

# Equality Diversity and Inclusion Policy

## Colleagues and Customers

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### 1. Introduction

- 1.1 At Peabody we are committed to promoting equality of opportunity for all and creating a working environment that is inclusive and free from discrimination. Our organisational purpose is 'helping people to flourish', which we do by providing great homes and services, by making a positive difference to the customers and communities we serve, and by creating a diverse inclusive and inspiring place to work. We are an organisation with colleagues and customers at our heart and equality diversity and inclusion (EDI) is a core part of our culture.
- 1.2 The aim of this policy is to ensure that we meet our equality diversity and inclusion commitments and work within the requirements of the Equality Act 2010 by promoting a culture of respect and dignity and actively challenging discrimination.
- 1.3 Through our work in promoting equality of opportunity for all, we will ensure fair treatment regardless of someone's:
  - Age
  - Disability
  - Ethnicity
  - Gender reassignment status
  - Marital and civil partnership status
  - Pregnancy and maternity status
  - Religion or belief
  - Sex
  - Sexual orientation
  - Socio-economic status
- 1.4 We recognise that all of these characteristics may be inter-linked and impact each other in different ways.
- 1.5 This policy should be read in conjunction with the:
  - Group EDI Strategy 2023-2026
  - Group People Strategy 2023-2026
  - Recruitment and Onboarding Policy and Procedure
  - Reasonable Adjustments for Colleagues Policy and Procedure
  - Reasonable Adjustments for Customers Policy and Procedure
  - Transgender Inclusion Policy, Procedure and Guidance
  - Hate Crime Policy
  - Anti-Social Behaviour Policy.

### 2. Scope

- 2.1 This policy applies to all colleagues and customers of Peabody Group and all its subsidiaries. It also applies to contractors, agency workers and anyone else engaged to work for Peabody.
- 2.2 For the purposes of this policy, any reference to colleagues also includes apprentices.

## Equality Diversity and Inclusion Policy

2.3 This policy may be subject to amendments from time to time, to reflect the changing needs of the business, legislation, and working environment.

### 3. Key terms and definitions

3.1 **Equality** is about fair and equal access, ensuring that our colleagues and customers have the same opportunities, regardless of their protected characteristics or socio-economic status. Whilst equality sets out the foundations to ensure fair and equal access, within this policy we also recognise the importance of **equity**. Equity is about ensuring that our colleagues and customers have what they need to achieve equal outcomes. Put simply, equity means understanding that not everyone starts out in the same place and that adjustments may need to be made to ensure fairness, based on someone's individual needs.

3.2 **Diversity** is about celebrating the rich diversity of our colleagues and customers recognising and valuing our differences and harnessing these differences to create a more inclusive, effective, productive organisation.

3.3 **Inclusion** means actively working to meet the needs of our colleagues and customers, taking action to remove any barriers to participation and creating an environment where everyone feels valued and respected and able to be themselves.

#### Group EDI Strategy 2023-2026

3.4 The implementation of this policy will support the delivery of our Group EDI Strategy and help make our vision for equality diversity and inclusion a reality. Our EDI strategic priorities are as follows:

- Tackling inequality and discrimination.
- Providing high quality inclusive accessible services that meet the needs of our customers.
- Embedding EDI throughout each stage of the employee lifecycle.
- Improving the diversity of our senior management team and our board.
- Improving the quality of our workforce and customer diversity data.
- Promoting developing and supporting our colleague-led diversity networks.

### 4. Our approach

4.1 We will make a strong and visible commitment to equality diversity and inclusion, underpinned by a clear strategy and action plan, effective leadership, and fit-for purpose governance.

4.2 We will encourage and facilitate the involvement of our customers in shaping the design and delivery of high quality, accessible services.

4.3 We will not tolerate victimisation bullying discrimination or harassment and we will tackle inequality and prejudice and promote understanding between people from different groups.

4.4 Any decisions that we make will be based on the facts and objective grounds and will be taken in a way that avoids direct or indirect discrimination. We will also make sure individual needs are considered through our employment practices or when we are delivering a service.

4.5 We will monitor our performance in relation to EDI to help us improve the experience of our customers and colleagues, and the services and support we offer.

### 5. Colleagues

## Equality Diversity and Inclusion Policy

- 5.1 We will harness the skills, experience and knowledge of a diverse workforce and realise the benefits of a strong organisational commitment to equality diversity and inclusion in all that we do.
- 5.2 We're committed to having recruitment processes which are fair and unbiased. This will include monitoring each stage of our recruitment and selection processes to ensure they are fair and transparent. More information about our approach to recruitment and selection can be found in our Recruitment and Onboarding Policy and Procedure.
- 5.3 As a Disability Confident employer, we will guarantee to interview all job applicants with a disability who meet the essential requirements of a role.
- 5.4 All colleagues will have fair access to learning and development opportunities, regardless of their protected characteristic.
- 5.5 Through our talent programmes we will promote the development of colleagues from underrepresented groups. This will include the provision of tailored programmes to accelerate their careers and remove any barriers to progression.
- 5.6 Having an awareness of equality diversity and inclusion issues will be essential for all colleagues and we will provide this through diversity and inclusion learning and development. Our senior leaders board and committee members will also receive learning and development on their roles and responsibilities in relation to EDI.
- 5.7 We will provide channels for colleagues to have their voices heard. These channels will include our colleague forum and our colleague-led diversity networks. We will also provide colleagues with opportunities to give feedback on our workplace practices through our colleague engagement surveys.
- 5.8 We will comply with our gender pay gap reporting requirements, publishing our gender pay gap annually. We will also undertake annual ethnicity pay gap assessments and publish the findings.
- 5.9 We will make tailored adjustments to support our colleagues that have a disability or health condition and provide reasonable adjustments where required.
- 5.10 We will celebrate the rich diversity of our organisation by celebrating and promoting key historical religious and cultural events that take place every year.
- 5.11 We will provide colleagues with opportunities to work flexibly and in ways that best meets their needs, including Hybrid Working and Flexible Working.
- 5.12 We will expect all colleagues to use appropriate inclusive language and behave in a way that upholds the dignity of colleagues customers and stakeholders.
- 5.13 We will make sure that colleagues receive appropriate training to help them support customers with particular needs.

### **Discrimination bullying victimisation and harassment**

- 5.14 If a colleague feels that they have been discriminated against or bullied victimised or harassed, or if they are aware of any other practice or behaviour which is in breach of this policy, they have a responsibility to report it to an appropriate manager or to an appropriate member of the

People Team. Depending on the nature of the incident, incidences of discrimination, bullying victimisation or harassment may be dealt with in accordance with the Grievance Policy and Procedure.

## Equality Diversity and Inclusion Policy

### 6. Customers

- 6.1 We will treat all customers fairly and with respect at all times.
- 6.2 We will understand reflect and meet the needs of the diverse communities we serve by providing services that are accessible inclusive and non-discriminatory.
- 6.3 We will listen to customers' needs and use their feedback to help shape the services we provide. We will also make our customer engagement activities open to all and do all we can to remove any barriers that prevent customers participating.
- 6.4 We will analyse how customers are using and accessing our services, and their opinions about our services, to ensure different groups are treated fairly.
- 6.5 We will make customers aware that we can make reasonable adjustments for them by advertising this on our website and communications. When providing services to customers we will also ask them if they require any adjustments to make the service accessible.
- 6.6 We will make sure all our customer communication is accessible with the use of alternative formats including pictorial audio and translation services where they are needed. Our imagery will reflect the diversity of the communities that we work in.
- 6.7 We will make it clear to our customers how to request information or communication in alternative formats, such as other languages or large print.
- 6.8 All of our website pages will be accessible and we will make sure that our content can be accessed on the widest possible range of browsers and devices.

#### **Translations and interpreting**

- 6.9 Where needed, translations can be provided by a customer's advocate such as a family member or support worker with the customer's consent. For legal or sensitive issues, we will always use a professional translation service if needed.
- 6.10 We will also translate written documents on request where it is practical and cost effective. If we're unable to provide the customer's preferred method or format, we will make sure they understand the information provided by using an alternative where needed, such as audio format.

#### **Antisocial Behaviour and Hate Crime**

- 6.11 We will treat all customers fairly and with respect and we will expect customers to have the same respect for our colleagues contractors and other customers. We will take action against any customer who abuses or discriminates against a colleague contractor, or another customer in line with our Antisocial Behaviour Policy and Hate Crime Policy.

### 7. Partners and suppliers

- 7.1 We will expect our suppliers and partners to share our commitment to equality, diversity and inclusion and our procurement processes will make sure that suppliers' approaches are aligned with ours.

### 8. Legislation and Regulation

#### **Equality Act 2010**

## Equality Diversity and Inclusion Policy

- 8.1 The Equality Act 2010 gives individuals protection from discrimination in the workplace and sets a standard for those providing services. The implementation of this policy will help ensure we comply with the general duty of the Act and are able to demonstrate how we will:
- Eliminate unlawful discrimination, harassment victimisation and other conduct prohibited by the Act.
  - Advance equality of opportunity between people who share a protected characteristic and those who do not.
  - Foster good relations between people who share a protected characteristic and those who do not.
  - Promote equality of opportunity and treating everyone with dignity and respect.
- 8.2 The Act identifies 9 protected groups. These groups have a shared characteristic and are protected from discrimination under the Act (see also Appendix 1).

### **Equality Impact Assessment (EIA)**

- 8.3 Equality Impact Assessments (EIAs) are an effective tool to help organisations meet their Equality Act responsibilities. An Equality Impact Assessment should be undertaken for any new or reviewed policy procedure or programme that may affect our colleagues or customers. This will ensure that any negative or differential impact on those with a protected characteristic is mitigated. Our EIA processes will take into consideration factors such as our colleague and customer diversity data, research findings and survey data. If an EIA shows that a current policy procedure or practice is having an adverse impact, or if opportunities arise which would allow a greater equality of opportunity to be promoted, we will ensure that the policy procedure or practice is revised.
- 8.4 The National Housing Federation Code of Governance 2020 requires boards to demonstrate a clear and active commitment to achieving equality diversity and inclusion in their organisation's activities.
- 8.5 The Regulator of Social Housing's Tenant Involvement and Empowerment Standard requires us to provide choices, information and communication that are appropriate to the diverse needs of our customers, and to treat customers with fairness and respect.

## **9. Diversity Data**

- 9.1 Collecting colleague and customer diversity data enables us to measure and report our performance and progress towards our EDI goals. The purpose of collecting diversity data is to look for differences between groups, identify trends over periods of time, investigate the reasons for these differences and put appropriate actions in place.
- 9.2 We will collect diversity data in a variety of ways. This will include collecting data by protected characteristic for our colleagues and customers. We will explain why we collect this data and how we will use it to understand how fair and inclusive our organisational practices are.

## **10. Responsibilities**

**Senior leadership team**

# Equality Diversity and Inclusion Policy

10.1 The senior leadership team will be responsible for championing this policy and ensuring that the policy is fully complied with. Specific senior leadership team and subsidiary equivalent responsibilities will include the following:

- The Executive Director of Care, Inclusion and Communities will have overall responsibility for the implementation of this policy.
- The Managing Directors and the Director of Community Strategy, Partnerships and Funding will have responsibility for the customer elements of this policy.
- The Group Director of People and Culture will have responsibility for the colleague elements covered by this policy.
- The Chief Finance Officer will have responsibility for the partners and suppliers elements of this policy.

## Managers

10.2 Managers are responsible for supporting the implementation of this policy and role modelling inclusive behaviour through the way that they support those that they manage.

## Colleagues

10.3 Colleagues are responsible for championing equality diversity and inclusion and understanding how this policy relates to their role.

## 11. Learning and development

11.1 All colleagues will have access to learning and development through mandatory and recommended routes to assist them to translate the requirements of this policy into practice. This will include the provision of learning resources within the EDI Resource Hub provided on the Pod, and equality, diversity and inclusion e-learning focussed on the content of this policy and the Group EDI Strategy.

## 12. Equality Impact Assessment

12.1 This policy seeks to ensure that we tackle inequality and discrimination, provide services that meets the needs of our customers and develop and maintain an inclusive diverse workforce. This policy also reinforces our commitment to meeting our responsibilities in relation to the Equality Act 2010 and robustly addressing any discriminatory practices that may occur. Through the effective implementation of this policy, it is anticipated that there will be an overall positive impact in relation to colleagues and customers that have a protected characteristic.

## Approval

<b>Version number</b>	1.1
<b>Effective from</b>	16 April 2024
<b>Policy owner</b>	Executive Director Care Inclusion and Communities

## Appendix 1: Equality Act 2010 Protected Characteristics

The Equality Act 2010 Protected Characteristics are:

## Equality Diversity and Inclusion Policy

**Age** – the Act protects people of all ages. However, different treatment because of age is not unlawful. For example, direct or indirect discrimination can be justified if it can be demonstrated that it is a proportionate means of meeting a legitimate aim. Age is the only protected characteristic that allows employers to justify direct discrimination – for example the age restrictions which apply to joining the Armed Forces.

**Disability (mental and physical)** – the Act makes it easier for a person to show that they are disabled and therefore protected from disability discrimination. Under the Act a person is disabled if they have a mental or physical impairment which has a substantial and long term adverse effect on their ability to carry out day to day activities, such as using public transport, answering telephones etc. As an employer and service provider we have a duty to make reasonable adjustments for colleagues and customers to help them to overcome any disadvantage associated with their disability.

**Gender Reassignment** – the Act provides protection for someone who proposes to, starts, or has completed a process to change their gender. Time taken to undertake appointments relating to gender reassignment is also covered by the Act.

**Marital or Civil Partnership Status** - The Act protects those who are married or in a civil partnership against discrimination.

**Pregnancy or Maternity** – The Act protects a woman against discrimination on the grounds of pregnancy and maternity. Any absence due to pregnancy related illness must be considered when making employment-related decisions.

**Race** – The Act protects individuals against discrimination on the grounds of their race. This includes colour, nationality and ethnic or national origins.

**Religion or Belief** – The Act protects individuals against discrimination on the grounds of their religion. This also includes an individual who has no religion. A religion must have a clear structure and belief system to be protected by the Act. Belief also means a clear and structured belief as well as no belief. Political or scientific beliefs are not covered by the Act.

**Sex** - both men and women are protected under the Act.

**Sexual Orientation** - the Act protects bisexual, gay heterosexual and lesbian people from discrimination.

### Appendix 2: Equality Act 2010 – definitions of discrimination harassment and victimisation

**Direct discrimination.** This occurs when someone is treated less favourably than another person because they have a protected characteristic.

## Equality Diversity and Inclusion Policy

**Associative discrimination.** This is discrimination against a person because they have an association with someone with a particular protected characteristic.

**Perceptive discrimination.** This is discrimination against a person because the discriminator thinks they possess a protected characteristic, even if they do not.

**Indirect discrimination.** This occurs when a policy, rule or procedure applies to everyone but has a disproportionate impact on someone with a protected characteristic.

**Harassment.** The Act defines harassment as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. Bullying is a form of harassment, usually persistent, and often related to an abuse of power or the use of unfair sanctions.

**Third party harassment.** The Act makes an organisation potentially liable for the harassment of an employee by those it does not employ. An employer will only be liable if the harassment has occurred on at least two previous occasions, and if the employer knows that it has taken place and has not taken reasonable steps to prevent it from being repeated.

**Victimisation.** This occurs when an employee is victimised because they have made or supported a complaint or raised a grievance or they are suspected of doing so.