



Equality, Diversity, and Inclusion Policy

Regulation & Legislation	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
Approved by	Group Board – September 2021
Supporting documents	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, Reasonable Adjustment procedure, Worksmart documentation, disability passport documentation, Customer Involvement policy
Scope	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.	

1. Introduction

- 1.1 Orbit's vision is to lead in building thriving communities, and that means being fair and equal to all, irrespective of age, gender, 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, employees, partners, and organisation. Equality, diversity, and inclusion is a fundamental part of our organisation. It is as integral as health and safety. Orbit aims to be an inclusive employer, where diversity is valued, respected, and built upon, with the ability to recruit and retain a diverse workforce that reflects the communities it serves.
- 1.2 For our customers we aim to ensure that we meet their diversity, in all aspects of their service from lettings, repairs and any reasonable adjustment through excellent customer service, being fair, inclusive, and providing accessible services.
- 1.3 With our partners and our procurement process we will monitor performance and ensure appropriate behaviour. We expect our partners to be committed to our equality principles
- 1.4 Orbit has a legal duty and responsibility to the Equality Act 2010 and has due regard to the Public Sector Equality Duty 2010.

2. 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.

3. Policy Statement

3.1 Customers

Orbit will;

- 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 and Customer Promise
- 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 our customer's home, where reasonable and possible – see 3.5

3.2 Recruitment

Our ambition is to work together to create a diverse and inclusive workplace, which attracts all candidates, signals our commitment to celebrate and promote diversity and ensures

everyone feels valued. Our inclusive approach to recruitment enables us to attract a diverse pool of talent and experience.

We will;

- Use clear statements which promote equality and inclusion within our recruitment material, adverts, and brand material
- Promote Disability Confident status and provide reasonable adjustments where needed
- Ensure all our vacancies are promoted on specific inclusion recruitment sites as well as mainstream channels
- Provide education and training for hiring managers around equality, diversity and inclusion and Unconscious Bias
- Not ask interview questions that may discriminate against anyone
- Commit to, where possible, to having a diverse hiring panel
- Review and analyse our diversity and inclusion statistics regarding; applications, new starters, and monitor progress to identify any trends or underrepresented groups

3.3 Employees

Orbit will;

- not tolerate prejudice, discrimination, or harassment from employees towards colleagues, customers or stakeholders. Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceedings
- provide reasonable adjustments for any employees with a disability where reasonable to do so
- provide relevant training and skills for employees and managers to ensure we value diversity and reduce inequality
- monitor and review employee feedback and best practice to create a work environment that makes employees feel respected and able to fulfil their potential
- encourage everyone to challenge stereotyping, unconscious bias and discriminatory practices within our working environment
- carry out “equality assessments” of our policies, proposed service changes and plans to make sure they are inclusive and do not have potential to discriminate against any group

3.4 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

3.5 Reasonable Adjustments for Customers

Under the Equality Act 2010, we have a legal duty to make a reasonable adjustment when a disabled person is placed at a 'substantial disadvantage'(defined as 'more than minor or trivial') compared with a non-disabled person because:

- of a provision, criterion or practice;
- of a physical feature of the employer's property; or
- they lack an auxiliary aid.

A reasonable adjustment may be:

- a physical alteration to one of our premises, for example, fitting a ramp.
- a change to one of our policies, procedures, or services, for example, a comfort or rest break in a meeting or an extension of time limits (where lawful to do so). In changing policies, criteria or practices we are not required to change the basic nature of the service we offer.
- making information available on request in a format that meets our customers' needs, for example, larger print, audio, translation services or Braille and ensuring our website is accessible

In deciding what is reasonable the law allows us to consider amongst other things:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person
- The practicality of making the adjustments
- The cost of the adjustment and whether the resources are available
- Any disruption to the service that making the adjustment may cause.

Where we are unable to make a reasonable adjustment, we will work with the customer to find the most appropriate alternative solution for them, where possible.

3.6 Reasonable Adjustments for Employees

We have a duty under the Equality Act 2010 to make adjustment for our employees, where reasonable to do so. A 'reasonable adjustment' is a change to remove or reduce the effect of:

- an employee's disability so they can do their job
- a job applicant's disability when applying for a job

3.7 The reasonable adjustment could be to:

- the workplace
- the ways things are done
- get someone to help the employee or job applicant
- a policy or procedure

3.8 By law, we must consider making reasonable adjustments when:

- we know, or could be expected to know, an employee or job applicant has a disability
- an employee or job applicant with a disability asks for adjustments
- an employee with a disability is having difficulty with any part of their job
- an employee's absence record, sickness record or delay in returning to work is because of or linked to their disability

4. Equality Analysis (EA)

- 4.1 An equality analysis is a way of systematically and thoroughly assessing, and consulting, where appropriate, the effects that a service or policy is likely to have on people from different characteristic groups. The main purpose of an equality analysis is to pre-empt the possibility that any proposed policy or service change could affect some groups unfavourably. If appropriate, steps are taken to avoid this happening.

5. Roles and 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. Performance Controls and Business Risk

6.1 Compliance with this policy will be monitored in 3 ways;

- EDI operational and strategic EDI forum will have responsibility on strategic issues and the delivery of the EDI action plan,
- People SMT and Group Remuneration committee have responsibility for monitoring performance and progress for employees
- Customer Services SMT and Board will monitor performance related to customers.

The performance on these areas will be reported to customers and employees, as well as any other relevant groups on a regular basis.

- 6.2 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.

7. Essential information

- 7.1 All Orbit policies and procedures are developed in line with our approach to the following, Data Protection statement, Equality Diversity and Inclusion approach, Complaints Policy and our regulatory and legal obligations to ensure we deliver services in a lawful manner and treat people equally and fairly. Details of these are found on the declaration document for Strategy Policy and Procedure summary and have been an integral part of the formulation of this document. Orbits privacy policy can be accessed on our website. www.orbit.org.uk/privacy-policy/.

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

Document control

Status	Date Issued	Version	Revision
Approved	4/10/2021	V3.0	

Uncontrolled if Printed

Title	Equality, Diversity and Inclusion Policy		ID 187
Doc Type	Policy	Review Cycle	3 Yearly
Circulation	All Departments	Classification	Public / Private

Doc Level 1

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		Date
Approved by	Orbit Group Board	Sept 2021
Last review		
Next Review (or sooner if changed)		Quarter 2 2025/6 (extension)

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