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| <b>Policy name:</b>                             |  |
| <b>Equality, Diversity and Inclusion Policy</b> |  |
| <b>Section:</b>                                 | Finance and Resources  |
| <b>Exec responsible:</b>                        | Governance Manager   |
| <b>Review by:</b>                               | Director of Housing, Governance Manager and EDI working group  |
| <b>Tenant review:</b>                           | Tenant involvement in EDI group  |
| <b>Authority to amend:</b>                      | Board  |
| <b>Frequency of review:</b>                     | Every three years  |
| <b>Last review:</b>                             | February 2026  |
| <b>Next review:</b>                             | February 2026  |
| <b>Responsibility for delivery:</b>             | All colleagues   |
| <b>Strategy:</b>                                | Within all business strategies and policies  |
| <b>Associated risk ID:</b>                      | R2 – Failure to meet legal and regulatory requirements<br>R4 – Loss of key stakeholder support and reputation<br>R7 – Unable to attract, retain, develop and motivate staff<br>R8 Inadequate and/ or ineffective customer service support and engagement |
| <b>Health &amp; safety:</b>                     | Risk assessments need to take into account individual issues and ensure that appropriate adjustments are in place where required. Health and safety information should be in an accessible format.   |
| <b>Equality &amp; diversity:</b>                | This policy sets the tone for the organisation in respect to EDI.  |
| <b>Associated costs and value for money:</b>    | None   |
| <b>Associated documents:</b>                    |  |

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| <b>VERSION CONTROL</b> |                          |                        |                     |
|------------------------|--------------------------|------------------------|---------------------|
| <b>Version number:</b> | <b>Sections amended:</b> | <b>Date of update:</b> | <b>Approved by:</b> |
| 1.0                    | First issue              | <b>September 22</b>    | <b>Board</b>        |
| 2.0                    | Full review              | <b>February 26</b>     | <b>Board</b>        |

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## 1. Purpose

This policy sets out our commitment to equality, diversity and inclusion (EDI) in our work as an employer and provider of housing. Cornerstone aim to respect and value differences and recognise that diversity enriches our communities. We encourage new ideas and new ways of working.

Equality ensures that everyone is given equal opportunities. Diversity is what makes us different. Inclusion celebrates our diversity. Belonging is about feeling part of a bigger group.

We aim to create an open, fair and respectful culture, where differences are embraced, and where everyone can be themselves at home and work and feels a sense of belonging.

This policy sets out how we comply with relevant legislation and regulatory requirements. It also reinforces our commitment to embedding and celebrating inclusion, equality and diversity as an employer and service provider.

## 2. Scope

This policy sets out our responsibilities in relation to the protected characteristics identified by the Equality Act 2010:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex
- sexual orientation

In addition, although not part of legislation, we consider that people excluded due to their actual or perceived social position, neurodiversity, gender identity, background or social/financial disadvantage and rural isolation are also communities and individuals that require specific attention.

In line with the Equality Act 2010 and the Public Sector Equality Duty, we will give due regard to the need to:

- eliminate discrimination
- advance equality of opportunity
- foster good relationships

We will adhere to the Regulator of Social Housing's Transparency, influence and accountability standard that states:

*Registered providers must treat residents and prospective residents with fairness and respect.*

*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.*

The Housing Ombudsman complaint handling code states:

*Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.*

### 3. Local Context

The National Housing Federation (NHF) uses the Office of National Statistics annual population survey to make the following estimates for the Cornerstone operational area (based on stock location and the 2021 Census).

- 52% female, 48% male
- 26% have a disability
- 97% heterosexual/straight, 2% bisexual, 1% gay or lesbian
- 93% of the population is white, 4% Asian, 3% other ethnic minority

### 4. Objectives

Our policy objectives are to:

- create an inclusive culture where people are treated with dignity,
- challenge inequalities,
- anticipate and respond positively to different needs and circumstances to enable individuals and communities to achieve their potential,
- foster good relations within the communities we serve,
- deliver fair, inclusive and accessible services,
- communicate effectively, understanding and meeting the needs of all our customers,
- ensure our people reflect the communities we serve, wherever possible,
- publish evidence of our EDI impact within strategy updates and our annual report,
- monitor key outcomes with reference to EDI data for example damp and mould, complaints, and lettings.

## 5. Responsibility

### The Board

Set the tone, agree targets, receive the annual report, ensure EDI data is considered in strategic decision making.

### Executive team

Ensure appropriate resourcing, remove barriers, provide EDI data to Board for strategic decision making.

### Management team

Complete equality impact assessments, act on data provided and ensure appropriate adjustments are made in service delivery.

### All colleagues

Treat others with respect, challenge inequality, consider the diverse needs of residents in when delivering services.

## 6. Policy Implementation

We will implement this policy by:

- reporting our progress on EDI with an annual review by the board,
- carrying out an equality impact assessment of our resident and staff policies,
- reporting our gender pay gap annually and moving toward including ethnicity and disability pay gap reporting,
- using data to understand the people who work with us and live in our homes, whilst ensuring we comply with data protection law,
- effectively identifying and promptly challenging prejudice, discrimination, bullying and harassment,
- providing accessible services and communication,
- providing reasonable adaptations for staff to work for us, customers to be involved and for membership of the board,
- providing minor aids and adaptations for residents and reasonable adjustments for staff and residents in line with our policies and procedures,
- providing our people with a range of e-learning and EDI resources and training,
- ensuring contractors and suppliers have an appropriate equality and diversity policy, or commit to comply with our policy,
- encouraging diversity in our workforce, board membership and involved customers (we are recognised as a 'Mindful Employer' [Mindful Employer](#) and are part of the disability confident scheme [The Disability Confident scheme](#))
- encouraging customer involvement and facilitating consultation,
- encourage employment applications from all sections of the community,

- challenge unconscious bias,
- providing a safe space to explore EDI related issues,
- listening, learning and adapting as things change,
- refreshing staff EDI data via annual survey,
- producing and completing an EDI action plan.

## 7. Monitoring And Review

The Board is responsible for ensuring EDI compliance and that monitoring is appropriate and effective.

Relevant EDI data is collected in accordance with data protection regulation and our policy. It is used to assess our compliance with EDI law and good practice and relates to:

- staff, volunteers and job applicants
- board members and applicants
- resident engagement panel
- customers, residents and referrals/applicants
- contractors and consultants
- customer satisfaction.

## Appendix 1 - Definitions

### Equality

Equality is ensuring individuals or groups of individuals are treated fairly and no less favourably, regardless of their protected characteristics. Equality is not about treating everyone the same, but about ensuring that people have equal access to opportunities. It is the *opportunity* that is equal, not the route or the outcome of the opportunity.

### Diversity

Diversity is what makes us different. Age, gender, ethnicity, religion, disability, sexual orientation, education, national background and life experiences, and more are examples of our differences. Celebrating diversity acknowledges and respects differences within and between groups of people.

### Inclusion

Inclusion harnesses and celebrates our diversity to the benefit and greater good of the organisation, those who work in it and the wider industry. It's about bringing diversity into action, allowing everyone to feel included and where people are proud to pull together to create environments of mutual respect.

### Belonging

Belonging is about feeling part of a bigger group. Just because someone is included in our organisation, doesn't mean they feel they belong. People feel that they belong when they are seen and valued for who they are, their true and unique self, which helps them, and people around them, to thrive.

### Discrimination

Discrimination is the unfair treatment of a person or group on the basis of one or more aspects of their identity, or because of stereotyped assumptions and usually results in fewer opportunities for them. Under the Equality Act 2010 people are protected from the following form of discrimination:

- direct - Direct discrimination is when you're treated differently and worse than someone else for certain reasons. The Equality Act says you've been treated less favourably.
- Indirect - Indirect discrimination is when there's a practice, policy or rule which applies to everyone in the same way, but it has a worse effect on some people than others. The Equality Act says it puts you at a particular disadvantage.
- harassment (see below)
- victimisation (see below)

## **Harassment**

Harassment is unwanted behaviour which you find offensive, or which makes you feel intimidated or humiliated. It can happen on its own or alongside other forms of discrimination.

### **Unwanted behaviour could be:**

- spoken or written words or abuse
- offensive emails, tweets or comments on social networking sites
- images and graffiti
- physical gestures
- facial expressions
- jokes

You don't need to have previously objected to something for it to be unwanted.

## **Victimisation**

Victimisation is when someone treats you badly or subjects you to a detriment because you complain about discrimination or help someone who has been the victim of discrimination. Because the Equality Act 2010 recognises you may be worried about complaining, you have extra legal protection when you complain about discrimination.

## **Unconscious bias**

Unconscious bias is when people make quick judgements or decisions about others without realising it, based on stereotypes or past experiences rather than facts. It's a bias we don't know we have, but it still affects how we think and behave.