



# Equality, Diversity and Inclusion Policy

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|----------------------------|-------------------|
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| Date approved              | 19 September 2024 |
| Equality Impact Assessed   | 2 September 2024  |
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## 1.0 Introduction

- 1.1 This policy sets out our approach to Equality, Diversity and Inclusion and how we will treat all tenants and prospective tenants with fairness and respect and take action to ensure fair and equitable outcomes.
- 1.2 We have reviewed this policy following a scrutiny review by the InsightXchange.

## 2.0 Purpose

- 2.1 Our vision of improving lives through providing sustainable homes and places is fully inclusive. This policy outlines our commitment to achieving, sustaining, and improving equality, diversity, and inclusion (EDI) in everything we do. It details how EDI considerations are embedded within our culture, processes, and procedures to ensure that we deliver our vision in line with our commitments and are compliant with all applicable legislation and regulation.

## 3.0 Principles

- 3.1 The principles underpinning this policy are aligned to Livin's values of trust, respect, innovate and working together.
  - Trust – We build trust with our customers by being inclusive, responsive and supportive to their diverse needs and delivering the service they need
  - Respect – We listen to customers and employees and respond to their diverse needs in a fair, respectful and caring way
  - Innovate – We will use our data to shape our strategies, policies and services and do things differently when our customers need it to remove or reduce any disadvantage
  - Work together – Our teams and partners will work together in an inclusive and respectful way and will be skilled at providing services that meet the diverse needs of tenants

## 4.0 Definitions

4.1 The key terms used in this policy are defined below.

|               |   |
|---------------|---|
| Equality      | Making sure everyone regardless of their protected characteristic and/or culture is treated fairly and can access the same opportunities and services.  |
| Diversity     | Valuing and respecting the differences between people of different backgrounds, identities, abilities and life experiences so they may access services and communicate free from bias.                            |
| Diverse needs | Understanding that different backgrounds, identities, abilities and life experiences can mean that people have different needs which can affect how they access and receive services in a fair and equitable way. |
| Inclusion     | To make reasonable adjustments to include people that may be excluded due to factors such as age, disability, race, gender or sexuality and ensure they are treated fairly and with respect.                      |

|                           |  |
|---------------------------|--|
| Protected characteristics | <p>List of nine characteristics that it is unlawful to discriminate against. These are:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• Gender reassignment</li> <li>• Marriage and civil partnership</li> <li>• Pregnancy and maternity</li> <li>• Race</li> <li>• Religion or belief</li> <li>• Sex</li> <li>• Sexual orientation.</li> </ul>  |
| Vulnerabilities           | <p>Vulnerabilities are characteristics that someone possesses, either permanently or temporarily, that mean they need support or adjustment/tailoring to live well in their home or to access and receive services. These characteristics also include protected characteristics under the Equality Act 2010.</p>  |
| Customer                  | <p>The term customer in this policy refers to both tenants and prospective tenants that access and receive our services.</p>   |
| Reasonable adjustments    | <p>Reasonable adjustments are specific to an individual. Under the Equality Act 2010 public sector organisations must make changes in their approach or provision to ensure that services are accessible. A reasonable adjustment aims to remove or reduce any disadvantage faced by the person, but in a way that is reasonable for the organisation. Key considerations for reasonable are:</p> <ul style="list-style-type: none"> <li>- It is effective in removing or reducing the disadvantage</li> <li>- It is practical to put in place</li> <li>- It is affordable/sustainable.</li> </ul> |

## 5.0 Scope

- 5.1 This policy applies to all Board members, employees and contractors of Livin.
- 5.2 This policy is aimed at all customers living in our homes, receiving our services and potential residents of our homes. It applies to the delivery of all services that sit within our scope of responsibilities and legal/regulatory obligations as a registered provider of social housing for general needs.
- 5.3 This policy informs our culture, employee behavioural, attitudes and values framework and our recruitment and employment policies and procedures.
- 5.4 In relation to data management, we will ensure that any personal data relating to EDI is collected, stored, consulted and disposed of in line our scope of responsibilities as a landlord and an employer, and complies with the Data Protection Act 2018.

## 6.0 Contribution to Plan A

- 6.1 The policy requires all services to ensure that all tenants receive positive customer experiences regardless of their circumstances or vulnerabilities. Our commitments are fully embedded within our business strategy, Plan A, its delivery plans and supporting policies and procedures, with appropriate equality and vulnerability assessments undertaken wherever relevant. The key equality objectives and targeted outcomes from the six chapters of Plan A 2022/25 are set out in policy statements in section 8 below. These will be amended in future reports to align with the new iteration of Plan A.

## 7.0 Legislative and regulatory framework

- 7.1 The Equality Act 2010 protects the rights of individuals in society and in the workplace and promotes equality of opportunity for all. It is against the law to discriminate against someone because of the following protected characteristics:
  - Age

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

## 7.2 The Public Sector Equality Duty (PSED)

Whilst we are not a public body, we are required to comply with PSED, as set out in the Equality Act 2010, in the provision, allocation, and management of social housing. The PSED requires us to think about how our policies or decisions affect people who are protected under the Equality Act and the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity between people who share a protected characteristic and those who don't
- Foster or encourage good relations between people who share a protected characteristic and those who don't

## 7.3 The Transparency, Influence and Accountability (TIA) Standard

The Transparency, Influence and Accountability (TIA) Standard sets out the following required outcomes which social housing providers must deliver in relation to fairness, respect and diverse needs:

**Fairness and respect:** Registered providers must treat tenants and prospective tenants with fairness and respect

**Diverse needs:** In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective

tenants.

7.4 The TIA Standard sets out the importance of treating all tenants and prospective tenants with fairness and respect. This should be central to all services to tenants. This policy ensures compliance with the specific requirements in the TIA Standard and the Code of Practice.

7.5 The National Housing Federation (NHF) Code of Governance 2020

We have adopted the NHF Code of Governance 2020 and will seek to comply with Principle 1.3 of the Code, which sets out provisions in relation to EDI, including:

- The Board will have a clear and active commitment to achieve equality of opportunity, diversity, and inclusion in all our activities, as well as in its own composition.
- We will have in place policies and statements which meaningfully demonstrate our commitment and set priorities and objectives for the organisation to achieve.
- The Board will seek regular assurance about how these commitments and objectives are being delivered in practice and will track progress against the priorities it has set
- We will publish information about our performance in delivering EDI

7.6 The NHF Code of Conduct 2022

We have adopted the NHF Code of Conduct 2022 and are committed to complying with Part H which sets out expectations that board members and employees conduct themselves professionally and treat others well.

The Chartered Institute of Housing (CIH)'s Professional Standards Equality, Diversity and Inclusion Policy

The CIH's Professional Standards clearly set out the behaviours, attitudes, values, and skills critical to providing inclusive and high-quality landlord services. These standards are fully reflected in our employee competency framework and role profiles.

7.7 Housing Ombudsman Complaint Handling Code (The Code)



The Code sets out the mandatory expectations that when handling a complaint, we will 'make reasonable adjustments for residents where appropriate under the Equality Act 2010'.

## 8.0 Policy statements

### 8.1 Providing services that meet diverse needs

In line with our business strategy, Plan A we will consider the diverse needs of customers throughout the delivery of our strategic objectives and services. We will:

#### Transforming Customer Experience and Digital Services

- Use customer voice and feedback to improve access to services and shape them to ensure they are fit for the future and meet diverse customer needs
- Ensure that customers can access and receive services in a fair and equitable way
- Provide our employees and contractors with the tools, resources and training to respond to diverse customer needs sensitively and with professionalism
- Use Equality and Vulnerability Assessments (EVAs) to analyse diverse needs to inform changes to policies and procedures

#### Planet A

- Provide opportunities for all tenants to live more sustainably in their homes and ensure that energy efficiency solutions are targeted to and benefit those most in need

#### Supporting Sustainable Places

- Use customer voice from local communities to understand the diverse needs and aspirations of individual residents, and groups with shared protected characteristics and reflect these in place-based initiatives and projects
- Value and celebrate the diversity of our communities; promote tolerance, fairness, and social cohesion; and encourage and support our tenants and all residents to thrive

#### Supporting Sustainable Tenancies

- Use customer insight to understand diverse needs and provide personalised, targeted support to promote tenant wellbeing and sustain tenancies
- Promote fairness and transparency and take the diverse needs of tenants and prospective tenants into account when allocating homes

### Providing Quality Sustainable Homes

- Consider the diverse needs and choices of the customer base when delivering health and safety checks, repairs and maintenance, planned maintenance and energy efficiency improvements

### Building and Acquiring Sustainable Homes

- Consider the diverse needs and, where appropriate, choices of the customer base as part of the design and build of affordable homes

## 8.2 Accessing services

To ensure customers can access services in an equitable way, regardless of their protected characteristic, we will

- Monitor and use service access data, including service access by protected characteristic, to ensure customers can access and receive services in a fair and equitable way
- Work with customers to find and agree the most suitable way to ensure equal access to services. This might include the customer appointing a trusted representative or advocate, providing information in alternative formats, or using our translation and interpretation services
- Make sure that customers with disabilities are aware of their rights to receive reasonable adjustments

## 8.3 Employees

As a recruiter and employer, we will

- Ensure that our recruitment and employment practices are fair and transparent
- Endeavour to recruit Board members and a workforce that reflect the diversity of the communities we serve

- Communicate clearly and openly with our employees
- Ensure our employees are role models for professional standards and our values
- Provide appropriate training on EDI to Board members and employees
- Ensure fair access to all learning and development opportunities
- Ensure that our employees are protected from discrimination, harassment or victimisation as far as is reasonably possible to do so
- Respond promptly and effectively to feedback to ensure continuous improvement

## Service Standards and Performance

- 8.4 We will always be polite and treat you with fairness and respect and we will maintain high performance standards in relation to tenant satisfaction in this area.
- 8.5 We will maintain high levels of customer data integrity, safely keep accurate records on protected characteristics and vulnerabilities, and use these to make reasonable adjustments to meet your needs.
- 8.6 We will maintain high levels of employee compliance with our Behaviours, Attitudes and Values framework.
- 8.7 The performance management framework, supported by a range of data quality dashboards will capture and evidence that performance is being met. This will be monitored and reported on in accordance with the table in section 11.1 of this policy.
- 8.8 We will report our performance against service standards to you on our website and provide accessible options so you can use this information
- 8.9 Customer expectations

We expect you to:

- Treat all our employees and contractors with respect
- Be open and honest about your reasonable adjustment needs
- Keep us updated with any changes in your personal circumstances and needs

## 8.10 Feedback and complaints

In line with the Housing Ombudsman's Complaints Handling Code and our Customer Complaints, Compliments and Feedback Policy, we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs.

8.11 Customers can provide feedback about the services they have received in respect of this policy. If a customer is dissatisfied with the service they have received from us, or the way this policy has been implemented they can make a complaint to us in line with our Complaints, Compliments and Feedback Policy.

8.12 We define a complaint as:

'Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, our own employees, or those acting on our behalf, affecting a resident or group of residents.'

8.13 Any restrictions placed on customer contact due to unacceptable behaviour will be appropriate to their needs and be reasonable and proportionate, considering protected characteristics and vulnerabilities where appropriate.

8.14 Any feedback or complaint relating to discrimination or unfair treatment of our customers in service delivery will be handled in accordance with the Complaints, Compliments and Feedback Procedure.

8.15 Any feedback or complaint relating to discrimination or unfair treatment during employment will be handled in accordance with the Dignity at Work or Grievance Procedure.

## Digital Services and communications

8.16 We are committed to the provision of seamless, responsive and convenient services and as such are a digital first organisation. We advocate, encourage and support our tenants to engage with us via the most efficient and effective method, suitable to their needs, and will assist tenants or their advocates to engage with us digitally. Digital copies of this policy and related guidance are available on our website.

8.17 Whilst we are a digital first organisation, we know that some customers may have no means of accessing those services.

In those cases, we will provide information to customers in alternative formats that relates to:

- How services can be accessed
- The standards of service they can expect
- Rent and service charges
- Our responsibilities and theirs for maintaining homes, communal areas, shared spaces and neighbourhoods
- Tenants' rights and their responsibilities
- Our legal obligations and regulatory requirements that we must meet
- How to make a complaint
- How to get involved
- The rights disabled tenants have for reasonable adjustments

## 9.0 Roles and responsibilities

9.1 Roles and responsibilities under this policy are outlined below.

|  |  |
|--|--|
| Board                                    | The Board has overall responsibility for this policy including approval and receives assurance via quarterly performance reports.  |
| Housing and Communities Committee (HACC) | The HACC is responsible for seeking and receiving assurance on monitoring and compliance with this policy.   |
| Executive Management Team (EMT)          | The EMT has oversight over compliance with this policy via assurance reports on policy monitoring and compliance.  |
| Inclusion                                | To make reasonable adjustments to include people that may be excluded due to factors such as age, disability, race, gender or sexuality and ensure they are treated fairly and with respect. |

|                           |  |
|---------------------------|--|
| Protected characteristics | <p>list of nine characteristics that it is unlawful to discriminate against. These are:</p> <ul style="list-style-type: none"> <li>• age</li> <li>• disability</li> <li>• gender reassignment</li> <li>• marriage and civil partnership</li> <li>• pregnancy and maternity</li> <li>• race</li> <li>• religion or belief</li> <li>• sex</li> <li>• sexual orientation.</li> </ul>  |
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|   |   |
|---|---|
| Executive Director of Corporate Services    | The Executive Director of Corporate Services has the strategic responsibility for ensuring legal compliance with EDI in employment and oversees compliance with the employment aspects of this Policy.  |
| Director of Customer Experience and Insight | The Director of Customer Experience and Insight has the strategic responsibility for overseeing the implementation of this policy, as well as providing compliance assurance to the HACCC.  |
| Head of People                              | The Head of People has responsibility for ensuring legal compliance with EDI in employment and the implementation and monitoring of the employment aspects of this policy.  |
| Heads of Service                            | All heads of service are responsible for implementing this policy in their service area, ensuring all customer facing services and related policies and procedures are compliant with this policy, including the actioning of recommendations from EVA's. |
| Customer Experience Manager                 | The Customer Experience Manager has responsibility for the overall implementation and monitoring of this policy and for managing the programme of EVA's.  |
| All managers                                | All managers are responsible for ensuring they and their teams apply this policy in their day-to-day work.  |
| Employees                                   | All employees are responsible for applying this policy in their day-to-day work.  |
| Contractors (Mears Ltd)                     | The partner contractor and its sub-contractors.   |

- 9.2 This policy will be communicated to our customers via our website and employees via the intranet. Those responsible for implementing the policy will be required to formally accept and confirm understanding of the policy and will where required receive appropriate training, advice, and/or guidance.

## 10.0 Related policies and procedures

- 10.1 This policy should be read in conjunction with the following documents

|   |  |
|---|--|
| Transforming customer experience and digital strategy | Our Plan A 2022-25 strategy sets out our vision and plan to deliver 'seamless, reliable and convenient services that customers can influence and trust to ensure their aspirations are met'.   |
| Customer vulnerability policy                         | This Policy sets our commitment and approach to how we listen to, understand, and respond to customers' specific and diverse needs or circumstances in relation to any vulnerabilities they have.  |
| Customer voice policy                                 | Sets our commitment to 'provide a range of ways for tenants to participate in involvement and engagement activities to ensure they have equitable opportunities to scrutinise services and influence key decisions.<br>Where tenants are unable to access customer voice activities due to a vulnerability or protected characteristic, we will work with them to make reasonable adjustments to enable them to access those opportunities.' |
| Complaints, compliments and feedback policy           | Sets out how we will 'respond to reasonable adjustment requests in line with the Equality Act 2010 and we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs.'   |



## 11.0 Monitoring, assurance and review arrangements

11.1 Assurance on compliance with this policy will be gained via a range of methods, as set out in the following table:

| Type of assurance                              | Key source  | Frequency          |
|--|---|--------------------|
| Management assurance                           | Performance metrics: Agreement that the landlord treats tenants with fairness and respect (internal customer satisfaction surveys)  | Quarterly          |
|  | Percentage of customers with vulnerabilities that are satisfied with overall service provided (internal)  | Quarterly/annually |
|  | Agreement that the landlord treats tenants with fairness and respect (TSM)  | Annually           |
|  | Employees meeting behaviours required in the Behaviour and Values framework (internal – check ins)  | Annually           |
|  | Percentage employees meeting respect value in BAV framework (internal – check ins)  | Annually           |
| Corporate oversight                            | Annual Equality, Diversity and Inclusion Report (HACC)  | Annually           |
| Compliance dashboards and data quality reports | <ul style="list-style-type: none"> <li>Customer equality and vulnerability analysis</li> <li>Customer access</li> <li>Customer UDC's (system user defined characteristics)</li> <li>CX Feedback – fairness and respect/satisfaction measures</li> </ul> | Quarterly          |
| Independent assurance                          | External independent review of EDI  |                    |

11.2 This policy will be reviewed every three years, unless there is significant development that would require an earlier review eg, new legislation or regulation.