

<b>Policy</b>	<i>Equity, Diversity and Belonging</i>
<b>Scope</b>	The policy is applicable to all colleagues, customers, clients, communities, suppliers and contractors, whether permanent or temporary. The policy also applies to all processes relating to employment and training.
<b>Purpose</b>	To set out the Group's approach to equity, diversity, inclusion and belonging. .
<b>Roles and Responsibilities</b>	<ul style="list-style-type: none"> <li>• <b>Human Resources</b> - policy owner; ensure this policy is up to date, incorporates best practice and is legally compliant; provide advice and support; oversight of consistency of application.</li> <li>• <b>Colleague</b> - – understand and adhere to policy; ensure actions are completed in a timely manner; ensure their own behaviour and conduct is appropriate; awareness of escalation of issues.</li> <li>• <b>Line Manager</b> – responsible for the implementation of the policy; decision making; carrying out the required actions in a timely manner; reporting, maintaining compliance and following the policy; escalation of issues.</li> </ul>
<b>Effective Date</b>	May 2024 (next review date – 2027)
<b>Version</b>	V3.0 (Supersedes all prior versions of this policy) Executive Director, People, Culture and Engagement

## Introduction

### General

This policy is issued by way of guidance on the Group's policy and practice. It does not form part of an employee's contract of employment or otherwise have any contractual effect on Gentoo's Terms and Conditions.

This policy may be varied, withdrawn or replaced at any time by the Group at its discretion.

### Contribution to organisational goals

The vision and values of the Group effectively set the headline rationale and culture for the Group. This policy operates within the vision and values.

### Monitoring and review

This policy will be reviewed every three years, or in line with legislation or business needs.

Overall accountability for this policy lies with the Executive Director People, Culture and Engagement and responsibility lies with the People Services Head of HR. This policy is grade 3 and changes require the approval of the Executive Director People, Culture and Engagement.

### Accessibility

If any reasonable adjustment is needed please advise the HR team who will make appropriate arrangements.

### Regulation and Legislation

- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Employment Rights Act 1999
- Gender Recognition Act 2004
- Equality Act 2010
- Modern Slavery 2015
- Regulator of Social Housing Consumer Standards 2024

## Policy

### Introduction

Gentoo is fully committed to fostering a strong culture that drives fairness, courtesy, and respect. It aims to eliminate unlawful and unfair discrimination and values the differences that a diverse workforce brings to the business. The Group will not discriminate because of any other irrelevant factor and will take action to deliver fair and equitable outcomes and a culture that values openness, fairness, and transparency.

All colleagues are responsible for the promotion and advancement of this policy. Behaviour, actions or words that breach the policy will not be tolerated and will be dealt with in line with the Group's disciplinary policy.

We are committed to the principles of diversity and inclusion throughout the Group, and we will:

- Treat everyone equally, fairly, and with respect.
- Welcome and value difference and not tolerate discrimination, harassment or victimisation of any individual or groups.
- Challenge the behaviour of those who do not uphold our values and go against our principles.
- Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities.

We will take action to remove barriers faced by people from different groups, providing:

Fair access to our services

Fair outcomes for the people using our services

Fair opportunities to participate and be involved in shaping our services

Use relevant information and data to understand the diverse needs of individuals, including those arising from protected characteristics, language barriers, and additional support needs.

### Diversity, Inclusion, and Belonging

**We are passionate about celebrating differences and are clear on the approach we take. This means:**

<b>Equity</b>	<p><b>Treating people fairly; this is not the same as treating everyone the same way. We believe no one should experience less favourable treatment, discrimination or be at a disadvantage. Everyone should have the same chances and opportunities and we must acknowledge and make adjustments to ensure this happens.</b></p> <p><b>Providing fair and equitable outcomes for colleagues and customers.</b></p>
<b>Diversity</b>	<p><b>Recognising, respecting, and celebrating the differences in each of us. The many parts of a person’s character and identity make them unique.</b></p>
<b>Inclusion</b>	<p><b>Creating an environment where everyone feels safe, valued, and involved. We understand someone’s differences, so that they are included in a way that suits them and they are treated fairly.</b></p>
<b>Belonging</b>	<p><b>It’s the level of inclusion people feel in their environment – it is feeling heard, supported, respected, and given equal opportunities to participate and contribute.</b></p>

The Group is committed to the principle of diversity and inclusion for all colleagues and customers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.

The Group is committed to diversity and inclusion to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.

We aim to create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all colleagues are recognised and valued.

The Group will review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

## **Discrimination**

Colleagues must not unlawfully discriminate against or harass other people, including current and former colleagues, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

**Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay, or treating a customer differently.

**Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

**Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

**Victimisation:** retaliation against a colleague or customer who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.

**Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### *Recruitment and selection activities*

The Group will monitor the composition of the existing workforce and of applicants for jobs (including promotion), and will aim to take steps to improve the diversity of our workforce and provide equality of opportunity.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job.

All colleagues who participate in recruitment and selection activities will receive training in issues of diversity and inclusion in employment.

Candidates who identify with having a disability and meet the essential criteria will be shortlisted for interview for posts within the Group.

Job applicants should not be asked questions that might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

The Group is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.

#### *Training, education, and development*

The Group recognises the need to invest in a range of different learning and development opportunities to develop colleagues.

The Group will make opportunities for training, development, and progression available to all colleagues, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Group.

Access to such opportunities will be provided on the basis of the needs of the business.

All employees will be given equal consideration for training and development.

The Group will provide training in diversity and inclusion to all colleagues. Mandatory training will be provided as part of the induction process for new starters and regular refresher training and additional workplace specific training will be made available.

#### *Terms and conditions*

The Group will ensure all terms and conditions relating to pay and benefits, disciplinary, grievance and selection for redundancy are inclusive and non-discriminatory.

The Group will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked, and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the business considers it has good reasons, unrelated to any protected characteristic, for doing so.

The Group will comply with its obligations in relation to statutory requests for contract variations. The Group may also make reasonable adjustments to its standard working practices to overcome barriers wherever possible.

The Group will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the business. Employees should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

#### *Leave and flexible working*

The Group operates a programme of work-life balance initiatives to support and promote a good work-life balance and recognise the variance in working patterns of employees.

The Group will ensure policies relating to flexible working, leave for parents, maternity and paternity are inclusive and non-discriminatory, recognising and reflecting the needs of all employees within the Group.

#### **Gender pay gap reporting**

In line with current legislative reporting requirements, the Group will carry out Gender Pay Gap reporting under the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

This involves carrying out six calculations that show the difference between the average earnings of men and women within the Group.

The Group is required to publish its results on an annual basis, within one calendar year of April 5<sup>th</sup> every year.

#### **Equal pay**

As part of its commitment to diversity and inclusion, the Group is committed to addressing inequality when it is identified.

The Group believes that its male and female colleagues should receive equal pay for:

- The same or similar work
- Work rated as equivalent under a job evaluation study; or
- Work of equal value.

Gentoo aims to ensure that it operates a fair and transparent pay system based on objective criteria and free from gender bias. The Group will do this by:

- Carrying out regular audits of pay and benefits for existing employees and initial pay and benefits for new starters within the Group, including those on maternity leave, sick leave, and career breaks.
- Providing training for all managers and colleagues who are involved in salary reviews on equal pay issues.
- Informing colleagues how their pay has been determined.
- Treating any grievance in relation to equal pay as a priority

Terms and conditions of employment covered by collective agreements will be negotiated between Gentoo and recognised trade unions through HR. As part of those negotiations, the Group will consult on equal pay issues.

### **Transgender status**

Gentoo is committed to welcoming and supporting transgender colleagues and removing barriers to their recruitment, promotion, and retention. Providing a working environment that is free from discrimination, harassment, or victimisation because of gender identity is an important step in ensuring that transgender employees are respected and valued.

We recognise that transgender job applicants and colleagues are not required to inform the Group of their gender status or gender history. The gender in which an individual chooses to present will always be acknowledged and respected.

To promote a workplace that is inclusive of transgender people, please refer to the Transgender Toolkit for further advice.

### **Protected characteristics**

The Group recognises its responsibilities in respect of each of the nine protected characteristics specified in the Equality Act 2010 and will not unlawfully discriminate because of age, disability, gender reassignment, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

The Group will:

- Commit to ensuring that all individuals are treated with dignity and respect
- Ensure that support is available to all employees to support them to fulfil their roles.

- Provide training and guidance for all employees and managers on protected characteristics.
- Ensure that where an employee requires any workplace adjustments during the course of their employment, the appropriate adjustments are put in place.
- Be committed to inclusion and equality of opportunity for all employees regardless of a protected characteristic.
- Strive to ensure that the work environment is free from harassment and bullying.
- Support employees in their role who are returning from a period of leave.
- Report on its gender pay gap, in line with legislation.
- Monitor the make-up and composition of the workforce regarding information relating to protected characteristics in encouraging diversity and inclusion, recruitment practices, and any other information relating to protected characteristics the Group believes appropriate to monitor.

The Group recognises that colleagues may have multiple, overlapping identities that impact their experience in the workplace, including multiple discrimination and disadvantage. We therefore take an intersectional approach to EDB.

### **Overcoming barriers**

Gentoo recognises the importance of taking proactive measures to remove barriers from the working environment. As an organisation, we firmly believe that equality matters.

The Group is committed to removing barriers and challenging discriminatory behaviours. It is recognised that this will benefit not only colleagues and prospective colleagues but also in many cases customers and visitors. It will ensure that the Group is able to recruit and retain the best employees on the basis of their abilities and individual merit.

The diversity and inclusion action plan will aim to address physical access to premises, access to benefits of employment, terms and conditions of employment, recruitment, and arrangements for recruitment, performance assessment, promotion, and retention.

### **Group Equity, Diversity, Inclusion and Belonging Principles**

Gentoo acknowledges that encouraging diversity in the workplace is good practice and makes business sense.

As part of our commitment to diversity, inclusion, and belonging the following Group Principles the Group will:

- Ensure that there is a supportive working environment.
- Ensure that the Board, Executive, and Leadership team are accountable for the embedding of the principles and plan for reviewing performance.

- Establish a Group Wide Steering group that will work with the Executive of People, Culture, and Engagement to embed the policy and shape the annual plan.
- Develop a Group Wide Equity, Diversity, and Belonging action plan on an annual basis, reviewing each year and reporting the outcomes to the Executive and the Board.
- Involve customers and colleagues in identifying priority actions within the plan which is reviewed annually in collaboration with the EDB Steering Group.
- Develop colleague networking groups and encourage colleagues to join.
- Ensure, through our Values and training colleagues know what standards of behaviours are expected of them.
- Undertake equality impact assessment, which shows how equality and diversity informs business objectives and how the quality analysis is transparent, monitored, reported, and acted upon.
- Take seriously complaints of bullying, harassment, victimisation, and unlawful discrimination by fellow colleagues, customers, suppliers, visitors, the public, and any others in the course of the organisation's work activities.
- Initiate disciplinary proceedings against any employee who is found to have committed an act of unlawful discrimination.
- Take reasonable steps to ensure our partners, suppliers, and groups connected to Gentoo are committed to our EDB principles.

## **Disabilities**

If a colleague is disabled or becomes disabled, the Group encourages colleagues to advise us about their condition so that the Group can consider what reasonable adjustments or support may be appropriate.

## **Part-time and fixed-term work**

Part-time and fixed-term colleagues should be treated the same as comparable full-time or permanent colleagues and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

## **Breaches of this policy**

The Group takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

If a colleague believes that they have suffered harassment, bullying, or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against colleagues who complain about or report discrimination. If a colleague believes they have been victimised for making

a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, they should raise this through the Group's Grievance Procedure.

The Group encourages the reporting of all types of potential discrimination, as this assists the Group in ensuring that diversity, equity, and belonging principles are adhered to in the workplace. However, making a false allegation in bad faith, or that an employee knows to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

### **Employee responsibilities**

Every colleague is required to assist the Group to meet its commitment to diversity and inclusion in employment and avoid unlawful discrimination.

Colleagues must comply with the provisions of this policy and must not unlawfully discriminate against, harass or victimise any other employee. Colleagues should not discriminate against or harass a member of the public in the provision of services or goods.

Colleagues can be held personally liable as well as, or instead of, the Group for any act of unlawful discrimination. Colleagues who commit serious acts of harassment may be guilty of a criminal offense.

All colleagues should intervene, if possible, to stop harassment or bullying and give support to recipients. Colleagues are expected to report such issues to their manager or HR and support the Group in the investigation of complaints.

Employees should refer to the Group's Social Media policy for guidance on expected behaviours in relation to social media.

### **Modern slavery and human trafficking**

The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. The Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

To ensure its employees are not subject to undue influence and are treated with dignity and respect, Gentoo has robust policies and procedures in place across all its operations to ensure compliance with employment legislation and prevent unethical working practices. Gentoo is committed to ensuring that all staff receive fair remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace.

When using agencies and other bodies associated with the employment of the Group, the Group will ensure that steps are put in place to ensure that no slavery or human trafficking is in these supply chains and that thorough checks and procedures are in place to work with such bodies.

The Group produces an annual statement on modern slavery and human trafficking which details the actions to understand all potential modern slavery risks related to its business and the steps put in place to ensure this doesn't occur in its supply chains.

Gentoo also has a whistleblowing policy that allows concerns to be reported on a confidential basis and without fear of recrimination.

## Complaints

If an employee or candidate for employment considers that they have been unlawfully discriminated against, they should follow the Group's grievance procedure to make a complaint. Details of any complaints will be retained confidentially for monitoring purposes.

## Related Policies

This policy should be read in conjunction with the following policies:

- Diversity and Inclusion in Service Provision Policy and Toolkit
- Code of Conduct
- Prevention of Bullying and Harassment
- Recruitment and Selection
- Disciplinary
- Grievance
- Learning and Development Policy
- Data Protection Policy
- Information Security Handbook
- Vulnerability Policy

## Version Control

Version	Reason	Issuer	Date
V1.0	Approved	A Bell	2018
V2.0	<ul style="list-style-type: none"><li>• 'General' deleted reference to 'orange book and red and green book</li><li>• 'Contribution and Goals' deleted detail of vision and values</li><li>• General Formatting</li></ul>	N Young	July 2020
V2.1	<ul style="list-style-type: none"><li>• This policy has been reviewed my Muckle Law Firm</li><li>• Reference to intersectionality</li><li>• Definitions added regarding discrimination.</li><li>• Reference to disabilities</li><li>• Included section on breach of this policy</li><li>• Updated Policy to refer to Colleagues, Equity, Diversity and Belonging</li></ul>	S England	April 2024
V2.2	<ul style="list-style-type: none"><li>• Updated to reflect contemporary principles and the plan to be developed in 2024</li></ul>	S Fulton	May 2024
V3.0	<ul style="list-style-type: none"><li>• Approved by People Committee</li></ul>	C Appleby	May 2024

