

DEPARTMENT:	People Excellence
DATE REVIEWED BY BOARD:	March 2026
DATE OF NEXT REVIEW:	March 2027

Fairness Statement

We embrace fairness in all areas of our work as an employer and service provider.

We recognise our responsibilities as a registered provider of social housing to deliver fair, equitable and inclusive services in accordance with regulatory standards, and to promote a culture of respect, integrity and accountability at Board and operational level.

Squared believes in, and is committed to FAIRNESS (Fairness, Respect, Equality, Diversity, Inclusion and Engagement - FREDIE), both within the organisation and the communities it serves. We value the rich social and cultural diversity of our communities. As a landlord, services provider and employer we understand that the people who provide and use our services have different experiences, needs and aspirations.

We will provide accessible high-quality services and purposeful employment opportunities to the widely diverse populations that we serve. This will tackle social exclusion, inequality, discrimination and disadvantage. We expect everyone who works with or for Squared to uphold these principles.

Squared treats all people with fairness, dignity and respect. To achieve this for our customers and team members, we will:

- Respect and listen to our customers and team members.
- Review this policy annually to see if it is working and to ensure continued fairness into the future using Equality Analysis methods. Tackle prejudice wherever it is found in the organisation.
- Induct our customers on equal opportunities and include this in their handbooks.
- Induct our team members and train them on equal opportunities, diversity and inclusion, and include this in their handbooks.
- Monitor the ethnicity of service users to ensure that our team members and our customers reflect the diverse communities we serve.
- Consult with people from all the diverse communities we serve, in order to help shape the services we provide.
- Provide feedback on comments received and report on how we are progressing in achieving our fairness objectives.

1. Purpose and context

This policy brings together all our equality, diversity and inclusion policies and demonstrates our commitment to meet the requirements of the Equality Act 2010.

The following procedures are in place to support this policy:

- Disability Discrimination
- Dignity at Work (includes Equal Opportunities, Bullying & Harassment)
- Recruitment & Selection
- Aids and Adaptations
- Complaints Handling

This policy is also directly aligned with our regulatory obligations, in particular:

- Consumer Standards (especially Transparency, Influence & Accountability)
- Tenant Satisfaction Measures (TSMs) and fairness in outcomes
- Safety & Quality Standard (fair access to safe homes)
- Complaints Handling Code alignment (via the Housing Ombudsman)

2. Scope of this policy

2.1 All aspects of Squared, our business and services, our contractors, consultants, partners and suppliers, are covered by this policy.

2.2 Appendix 1 provides useful terminology and definitions relating to equality, diversity and inclusion.

3. Roles and responsibilities

3.1 Everyone concerned is required to familiarise themselves with the Fairness Policy. This includes all team members, temporary workers, board members and customers.

3.2 All team members are expected to abide by the policy as part of their employment contract. A breach of the policy will be regarded as misconduct and could lead to disciplinary action.

3.3 The Board

The Board has overall responsibility for ensuring that Squared meets its legal and regulatory obligations regarding fairness (FREDIE). This includes:

- Setting the tone from the top and promoting a culture of integrity, inclusion, objectivity, accountability and respect.
- Ensuring compliance with the Equality Act 2010 and relevant regulatory standards, including the Consumer Standards
- Approving measurable Fairness Objectives and monitoring performance against them.
- Scrutinising equality data, complaints data and customer feedback to identify potential unfair outcomes.
- Ensuring that decision-making demonstrates due regard to equality impacts.
- Holding the Leadership Team to account for delivery of this policy.

3.4 Leadership Team

The Chief Executive (CEO) will ensure effective implementation and operation of the policy.

The Leadership Team will ensure that they and their team members operate within the policy and that all reasonable and practical steps are taken to avoid discrimination.

3.5 Operational Team

Line managers and supervisors/team leaders will:

- Ensure that the policy is implemented and monitored in their department.
- Ensure that all policies and strategies are communicated to all team members and allow for discussion and feedback via meetings and one-to-ones.
- Ensure that all team members understand their responsibilities.
- Manage effectively and deal promptly and thoroughly with any complaints of discrimination – including harassment, victimisation and bullying.
- Deal promptly with complaints of inequality and make sure the matter is investigated thoroughly and any other steps taken.
- Respect the dignity of all team members and value the contribution they make in the workplace, providing a working environment free from all forms of bullying and harassment, in which everyone is treated with respect.

3.6 Team members

The attitudes of team members are crucial to fair employment practices – even though responsibility for ensuring there is no unlawful discrimination rests with management. In particular all team members should:

- Make sure they understand the policy and are clear about its implications.
- Treat all individuals or groups fairly and respectfully and make sure they do not discriminate in any matter of employment, service provision or delivery.
- Not discriminate against or bully, harass, abuse, intimidate or victimise other team members or customers.
- Not induce – or attempt to induce – other team members to discriminate against, bully, harass, intimidate or victimise team members or customers.
- Take appropriate action if there are apparent breaches of the policy e.g. follow the whistleblowing policy, or grievance procedures.
- Treat everyone with dignity, fairness and respect at all times.
- Any form of discrimination or inappropriate behaviour will be treated as a serious offence and may lead to disciplinary action.

3.7 Our Vision

Squared will have:

- Fairly let and maintained housing stock;
- Fairly provided services;
- Housing and services open to everyone including those with protected characteristics and other vulnerable groups as identified by Squared; and
- Satisfied customers and team members who are all treated fairly, with respect and dignity.

3.8 Our Principles

We have placed fairness at the centre of everything we do, in order to achieve our mission of fair and inclusive services and workplaces. Our approach is based on these principles:

- **Fairness:** We will work in a way that promotes equality, diversity and inclusion and does not discriminate against any of our customers, team members or other stakeholders.

- **Respect:** We will work in partnership with our customers, team members and other stakeholders to encourage a culture where everyone is valued and respected.
- **Engagement:** We will work in partnership with our customers, team members and other stakeholders to encourage a culture where everyone's voice is heard.
- **Integrity:** We will work to ensure that our practices are transparent and open to scrutiny.
- **Providing opportunity:** We will work towards a culture which is fair and where all our customers, team members and other stakeholders have the opportunity to reach their full potential.
- **Expertise and excellence:** We will work to ensure that the skills and knowledge of our workforce meet the diverse needs of our customers. Squared will be led by a Board that fairly represents the communities it works in
- **Equal access:** People with protected characteristics will have equal access to services and to Squared's decision-making processes. All communities should be equally satisfied with the choices available and the quality of services they receive.

3.9 Our Values and Core Behaviours

Understand: Treat people fairly

- Being ethically and socially responsible
- Enhancing performance
- Showing empathy.

Grow: Always aim to improve

- Taking responsibility
- Welcoming change and improvement
- Learning and sharing ideas.

Recognise: Treat everyone with respect

- Being valued for our integrity
- Understanding other's needs
- Building trust.

Deliver: Place customers at the heart of what we do

- Being committed to the values and goals of Squared
- Working together to achieve what is required
- Offering quality and excellence in our services

Innovate: Be ahead of the game

- Adventurous thinking
- Confidently questioning
- Championing progression

Play: Enjoy what we do

- Encouraging curiosity
- Collaborating with purpose
- Taking fun seriously

4. Definitions and reference to legislations used in this policy

Squared meets all relevant legislative and regulatory requirements – but seeks to exceed them. We aim to produce the best equality outcomes possible for our customers and team members.

We recognise our responsibility to provide equality of opportunity, eliminate discrimination and foster good relations, both in our activities as an employer, landlord, service provider and partner and in procurement.

Here is a brief overview of the key frameworks – legal, regulatory and good practice.

4.1 The Equality Act 2010

The Equality Act 2010 consolidated previous equality legislation with the aim of making it more accessible and easier to understand. It refers to nine protected characteristics for which discrimination, harassment and victimisation are prohibited.

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation
- Marriage and civil partnership
- Pregnancy and maternity.

4.2 The Public Sector Equality Duty

The Equality Act 2010 includes the Public Sector Equality Duty, which requires public bodies (and those receiving public funds) to have due regard to the:

- Need to eliminate discrimination, harassment and victimisation;
- Need to advance equality of opportunity; and
- Need to foster good relations.

Although not a requirement, it is recognised good practice to publish Equality Objectives and the progress being made to achieve them. This should be done at least every three years. We also publish data on our team members and our customers, including by relevant protected characteristics and their context.

In the course of developing policy and delivering services, Squared also adds further characteristics relevant at the time, such as: Socio-economic deprivation;

- individuals with alcohol and drug issues;
- victims of anti-social behaviour;
- individuals reporting domestic abuse;
- individuals experiencing financial exclusion;
- individuals experiencing digital exclusion; and
- personality diversity.

Although Squared is not a public body, we recognise that as a registered provider of social housing and recipient of public funding, we are required to comply with the duties under the Equality Act 2010 in the exercise of our housing and service provision functions and to demonstrate due regard to the Public Sector Equality Duty where applicable.

4.3 Other associated legislation:

Other associated legislation includes:

- Rehabilitation of Offenders Act 1974
- Human Rights Act 1998
- Employment Rights Act 1996 (as amended)

- Modern Slavery Act 2015
- Data Protection Act 2018
- UK GDPR
- Domestic Abuse Act 2021
- Relevant Health and Safety legislation

Squared also adheres to related standards and good practice, including those of the:

- Regulator of Social Housing National Housing Federation
- Local authorities who monitor our support services; and
- National legislation.

5. How we will meet our obligations

5.1 In all our activities, we will have “due regard” to the need to:

- Ensure that service design, delivery and performance monitoring align with the Consumer Standards of the Regulator of Social Housing, including transparency, tenant influence, safety and quality outcomes.
- Eliminate bullying, discrimination, harassment and victimisation.
- Advance equality of opportunity by removing or minimising disadvantages suffered by people with different characteristics. This includes taking steps to meet the different needs of disabled people.
- Foster good relations between people and encourage them to participate in public life, or in any other activity in which their participation is disproportionately low.
- Ensure that no customer or team member is discriminated against.
- Ensure that all of our services are accessible and appropriately tailored to the individual needs of customers. Have in place a responsive complaints procedure and monitor it by protected characteristics.

5.2 We will implement a framework for fairness that enables us to:

- Have in place a responsive aids and adaptations procedure and monitor it by protected characteristics.
- Promote diverse customer participation in key decision-making and service improvement.
- Promote the development of safe, secure communities and reduce antisocial behaviour, domestic violence, bullying, discrimination and harassment.
- Develop positive partnerships that support stronger service provision and share common fairness principles.
- Promote fairness in purposeful employment practices and organisational culture.
- Promote personality diversity in employment to enhance team inclusion using psychometric assessment tools and coaching models.
- Provide regular training, learning and development opportunities to help the Board and team members gain knowledge and skills in delivering fairness successfully in their work.
- Provide training, learning and development opportunities to help service user group members gain knowledge and skills in the principles of fairness.
- Understand who our customers are, and what their specific needs are.
- Ensure that the services we design and deliver meet the individual needs of our customers.
- Provide services that help our customers address the inequalities they experience, and make a positive difference to the communities we work in.
- Recruit and retain a diverse workforce which works together and delivers creative and inclusive services for our customers.
- Support and develop a culture that values the diversity of our customers, board members and team members.

- Be confident that all our team members are competent and deliver fair, respectful and inclusive services.

5.3 Gathering evidence

- As Squared provides public funded services, we will need to provide equal opportunities information and by doing so this will help us to ensure the services we provide are accessed appropriately, that our customers and our team members are being treated fairly and that their needs are recognised.
- Data is collected against the 9 protected characteristics and other local vulnerable groups identified by Squared, as relevant at the time.
- All equality monitoring data will be collected, processed and stored in accordance with Data Protection legislation.
- We will be transparent about why we collect this information and how it will be used to improve services and eliminate disadvantage.
- We will analyse equality data alongside Tenant Satisfaction Measures, complaints data, allocations data and service outcomes to identify any disproportionate impact or unfair outcomes.

5.5 Involving and consulting customers

- We will consult our customers regularly and assess the participation rate to identify which groups are under-represented.
- We will involve our customers in developing strategies and activities to enhance fairness.

5.6 Equality Analysis

- Equality Analysis will be carried out on all key strategies and policies. This will identify key actions to deliver improvements for our diverse customers and team members.
- Equality Analysis findings will be reported to the Leadership Team and the Board to ensure oversight, challenge and accountability.

6.0 Training and Implementation

6.1 We encourage all our team members to discuss their career prospects and their learning, development and training needs with their manager throughout their employment.

6.2 Opportunities for promotion and training are communicated and available to all team members on a fair and equal basis. Progress will be determined only by personal merit and application of the criteria relating to the duties of each post.

6.3 Opportunities for training and development are provided to our board members.

6.4 We may take positive action to help address any under-representation of groups in particular areas of employment.

7.0 Compliance and Monitoring

7.1 Responsibility for monitoring compliance

Responsibility for monitoring compliance with this policy rests with the Leadership Team, with oversight from the Board.

Monitoring will include:

- Workforce equality data
- Recruitment, promotion and pay data
- Customer demographic and satisfaction data
- Tenant Satisfaction Measures
- Complaints data and Housing Ombudsman determinations
- Allocations and lettings outcomes

- Equality Analysis outcomes

Monitoring will take place at least annually, with key findings reported to the Board.

Where deficiencies are identified, an action plan will be developed with clear ownership, timescales and reporting arrangements.

7.2 Equality Analysis

- The actions arising from Equality Analysis will be included in our improvement planning, and our service delivery framework.
- We will re-establish the Fair and Squared staff group with representation of team members from different parts of the organisation.
- The Fair and Squared group will review and comment on Equality Analysis and the actions identified to address adverse impact with the support of the Business Support & Governance team. The group will help to steer fairness at Squared and support the leadership and operational teams in the ongoing review of the Fairness Policy, ensuring that the identified outcomes of Equality Analysis are addressed.

7.3 Related documents

All policies and procedures are governed by our Fairness Policy.

Appendix 1

Equality, Diversity and Inclusion Terminology and Definitions

This appendix reflects definitions contained within the Equality Act 2010 and current guidance from the Equality and Human Rights Commission (EHRC)

Protected Characteristics

Under the Equality Act 2010, the following characteristics are protected in law:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage and civil partnership
- Pregnancy and maternity

Direct Discrimination

Treating someone less favourably because of a protected characteristic.

Indirect Discrimination

Where a provision, criterion or practice applies to everyone but disadvantages people with a particular protected characteristic and cannot be objectively justified.

Discriminate unlawfully

When an employer has treated someone less favourably because of a protected characteristic (in other words, discriminated against them) and does not have a valid defence.

Discrimination can be intentional or unintentional. It can also occur through direct discrimination, indirect discrimination, harassment or victimisation under the Equality Act 2010.

Individuals, groups, whole institutions or organisations can be discriminatory.

Perception is as important as intention. It is essential to take seriously the views of people who feel they experience discrimination.

Age Discrimination

Assumptions may be made about the capability of younger and older people because of their age.

Age discrimination can occur both directly (i.e. treating people less favourably because of their age – or apparent age), or indirectly (i.e. treating everyone the same if that causes a disadvantage for people in a particular age group).

Age discrimination may be lawful in limited circumstances where it can be objectively justified as a proportionate means of achieving a legitimate aim.

Disability Discrimination

A person has a disability if they have a physical or mental impairment with a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Disability Discrimination can arise where a person is treated unfavourably because of something arising from their disability and this treatment cannot be justified.

Physical barriers in the environment, and attitudinal barriers in society lead to disability discrimination.

People having a disability are disadvantaged by these factors rather than by their impairment.

(see also Reasonable Adjustments)

Reasonable Adjustments

Organisations have a legal duty to take reasonable steps to remove barriers experienced by disabled people. This may include:

- Physical adjustments
- Changes to policies, procedures or practices
- Providing information in accessible formats
- Additional support arrangements

In service provision, this is an anticipatory duty.

Harassment

Unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation

Treating someone unfairly because they have made a complaint of discrimination, supported someone else's complaint, or raised concerns relating to equality.

Bullying

Bullying is not specifically defined within the Equality Act 2010. However, bullying behaviour may constitute unlawful harassment where it relates to a protected characteristic.

Bullying is persistent, offensive, intimidating or malicious behaviour that has a detrimental impact on a person's confidence and self-esteem.

In the workplace this type of behaviour undermines an individual or group of employees in vindictive, cruel, malicious or humiliating ways having a destructive effect on working and team relationships and the quality and effectiveness of the service to customers.

Bullying may be related to an abuse of power. Such conduct by one or more people in a position of strength, authority or responsibility abuses the power of that position.

It can involve the misuse of any form of individual power, such as physical strength, personality or age, or collective power through strength of numbers.

All these can result in intimidating, insulting or malicious behaviour.

Positive Action

Steps taken to address disadvantage or underrepresentation experienced by people with protected characteristics.
Positive action is lawful where it is proportionate and evidence-based.

Equality Impact Assessment (EIA)

A structured assessment process used to identify the potential impact of a policy, strategy or decision on different groups and to mitigate adverse impacts where identified.

Intersectionality

Recognition that individuals may experience overlapping forms of disadvantage due to more than one protected characteristic.