

# Equality, Diversity, and Inclusion (EDI) Policy

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## 1. Introduction

- 1.1 Orbit's vision is to provide amongst the best customer experience of any housing association in the country, and that means being fair and equal to all, irrespective of age, gender identity, sex, disability, race, caring responsibilities, religion/belief or sexual orientation. We recognise that people from different backgrounds and experiences can bring valuable insights to the workplace and our community and enhance the way we work. Feedback, points of view and challenges shape our decision-making, operations and actions providing value to our customers, colleagues, partners, and organisation. Equality, diversity, and inclusion is a fundamental part of our organisation.
- 1.2 This policy outlines our commitment to Equality, Diversity, and Inclusion (EDI) and sets out the framework for promoting and maintaining an environment where all colleagues, customers, contractors and partners are treated fairly, with dignity and respect.
- 1.3 For our customers we aim to ensure that we meet their diverse needs, in all aspects of their service from lettings, repairs and any reasonable adjustment through excellent customer service, being fair, equitable, inclusive, and providing accessible services by default when possible and reasonable.
- 1.4 Orbit is committed to fostering a workplace environment that values and respects diversity, promotes equity, and encourages inclusion. We recognise that a diverse and inclusive workforce is essential to our success and will ensure that all individuals can thrive, irrespective of their background, characteristics, or personal circumstances.
- 1.5 With our partners and our procurement process we will monitor performance and ensure appropriate behaviour. We expect our partners to be committed to and uphold our equality principles

## 2. Legal Framework

This policy is in line with the Equality Act 2010, which consolidates and updates previous anti-discrimination legislation in the UK and has due regard to the Public Sector Equality Duty 2010 (see the Equality Analysis procedure). We commit to meeting our obligations under the Act, ensuring we do not discriminate against individuals based on any protected characteristics

### 3. Definitions

#### Equality

Equality is about breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups, both in employment and for goods and services; the basis of which is supported and protected by legislation.

#### Diversity

Diversity is about people from diverse backgrounds, with different skills, knowledge, and life experiences. It's about empowering people by respecting and appreciating what makes them different. This allows us both to embrace and celebrate the rich dimensions of diversity contained within each individual and place positive value on diversity in the community and in the workforce.

#### Inclusion

Positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.

### 4. Our Commitment to Equality, Diversity, and Inclusion

#### 4.1 Customers

We aim to:

- not tolerate intimidation, discrimination or harassment against or by you based on any protected characteristic, and will act against employees, contractors, agents or customers who behave in this way. They could either face disciplinary proceedings, contract enforcement or tenancy enforcement. This is part of our zero tolerance
- ensure our colleagues use respectful and appropriate communication and positive body language
- collect information about customers to help us to develop and tailor our services to meet different needs
- make information available on request in a format that meets our customers' needs, for example, larger print, audio, translation services or Braille and ensure our website is accessible
- involve and consult with customers and others who reflect the diversity of the communities we serve and will make changes to our services when their feedback tells us this is necessary
- ensure accessibility for our customers, including our involved and engaged customers, where possible.
- Provide reasonable adjustments to for our customers where reasonable and possible. For more information, please see the **Additional Needs and Reasonable Adjustment policy**

4.2 Customers that breach a term of their tenancy agreement in relation to equality and diversity will have appropriate action taken against them in line with our policies, such as;

- Tenancy Management policy
- Hate Incidents policy
- Anti-social behaviour policy

### 4.3 Colleagues

We aim to

- Promote a culture that respects and values diversity and encourages participation by all individuals, regardless of their background.
- Ensure that our recruitment, selection, training, development, and promotion procedures are fair and transparent.
- Ensure that individuals are treated equally and with respect, and that any form of discrimination, harassment, or victimisation is not tolerated.
- Provide a work environment where everyone feels valued, heard, and able to contribute fully to the success of the organisation.
- Ensure equal access to opportunities and resources, providing reasonable adjustments for colleagues and customers with disabilities and other individual needs where necessary. Please see the **Reasonable Adjustment at Work procedure** for more information
- Continuously improve our policies and practices to align with the evolving needs of a diverse workforce and customer base.
- Support and respect individuals' gender identity and ensure that our workplace is inclusive of all gender identities, including transgender and non-binary individuals

### 4.4 Recruitment and Selection

We are committed to promoting equality and diversity through our recruitment and selection process. We will:

- Ensure that all candidates are considered based on their skills, experience, and qualifications, without discrimination based on a protected characteristic.
- Advertise vacancies widely, using a range of methods to reach diverse groups of potential applicants.
- Provide training to staff involved in recruitment to help them make objective, fair and unbiased decisions.
- Review recruitment processes regularly to ensure they are inclusive and accessible to all candidates.

### 4.5 Training and Development

Orbit is committed to providing training and development opportunities that ensure equality of opportunity for all colleagues. We will:

- Provide EDI training to all colleagues to raise awareness of equality, diversity, and inclusion issues.
- Offer development programmes that enable all employees to progress within the company, regardless of background or personal characteristics.
- Encourage the development of leadership talent from diverse backgrounds.

#### **4.6 Contractors, Stakeholders and Partners**

We will not;

- tolerate intimidation, discrimination or harassment from or against contractors, agents or partners, towards or from colleagues, customers or stakeholders. Any breaches of this policy will result in action being taken and may result in the contract being terminated. This is part of our zero tolerance commitment.

When working with others we aim to;

- promote, share information, experiences, and examples of good practice of equality and diversity through links with other organisations' and partners
- promote procurement practices that will ensure contractors and suppliers demonstrate thorough monitoring and action a genuine culture of inclusion and equality of opportunity
- develop working relations with more "third sector" agencies representing and supporting diverse communities and groups

### **5. Responsibilities**

#### **5.1 The Board, Executive Team and Leadership Team**

The Board, Executive Team and Leadership Team are responsible for:

- Providing leadership on this policy and acting as overall champions to ensure that it is implemented
- Championing the policy, internally and externally

#### **5.2 Managers**

Managers at all levels are responsible for:

- Implementing the policy as part of their day to day line-management and applying employment policies and practices in a fair and equitable way
- Ensuring all employees act in accordance with this policy, providing necessary support and direction

#### **5.3 Employees**

Each employee is responsible for:

- implementing the policy in their day-to-day work and dealings with other employees and customers
- ensuring their behaviour is appropriate to this policy and supporting procedure, and they treat people with respect and dignity

5.4 Orbit will not tolerate any behaviour from its employees which breaches this policy. Any such breaches will be regarded as misconduct. Serious offences such as discrimination on protected grounds, including bullying, harassment or victimisation will be treated as gross misconduct. Disciplinary action may include dismissal without notice.

## **5.5 Customers**

Customers that breach a term of their tenancy agreement in relation to equality and diversity will have appropriate action taken against them in line with our policies, such as;

- Tenancy Management policy
- Hate Incidents policy
- Anti-social behaviour policy

## **5.6 Contractors, stakeholders, and partners**

Each contractor, stakeholder and partner are responsible for:

- ensuring their employees behaviour is appropriate to this policy and supporting procedure, and they treat people with respect and dignity
- reporting any concerns regarding the conduct of other employees, customers, the public, contractors or third parties to Orbit

Any breaches of this policy will result in action being taken and may result in the contract being terminated.

# **6. Gender Identity and Expression**

Orbit respects the gender identity and expression of all individuals, whether colleagues or customers. We will:

- Allow individuals to express their gender identity freely and in accordance with their personal preferences.
- Use preferred names, pronouns, and titles for individuals, and ensure that all colleagues are educated to respect these preferences.
- Ensure that colleagues undergoing gender transition are supported throughout the process, providing adjustments where needed.
- Prevent any form of discrimination or harassment based on gender identity, including non-binary, transgender, or gender-nonconforming individuals.

## 7. Performance Controls and Business Risk

7.1 We will monitor and evaluate the effectiveness of this policy and its implementation on an ongoing basis. This will include:

- Regularly reviewing our diversity statistics to identify areas for improvement.
- Gathering feedback from colleagues and customers about their experiences of equality, diversity, and inclusion within Orbit.
- Ensuring that any complaints or incidents of discrimination, harassment, or victimisation are thoroughly investigated and addressed.

The relevant teams will report annually to the Board of Directors on the progress of EDI initiatives, and any improvements made will be communicated to colleagues and customers.

7.2 Orbit will carry out a fundamental review of this policy every three years subject to legal, regulatory changes or in accordance with the agreed Policy Review programme.

## 8. Confidentiality

Any concerns, complaints, or feedback raised under this policy will be treated with the utmost confidentiality, and information will only be shared with those who need to know to investigate the matter or take appropriate action.

## 9. Data retention

Documents and data will be retained as necessary to comply with statutory and legal requirements. The Head of HR Services is responsible for ensuring that any data etc. is held securely and is disposed of in an appropriate and timely manner.

## 10. Complaints

If a customer is unhappy with the way we have handled their reasonable adjustment request or wish to appeal against the decision they should be referred to our **Customer Complaint and Customer Care policy**.

## 11. Essential information

10.1 All Orbit policies and procedures are developed in line with our approach to the following, data protection statement, equality diversity and inclusion (EDI) approach, complaints policy and our regulatory and legal obligations to ensure we deliver services in a lawful manner and treat people equally and fairly. Orbit's privacy policy can be accessed on our website [www.orbitcustomerhub.org.uk/publications/policies/](http://www.orbitcustomerhub.org.uk/publications/policies/)

<b>Regulation &amp; Legislation</b>	This policy links to Equality Act 2010, Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018, Anti-social Behaviour Act 2018, The Rehabilitation of Offenders Act 1974, Human Rights Act 1998, Tenant Involvement and Empowerment Consumer Standard
<b>Approved by</b>	Group Board – September 2021
<b>Supporting documents</b>	Procurement policy and procedure, Business Conduct and Professional Boundaries policy and procedure, Disciplinary policy and procedure, Grievance policy and procedure, Agile working policy, Equality Analysis procedure, Additional Assistance and Reasonable Adjustment policy, Reasonable Adjustment at work procedure, Inclusivity passport documentation, Customer Involvement policy
<b>Scope</b>	Outline clearly Orbit's approach to Equality, Diversity and Inclusion and what it means to our organisation so that it can be delivered and lived by our customers, employees and partners.
Reference to “Orbit” means Orbit Group which consists of Orbit Group Limited, Orbit Housing Association Limited, Orbit Homes (2020) Limited, Orbit Treasury Limited and Orbit Capital Plc.	

<b>EA</b>	Equality Analysis was completed in May 2021 and is available to view.
<b>DPIA</b>	A DPIA was completed and is awaiting approval and is available to view.
<b>Consultation</b>	<b>Internal:</b> EDI allies, Employee Ambassadors, Orbit Homes, Customer Services, Procurement, Human Resources, People Development, Communications
	<b>External:</b> Customers, Contractors, Partners, EDI Consultant
<b>Applies to</b>	All Employees

# Document control

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Doc Level 1

Author	Susan Duttaroy	Sponsor	Afzal Ismail, Helen Moore, Paul Richards, Helen Nicholson-Rhodes, Jonathan Wallbank
Team	All	Department	All

Directorate

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Approved by	Director of HR	August 2025
Next review		Qtr 4 2026/27

## Revision History

Version Number	Date	Comments / Reason for revision
V2.0	Nov 2020	Rewrite needed to reflect Orbit's position and merge Reasonable Adjustment policy, EA policy
V2.1	Sept 2025	Desktop review for review cycle to enable results of EDI audit