



EQUALITY, DIVERSITY & INCLUSION (EDI) POLICY

1. Purpose

The purpose of this policy is to set out our commitment to creating an organisation where people of all identities and backgrounds can belong, free from discrimination. We strive to create and maintain a fair working environment where individual differences and contributions are recognised and valued. This policy supports the creation and maintenance of an inclusive organisation, by actively promoting fairness and implementing best practices.

To support our inclusive culture, this policy:

- outlines our commitment to EDI and sets out how we put this commitment into practice.
- explains the behaviours we expect of our people in support of this commitment.
- sets out the key steps we take to make our culture as inclusive as possible, including how we ensure equality of opportunity for our colleagues.

2. Introduction

We value all our people for the differences they bring, each one is unique, whether in terms of background, personal characteristics, experience, skills and motivations. This policy sets out our approach to ensuring we recognise and celebrate difference and foster a culture of inclusion and belonging.

We expect you to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility that we all share. Cultivating this culture does not happen by accident but requires ongoing work and commitment.

We expect you to treat everyone, including our colleagues, tenants, suppliers, contractors, agency workers and consultants fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

3. Scope

This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. It covers our approach to our colleagues, tenants and other key stakeholders and the behaviours we expect and encourage.

The policy accompanies our Bullying, Harassment and Victimisation Policy, available on our intranet.

4. Statement

We believe that a culture of equality, diversity and inclusion benefits all our colleagues and tenants, supports wellbeing and enables people to thrive, to be themselves and feel they belong.

5. EDI - definitions

- **Equality** is when everyone is treated fairly and with respect according to their individual needs.
- **Diversity** recognises that, although we have things in common with each other, we are also different in many ways.
- **Inclusion** is where our differences are celebrated as a benefit, and where other perspectives are shared, leading to better decisions. It occurs when everyone is supported, feels valued and has access to opportunities.

6. Our commitments

- We believe that everyone has the right to be valued, treated with respect for their culture, beliefs and values, and feel safe and secure in their workplace, own home and neighbourhood.
- We put EDI at the heart of what we do. We will reduce barriers and strive to attract and retain people from diverse backgrounds and experiences.
- We ensure all colleagues are aware of their legal responsibilities under the Equality Act 2010 and that no person, colleague, tenant, or stakeholder is discriminated against, treated less favourably or unfavourably on the grounds of any of the nine legally protected characteristics outlined in it: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origin), religion or belief, sex, or sexual orientation.
- Furthermore, we will not unfairly discriminate because of any other irrelevant factor and will instead build and maintain a culture that values meritocracy, openness, fairness, and transparency. This applies to every aspect of your work with us including pay and benefits, terms and conditions of employment, grievances and disciplinary action, dismissal, redundancy, family friendly leave, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.
- We create and maintain an organisation that is free from discrimination and prejudice. We will not tolerate any form of discrimination and are committed to its elimination in all forms in our services, policies, procedures and working practices.
- We promote a working environment based on dignity, trust and respect; one that is free from discrimination, harassment, or victimisation. We seek to promote an open

atmosphere where everyone has a voice and if anyone feels they are being discriminated against, victimised, or harassed, knows that they can speak up, be heard and taken seriously.

- We value and celebrate diversity and differences - we are committed to developing a culture that values people from all sections of society and recognises the contribution everyone can make.
- We actively promote positive attitudes to EDI to create an environment of allyship.
- We will continuously improve by following our EDI strategy and regularly analysing and reporting on EDI performance to the board.

7. Key Responsibilities

Our Board

- Overall accountability to ensure EDI is fully incorporated into our strategic objectives.
- Hold our executive team accountable for implementing this policy effectively, and regularly review progress through reports and audits.

Our Executive Team

- Ensure all legal obligations are met in relation to equality, ensuring that risks related to non-compliance are managed and mitigated.
- Translate this policy into actionable plans across the organisation, ensuring adequate resources are allocated to support EDI initiatives.
- Model inclusive behaviours and encourage a culture of diversity and respect throughout the organisation.
- Act as visible EDI champions and set an example for inclusive leadership.
- Oversee the collection of data on EDI metrics, and report progress to the board.

Our Managers

- Embed a culture of inclusivity where everyone is treated with dignity and respect.
- Ensure EDI practices are followed in all activities, including recruitment, promotion, and development.
- Proactively address any issues of discrimination, harassment, or victimisation, and work to create an environment which reduces the possibilities of these occurring.
- Promote open discussions about EDI, and create an environment where all voices are heard and respected.
- Ensure that decision-making processes are inclusive and consider diverse perspectives.
- Ensure that all colleagues are trained and supported in EDI principles and practices.
- Model inclusive behaviours and encourage a culture of diversity and respect.
- Integrate EDI objectives into performance management processes.

Our HR team

- Maintain and update this policy in conjunction with senior leadership, ensuring alignment with legislation and other policies and procedures.
- Develop and promote fair recruitment processes, mitigate bias, and promote the career growth of diverse talent through learning and development opportunities.
- Collect and analyse EDI metrics, track progress, and report regularly on EDI initiatives and workforce diversity.
- Provide support channels for colleagues and coach managers to handle EDI-related grievances, complaints or conflicts fairly and sensitively.

All Colleagues

- Familiarise yourself with this policy and adhere to its principles in your work and actions.
- Treat everyone with dignity and respect, taking the time to understand how they would like to be treated.
- Participate in EDI training and awareness activities offered; be open to learning about EDI and contribute ideas for creating a more inclusive workplace.
- Take into account the uniqueness of colleagues and tenants and look to celebrate differences.
- Recognise your own unconscious biases and take positive action to challenge your own thinking.
- Challenge others, speak up and report matters if any behaviour is not aligned to the expectations of this policy.

8. Discrimination – definitions

Discrimination can be unintentional; it is not always obvious and can be subtle and unconscious. This stems from general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause you to apply requirements or conditions that put those in particular groups at a disadvantage.

The following forms of discrimination are unlawful under the Equality Act 2010 and prohibited under this policy:

- **Direct discrimination** occurs where one person is treated less favourably than another because of a protected characteristic. Other types of direct discrimination are:
 - **Associative discrimination** is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
 - **Perceptive discrimination** is direct discrimination against a colleague because others think they possess a particular protected characteristic.
- **Indirect discrimination** is a provision, criterion or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others and

is not justifiable. Such a requirement would be discriminatory unless it can be objectively justified.

- **Harassment** includes **sexual harassment** and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is covered further in our Bullying, Harassment and Victimisation Policy, available on our intranet.
- **Victimisation** occurs where an individual is subjected to a detriment (i.e. treated poorly), such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance about discrimination or harassment, or because they are suspected of doing so. This protection does not apply if the individual acted maliciously or made or supported an untrue complaint in bad faith. Victimisation is covered further in our Bullying, Harassment and Victimisation Policy, available on our intranet.
- **Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a colleague who is disabled at a substantial disadvantage compared with someone who does not have that disability, and we have failed to make reasonable adjustments to enable them to overcome the disadvantage.

9. Breaches of this policy

You must not unlawfully or otherwise discriminate against, harass or victimise, other people including current and former colleagues, job applicants, clients, tenants, suppliers and visitors. This applies in the workplace (including while working from home), outside the workplace (when dealing with tenants, suppliers or other work-related contacts), and on work-related trips or events including social events. You may be held individually liable for such acts while working with us.

Acts of discrimination, harassment, or victimisation against other colleagues or tenants are disciplinary offences and will be investigated and dealt with under our Disciplinary Policy. We treat this type of conduct extremely seriously and it may amount to gross misconduct resulting in dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

If you believe that you have suffered discrimination, harassment or victimisation you can raise the matter through our Grievance Policy or Bullying, Harassment and Victimisation Policy. Complaints will be treated in confidence and investigated as appropriate.

You will not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith is likely to be treated as misconduct and dealt with under our Disciplinary Policy.

Our Disciplinary, Grievance, and Bullying, Harassment and Victimisation Policies can all be found on our intranet.

10. Equality of opportunity

10.1 Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible. Anyone making a decision about recruitment must not discriminate in any way and must have attended appropriate EDI training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions. Further details on the application of our recruitment process are contained within our Recruitment and Selection Policy found on the intranet.

10.2 Career Development

Any decision we make relating to a person's promotion or career development must be free from discrimination. We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

10.3 Learning and Development

If you are involved with making decisions about a person's employment, you must attend appropriate EDI training. All new starters must attend EDI training as part of their onboarding programme.

We expect all our people to proactively support our EDI initiatives by attending organised events and workshops to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

10.4 Monitoring and Review

We analyse EDI data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our EDI strategy. This includes recruitment, promotions, disciplinary action, capability, access to training, pay and benefits, and colleague feedback including exit interviews and annual survey.

11. Our Tenants

We will promote equality of opportunity and welcome diversity in all aspects of our services and activities. We will not tolerate discrimination, harassment or victimisation against any tenants. We will work to ensure all our colleagues and partners treat everyone with dignity and respect.

We will continuously review our complaints, services and SLAs to ensure we are providing the right level of service to all our tenants, and we will continue to learn, develop and adapt to ensure we continue to tailor our services to the needs of the tenant.

Tenant involvement is at the heart of everything we do, we will engage, consult and involve our tenants to adapt and make changes to services as needed. We will provide a set of standards that summarise our commitments to tenants and make these available on our website.

10.1 Access to our Homes

We will work towards ensuring that our services are accessible to our tenants. We will recognise people's cultural and language needs and services will be provided which are appropriate to those needs. We will make reasonable adjustments to ensure services are accessible to everyone who needs them and seek alternative methods of service delivery for disabled people where barriers may exist.

We will:

- Provide clear, accurate and accessible information about services, including interpretation and translation services to remove any communication barriers.
- Set targets and measure performance on lettings to diverse groups.
- Ensure reasonable adjustments are made in the provision of services for disabled people.
- Provide documents in alternative formats on request.

12. Procurement of goods, work and services

We are committed to EDI in respect of achieving the best value in all procurement activities, services and supplies, we will ensure we do not discriminate, unlawfully, directly or indirectly as set out in the Equality Act 2010. We will also consider the duty to advance equality as set out within the Act.

We expect all individuals acting on our behalf to comply with legalisation and behave towards others in a way that is in keeping with this policy. We will only work with contractors who can demonstrate that they comply with acceptable EDI standards. We are committed to achieving the highest standard of service delivery in employment practice. Equality of opportunity for all prospective contractors' employees is an integral part of our approach.

Our Procurement Policy makes clear reference to EDI and how this will be considered throughout the procurement process. We will incorporate EDI considerations into all stages of the procurement process, including:

- Pre-contract considerations – initial assessment of potential contractor to ensure they meet the organisations minimum EDI requirements. This is done through our pre-qualification questionnaire (PQQ),
- Drawing up contract specifications - and inviting tenders – we will clearly set out specific EDI requirements in all contract specifications were deemed relevant and include the need for compliance with equality law as mandatory.
- Contract conditions – we will set out specific EDI requirements of the appointed contractor in the final contract, for example, if direct contact with tenants - suitable code of behaviour to be in place, appropriate level of EDI training or toolbox talks to be delivered and possible sharing of tenant profiling information required.
- Monitoring performance once the contract has been let- we will put in place suitable monitoring mechanism as agreed with the contractor. The monitoring mechanisms will be integrated into the ongoing performance management of the contract and ongoing performance in relation to EDI will be measured against targets set.

Consulted with CV	N/A
Board/Committee/Exec	PNR Committee & Board
Date Approved	23 rd Sept 2024
Review Date	23 rd Sept 2026
Officer	Chief People & Change Officer
Version Number	5