

## Equality, Diversity and Inclusion Policy

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Approved by (relevant group/s)	Board
Reviewed by	CLT, Staff Matters

### STATEMENT OF INTENT

Cottsway understand Equality, Diversity, and Inclusion to mean the following: -

**Equality** is about creating a fairer society where everyone can participate and has the same opportunity to fulfil their potential. Equality is backed by legislation (Equality Act 2010) designed to address unfair discrimination, harassment, and victimisation; advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

**Diversity** acknowledges and values the full range of differences between people both in the workplace and in wider society. Diversity acknowledges that entry into the workplace and an individual realising their potential once there can be influenced by a range of factors beyond the characteristics included within equality legislation, including social, economic, and educational background, professional background, hierarchical level, working style, nationality etc.

**Inclusion** refers to an individual's experience within the workplace and in wider society and the extent to which they feel valued and included.

We are fully committed to promoting the benefits of equality, diversity, and social inclusion/cohesion, ensuring this principle underpins our work. In doing so, we recognise the importance of the protected characteristics stated in the Equality Act 2010, which are:

1. Age
2. Disability
3. Gender reassignment
4. Marriage & civil partnership
5. Pregnancy and maternity
6. Race
7. Religion or belief
8. Sex
9. Sexual orientation.

In addition, we recognise the importance of other characteristics which might need protection from discrimination, such as caring responsibilities, appearance, unrelated criminal activities or social class.

Cottsway commits to tackle unlawful discrimination, promote equality and diversity and to foster inclusion. Our equality, diversity and inclusion commitments help us treat people according to their specific needs and to ensure no individual or group is disadvantaged by any of our policies, procedures, or practices.

We aim to provide and deliver services which meet the needs of the community and are relevant, appropriate, and accessible to all sections of the communities we serve, and to create an environment where diversity is valued and embraced by our staff, our suppliers and customers alike.

We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking and have adopted a zero-tolerance approach to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Signed

A handwritten signature in black ink, appearing to read 'Richard Reynolds', with a stylized, looped initial 'R'.

Richard Reynolds

Chief Executive, signed on behalf of The Board

## Equality, Diversity and Inclusion Responsibilities

Chief Executive and Board	<p>The Board is ultimately responsible for providing effective governance of Equality, Diversity and Inclusion (EDI).</p> <p>The Chief Executive Officer (CEO) is responsible for the effective implementation of the policy. The Board is responsible for:</p> <ul style="list-style-type: none"> <li>• Approving the policy and seeking assurance that the outcomes and commitments are delivered in practise.</li> <li>• Ensuring the organisational culture embeds EDI.</li> <li>• Ensuring the Board has a diverse membership with regard for the diversity of the community we serve and in line with the organisation's stated commitments to EDI.</li> </ul>
Executive Directors	Authorised by the CEO and the Board to ensure the EDI policy is implemented across the business operations.
Deputy CEO	Responsible for monitoring EDI for our customers and to work with the relevant committee(s) to address any areas of concern.
Head of Corporate Services	Responsible for the EDI of all employees of Cottsway in accordance with the policy. This includes ensuring that staff are suitably trained and supported, monitoring EDI in relation to our commitments and associated action plan and reporting progress annually to the Board, ensuring that a summary is available to our customers.
Heads of Service	Responsible for ensuring that all aspects of the policy are properly applied and implemented in their work areas and through their own actions and behaviours and the staff they manage.
Managers and Team Leaders	Responsible for ensuring of employees under their management have received adequate training, instructions, and guidance to carry out any task required in accordance with the policy.
Employees inc. contract, temporary, part time, agency staff and scrutiny group.	Responsible for ensuring that all aspects of the policy are implemented through their own actions and behaviours and for reporting any areas of concern to their manager or team leader as soon as practically possible.

## **1. Scope of policy**

- 1.1. This policy applies to our board, all staff, customers, and visitors to Cottsway properties together with those contracted to work at or for Cottsway.
- 1.2. Equality, diversity, and inclusion (EDI) is integral to all aspects of our housing activity which includes:
  - Governance – incorporating equality, diversity and inclusion considerations into business plans and board/committee reports.
  - Employment.
  - Access to housing - allocating our property in a fair manner.
  - The provision of housing management and maintenance services - taking prompt and effective action to deal with any form of unfair discrimination, hate crime, domestic abuse, bullying or harassment.
  - Customer involvement and engagement
  - Development and regeneration - seeking to ensure within available resources, that housing design, size and adaptations produce stock which is suitable for current needs and can respond to changes in people’s personal circumstances.
  - Shared ownership and leasehold properties.
  - Procurement - requiring contractors’ and partners’ service delivery and employment practices to be consistent with Cottsway’s commitments in this policy.
  - Partnerships - encouraging the local authorities and other agencies with which we work closely to promote equality, diversity, and inclusion.
  - Promoting cohesion and social inclusion
- 1.3 The outcomes from this policy are designed to ensure:
  - our customers and potential customers find it easy to access our services, which reflect and meet their needs and the needs of the diverse communities which we serve.
  - our staff and job applicants are treated fairly in recruitment, selection, terms and conditions of employment, learning and development.
  - our contractors and partners share our commitments to promote equality, diversity and inclusion and this is reflected in the services they provide for our customers and how they treat their staff.

## **2. Our commitments**

### **2.1 Commitment 1 – accessible services that meet customer needs.**

We ensure that all our customers can access our services as easily as possible; and the services we provide meet their needs and they feel valued and included.

We ensure that we are communicating with our customers and service users in ways which are most appropriate for them.

We are committed to ongoing improvement in providing fair, accessible, and inclusive services and will continue to develop our understanding and respond to customer's needs and seek to ensure that services are provided fairly and effectively.

Examples of how we meet this commitment:

- We offer a range of traditional and digital options for accessing services as well as a translation services and an emergency service out of office hours.
- We ensure our website can be used easily by people with visual and hearing impairment and offer a range of languages.
- We measure customer satisfaction by protected characteristics and act on areas of concern.
- We compare and monitor the diversity of our workforce and our Board to see if it broadly reflects our customers and the areas, we operate in.
- We use our ongoing customer satisfaction surveys and feedback, as well as the 3 yearly consultations to identify customers priorities.
- We offer a range of support for more vulnerable people, including adaptations, assisted gardening and decorating service, access to Welfare and Pre-tenancy support and an "Easy Move" scheme to assist with financial and practical support to downsize.

## 2.2 Commitment 2 - A Fair and Inclusive Employer

As well as treating our customers fairly we must also treat our staff fairly. We will recruit, develop, and promote staff fairly and support a culture that enables all staff to achieve their full potential. We will ensure the dignity and rights of all are respected and protected, and the needs of staff are met. We want Cottsway to be an employer who embraces diversity and is inclusive.

Examples how we meet this commitment:

- We monitor diversity of staff with the aim of having a diverse Board and workforce.
- Through our annual staff pulse survey, we provide opportunities for staff to provide feedback and suggest improvements to our ways of working and the services we provide.
- We identify areas for action from the annual staff pulse survey.
- We ensure all staff complete equality, diversity, and inclusion training.
- We offer apprenticeships and work experience.
- We provide learning and development opportunities for our staff.
- We undertake a gender and ethnicity pay gap exercise and action accordingly.
- We are members of the Disability Confident scheme.
- We have signed up to the Menopause Charter.
- We provide an 24/7 advisory and support service for staff.
- We have signed the mental health at work commitment and have mental health champions available to support staff.

### 3. Collecting and Monitoring Data

- 3.1. We will collect relevant data on the protected characteristics, communication requirements and other needs about customers, staff, and Board members. We will use this data to help us understand and meet our staff and customers' needs better, to plan future provision and to monitor our performance against our equality related targets and performance indicators.
- 3.2. We will also use this data when we carry equality analyses for new policies or when reviewing existing ones. These will help us identify needs we might not be meeting and good practice which can be implemented throughout Cottsway.

### 4. Enforcing the Policy

- 4.1. Should any employee believe we have not responded to them in accordance with this policy they have the right to make a complaint which will be managed through our Dignity at Work or Grievance Policies.
- 4.2. In the event of a complaint by a customer relating to EDI, this will be managed through our Complaints and Feedback Policy and Procedure.

### Other relevant policies

Performance Management policy and procedure  
Dignity at Work policy and procedure  
Grievance policy and procedure  
Complaints and Feedback policy and procedure

### List of changes

May 2021	Modern slavery statement added.
Nov 2021	Terminology changed from Equality and Diversity to Equality, Diversity and Inclusion. Amendment to include ongoing awareness sessions.
Apr 2024	Policy reviewed with the following changes made <ul style="list-style-type: none"><li>- Statement of intent added</li><li>- New responsibilities section</li><li>- Addition of section 2, with new commitments.</li></ul>