



The Equality, Diversity and Inclusion policy promotes a culture that values difference and eliminates discrimination enabling diverse teams to be built, creating an environment where all our colleagues can thrive,

Equality, Diversity and Inclusion Policy

Reference	[PO-A-283-PP]
Approved	[24 September 2024]
Published	[27 September 2024]
Review frequency	[Annual]

Part 1

About this policy

Document management

Directorate	People and Performance
Policy sponsor	Executive Director of People and Performance
Policy owner	Director of People Services
Policy author	Head of HR Business Partnering
Summary	The Equality, Diversity and Inclusion policy promotes a culture that values difference and eliminates discrimination enabling diverse teams to be built, creating an environment where all our colleagues can thrive.
Target audience	This policy is relevant to all colleagues, stakeholders, suppliers, contactors, customers, Board and Committee Members.

Review process

Approval route	Directors Team – Executive Leadership Team – People, Remuneration and Nominations Committee – Group Board
Approved by	Group Board
Approval date	24 September 2024
Review date	24 September 2025
Version number	3.0

CONTENTS

EQUALITY, DIVERSITY AND INCLUSION POLICY	0
About this policy	1
Document management	1
Review process	1
Overview	3
Intent	3
Policy statement	3
Scope	3
Policy details	4
Defining Diversity and Inclusion	4
Why Equality, Diversity and Inclusion are Important	4
Our Commitments	4
Discrimination	5
Recruitment and Selection	5
Positive Action	6
Training, Promotion and Conditions of Service	6
Termination of Employment	7
Disabilities and Neurodiversity	7
Part-Time and Fixed-Term Working	7
Breach of this Policy	7
Policy implications	8
Roles and responsibilities	8
Data protection	9
Safeguarding	9
Equality, diversity and inclusion	9
Complaints and feedback	9
Risk analysis	9
Evaluation, review and performance reporting	9
Summary of local variations	9
Compliance	10
Legal and regulatory compliance	10
Related policies	10
Appendices	11
A. Glossary of terms	11

Part 2

Overview

Intent

The vision at Longhurst Group (the Group) is clear, everything we do is about ‘improving lives.’ From the great homes, care, and support services we provide, to projects that make a positive difference to our communities and to people’s lives. Fundamental to this is our commitment to equality, diversity, and inclusion, which underpins everything we do.

Promoting a culture that values difference and eliminates discrimination enables diverse teams to be built. We believe that diverse perspectives enable us to understand the needs of our customers at the Group.

The Group is committed to promoting equality and creating a workplace culture in which diversity and inclusion is valued. We are also committed to providing equitable treatment to all those who we deal with be they colleagues, customers, or suppliers.

Policy statement

This policy supports the Group’s values and is a commitment to improving lives and supporting colleagues by setting out our approach to equality, diversity and inclusion and underpinning the development of the strategy, which will set out our ambitions, aims and objectives.

Scope

The terms ‘Longhurst Group’ and ‘the Group’ incorporate all member companies and subsidiaries.

This policy applies to all colleagues, consultants, contractors, casual workers, volunteers, interns, job applicants, Board and Committee Members.

This policy applies to all conduct within the workplace, as well as events outside of the workplace, such as meetings, social events, and social interactions with colleagues. It also covers conduct that may impact the Longhurst Group’s reputation, such as expressions of views on social media, communications with a member of the media and communications with customers.

The policy does not form part of any colleague’s contract of employment and the policy may be amended at any time.

Part 3

Policy details

Defining Diversity and Inclusion

When we talk about diversity, we mean ensuring that we employ and retain colleagues with diverse backgrounds, perspectives, and experiences. When we talk about inclusion, we mean creating a working environment where everyone has a 'voice,' and everyone's opinions and views are heard and respected. Diversity and inclusion go hand in hand.

Why Equality, Diversity and Inclusion are Important

All colleagues bring something unique to the Group and we want to celebrate and champion that. For us, a great place to work means somewhere that is inclusive of everyone, where colleagues feel valued and appreciated for the contribution they bring. Diversity also makes our organisation better and stronger, encouraging ideas, innovation, and a culture of learning. We want you to:

- Bring your authentic self to work.
 - Feel accepted in your teams.
 - Have equal opportunities to succeed.
 - Have your voice heard, even if it goes against the status-quo.
 - Not face any discrimination or bias at work.
 - Respected and taken seriously; and
 - Feel part of our community, wherever you work.
-

Our Commitments

Longhurst Group will take all reasonable steps to:

- Promote awareness and provide training to all colleagues on all aspects of equality and diversity in the workplace.
- Apply the principles of equality to all colleagues and all job applicants so that there is equality of opportunity. Our aim is that no individual is denied employment opportunities for reasons unrelated to ability.
- Establish programmes and processes that ensure a diversity of candidates.
- Create an inclusive working environment that is sensitive to the needs of differing cultures, religions, and beliefs.
- Make reasonable adjustments to support colleagues with disabilities to reach their full potential.
- Ensure that all work environments are free from all forms of discrimination, harassment, intimidation, or bullying.
- Ensure all colleagues have spaces to share thoughts, ideas, and seek help, and be actively reminded of where and what these are.
- Support the continuous improvement of our practices through external benchmarking and surveys.
- We care about our customers; we listen, and we act. We recognise diversity and offer services that let customers engage in a way that works for them.

- We ensure all our policies, both colleague and customer facing, have a robust ED&I process to prevent discrimination.

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), and on work-related trips or events, including social events.

Protected Characteristic means age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex, or sexual orientation.

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

- **Direct discrimination:** treating someone less favorably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views.
- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic. For example, requiring a role to be full-time rather than part-time would adversely affect women because they have greater childcare commitments than men. Such a requirement would be discriminatory unless it is 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 someone who has complained or has supported someone else's complaint about discrimination or harassment. For example, giving an unjustified poor performance review to someone who made an allegation of discrimination.
- **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favorable treatment because of the effects of a disability and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Recruitment and Selection

Recruitment, promotion, and other selection exercises, such as redundancy selection, will be based on merit, against objective criteria that avoids discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing are conducted by more than one person and with the involvement of the People Services Team, where possible.

The Group take steps to ensure that vacancies are advertised to a diverse labour market by using a variety of media channels.

Job applicants shall not be asked questions which might suggest an intention to discriminate on the 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 their disability before a job offer is made. There are limited exceptions to this with the approval of the People Services team. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

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 colleagues, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

To ensure that this policy is operating effectively, and to identify groups that may be under-represented or disadvantaged in our organisation, we monitor applicants' ethnic groups, gender, disability, sexual orientation, religion, and age as part of the recruitment process.

Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Positive Action

Longhurst Group recognises that overcoming barriers to equality of opportunity can require positive action. We will consider measures that we can take in order to address underrepresentation of certain groups within our organisation. For example:

- Actively inviting participants from underrepresented groups.
- As a disability confident employer, supporting the recruitment of people with disabilities. This includes offering an interview to any candidate who declares a disability and meets the minimum criteria of the relevant job specification, in the efforts to widen opportunities for disabled candidates.
- Promoting opportunities such as apprenticeships, internships and mentoring to underrepresented groups; or
- Such other lawful steps that we can take.

Training, Promotion and Conditions of Service

All colleagues will be given appropriate access to training to enable them to progress. The People Services Team, together with line managers, will annually review each colleagues' training and development requirements. Development opportunities will be offered regularly to upskill and provide colleagues with additional tools and support.

Longhurst Group will provide all colleagues with regular training to ensure that everyone is aware of and understands the contents of this policy.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all colleagues who should have access to them and that there are no unlawful obstacles to accessing them.

Termination of Employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that the disciplinary policy is applied without discrimination.

Disabilities and Neurodiversity

If a colleague is disabled or becomes disabled, then we encourage them to tell us about their condition as soon as possible so that we can support them as appropriate.

If a colleague is experiencing difficulties at work because of a disability, this should be discussed with their line manager. The line manager may wish to consult the People Services team about reasonable adjustments and shall explore these with the colleague. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible with the colleague.

When considering how to support neurodiverse colleagues, line managers should explore adjustments that the colleague may benefit from so they can thrive given the right environment.

Part-Time and Fixed-Term Working

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 differential treatment is justified.

Breach of this Policy

Longhurst Group takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy. 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, then they can raise the matter via the Grievance Policy. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimization or retaliation against colleagues who complain about or report discrimination. If a colleague believes that they have been victimized for making a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, they should raise it via the Grievance Policy.

Longhurst Group encourages the reporting of all types of potential discrimination, as this assists us in ensuring that our equality, diversity, and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Policy. |

Part 4

Policy implications

Roles and responsibilities

All persons involved with the Group, whether Board Member, or employee have delegated responsibilities. The key roles and responsibilities are listed below.

Group Board

The Board is responsible for ensuring that there is an effective policy with controls in place, but delegation is the Management Team of the Group.

Executive Management Team

The Chief Executive, Executive Directors and Directors collectively are the officers responsible for ensuring the implementation of the Group's objectives in this policy.

Policy Sponsor - Executive Director of **People and Performance**

This person has strategic responsibility for the policy and how it relates to business plans, key strategies and other elements of the policy framework.

Policy Owner – Director of **People Services**

Responsible for the policy's suitability; effective implementation; and commissioning new policy development and periodic policy review.

Policy Author – **Head of HR Business Partnering**

Responsible for drafting a new policy and proposing any amendments to an existing policy.

Data Protection – Data Protection Officer

Responsible for identifying, assessing and mitigating privacy risks with data-processing activities that fall within the policy.

Data protection

The collection of EDI data in identifiable form will result in the processing of personal data. When processing any personal data, the Group shall comply with the requirements set out in the Groups Data Protection and Confidentiality Policy.

Safeguarding

All adults will have the same protection, regardless of age, disability, race, sex, sexual orientation, gender reassignment, religion or belief, marriage and civil partnership and pregnancy and maternity. The Group is committed to anti-discriminatory practice and recognise that some of our customers from minority ethnic groups or with disabilities may have additional needs and communication barriers.

Equality, diversity and inclusion

An equality analysis has been conducted in the Policy Development Plan and the implications have been highlighted throughout the Equality, Diversity and Inclusion policy.

Complaints and feedback

If a colleague has a complaint or feedback on how this policy has been applied, they can raise the matter via the Grievance Policy. Complaints will be treated in confidence and investigated as appropriate.

Risk analysis

This policy ensures that the Group is compliant with regulations and law and that internal processes are clearly outlined.

Evaluation, review and performance reporting

This policy will be reviewed on a Annual basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

The Group undertakes monitoring to meet statutory requirements and achieve best practice. This is used to inform and improve our employment practices.

The People, Remuneration and Nomination's Committee (PREMCO) will be provided with ongoing reports, including reports on gender and other pay gaps and actions to eliminate any disparities that exist.

Summary of local variations

This policy applies to all colleagues in all locations.

Part 5

Compliance

Legal and regulatory compliance

This policy fully complies with the Group's legal and regulatory obligations.

- Equality Act 2010
- Data Protection Act 2018
- General Data Protection Regulations
- Public Sector Health Duties
- Regulator of Social Housing Standards

This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure the Group meets its obligations and complies with the current and relevant legislation and regulations.

Related policies

- All policies relate to this policy

Part 6

Appendices

A. Glossary of terms

Term	Definition
Legislation	The legal requirements that must be followed.
Policy	A statement of intent describing our approach towards a particular activity or area – usually comprising a set of rules or standards that must be followed.
Policy Development Plan (PDP)	The document used to support planning policy development and review.
Procedure	An agreed way of doing things that describes how a policy will be implemented. The specific steps and/or actions that must be taken to put policy into practice and ensure a consistent service.
Regulation	The rules or standards set by a governing body such as the Housing Ombudsman, Regulator of Social Housing and Financial Conduct Authority.
Strategy	A broad, long-term plan of action to take the organisation in a particular direction, often supported by policies and procedures.