

# Fairness for All

Sanctuary Group

Equality and Diversity Scheme 2019-2021

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Since we launched our previous version of our equality and diversity scheme, Fairness for All, in 2015, the world has moved on. In Sanctuary's two countries of operation, England and Scotland, we have seen same-sex couples able to marry, large companies have published their gender pay gaps, parents are now able to share leave following the birth of a child and public discourse regarding mental health has made great strides forward.

These are significant developments which benefit our staff, customers and wider society. But we recognise, as an employer of over 13,000 people and serving more than 200,000 customers, that we can and should play a further part in actively progressing equality and continuing to build even fairer communities.

Our Fairness for All scheme defines Sanctuary Group's commitment to diversity, highlights and celebrates good practice and describes our shared direction in creating a society where people are not judged by their skin colour, gender, faith, age or (dis)abilities. I welcome your feedback on it and you can contact me on the email address below.



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Group Chief Executive

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# About Sanctuary Group

Sanctuary Group is a leading housing and care provider and was established in 1969. Sanctuary now manages more than 100,000 homes, made up of social housing, care homes, supported housing and student accommodation.

Sanctuary is a housing association. It does not distribute profit to shareholders but instead any surplus income generated is reinvested into building homes, improving services and supporting communities.

There are two significant areas of focus for us for the coming years: building new homes to address inequality in the housing market; and helping cater for the needs of an ageing population through our residential and nursing care homes, independent older people’s accommodation, telecare and retirement living.

The nature of our business means we support some of the most vulnerable people in society and we take seriously our position as role model for the society we exist to serve. As such we are driven by our values of ambition, diversity, integrity, quality and sustainability.

Our values describe what is important to us and give our staff a shared understanding of what we believe in.



# Developing Fairness for All

In developing our Fairness for All scheme we have taken account of legislative and regulatory requirements and best practice from a suite of experts. The updated 2019-2021 scheme contains a range of activities to ensure that we continue to deliver fair and equitable services to our customers, staff and society.

## Legislative requirements

### Equality Act 2010

The most pertinent legislation in terms of equality and diversity is the Equality Act 2010. The Act protects people from discrimination on the basis of 'protected characteristics' which are:

- race (this includes ethnic or national origins, colour and nationality)
- sex
- sexual orientation (whether lesbian, gay, bisexual or heterosexual)
- gender assignment, gender identity and gender expression
- disability (or because of something connected with their disability)
- religion or belief (or lack of religion or belief)
- age
- pregnancy and maternity (having just had a baby or being pregnant)
- being married or in a civil partnership (this applies only at work or if someone is being trained for work).

As with previous equalities legislation, the Act applies in the following areas:

- employment
- service delivery
- the exercising of public functions
- a public sector equality duty.

For full details of the Equality Act 2010 and up to date guidance please see the Equality and Human Rights Commission website which can be accessed at the following address:

[www.equalityhumanrights.com/en](http://www.equalityhumanrights.com/en)

### Gender Pay Gap Information Regulations 2017

All companies with a headcount of 250 or more employees must report annually how they pay men and women. Sanctuary published its first gender pay report in March 2018.

Gender pay looks at the difference between average male and female earnings across a group of workers, regardless of the role they are in, expressed as a percentage of male earnings.

Gender pay is different from equal pay. Equal pay looks at ensuring everyone, regardless of gender, is paid the same for the same work. Sanctuary Group has robust processes in place to ensure that men and women are paid equally for doing equivalent roles. This includes regular reviews of pay levels across the organisation.

## Regulatory requirements

In addition to the legislative requirements around equality and diversity we are also subject to regulatory requirements around equality and diversity in our care, supported living and housing operations.

Our equality scheme sets out how we will meet these requirements and how we will demonstrate that we understand the different needs of our tenants. Within our housing and supported living operations, we are regulated by the Regulator of Social Housing and the Scottish Housing Regulator. Within our care and supported living operations we are regulated by the Care Quality Commission and the Care Inspectorate.

In developing this scheme we have undertaken an assessment of the requirements of this framework and are confident that our approach to diversity and the actions we have developed ensure our continued improvement and compliance across all our areas of operation.

## Best practice

We work with the following partners and campaigns to take advice on practical matters, policy and best practice to ensure our work relating to diversity is of the highest standard:

- Business Disability Forum
- Disability Confident
- Good Recruitment Campaign
- Housing Quality Network
- Investors in People
- National Care Forum
- National Housing Federation
- Recruitment and Employment Confederation (REC)
- Scottish Federation of Housing Associations
- Stonewall Diversity Champions
- Tech Talent Charter
- Tech We Can
- Universities UK
- Women into Construction.



# Our equality and diversity scheme

## What we will do

Our equality scheme provides us with a comprehensive strategy and a supporting action plan to ensure our continued improvement in equality and diversity. It sets out how our services meet the needs of all our diverse customers and how we will eradicate discrimination and promote equality of opportunity in everything we do. The equality scheme covers both our functions as an employer and our role as a provider of public services.

This scheme is the strategic action plan which will drive improvements across all our operations. This document is supplemented by individual objectives and actions for each operational area which recognises their own unique customers' needs.

At Group level, this document acts as our strategic equality management framework to ensure compliance with relevant legislation and that continual improvement and learning cascades through the organisation.

## How we will monitor progress against the scheme

Effective performance management is the essential foundation on which continuous improvement is built. Organisations monitor progress and measure their performance in order to know how well they are performing and to identify opportunities for improvement.

Our leadership and governance structure for equality and diversity is well developed. The Equality and Diversity Working Group (EDWG) leads on the coordination of diversity work across the organisation and meets three times per year. The EDWG comprises service heads from across

the Group who act as equality champions and are accountable for ensuring that their operational area adopts best practice and ensures regulatory compliance.

The EDWG is accountable to the Group Board and the Executive Committee.

While the EDWG leads on the preparation, delivery, monitoring and reporting of the equality scheme, all employees have a stake in the scheme and are responsible for its success.

We formally monitor the progress of the scheme through the EDWG and regularly report to the Group Board on activity throughout the year.

## The role of equality analysis in the monitoring of our scheme

For us to be able to know that we are successfully achieving our aim of developing a diverse workforce delivering services in a fair and equitable way to all, we need to measure and record the protected characteristics of our staff and customers.

We hold information on our staff and customers which enables us to analyse how effective our services are in meeting their diverse needs. Periodically, and according to the General Data Protection Regulation, we ask staff and customers to re-provide diversity data. This data is used to analyse trends and identify any areas where improvement could be made. Analysing these patterns helps us to ensure people are being treated fairly at each stage of the service they are receiving.



## What we will achieve

The scheme:

- provides the framework to help us to develop and improve our services, eradicate discrimination where it may exist and promote equality of opportunity
- sets the standards to help all areas of the Group to become an employer of choice and ensure that our staff feel fairly treated and valued
- provides an operational strategy to ensure that we are fully compliant with our legislative and regulatory duties
- ensures our work on equality and diversity is set firmly within an improvement focused context and delivers the best outcomes for our customers and the operational areas.

And, in so doing, our scheme will:

- give clear leadership, communication and governance to equalities, with the Group Board and Group Chief Executive having ultimate responsibility for ensuring that all parts of the Group are working towards the same goals

- provide a more comprehensive yet focused approach to equality and diversity
- provide a mechanism to embed equality and diversity into the mainstream structures of the Group
- identify, and if necessary prioritise, activities that cut across all equality groups
- ensure we have robust information about our employees and customers based on the protected characteristics laid out in the Equality Act 2010
- highlight important links between the scheme and other key strategies
- ensure we have integrated methods of consulting and engaging with customers, residents and staff to make sure that discriminatory practice is eliminated from all service design and formal and informal employment practice
- provide a mechanism to effectively performance manage equality and diversity within the Group on an ongoing basis
- provide a living document that we will regularly review and change to reflect current developments in the legislation and the organisation.

# Strategic objectives



In order to ensure our work on equality and diversity continues to deliver effective improvements for both our customers and the wider Group we have developed three strategic objectives.

On the pages following you will find each of our strategic objectives and our supporting objectives that sit below each of these.

## Strategic objective 1

Create a diverse workforce by providing fair and equal access to all our jobs, for existing and future members of staff

To do this we will:

- employ a diverse workforce that reflects the economically active population of the regions and areas in which we work
- ensure that all our staff and board members are clear about their roles and responsibilities in relation to fairness and equality
- make sure our staff and board members are provided with learning and development opportunities to enhance skills, knowledge and competencies to facilitate their roles
- strengthen and communicate our commitment to reducing incidents of bullying and harassment
- work towards identifying and eradicating any gender pay gap or job segregation that may exist in the organisation
- ensure that we use our influence and resources as an employer to make a difference to employment opportunities for the local communities in which we work, especially those who are vulnerable or disadvantaged.



As a responsible employer we take our obligations very seriously. We have a well-developed staff consultation process through our Staff Council, which helps formulate and shape employment policy. By valuing differences in the experience, culture and background of our staff we can encourage new ideas and perspectives and deliver better services. Good equality practices can also provide an environment where people from different backgrounds and circumstances can work together, develop positive relationships and learn and develop mutual understanding and appreciation.

## Strategic objective 2

### Ensure customers have fair access to the services they need

#### To do this we will:

- continue to improve resident diversity profiling to enable quality service planning and delivery for the diverse local communities in which we work
- ensure regular consultation, engagement and feedback with our customers that will enable us to commission and deliver the most appropriate services to meet their varied needs
- improve accessible communication on services, initiatives and achievements for all

our residents

- ensure that service outcomes are proportionate for all equality groups
- make sure all complaints are investigated robustly and there is not a disproportionate number of complaints from any particular group of customers
- ensure that satisfaction levels with our services are comparable across equality groups
- ensure community engagement and involvement activities reach out to all groups.

We want to encourage as much participation and involvement with customers and staff as possible in the planning, development and delivery of our services. This involvement enables us to ensure our services are fit for purpose and cater for everyone's individual needs. Through participation and involvement we can make sure that people's views can influence the way we provide our services. It is recognised that services are more effective if involvement, participation and empowerment are at the heart of service delivery.

Sanctuary Group currently offers a wide range of training to its employees to ensure that they are able to respond to the diverse needs of customers. Issues of equality and diversity are present in the majority of our learning opportunities and are specifically targeted in mandatory training for all staff.

## Strategic objective 3

Ensure that our governance structures and support services ensure the elimination of discrimination and the promotion of fairness

### To do this we will:

- ensure our corporate communications are accessible and tailored to the needs of the intended audience
- use our buying power to achieve improvements in equality and diversity through the procurement process
- improve the involvement of people in the planning and policy development processes
- at a corporate level take steps to improve the diversity of participants in governance arrangements

- facilitate a more in-depth understanding of equality and diversity issues across the organisation
- ensure our procurement and supply chain does not participate in modern slavery and that we select suppliers that share our commitment to diversity
- work with other organisations to promote and share best practice in equality and diversity.

Effective governance structures are critical to ensuring that diversity issues progress effectively. Sanctuary's Group Board oversees all strategic decisions by the Group and beneath it sits committees which take an interest in particular areas. The Group Chief Executive and Executive Committee are responsible for the day to day running of the organisation.



# Next steps

Our aim is to use our updated 2019-2021 Fairness for All scheme to help us move towards being an even fairer and more equitable organisation, where diversity is celebrated. Now we have published the scheme, the next steps are to integrate it into all aspects of our work and ensure we deliver against its objectives.

Effectively communicating this document to staff, residents, customers, regulators and stakeholders is an important part of making it come to life and demonstrate its value. To do this we will present this scheme internally to our Staff Council, through team meetings, via our intranet, and externally on our website and using video and social media. We will continue to emphasise its importance through our learning opportunities and we will continue to review it as our organisation grows.

# Feedback

We believe that feedback helps us improve services and as such we actively encourage feedback from staff, customers, stakeholders and the wider public on all areas of our work including this scheme. If you have any comments relating to this scheme or if you would like further information on any other areas of equality and diversity, please contact:

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