

Equality, Diversity & Inclusion Policy

1. Introduction

- 1.1 A2Dominion is committed to equality, diversity and inclusion (ED&I) by providing services and that are accessible and inclusive for all our customers and an inclusive environment for colleagues in which everyone has an opportunity to achieve their full potential and feel like they belong.
- 1.2 This policy applies to A2Dominion customers, colleagues, contractors and other stakeholders.
- 1.3 This policy meets the requirements of the Equality Act 2010 and includes consideration of the protected characteristics, related codes of practice and other legislation and regulatory requirements, but not limited to:
 - the Equality Act 2010 (incorporating the Public Sector Equality Duty);
 - the Human Rights Act 1998;
 - the National Housing Federation Code of Governance 2020; and
 - Regulator of Social Housing's Regulatory Framework.

2. Policy aims and objectives

- 2.1 The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation. The nine Protected Characteristics are: race, sex, sexual orientation, gender assignment, disability, religion or belief, age, pregnancy and maternity, marriage or in a civil partnership.
- 2.2 In support of these and in line with our own ED&I plan, we aim to:
 - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and



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- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 2.3 A2Dominion has a duty to address discrimination as an employer, a landlord and as a provider of services We are committed to supporting diversity and managing risks of discrimination beyond the protected characteristics set out in the Equality Act 2010.
- 2.4 We will tackle inequality in its widest sense and challenge discrimination based on social and cultural characteristics such as the protected characteristics above, but also including: socio-economic background; class; appearance; language; accents; education; learning styles; political affiliation and any other matter which causes a person to be treated with injustice.

3. Definitions

- 3.1 **Equality** means that every individual has an equal opportunity to make the most of their lives and talents, a right to be treated the same as everyone else, and to enjoy the same life chances regardless of where, what or whom they were born, what they believe, or whether they have a disability.
- 3.2 **Diversity** means taking account of people's different backgrounds, knowledge, skills, needs and experiences.
- 3.3 **Inclusion** means making effort to make every individual or group feel welcome, accepted and respected.

4. Our ED&I plan and framework

- 4.1 We will have an ED&I framework, including an overarching ED&I Plan and an Equality Impact Assessment (EIA) framework and guidance in place. We will monitor and review to ensure it continues to meet our EDI aims and objectives.
- 4.2 To support the plan and framework we will undertake EIAs on new areas of work, in particular new policies, strategies, plans and/or major initiatives.
- 4.3 Our ED&I plan (2020-25) is for our colleagues, our customers and all those we work with. Achieving our plan will give us more breadth of experience and thinking and will foster creativity, openness and respect leading to a better service to our customers and a positive culture for our colleagues.
- 4.4 Our ambition is:
- **To monitor and narrow key gaps** to achieve and maintain equal pay so that people who do the same jobs are rewarded fairly. We strive to understand, address and reduce gaps in pay at all levels.
 - **To fully represent the diversity of the communities** we serve, across all levels of the organisation. This means getting the best understanding we can

of the customers and communities we work with and working towards improved diversity among our colleagues and senior teams.

- **That our people feel they can be their professional selves** at work and that uniqueness is celebrated. We believe that people perform and collaborate better when they can be genuine and authentic. This means creating and nurturing an atmosphere where people feel they can be themselves.
- **That respect and fairness are at the heart of all we do** so that all our people are treated equally at work, access to opportunities are fair and people can speak out about issues we care about in a safe and open environment.
- **To lead our dialogue** on ED&I issues to foster confidence, inspire customers, colleagues and the sector, so that we all understand why ED&I is important to us and what we are aiming to change and achieve. This will help us all be clear about the part we can play and empower us to talk about the issues that matter to us.
- **To use high quality data** to inform action/share progress so that we have the insights we need to identify challenges to address and so that we can understand, measure and share our progress towards our ambition

5. Specific policy wording for A2D colleagues

5.1 Our aims are:

- Our people to be representative of the customers and communities we serve; and
- Every colleague to feel respected and able to give their best.

5.2 Our approach is set out by the ED&I Steering Board and endorsed and sponsored by our Executive Management team. It is delivered in collaboration with our A2Dominion consultative forum, our Equality, Diversity and Inclusion Network and our Wellbeing Matters Forum.

5.3 Our approach is to build a culture in A2Dominion where everyone is committed to creating an inclusive environment in which everyone has an opportunity to achieve their potential and feel like they belong. To do this we will:

- Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
- Ensure no one is discriminated against because of their protected characteristics (as per the Equality Act 2010).

- Oppose and avoid all forms of unlawful discrimination in how we treat our people at every stage of the employment with us.
- 5.4 Through delivery of our six ambitions and our ED&I strategy we will create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of everyone are recognised, valued and celebrated. See A2Dominion's Grievance policy and procedure for more detail.
- 5.5 We do not tolerate bullying and harassment of any kind. Any allegations of bullying and harassment will be taken seriously, handled confidentially and empathetically and if appropriate, disciplinary action will be taken (dismissal or legal action may result).
- Bullying is unwanted behaviour from a colleague and can be offensive, intimidating, malicious or insulting or an abuse or misuse of power that undermines, humiliates or causes physical or emotional harm to someone
 - By law, harassment is when bullying or unwanted behaviour is related to any of the nine protected characteristics
- 5.6 We will not tolerate victimisation of a person for making any allegations of bullying or harassment or supporting someone making a complaint. Victimisation is also a disciplinary offence.
- 5.7 A2D will investigate any complaint of bullying, harassment or victimisation which is perceived by anyone on the receiving end of it, taking into account all the circumstances to establish whether bullying, harassment or victimisation has taken place and will be handled under this grievance procedure. It can occur face to face/written format/by email/by text including WhatsApp)/on social media and by telephone. Further detail is provided in our Grievance policy and procedure
- 5.8 We will ensure opportunities for training, development and progress are available to everyone. We will encourage every colleague to develop their full potential, to fully develop their talents and resources and maximise the efficiency of the organisation.
- Our decisions concerning our people (for example promotion and access to opportunities) will be based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
 - We regularly review employment practices and our policies to ensure fairness, and to ensure legal compliance. We will listen to our colleagues, including through focus groups, colleague surveys and colleague networks and take appropriate action.

6. Performance Measures and Targets

- 6.1 We monitor the composition of our colleagues, board, committees, and our customer profile in line with the requirements of the Equality duty as set out in the Equality Act 2010.
- 6.2 Measurement is undertaken through:
- Customer data
 - People data
 - Surveys such as Your View and Investors in People
 - Evaluation of projects and initiatives
 - Candidate surveys to assess the importance/recognition of our ED&I position and Employee Value Proposition (EVP) in their decision to apply/accept a job with us (future potential)
- 6.3 We will continue to develop and monitor our performance measures and targets in line with developments in our data and insights.

7. Responsibility and Reporting Arrangements

- 7.1 All colleagues are responsible for ensuring this policy is put into practice and to comply with the formal procedures designed to ensure its successful implementation. Any breach of the policy will be treated as a disciplinary matter.
- 7.2 We provide reports to our Executive Team and Group Board and publish an external report every year. Throughout the year, our data is used by HR and operational teams to monitor progress, identify issues for further work and to inform action to ensure we deliver with equality and fairness at our heart and work towards our ambition.

Roles and responsibilities

Delivery and oversight roles are set out below:

- The ED&I Steering Board oversees delivery of our E&DI plan
- The ED&I Programme oversees and collaborates on projects across customer, colleague and corporate fields
- The Customer Services Committee has oversight of the customer aspects of the ED&I plan and policy, with particular emphasis on the vulnerable persons action plan
- Managers will ensure colleagues are trained effectively to support ED&I plan and policy.

8. Consultation

- 8.1 In developing this policy, we have consulted with:
- Group Board
 - Executive Management Team

- The ED&I Steering Board

9. Equality, Diversity & Inclusion Statement

- 9.1 A2Dominion Group, colleagues, partners, stakeholders and contractors are committed to providing services, which are relevant and appropriate to the needs of people. We will treat others fairly and without discrimination.
- 9.2 We will ensure that all our services relating to this policy are accessible and available for all customers as set out in the requirements of the Equality Act 2010.
- 9.3 An equality impact assessment has been undertaken for this policy, which confirms that the policy has been developed to foster and improve ED&I.

10. Data Protection Statement

- 10.1 The protection of personal data is of great importance to A2Dominion Group and more than just a legal obligation.
- 10.2 A2Dominion Group and affiliate organisations are the data controllers registered with the ICO with the following registration numbers:
- A2Dominion Housing Group Limited: Z4843307
 - A2Dominion Homes Limited: Z9799978
 - A2Dominion South Limited: Z7835340
 - A2Dominion Housing Options Limited: Z5412073
 - A2Dominion Residential Limited: Z3391351
 - A2Dominion Developments Limited: ZA103931
 - Pyramid Plus London LLP: Z3594227
 - Pyramid Plus South LLP: Z3594230
- 10.3 Our data protection policy and procedures are governed by the Data Protection Act 2018. We collect and process personal information in order to provide housing services and meet our contractual and legal obligations. All persons authorised to receive personal data are obliged to handle personal data in accordance with applicable laws and regulations at all times.
- 10.4 For information on how we collect, store, process and use customers' personal data, please visit our website on <https://www.a2dominiongroup.co.uk/privacy-and-cookie-policy>.
- 10.5 For employee related privacy statement, please contact our HR team at hrenquiries@a2dominion.co.uk.
- 10.6 You can also contact the Data Protection Officer / Data Compliance team at governance@a2dominion.co.uk

11. Associated documents

- Equality, Diversity & Inclusion Plan 2020-25
- Equality Impact Assessment Framework

- Chartered Institute of Housing Equality and Diversity Charter
- Grievance policy and procedure

12. Record of amendments

Date	Details of amendment	Name and job title
August 2023	<ul style="list-style-type: none"> • Refresh to tidy up and reduce duplication 	Laura Graham, Head of Corporate Strategy
January 2023	<ul style="list-style-type: none"> • Inclusion of data protection, ED&I statement and EIA • Further detail on bullying and harassment 	Nicky Moore, Head of HR (Centre of Excellence)
November 2021	<ul style="list-style-type: none"> • Full review of policy to align with ED&I plan and customer plan and HR activities • Reference to 2020 amended and updated to 2021 in section 1 (introduction) 	Kam Sandhu Shinger, Policy Manager
February 2020	<ul style="list-style-type: none"> • Refresh to tidy up • Updated to reflect our continued commitment to staff and embed diversity and inclusion across the Group 2019-20 • New objective from the aspirational state: To celebrate the uniqueness of every individual at A2Dominion and create a workplace where everyone feels they can be themselves • Inclusion of reference to KPIs will be reviewed and D&I Steering Board 	Kam Sandhu Shinger