

Equality, Diversity and Inclusion Policy

Version 1.1

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Version Control

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Table of Contents

1. Introduction	Page 4
2. Values and commitment	Page 4
3. Collective and personal responsibility	Page 5
4. Corporate commitment and continuous improvement	Page 6
5. Use of data and information	Page 7
6. Setting targets, monitoring and review	Page 7
7. Policy review	Page 7
8. Legal and regulatory framework	Page 7
9. Related procedures	Page 9
10. Definitions	Page 9

1. Introduction

Radian Group refers to Radian Group Limited, the parent company and all of its subsidiary companies which, for the avoidance of doubt includes Yarlington Housing Group and its subsidiaries.

- 1.1 Our vision is to promote a culture where Equality, Diversity and Inclusion (EDI) are valued and respected throughout Radian Group.
- 1.2 We recognise that there is inequality in society, in our own communities and in our workplace and we would like to make a difference. We know that organisations can be more effective, innovative and successful because they are more diverse, but we don't think this is the reason for seeking a more inclusive world. It is simpler than that, it is just the right thing to do.
- 1.3 As a social housing provider, we have responsibilities under the Equality Act 2010 to promote equality of opportunity. The Equality Act 2010 makes discrimination unlawful in relation to nine protected characteristics; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
- 1.4 The Public Sector Equality Duty requires housing associations delivering public services to give 'due regard' to the need:
 - i. To eliminate discrimination, harassment and victimisation
 - ii. To advance equality of opportunity
 - iii. To foster good relations - tackling prejudice and promoting understanding.
- 1.5 This policy underpins all policies and major decision making.

2. Values and commitment

- 2.1 We believe that a commitment to Equality, Diversity and Inclusion and the value it brings is a key foundation of our effectiveness as a business and supports us in achieving our Strategy. We will strive to ensure that (wherever possible) we:
 - i. Adopt positive action if required, to ensure that the composition of the Board, customer involvement groups and our colleagues fairly represent the communities we work in
 - ii. Take full account of our customers' and colleagues' diversity, providing services that are appropriate to their needs and aspirations
 - iii. Design and develop our services to meet the diverse needs of our customers

- iv. Encourage all communities to take part in decision making and developing services through customer involvement initiatives
- v. Develop a culture that values people from all sections of society and the individual contributions they make
- vi. Protect customers, Board Members, colleagues and service providers from bullying, harassment, victimisation and unfair treatment
- vii. Create a diverse, engaged workforce and inclusive workplaces
- viii. Encourage tolerance, and understanding of others or their lifestyle choices
- ix. Challenge prejudice, discrimination and harassment where we find it
- x. Promote equality, diversity and inclusion with our customers, communities, partners, stakeholders and our supply chain
- xi. Abide by our statutory and regulatory obligations to promote equality of opportunity, deliver our services with 'due regard' to need, to comply with the duty in the provision, allocation and management of social housing, and to treat all customers and tenants with fairness and respect including protected characteristics and those with additional support needs
- xii. Undertake an annual Equality and Diversity Review which will be approved by the relevant Board Committee
- xiii. Commit to review and/or establish specific Equality objectives once annually

3. Collective and personal responsibility

3.1 All Board members, customer involvement groups and colleagues have a responsibility to implement this policy. Board members are responsible for:

- i. Approving the Equality, Diversity and Inclusion Policy
- ii. Reviewing the Policy and action plans on an annual basis
- iii. Monitoring and analysing performance against targets and agreeing corrective action where appropriate
- iv. Considering the Equality, Diversity and Inclusion of all proposals to the Board, ensuring effective Equality Impact Analysis has been undertaken where appropriate
- v. Helping to embed a culture that properly considers and acts correctly and consistently on Equality, Diversity and Inclusion issues

3.2 The Executive Team are responsible for:

- i. Ensuring Equality, Diversity and Inclusion is included in all corporate strategies
- ii. Ensuring all corporate strategies and substantial business decisions are subject to Equality Impact Assessments
- iii. Monitoring and analysing performance against targets and agreeing corrective action where appropriate

- iv. Embedding a culture that properly considers and acts correctly and consistently on Equality, Diversity and Inclusion issues
- v. Considering and agreeing any significant decisions, requests for change to company policy and budget requests put forward by the EDI Group
- vi. The Executive Director of Strategy, Business Intelligence and HR will act as the champion on this policy and will be responsible for drafting changes to the policy and reporting progress

3.3 The Heads of Department are responsible for:

- i. Implementing this Policy through annual and long-term action plans
- ii. Making sure that this Policy is consistently applied in all areas of work
- iii. Ensuring that their respective departments understand the Policy and are helped to put it into practice
- iv. Taking immediate action to correct the behaviour and conduct of any colleague whose behaviours are not in line with this Policy
- v. Reviewing existing and new policies and procedures to ensure that they align

3.4 The EDI Group are responsible for:

- i. Supporting the company to become increasingly inclusive
- ii. Raising awareness, challenge and innovate on area of Equality, Diversity and Inclusion
- iii. Reporting to the Board on Equality, Diversity and Inclusion performance
- iv. Supporting to identify the impact of business change on Equality, Diversity and Inclusion

3.5 All staff are responsible for:

- i. Practising and promoting Equality, Diversity and Inclusion in their day-to-day activities
- ii. Ensuring that their behaviour and actions comply with and support this policy
- iii. If staff have any concerns regarding Equality, Diversity and Inclusion issues they can talk to their line manager, Head of Department, the HR team, put in an official grievance or invoke the whistle-blowing policy if necessary

4. Corporate commitment and continuous improvement

4.1 We will demonstrate corporate commitment and continuous improvement through:

- i. Designating the Executive Director of Strategy, Business Intelligence and HR to champion Equality, Diversity and Inclusion

- ii. Having an active EDI Group providing appropriate training and guidance to all colleagues, Board members, customer groups, main contractors and partners to ensure that they clearly understand their position in law and their personal responsibilities
- iii. Publishing this Policy and making it available to Board members, colleagues, contractors, suppliers and customers
- iv. Ensuring that commitment to Equality, Diversity and Inclusion forms part of our procurement process
- v. Taking into account Equality, Diversity and Inclusion in everything we do in the business
- vi. Regularly analysing and reporting performance against targets to the Board, customers and colleagues
- vii. Reviewing this policy on an annual basis.
- viii. Updating the policy in-line with new and developing legislation
- ix. Ensuring adequate mechanism for feedback, via EDI Group, performance appraisals and colleague satisfaction surveys

5. Use of data and information

- 5.1 We will collect data on the protected characteristics from colleagues and customers provided that we can demonstrate that we can use this insight to improve how we deliver services and/or prevent unfair or inappropriate treatment.
- 5.2 We will ensure that all data handling is consistent with the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Data Protection Act 2018.

6. Setting targets, monitoring and review

- 6.1 To assess the effectiveness of this Policy monitoring systems are essential. We monitor the collection of protected characteristics data and have established a number of performance indicators. Monitoring of Equality, Diversity and Inclusion priorities and performance are ongoing and reviewed by the EDI Group. Formal update reports are provided to the Board at least twice a year.

7. Policy review

- 7.1 This policy will be reviewed by the Board on an annual basis.

8. Legal and regulatory framework

- 8.1 Equality Act 2010
- 8.2 Employment Rights Dispute Resolution Act 1998
- 8.3 Employment Relations Act 1999
- 8.4 Protection from Harassment Act 1997

- 8.5 Health and Safety at Work Act 1974
- 8.6 Public Interest Disclosure Act 1998
- 8.7 ACAS Code of Practice on Disciplinary and Grievance Procedures
- 8.8 Modern Slavery Act 2015

9. Related procedures

- 9.1 All People and Organisational Development Policies and Procedures
- 9.2 Whistleblowing Reporting Procedure
- 9.3 Customer/Service Provision EDI Procedure
- 9.4 The Annual Equality and Diversity Review Process and the associated objectives agreed and acted upon.
- 9.5 The Impact Analysis papers which accompany every Executive, Board and Committee paper.
- 9.6 Our housing procedures

10. Definitions

- 10.1 We follow plain English guidelines. The complicated terms of this policy are explained here:

Term	Definition
The Equality Act 2010	The Equality Act 2010 makes discrimination unlawful in relation to nine protected characteristics; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
Public Sector Equality Duty	The Public Sector Equality Duty requires housing associations delivering public services to give 'due regard' to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity and to foster good relations (tackling prejudice and promoting understanding).
Regulator of Social Housing's Regulatory Framework	Registered providers are required: to treat all customers and tenants with fairness and respect including protected characteristics and those with additional support needs.