

Equality, Diversity and Inclusion Policy

Reference	EDI Policy	Version	2
Staff affected	All staff	Issue date	
Approved by	Executive Management Team	Review Date	August 2026
Lead Officer	Director of Operations	Next Review	By August 2029

1. Policy Purpose

Arches Housing is committed to providing homes, services and workplaces where people are treated with fairness, dignity, respect and compassion.

Equality, diversity and inclusion are central to how we work with tenants, colleagues, Board members, contractors, partners and the communities we serve.

We recognise that people have different experiences, needs and barriers. We will take proactive steps to understand those differences, remove unfair barriers, make reasonable adjustments where required, and ensure that our services and employment practices are accessible, inclusive and fair.

This policy supports our organisational values and confirms our commitment to treating tenants, applicants, colleagues, Board members, contractors, suppliers and partners fairly and respectfully;

- preventing unlawful discrimination, harassment and victimisation;
- promoting equality of opportunity and good relations between people and communities;
- ensuring tenants and colleagues can influence the services and decisions that affect them;
- using information and insight to understand diverse needs and deliver fair and equitable outcomes;
- meeting our duties under the Equality Act 2010 and relevant housing, employment, health and safety, safeguarding, data protection and social housing regulatory requirements.

We will ensure that equality, diversity and inclusion are embedded in the way we design, deliver, monitor and improve services.

2. Policy Scope

This policy applies to:

- all tenants, leaseholders, shared owners, housing applicants and other service users;
- all employees, agency workers, volunteers, Board members and committee members;
- contractors, consultants, suppliers and partner organisations acting on behalf of Arches Housing;

- all services, policies, procedures, employment practices, governance arrangements and tenant engagement activities.

Everyone working for or on behalf of Arches Housing is expected to uphold this policy.

3. Legal and regulatory framework

This policy is informed by current legislation, regulation and good practice, including:

- Equality Act 2010;
- Human Rights Act 1998;
- Public Sector Equality Duty principles, where relevant to our work and partnerships;
- Health and Safety at Work etc. Act 1974;
- Protection from Harassment Act 1997;
- Rehabilitation of Offenders Act 1974;
- Data Protection Act 2018 and UK GDPR;
- Social Housing (Regulation) Act 2023;
- Regulator of Social Housing consumer standards, including the Transparency, Influence and Accountability Standard;
- Housing Ombudsman Complaint Handling Code;
- safeguarding duties and relevant housing management obligations.

The Equality Act 2010 replaced earlier equality legislation, including the Disability Discrimination Act 1995, Race Relations Act 1976, Sex Discrimination Act 1975 and Equal Pay Act 1970. References to equality law in this policy should therefore be read in line with the Equality Act 2010 and any subsequent amendments or statutory guidance.

4. Protected characteristics and wider inclusion

The Equality Act 2010 protects people from discrimination because of the following nine protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race, including colour, nationality and ethnic or national origins;
- religion or belief;
- sex;

- sexual orientation.

Arches Housing also recognises that people may experience disadvantage or barriers linked to wider circumstances, including but not limited to caring responsibilities, socio-economic disadvantage, language barriers, literacy, digital exclusion, mental health, neurodiversity, domestic abuse, homelessness, offending history, immigration status and rural or community isolation.

We will consider intersectionality, recognising that people may experience discrimination or disadvantage because of more than one characteristic or circumstance.

5. Our equality, diversity and inclusion objectives

Arches Housing Limited will focus on four strategic objectives: Learn, Connect, Deliver and Support.

5.1 Learning

We will improve our understanding of tenants, applicants, colleagues and communities so that services and employment practices are shaped around real needs.

We will:

- collect, maintain and use equality and diversity information lawfully, transparently and proportionately;
- explain why diversity information is requested and how it helps us improve services;
- use complaints, feedback, tenant insight, workforce data and service performance information to identify unfair barriers or unequal outcomes;
- provide training and awareness for colleagues, managers, Board members and relevant contractors;
- promote inclusive language, respectful behaviour and cultural awareness;
- keep our policy, procedures and guidance under review.

5.2 Connections

We will create meaningful opportunities for tenants, colleagues and communities to influence services and decisions.

We will:

- involve tenants and colleagues in the development and review of strategies, policies, procedures and services;
- ensure involvement opportunities are accessible and inclusive;
- provide information in clear, accessible and appropriate formats;
- support tenants to take part in scrutiny, consultation and engagement activities;
- listen to people with lived experience and use their insight to improve services;
- work with local partners, community groups and specialist organisations where this helps us better understand and respond to diverse needs.

5.3 Delivery

We will deliver services and employment practices that are fair, accessible and inclusive.

We will:

- assess the equality impact of new and reviewed policies, procedures, service changes and key decisions;
- make reasonable adjustments for disabled tenants, applicants, colleagues and job applicants;
- ensure recruitment, selection, promotion, learning and development opportunities are fair and inclusive;
- ensure contractors, consultants and suppliers understand and comply with our equality expectations;
- provide accessible routes for tenants to contact us, use services, raise complaints and request support;
- consider equality, diversity and inclusion in procurement, service design, housing management, repairs, allocations, tenancy support and tenant engagement;
- take prompt action where discrimination, harassment, victimisation or hate incidents are reported.

5.4 Support

We will support people to achieve fair outcomes and access the services, opportunities and assistance they need.

We will:

- tailor services where reasonable and appropriate to meet individual needs;
- support tenants and applicants who need help to access online, telephone, written or in-person services;

- allow tenants and applicants to be supported by advocates, representatives or carers where appropriate;
- work with partner agencies to support tenants affected by vulnerability, safeguarding concerns, domestic abuse, hate crime, mental health issues or other support needs;
- ensure colleagues know how to identify and respond to additional support needs;
- promote a workplace culture where colleagues feel safe to speak up, request adjustments and challenge inappropriate behaviour.

6. Roles and responsibilities

6.1 Board

The Board has overall responsibility for ensuring that Arches Housing promotes equality, diversity and inclusion and complies with relevant legal and regulatory requirements. The Board will receive appropriate assurance on progress, risks and outcomes.

6.2 Executive Team

The Executive Team is responsible for implementing this policy, setting expectations, allocating resources, monitoring performance and ensuring equality, diversity and inclusion are embedded across the organisation.

6.3 Managers and Team Leaders

Managers and Team Leaders are responsible for:

- applying this policy in day-to-day service delivery and employment practice;
- promoting inclusive behaviour within their teams;
- ensuring colleagues receive appropriate guidance, training and support;
- identifying and addressing barriers to fair access and outcomes;
- responding appropriately to concerns, complaints or incidents.

6.4 Employees

All employees must:

- treat tenants, colleagues, partners and the public with dignity, fairness and respect;
- comply with this policy and related procedures;
- avoid discriminatory, harassing, victimising, bullying or intimidating behaviour;
- challenge inappropriate behaviour where safe and appropriate to do so;
- report concerns in line with relevant procedures;
- support reasonable adjustments and inclusive service delivery.

6.5 Contractors, consultants, suppliers and partners

Contractors, consultants, suppliers and partners working on behalf of Arches Housing Limited must act consistently with this policy and any equality requirements set out in contracts, service specifications or partnership arrangements.

7. Types of unlawful or unacceptable behaviour

Arches Housing Limited will not tolerate discrimination, harassment, victimisation, bullying, hate incidents or any conduct that undermines dignity, fairness or inclusion.

7.1 Direct discrimination

Direct discrimination occurs where a person is treated less favourably because of a protected characteristic.

7.2 Indirect discrimination

Indirect discrimination occurs where a provision, criterion or practice applies to everyone but disadvantages people who share a protected characteristic and cannot be objectively justified.

7.3 Discrimination arising from disability

Discrimination arising from disability occurs where a disabled person is treated unfavourably because of something arising in consequence of their disability and the treatment cannot be justified.

7.4 Failure to make reasonable adjustments

A failure to make reasonable adjustments can occur where an organisation does not take reasonable steps to remove or reduce disadvantage experienced by a disabled person.

7.5 Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

7.6 Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

7.7 Victimisation

Victimisation occurs where someone is treated badly because they have made, supported or are believed to have made or supported a complaint or allegation of discrimination.

7.8 Hate incidents and hate crime

A hate incident is any incident perceived by the victim or any other person to be motivated by hostility or prejudice based on disability, race, religion, sexual orientation, transgender identity or another personal characteristic. Where a criminal offence may have been committed, this may be a hate crime.

8. Reasonable adjustments and accessible services

Arches Housing Limited will make reasonable adjustments to remove or reduce disadvantage for disabled people, including tenants, applicants, colleagues, job applicants and others using our services.

Adjustments may include, where reasonable and appropriate:

- providing information in alternative formats;
- adapting communication methods;
- allowing additional time or support;
- changing appointment arrangements;
- supporting access to online services;
- adapting working arrangements;
- making physical or environmental changes;
- changing a policy, process or practice where it creates unnecessary disadvantage.

Requests for adjustments will be considered promptly, fairly and on an individual basis.

9. Tenant involvement, communication and access

We will ensure tenants and prospective tenants are able to access services, understand what to expect from us, raise complaints, influence decisions and hold us to account.

We will:

- provide clear and accessible information about landlord services;
- communicate in ways that meet tenants' diverse needs;
- ensure services are accessible and that accessibility arrangements are publicised;
- support tenants who need help to use digital services;
- provide opportunities for tenants to influence and scrutinise services;
- explain how tenant feedback has influenced decisions;

- ensure complaints are handled fairly, effectively and promptly.

10. Employment, recruitment and workforce inclusion

Arches Housing Limited is committed to being an inclusive employer.

We will:

- recruit, select and promote on merit using fair, transparent and inclusive processes;
- make reasonable adjustments for job applicants and employees;
- provide equitable access to learning, development and progression opportunities;
- monitor workforce diversity where data is available and appropriate;
- address barriers to inclusion and under-representation where identified;
- support flexible and inclusive working practices where possible;
- take action to prevent and respond to bullying, harassment, discrimination and victimisation.

Positive action may be used where lawful and appropriate to encourage participation or applications from groups that are disadvantaged, have different needs or are under-represented.

Positive discrimination will not be used unless specifically permitted by law.

11. Procurement and partnerships

We expect organisations working with or for Arches Housing Limited to support our commitment to equality, diversity and inclusion.

We will:

- include equality expectations in relevant procurement and contract management processes;
- consider accessibility, fairness and inclusion in service specifications;
- require contractors and suppliers to comply with relevant equality legislation;
- take action where contractor or supplier behaviour falls below expected standards.

12. Equality impact assessment

We will consider equality, diversity and inclusion when developing or reviewing key strategies, policies, procedures, service changes and decisions.

Equality impact assessments or proportionate equality analysis will be used to:

- identify potential barriers or adverse impacts;

- consider the needs of people with protected characteristics and other support needs;
- identify opportunities to advance equality and improve access;
- record actions needed to reduce disadvantage or improve outcomes.

13. Data, monitoring and confidentiality

We will collect and use equality, diversity and inclusion data only where there is a clear and lawful purpose.

We will:

- explain why information is being requested;
- handle personal data securely and confidentially;
- use data to understand needs, monitor outcomes and improve services;
- avoid using data in ways that unfairly disadvantage individuals or groups;
- report progress in a proportionate and transparent way.

14. Complaints, concerns and breaches

Tenants, applicants, colleagues, contractors and others may raise concerns if they believe this policy has not been followed.

Concerns may be raised through relevant procedures, including:

- complaints procedures;
- anti-social behaviour or hate incident reporting routes;
- safeguarding procedures;
- grievance procedures;
- disciplinary procedures;
- whistleblowing arrangements.

Arches Housing Limited will take concerns seriously and respond fairly, promptly and proportionately.

Breaches of this policy may result in action under relevant tenancy, employment, contract or governance procedures.

15. Training and awareness

We will provide appropriate equality, diversity and inclusion training and guidance for colleagues, managers, Board members and others where relevant.

Training may include:

- equality law and protected characteristics;
- reasonable adjustments;
- inclusive communication;
- unconscious bias and inclusive decision-making;
- hate incidents and harassment;
- safeguarding and vulnerability;
- equality impact assessment;
- accessible services and tenant engagement.

16. Monitoring, review and reporting

This policy will be reviewed regularly and updated when legislation, regulation, organisational priorities or good practice change.

Progress will be monitored through a range of measures, which may include: tenant and colleague feedback;

- complaints and learning from complaints;
- service access and outcome data;
- equality impact assessments;
- workforce information;
- tenant involvement and scrutiny activity;
- tenant satisfaction measures;
- internal audits and assurance reports;
- Board and committee reporting.

An action plan may be developed to support delivery of this policy and to track progress against equality, diversity and inclusion objectives.

17. Linked policies and strategies

This policy should be read alongside relevant Arches Housing Limited policies and strategies, including where applicable:

- Code of Conduct;
- Complaints Policy;
- Anti-Social Behaviour Policy;
- Safeguarding Policy;
- Domestic Abuse Policy;
- Access to Homes Policy;
- Tenancy Management Policy;
- Repairs and Maintenance Policy;
- Tenant Support & Service Adjustment Policy;

- Recruitment and Selection Policy;
- Grievance Policy;
- Disciplinary Policy;
- Whistleblowing Policy;
- Data Protection Policy;
- Tenant Voice Strategy;
- Health and Safety Policy.

18. Review and Publication

This policy will be reviewed:

- At least every three years
- Following significant legislative change
- After serious incidents or regulatory findings

This policy will be published on the Arches Housing website.