them any more work if there is a substantial and unresolved breach of the guidelines.
- 6.4. We will ensure that our selection of consultants and contractors is fair and non-discriminatory.
- 6.5. We will expect our contractors, consultants and partner agencies to pay their employees the London Living Wage.
- 6.6. We will provide training to ensure that our partners understand our equality and diversity expectations.

7. Hexagon's Board

- 7.1. Hexagon will try to ensure that our Board is fully representative of the local community by having an open and accountable recruitment process and by the use of positive action to recruit members from underrepresented groups.
- 7.2. Board members will be regularly briefed on equalities issues and will receive regular monitoring reports on key areas of activity, both on service delivery and employment.

8. Responsibilities

- 8.1. All staff have responsibility for ensuring that this Policy is put into practice. We expect a personal commitment from all employees in making it effective, and in setting an exemplary standard for others to follow.
- 8.2. Additional and specific responsibilities apply to those who manage staff and to those who are involved in recruitment, training and development.

- 8.3. All members of staff have a contractual responsibility to:
- 8.3.1. Ensure that they understand the values and benefits of equality and diversity;
 - 8.3.2. Familiarise themselves with this Policy, follow it, and ensure that any staff for whom they are responsible do so as well;
 - 8.3.3. Draw to the attention of their line manager any instances of apparent discrimination or harassment, or any perceived problem in relation to employment or to the provision of services.
- 8.4. The Board have overall responsibility for setting the strategic direction and for approving the EDI Policy. The role of the Board goes beyond compliance to ensure that we are meeting our inclusion aspirations set out in our Corporate Plan.
- 8.5. The Chief Executive has responsibility for developing the organisational culture in which this Policy can operate effectively, and for ensuring that it is implemented.
- 8.6. Directors are individually and corporately responsible for ensuring that the Policy is implemented in their particular area(s) of responsibility. Departmental Annual Reviews will include an update on equality and diversity issues, including relevant performance information.
- 8.7. The Head of HR & Facilities is responsible for the operation, monitoring and review of this Policy in relation to employment and training.

9. Communication

- 9.1. A copy of this Policy will be provided to all job applicants and new residents and will be available on Hexagon's website. The Policy will also be available to staff through the intranet.
- 9.2. The Policy will also be included with tender information and contracts for work undertaken for us by external organisations and individuals.
- 9.3. Training in the importance and use of this Policy will be part of an individual's induction to the organisation and regular refreshers will be available to all staff.

10. Monitoring and Review

- 10.1. The Diversity Working Group, comprising management representatives from across the Association, will meet on a regular basis to monitor the

implementation of the Policy (including progress against targets) and develop related action plans and strategies.

- 10.2. Requirements, conditions, provisions, criteria and practices will be reviewed regularly in the light of the monitoring results, and revised, if they are found to actually or potentially discriminate against any particular groups.
- 10.3. A report on progress will be produced each year and published via the intranet.
- 10.4. This Policy is designed to encourage practical changes, and we expect to update it in the light of experience from applying it in practice and as a result of changes in legislation or our own internal procedures. As a minimum the Policy will be reviewed every two years.

11. Legal Framework

- 11.1. The Equality Act 2010

12. Related Hexagon policies, strategies and procedures

- 12.1. Complaints Policy
- 12.2. Anti-Social Behaviour Policy
- 12.3. Translation Policy
- 12.4. Vulnerable Residents and Reasonable Adjustments Policy
- 12.5. Remuneration Policy
- 12.6. Considerate Contractors Policy
- 12.7. Equality and Diversity Policy for Contractors
- 12.8. Aids and Adaptations Policy
- 12.9. Confidential Reporting/Whistleblowing Policy
- 12.10. Training and Development Policy
- 12.11. Dignity at Work Policy
- 12.12. Lettings and Allocations Policy
- 12.13. Hate Crime and Harassment Policy

13. Version Control

Version	Date	Updates
2	November 2025	Equality Impact Assessments, reasonable adjustments for job applicants, expectation of London Living Wage for partners.

Appendix 1: Equality Impact Assessment

This assessment is completed in compliance with the Equality Act 2010, the Housing Regulator's Transparency, Influence and Accountability Consumer Standard, and Hexagon's Vulnerable Residents and Reasonable Adjustments Policy. Hexagon's Vulnerable Residents and Reasonable Adjustments Policy commits the organisation to understanding the diverse needs of residents and, where there are any barriers to accessing the service or any disproportionate negative impact, considering reasonable adjustments to ensure a fair and equitable outcome for all residents.

Hexagon recognises that responding and reacting to the changing needs of residents requires a willingness to do things differently and find individual solutions to ensure equitable access to our services for all. The following table will propose how we will adjust the service to account for possible requirements of different groups, to help us to prepare for these expected needs. However, we recognise that we cannot anticipate every need and that there is not a one-size-fits-all solution to all needs, so we will continue to be responsive and flexible in adapting to the diverse needs of residents in enacting this policy.

See the Vulnerable Residents and Reasonable Adjustments Policy for examples of Reasonable Adjustments we will consider. When considering what is reasonable, we will take into account: The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability; The practicality of us making the adjustments; The availability of our resources, including external assistance and finance; Any disruption to the service that making the adjustment may cause.

Characteristic	Impact	Explanation of Impact	Reasonable Adjustments Considered	Consideration of effectiveness, practicality, cost/availability of resources and any disruption to service	Decision on whether to implement the Reasonable Adjustment
Age	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our			

		communications, learning, and colleague materials.			
Pregnancy/ Maternity	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			
Disability: Physical health and mobility	Positive	We will provide accessible services, make reasonable adjustments, including aids and adaptations.			
Disability: Learning and neurodiversity	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			

Disability: Vision and hearing	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			
Disability: Mental health	Positive	We will try to ensure that the housing service responds sensitively to the needs of vulnerable residents. Where financially possible, extra services will be provided in response to the needs of vulnerable residents.			
Sex	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			

Gender reassignment / Transgender / Non-binary identity	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			
Race or nationality	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			
Religion or belief	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			

Sexual orientation	Positive	We will provide accessible services, make reasonable adjustments, and use inclusive language and visuals in all our communications, learning, and colleague materials.			
Language	Positive	We will maintain up to date information on the translation or other communication needs of all residents.			
Literacy	Positive	We will maintain up to date information on the translation or other communication needs of all residents.			