

## Equality, Diversity and Inclusion Policy

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### Policy Statement & Purpose

#### Our Commitment

At **Bromford Flagship**, we are dedicated to fostering an environment where **equality, diversity, and inclusion** are at the heart of everything we do. We believe that a diverse workforce, representative of our communities and all sections of society, is key to our success. We are committed to eliminating unlawful discrimination and ensuring that everyone, which includes customers, tenants, members of the public and employees and colleagues, feels respected and empowered to give their best whatever their background and circumstances.

#### Our policy's purpose

This policy is designed to:

1. **Promote Equality and Respect:** Ensuring that our customers, tenants and members of the public, and all in our employment, whether temporary, part-time, or full-time, are treated with fairness and respect.
2. **Uphold Legal Standards:** Complying with the Equality Act 2010, protecting against discrimination based on:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race (including colour, nationality, and ethnic or national origin)
  - Religion or belief
  - Sex
  - Sexual orientation

As an employer, we recognise and are committed to our duty to take reasonable steps to prevent all forms of harassment, including sexual harassment and create a safe working environment.

3. **Prevent Unlawful Discrimination:** Opposing and avoiding all forms of unlawful discrimination. This is in areas such as services, goods, facilities, pay, benefits, employment terms, grievances, discipline, dismissal, redundancy, leave for parents and carers, flexible working requests, and opportunities for employment, promotion, training, or development.

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## Scope

This document covers Bromford Flagships approach to equality, diversity, and inclusion and applies to all colleagues. Visitors, contractors and agency/bank workers are also expected to abide by this policy.

This Bromford Flagship Policy includes Bromford Housing Group and Flagship and all its subsidiaries.

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## Our ED&I Commitments

1. **Encouraging ED&I:** We believe that promoting equality, equity, diversity, and inclusion is not only good practice but also makes business sense. We are committed to creating a diverse workforce that reflects the diverse needs of the communities we serve to bring a wealth of perspectives and ideas.
  2. **Creating a Respectful Environment:** We are committed to a workplace free from bullying, harassment, victimisation, and unlawful discrimination. We promote dignity and respect for all, recognising and valuing individual differences and contributions.
  3. **Training and Awareness:** We provide ED&I training and awareness to everyone, which includes the rights and responsibilities of everyone under this policy. Equality and inclusion is considered in all our training, and everyone is expected to contribute to a respectful and inclusive workplace, free of discrimination and harassment and complete all required training and additional learning modules for leaders.
  4. **Recruitment:** We provide inclusive recruitment practices, free from unconscious bias to ensure a fair selection process. We work with local and national organisations to ensure fair access to all our employment opportunities for underrepresented or marginalised groups.
  5. **Accountability:** Everyone should understand that they, as well as the organisation, can be held accountable for acts of bullying, harassment of any kind, victimisation, and unlawful discrimination.
  6. **Addressing Complaints Seriously:** We take complaints of bullying, harassment, victimisation, and unlawful discrimination seriously. Such acts will be treated as misconduct and dealt with under our grievance and disciplinary procedures. Serious complaints may lead to dismissal without notice. Under the **Protection from Harassment Act 1997**, harassment is a criminal offence. Sexual harassment, such as in sexual assault allegations, may amount to both an employment rights matter and a criminal matter. Harassment can take many forms, including unwanted behaviour that makes someone feel intimidated, degraded, or humiliated. This law isn't just limited to
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situations where harassment is related to a protected characteristic; it covers all forms of harassment ensuring that everyone is protected.

7. **Supporting Development:** We are committed to providing opportunities for training, development, and progression for all colleagues and customers. We encourage everyone to develop their skills and achieve their full potential to truly thrive, ensuring that their talents and contributions are fully recognised.
8. **Merit-Based Decisions:** When selecting candidates or colleagues for employment, promotion, training or any other benefit, it is based on their aptitude and ability, except where exemptions and exceptions under the Equality Act may apply.
9. **Continuous Improvement:** We regularly review our employment practices and procedures to ensure fairness and compliance with the law. We update our policies as necessary, to reflect legislative changes.
10. **Monitoring and Evaluation:** We monitor the makeup of our workforce and assess how our ED&I policy and action plans are working in practice. We monitor and assess all stages of the employment lifecycle and review these regularly and take action to address any issues.

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## Responsibilities

**All colleagues** behave with dignity, courtesy and respect and act in a manner that does not discriminate, harass or victimise in accordance with this policy. As part of the annual performance review, all colleagues will be assessed on their behaviours in line with our DNA.

Colleagues are responsible for:

- Treat everyone with dignity, respect and take time to understand how they would like to be treated
- Build rapport quickly with everyone through brilliant communication
- Actively promote inclusion and seek out diversity, new thinking, new ideas and different opinions
- Value and explore other people's contributions
- Recognise own unconscious biases and take positive action to champion efforts to make our organisation more inclusive
- Build strong relationships with all customers, understanding needs and valuing difference
- Undertake the required learning
- Report any witnessed or suspected incidents of discrimination, harassment or victimisation through the relevant channels.

**Leaders** commit to recognising the importance of valuing and role modelling inclusive leadership. Leaders understand that trust and respect are at the heart of all relationships with colleagues and customers and continually hold themselves and each other to account to ensure our actions and decisions reflect a commitment to EDI.

Leaders are responsible for:

- Demonstrating a high standard of behaviour and setting clear expectations to colleagues on what behaviour is acceptable and expected at work
- Fair and inclusive practices in the workplace, including promoting inclusive recruitment practices to attract diverse talent

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- Selection decisions that are based on objective criteria and regularly reviewed recruitment procedures
  - Ensuring equal access to benefits and conditions
  - Fostering a culture in which colleagues feel able to challenge unacceptable behaviour
  - Taking appropriate action to stop unacceptable behaviour such as bullying, harassment and victimisation, ensuring a workplace that is free from unlawful discrimination, harassment or bullying at work
  - Fair processes to deal with work related complaints and grievances
  - Fair processes in the event of making redundancies
  - Ensuring colleagues are encouraged and enabled to reach their full potential, irrespective of their background or protected characteristics, creating equal opportunities for training and development
  - Fulfilling their legal duty to ensure reasonable adjustments are made for colleagues in accordance with the requirements of the Equality Act 2010
  - A robust framework to ensure we can support all our customers to thrive
  - A clear and dynamic approach to customer service, ensuring the needs of customers is at the heart of everything we do

**Talent & Culture Team:** •

The Talent & Culture team is responsible for the development of strategic goals, monitoring progress and coordinating action related to equality, diversity and inclusivity for colleagues.

**The Executive Team is responsible for:**

- Role modelling an inclusive culture and playing an active role in championing the inclusion agenda
- Reviewing the quarterly ED & I dashboard and monitoring performance against targets

**The Board** has overall responsibility for this policy.

We regularly review and update our ED&I related procedures in line with any changes in UK employment law or as a result of the monitoring of the application of this policy. This policy will be available to all colleagues via our intranet

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**Legislative or Regulatory Requirements**

This policy is set within the following legislation:

- Equality Act (2010)
- Protection from Harassment Act (1997)
- Data Protection Act (2018)
- General Data Protection Regulation (2016/679 EU)

More information on the Equality Act (2010) can be found here:

<https://www.gov.uk/guidance/equality-act-2010-guidance>

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**Definitions**

- **Equality** is about creating the same level of opportunity for everyone; recognising that some people face barriers that others do not

- **Diversity** is about recognising and harnessing our differences. Respecting, and valuing each other and creating a workplace that is welcoming and engaging
- **Inclusion** means that we create a truly inclusive culture where different life experiences, viewpoints and perspectives are valued and welcomed
- **Direct discrimination** means actions where people are treated less favourably than others on grounds related to their identity as one of the protected groups
- **Indirect discrimination** occurs where a condition or requirement has been put in place which applies to all, but, in practice, has a detrimental effect upon a group of individuals that cannot be fully justified
- **Victimisation** means the treatment of someone less favourably because they have made or might make a complaint about discrimination under one of the above protected group categories
- **Harassment** is 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’. Harassment may be persistent or an isolated incident. In discrimination law (Equality Act 2010) there are 3 types of harassment:
  - harassment related to certain 'protected characteristics'
  - sexual harassment
  - less favourable treatment as a result of harassment

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### Document Details

**Owner:** Chief Talent and Culture Officer  
**Author:** Head of People/ Director of HR  
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### Version Control

Renewal Date	Version	Approved By	Comments
January 2025	1.0	Board	Policy reviewed for day following Bromford Flagship merger