



Southdown

This is us.

Equality, equity, diversity and inclusion (EDI) priorities, and framework for delivery.

2022-27



Image above: Rapid Rehousing Pathway workers with client of the housing support service.

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# Introduction

Our mission is to help people in our Sussex communities live well and we want to do everything we can to overcome any barriers or inequalities that might be getting in the way of this for our clients, staff and stakeholders.

In essence principles of equality, equity, diversity and inclusivity are at the heart of Southdown's reason for being.

We believe that having a diverse workforce with lived experience that is representative of our clients and our broader Sussex communities will help us:

- remain relevant to our clients
- make better decisions
- be more creative
- have a competitive edge (employer and provider of choice)

This means making EDI part of our DNA and creating a truly inclusive culture where individuals feel a sense of belonging rather than a requirement to 'fit in'. "This is Us" is our framework for delivering this ambition.

We have come a long way in our EDI work but there is still much to do.

Our new EDI framework will ensure we make meaningful, systemic and methodical interventions that promote best practice, comply with equalities and human rights legislation, and, move us ever closer to achieving our mission.

The framework describes our EDI priorities, governance structure, roles and responsibilities, assurance activity and performance monitoring.

It aims to be an accessible document for all of Southdown's people.

**Jo Raisey**  
(Director of People, Culture and Change;  
Senior sponsor for EDI)



# What do we mean by EDI?

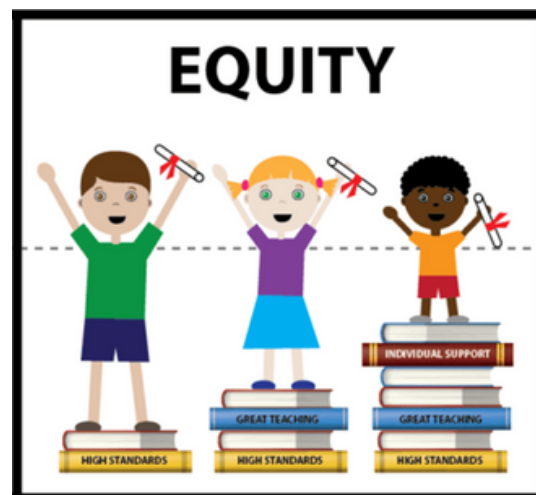
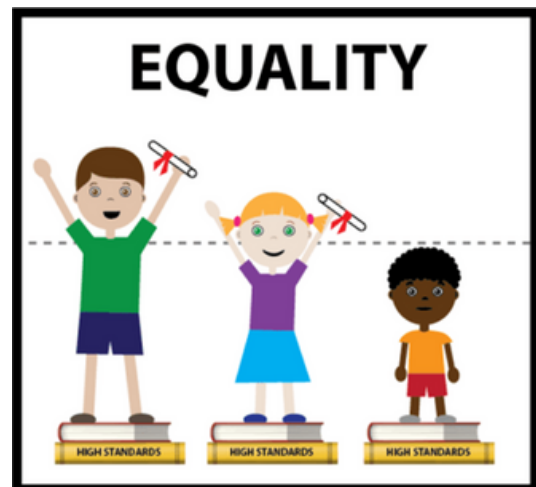


It can be challenging to understand what we really mean when we use the term EDI. This infographic provides a common frame of reference for us all to work with.

The distinction between equity and equality is important in the context of our mission and social justice.

Equality focuses on equal rights and opportunities (this is enshrined in law).

Equity is about the resources we need to make the most of these opportunities; the amount and type of resource required is unique to every individual. In many respects, equity is at the heart of our work with clients but we believe there is a real opportunity for Southdown to make an even greater difference; particularly in relation to our staff.



# Our commitments to you

1.	We will comply with equality law and implement good practice in all aspects of employment.
2.	We will demonstrate clear leadership and good governance on EDI.
3.	We will work proactively and in partnership to advance EDI for our clients, staff and stakeholders.
4.	We will ensure our policy, strategy and legal context on EDI is consistently understood.

# Our EDI Priorities & Actions

Our priorities are the things we have chosen to focus our attention on with the aim of moving us beyond compliance to a dynamic approach to EDI. These priorities will be reviewed regularly in accordance with our EDI governance structure (see page 9) to ensure they remain relevant and that progress is being made. Overall, our approach is to create something which is relevant to Southdown and its community (current and future) in an effort to focus our attention on the things that matter most.

## 1

### Improve our EDI evidence base and extend our insight

How we collect, analyse, use and share information on EDI is important in determining the direction of our strategy, the wider community health agenda and how effective we are. We need to be more sophisticated and integrated in the way we do this. We will:

- Broaden the data categories we use (following National Housing Federation best practice) to help us better understand our people
- Move towards a single data set for clients and staff
- Seek permission to use this data so we can produce insight to make better business decisions e.g. the ability to integrate this data with our employee engagement platform
- Ensure we consistently and accurately collect diversity data
- Analyse broader sources of evidence such as disciplinary investigations, grievances and complaints, safeguarding register, number of reasonable adjustments
- Monitor staff data against client data
- Ensure our staff engagement platform asks questions about the ability to 'be oneself' at Southdown
- Work with clients and tenants, to identify priorities for improving outcomes and services and increasing local community participation
- Establish working groups to explore the experiences of lesbian, gay, bisexual, transgender, queer and intersexed (LGBTQI+), disabled and minority ethnic staff who work for Southdown

- Undertake pay surveys relating to protected characteristics
- Use insight from our membership bodies, regulatory partners and other stakeholders to inform our work

## 2

### Broaden our EDI focus to include neurodiversity

We believe that a better understanding of neurodiversity is fundamental to advancing our EDI ambitions and our mission. We will:

- Seek to capture data about neurodiversity in Southdown (as described above)
- Develop a neurodiversity policy which reflects the social model of disability
- Understand the features of workplaces and working conditions (including written and unwritten rules) that can present barriers for neurodivergent people and have the flexibility to put in place reasonable adjustments that respond to these needs.
- Promote understanding of neurodivergence through our communication channels
- Create neurodiversity champions who can help us to understand any barriers in our recruitment, training, communication

## 3

### Build leadership capability and diversity of leadership

Emotional and cultural competence is seen as critical to creating inclusive environments, identifying potential from diverse backgrounds, improving well-being and ensuring fair and non-biased decision making. Overall, we aim to improve our leadership composition to reflect the staff and communities we serve. We will:

- Establish succession planning for leadership roles and ensure representation and inclusivity is a key factor in this activity
- Provide mentoring and coaching for those with protected characteristics to consider leadership roles
- Deliver a management development programme that builds emotionally intelligent and culturally aware leaders
- Appoint leaders as sponsors for protected characteristics (as they develop) demonstrating their commitment to EDI
- Consider how we develop leaders for our community not just for Southdown – we should encourage people to fulfil their potential even if that means progression outside of Southdown

# 4

## Create a safe and just culture where 'voice' is encouraged and diversity of thought is welcomed - people should feel a sense of belonging in Southdown

We believe that creating safe spaces for people to share experiences, raise concerns and challenge the status quo is critical in order to systematically identify and break down barriers to inclusion.

Considering the balance of power in Southdown is critical to this.

- We will introduce and develop 'Southdown Voice' as a framework for better listening and organisational decision making
- We will develop mechanisms to hear client voice more effectively and use this to influence our service design – You Said We Did.
- We will establish networking groups with a framework that allows them to flourish and with appropriate publicity and support
- We will ensure that EDI training is embedded in our induction materials and ongoing staff training
- We will develop a clear system of shared accountability
- We will ensure our people know the policies and processes' that enable their voice to be heard
- Mistakes should provide opportunity for learning

# 5

## Communication and engagement

There should be a continuous conversation around EDI in Southdown. We will:

- Actively promote national awareness campaigns, key religious events and developments in EDI through internal and external communications so that our people can visibly see our commitment.
- Ensure our website is accessible for all
- Encourage communication beyond digital tools
- Raise awareness of our EDI priorities and action plan through our communications
- Develop messaging in formats, media, language and imagery that is accessible and inclusive
- Run diversity talks and arrange presentations
- Invite Southdown staff to talk to leadership groups about their experiences and recommendations for action – listening events that build awareness
- Communicate more clearly that our policies provide guidance but adherence should not be at the expense of promoting diversity and achieving reasonable adjustments



# 6

## Deliver Inclusive Services

Our services should be responsive to individual needs, easy to access and with opportunities to improve outcomes. We will:

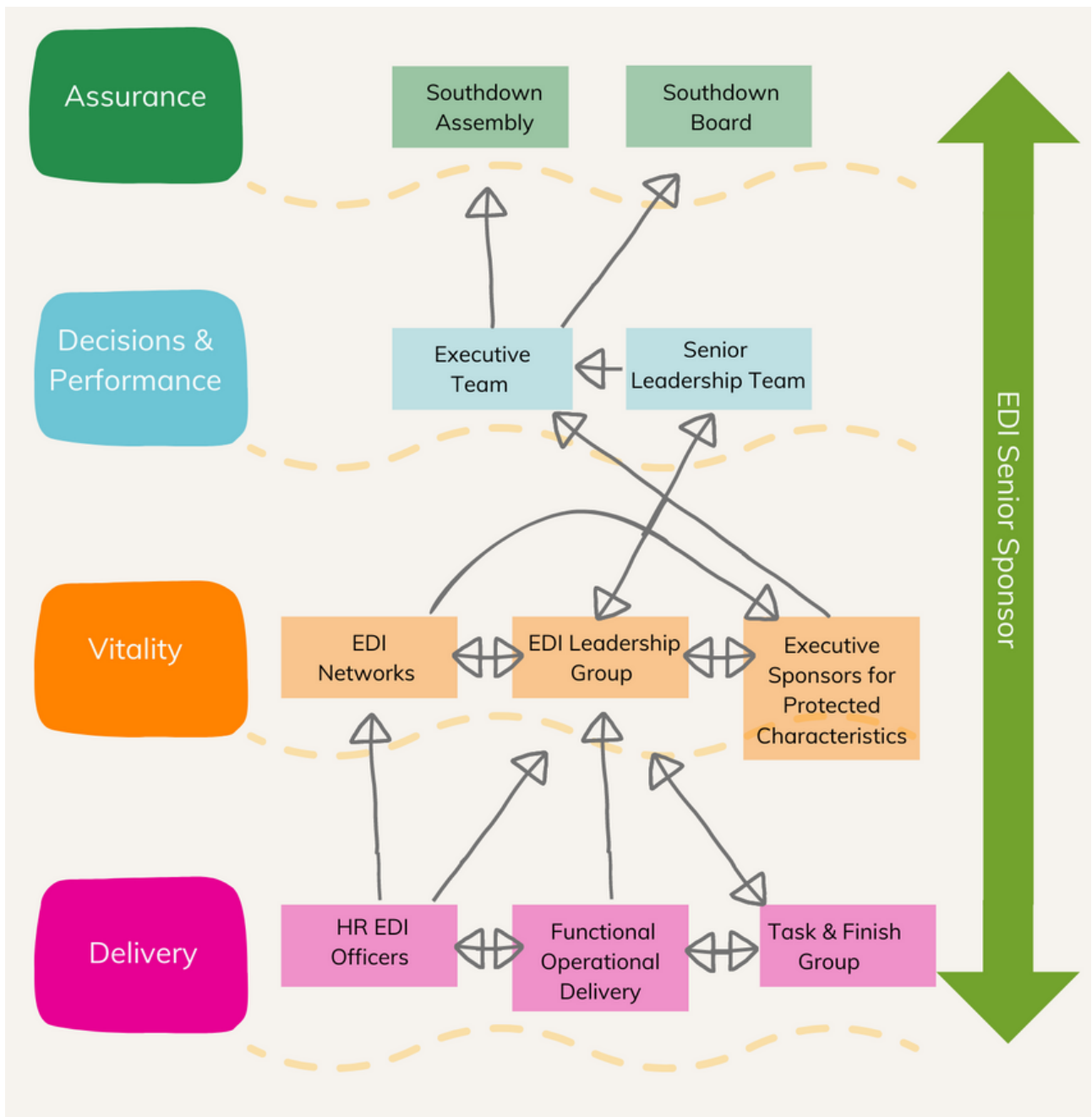
- Conduct an annual Equality Act (DDA) compliance survey
- Undertake Equality Impact Assessments when new services are introduced or changes are made as appropriate
- Work with community groups to identify gaps in service provision
- Ensure that contractors are asked to provide evidence of how they promote equal opportunities

Image below: Client of our learning disability services with a Support Worker.



# Governance

Our EDI governance structure shows the way in which EDI is directed and controlled in Southdown. The arrows denote how information flows.



# Roles and responsibilities

## Delivery

EDI Senior Sponsor	The Senior sponsor for EDI (Director of People & Culture) is accountable to the Chief Executive for ensuring adequate provisions are in place to deliver the EDI priorities via the EDI Framework. The Senior sponsor chairs the EDILG and sponsors the EDI activities on behalf of the executive team
Directors	Deliver the EDI priorities through their incorporation into their business plans. Directors are accountable to the Chief Executive for ensuring adequate resources are in place to deliver the EDI priorities via the EDI framework e.g. undertaking equality impact assessments if deemed necessary and contributing resource to task and finish groups which help ensure compliance with the Equality Act 2010 and progress our priorities.
Senior Managers and Line Managers	Are responsible for the delivery of the EDI priorities and for understanding and raising the importance of EDI in their area of responsibility. They must undertake equality impact assessments where appropriate. In managing their teams, they must provide feedback on how colleagues are doing their work in line with EDI principles and values

<p>HR EDI Officers</p>	<p>Support the delivery of the EDI priorities in line with equalities and human rights legislation and best practice. In particular they will:</p> <ul style="list-style-type: none"> <li>• Provide advice and guidance to the business, shaping relevant policy</li> <li>• Watch for early warning signs of any issues or concerns</li> <li>• Work proactively and out in the services to raise awareness of our EDI priorities and legislative requirements</li> <li>• Provide the secretariat for the EDILG and task and finish groups</li> </ul>
<p>Task and Finish Groups</p>	<p>To undertake assigned, discrete pieces of work to unlock a particular aspect of our EDI priorities. These will be identified by the EDILG.</p>
<p>All employees</p>	<p>Are responsible for the delivery of EDI and for compliance with the equalities and human rights legislation. They are responsible for ensuring their understanding of EDI is up-to-date and contributing to an inclusive work culture that celebrates the diversity of those using our services as well as our staff.</p>

# Vitality

<p>Equality, Diversity and Inclusion Leadership Group</p>	<p>A group of individuals who are passionate about championing EDI and raising its profile. They are responsible for:</p> <ul style="list-style-type: none"><li>• Raising awareness and building understanding e.g. invites members of staff to talk to the group about their experiences in order to inform action plan</li><li>• Instigating and co-ordinating task and finish activity</li><li>• Communicating key messages</li><li>• Acting as a conduit between the business and senior leadership</li><li>• Escalating issues that need decisions to the SLT</li><li>• Reviewing the quarterly monitoring report from the SLT</li></ul>
<p>Executive sponsors of protected characteristics</p>	<p>To promote awareness for a particular protected characteristic</p> <ul style="list-style-type: none"><li>• Work closely with employee network groups associated with the protected characteristic</li><li>• Try to introduce the relevant perspective into conversations to facilitate diversity of thought.</li></ul>
<p>EDI Networks</p>	<p>Bring employees with shared characteristics together in a safe space to discuss their experiences and consider ways the organisation might better support them.</p>

## Decisions and Performance

SLT	<ul style="list-style-type: none"> <li>• Develop the workplan to deliver the priorities</li> <li>• Monitor action plans to achieve progress quarterly and report to the Senior Responsible owner quarterly</li> </ul>
Executive Team	<p>The Executive team are ultimately accountable for EDI compliance with equalities and human rights legislation. They:</p> <ul style="list-style-type: none"> <li>• Agree the priorities</li> <li>• Set measures</li> <li>• Review performance</li> <li>• Provide an annual review to the Audit and Risk Committee and Southdown Assembly</li> </ul>

## Assurance

Southdown Assembly	<p>Must be assured that Southdown is compliant with equalities and human rights legislation in the decisions and information that is presented to them. They are representative of the views of our people and act as their voice to hold the Executive Team to account for placing EDI at the heart of everything it does.</p>
The Board	<p>Must be assured that Southdown is compliant with equalities and human rights legislation in the decisions and information that is presented to them</p>

# EDI Performance Monitoring

## Tools

The principle tools that we will use to evaluate that we are compliant and fair in how we deliver our strategy:

- EDI functional action plans
- Insight and evidence including census data
- Training and awareness raising
- Equality Act Compliance Survey
- Equality Impact Assessments
- Qualitative feedback from across our internal diversity network

## Measures

- Diversity - of applicants vs. hires – to understand bias in the recruitment process
- Diversity -of protected characteristics across hierarchical levels
- Inclusion – Survey questions “I can be myself at work” and “Southdown is a community not just a place of work”
- Equity – % of reasonable adjustments against number of individuals with protected characteristics
- Equity – Spend on equipment to support individuals with a disability
- Equality – distribution of pay and benefits according to protected characteristics

## Reporting

- Annually to the Remuneration & Nomination (R&N) Committee
- Quarterly at the SLT with updates to the EDI Leadership Group

# The Law

This is a summary of the main points which we think you might find helpful. For more detail please visit [www.gov.uk](http://www.gov.uk).

## The Equality Act and protected characteristics

The Equality Act 2010 is the law that protects you from discrimination and gives you the right to challenge it.

The Act makes it unlawful to discriminate against someone on the grounds of any of these characteristics: age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion/belief, sex (gender) and sexual orientation.

These are often referred to as protected characteristics.

## Are mental health and neurodivergence covered under the Act?

The Equality Act says you have a disability if you have a physical or mental impairment that has a substantial, adverse, and long-term effect on your ability to carry out normal day-to-day activities.

In this way the definition of disability is broader than the usual way you might use it and neurodivergent individuals and those with mental health challenges are likely to meet the legal definition if they can show it:

- has more than a small effect on everyday life
- makes things more difficult for them
- has lasted at least 12 months, is likely to last 12 months, or that it is likely to recur.

## Types of discrimination

- Direct
- Indirect
- Harassment
- Victimisation

### Direct discrimination

This occurs where a person is treated differently because he/she has protected characteristics (e.g. gender, race or sex). Direct discrimination may even occur by association (where a person is treated differently because he/she is associated with a person who has a protected characteristic) or by perception (because a person appears to have a protected characteristic he/she is treated differently).



Direct discrimination may be failing to promote a person, dismissing them, or not employing them in the first place because of their protected characteristic.

## Indirect discrimination

This form of discrimination is not as obvious and can be unintentional. Indirect discrimination occurs when an organisation has a policy, requirement or practice that appears to apply to all, but its effect in practice disadvantages a particular group of people with a protected characteristic.

## Harassment

This occurs where the conduct or behaviour is unwanted and relates to one or more of the protected characteristics. The conduct must have the effect or purpose of violating a person's dignity or creating a hostile, intimidating, degrading, humiliating or offensive environment for the person receiving it. Harassment can include name calling, threats, jokes, banter, being excluded, insults, and unwanted physical contact.

## Victimisation

Victimisation happens when a person is treated differently because he/she has made an allegation of or supported a complaint of discrimination. It can even be where the person has given evidence relating to a complaint of discrimination, or raised a grievance concerning discrimination.

## Making reasonable adjustments

There is a duty on an employer to make reasonable adjustments where an employee is deemed to have a disability in situations where the knowledge of the disability has been brought to the attention of the employer or where it is reasonable to assume the employer should have known of the disability.

If the disability affects the work of the person, for example leads to lower performance or poor timekeeping, the employer should consider reasonable adjustments after discussion with the employee or obtaining a medical report.



“The best thing about my job is being surrounded by other people. It’s a rich environment in terms of opinions, ideas, and backgrounds. It’s very diverse. I work with clients who are non-judgemental. I’m transgender. That’s never been an issue to anybody. I’m accepted for who I am and what I do.  
” - Learning Disability Service Manager



“

The language we use to describe identities can help promote inclusion and create a more welcoming environment, or it can reinforce damaging stereotypes that cause offense.

At Southdown, we regularly reflect on how we communicate to avoid offense and break down unhelpful stereotypes that marginalise people. This includes keeping abreast of preferred terms and phrases that can be used in spoken and written communication.

If you would like to share your thoughts on language used within Southdown to describe identities, please email [vaska.trajkovska@southdown.org](mailto:vaska.trajkovska@southdown.org).

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Southdown is an exempt charity registered with the regulator of social housing (L1829). We are also a registered society under the Co-operative and Community Benefit Societies Act 2014 (20755R).