

Equality, Diversity and Inclusion Policy

1. What this policy is about

- 1.1 Livv Housing Group embraces diversity and does not tolerate discrimination in any form. We encourage equality and inclusion in all aspects of our work.
- 1.2 As an employer and housing provider we respect and value the diversity of our customers and our colleagues. We provide a safe space where everyone can bring their whole selves to work and be their true selves in our communities.
- 1.3 This policy should be reviewed alongside our Equality, Diversity & Inclusion Strategy, which sets out our core principles and priorities for fulfilling our legal and ethical duties. This policy should also be considered alongside other policies such as our Family Friendly Policy, Dignity at Work Policy, Treating Customers with Fairness and Respect Policy, Domestic Abuse Policy and Hate Incidents and Crime Policy, among others.

2. Our approach

2.1 Policy statement

This policy sets out our commitment to eliminating unfair discrimination from all aspects of work and service delivery. It shows what governs us, what our intentions are and how we implement, coordinate and monitor our progress toward the objectives set out in our Equality, Diversity and Inclusion Strategy.

2.2 Law and regulation

As an employer and a housing provider we are governed, primarily, by four things when it comes to equality. These are:

The Equality Act 2010

This piece of legislation was brought in to replace lots of other pieces of legislation, such as The Sex Discrimination Act 1975 and the Race Relations Act 1976, to bring consistency in protections for all characteristics. The Equality Act defined nine Protected Characteristics which are:

- Age (which may relate to a person's age or age group at any stage of life)
- Disability
- Gender reassignment

- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion and belief (and no belief)
- Sex
- Sexual orientation

The Equality Act 2010 protects anyone with any of these characteristics (we *all* have at least five) from being discriminated against, on the basis of any of these characteristics, when in employment or receiving goods or services.

People who experience direct, or indirect, discrimination or harassment because they're associated with someone who has a protected characteristic, (family, friend or carer of a disabled person) or who are perceived to have a protected characteristic (a perception that they are gay) when in fact, they don't have that protected characteristic are also protected by law.

In addition to the protected characteristics set out specifically in The Equality Act 2010, we recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, unrelated criminal activities, being HIV positive or having AIDS, being menopausal or any other matter which may cause unfair treatment. Our approach to equality, diversity and inclusion aims to be proactive and exceed our legal duties, ensuring that everyone we work with is treated fairly and with respect.

The Equality Act Amendment of October 2024 also requires that we take proactive measures to ensure our colleagues are not subjected to sexual harassment of any kind by co-workers, customer or third parties.

Public Sector Equality Duty

As a social housing provider, we must also comply with the Public Sector Equality Duty.

The general duty states that as a business we must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by The Equality Act 2010.
- Advance equity of opportunity between people who share a protected characteristic and those who don't.
- Foster good relations between people who share a protected characteristic and those who don't.

The regulations also require us to comply with three specific duties:

- To publish information that demonstrates our compliance with the equality duty.
- To set ourselves equality objectives and publish them.
- To publish our gender pay gap information.



The Gender Recognition Act 2004

This piece of legislation protects an individual who intends to undergo, is undergoing, or has undergone gender reassignment from the moment they decide to start the process. It's unlawful for an organisation to harass or treat a person less favourably by reason of undergoing gender reassignment or absence from work while doing so. The GRA 2004 protects the rights of trans people to live in accordance with the gender they identified with though it falls short in that it does not properly recognise the status of non-binary folk. As an inclusive employer and housing provider, Livv Housing Group recognises the rights of people of all genders to live as themselves without harassment or fear. Our full stance with regard to the protected characteristic of gender reassignment is set out in our Trans and Non-binary Inclusion Policy.

Regulator of Social Housing - Transparency, Influence and Accountability Standard

The Regulator of Social Housing sets standards we must meet when providing housing and landlord services. The Transparency, Influence and Accountability Standard sets out that we must:

- Treat tenants and prospective tenants with fairness and respect.
- Take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.
- Use information and data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs.
- Use information and data to assess if our services are fair and equitable.
- Ensure that our communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.
- Ensure that our landlord services are accessible, and that the accessibility is publicised to tenants.

Forthcoming legislation: The Employee Rights Bill 2024

This bill will enhance the rights of employees from day one of employment. The primary impact of the bill on our Equality, Diversity and Inclusion Policy is that it requires that employers have an action plan to support gender equality in the workplace and to support colleagues through menopause. The Government has not yet released the specifics of the action plan and its contents, but we will closely monitor this and maintain compliance.



3. How we uphold equality, diversity and inclusion

3.1 Within our role as a proactive leader in equality, diversity & inclusion, we will:

- Lead in tackling discrimination and embracing inclusion within our business and the sectors and the communities in which we work.
- Ensure our policies, procedures and how we do business are inclusive and free from discrimination.
- Ensure our workforce understands their rights and responsibilities under the policy and that they as individuals, not only us as their employer, can be held responsible for any form of bullying, harassment, and discrimination.
- Achieve and retain external recognition for our approach to equality, diversity, and inclusion.
- Complete Equality Impact Assessments (EIAs) for new policies and approaches to delivering services.
- Use our partnerships effectively to promote, support and maximise the impact of diversity themed services (examples include anti-social behaviour services, domestic violence and harassment policies).
- Improve equality across the facilities management and construction industries.
- Ensure that our procurement and tendering services are fair and accessible.

3.2 Our role as an employer:

- Embed a positive culture that is inclusive and embraces diversity.
- 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.
- Ensure our workforce, including managers and senior leaders, are routinely trained on equality, diversity and inclusion, and educated around the issues and experiences of those who identify and live with the protected characteristics listed above.
- Ensure that our recruitment, training, and promotion opportunities are inclusive, free from discrimination and promote equality and equity.
- Monitor our recruitment, training, workforce profile and employee satisfaction by protected characteristic.
- Have a zero-tolerance approach to the harassment, victimisation or bullying of colleagues. Any complaints will be taken seriously and dealt with promptly in line with our Dignity at Work Policy.
- Support job candidates and colleagues who require reasonable adjustments to access reasonable adjustments as needed.
- Ensure our opportunities are equitably accessible to under-represented groups.



3.3 As a service provider we will:

- Ensure diverse needs are met equitably.
- Ensure that the services, offices, facilities and venues we provide or use are, as far as is possible, accessible to all including those with cultural and physical differences.
- Maintain awareness raising among colleagues to ensure they understand customers' diverse needs and experiences.
- Provide information and access to services through a variety of channels and alternative formats including braille, large print, access to British Sign Language interpreters or language translators.
- Ensure that the way we communicate is clear and easy to read or understand.
- Maintain a zero-tolerance approach to the harassment, bullying or victimisation of customers and fully investigate allegations or concerns through our appropriate policies and procedures.
- Monitor customer satisfaction with our services by the protected groups listed above.
- Involve customers and service users in the design and delivery of services, striving to have diverse, representative groups involved.
- Ensure that effective safeguarding procedures are in place to enable effective referrals where there are safeguarding concerns.
- Support our older customers to maintain independent living.

3.4 We expect our employees to;

- Treat colleagues and customers with kindness, dignity and respect.
- Embrace equality, diversity and inclusion initiatives and objectives set by the Business.
- Engage with mandated equality, diversity and inclusion training and awareness raising activities.
- If using social media channels where they're identifiable as a Livv employee, conduct themselves in an appropriate manner, treating others with dignity and respect.

3.5 Further details on what we want to achieve in these areas can be found in our Equality, Diversity & Inclusion Strategy.

4. Discrimination

4.1 In the UK, discrimination refers to unfair treatment of individuals based on protected characteristics, as detailed in section two of this policy. The Equality Act 2010 aims to protect people from being treated unfairly in areas such as employment, education, housing, and access to goods and services.



4.2 Discrimination can be:

- Direct Discrimination – Treating someone less favourably because of a protected characteristic.
- Indirect Discrimination – A policy or rule that applies to everyone but disadvantages people with a protected characteristic.
- Harassment – Unwanted conduct related to a protected characteristic that creates an intimidating, hostile, or offensive environment.
- Victimisation – Treating someone unfairly because they've made or supported a complaint about discrimination.
- Failure to make reasonable adjustments (specifically for disabled people) – Not taking appropriate steps to accommodate a person's disability, which causes them disadvantage.

4.3 Please see our Dignity at Work Policy for more information on the nature of discrimination and our approach in dealing with instances.

5. Responsibilities

5.1 All colleagues are responsible for carrying out their work in line with this policy and associated procedures. The Executive Director – Resources is responsible for overall implementation of this policy.

Role	Responsibility
Executive Directors Team	Final approval under the policy framework
Director - People	Implementation of the policy
Equality, Diversity and Inclusion Manager	Reviewing the policy, amending it accordingly to comply with current legislation, best practice and Equality, Diversity and Inclusion (EDI) principles
People Services Team	Communicating, promoting and reviewing this policy and procedures and providing advice and guidance to managers on its application
Managers	Implementing and following this policy
Colleagues	Understanding and following this policy

6. Monitoring and review

6.1 We will review this policy every three years, or sooner if our monitoring of the policy identifies that changes are required, for example because of changes to law, regulation or related Livv strategies and policies.



Control framework

Compliance

This policy supports compliance with:

- Protection from Harassment Act 1997
- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act
- Data Protection Act 2018
- General Data Protection Regulation (2016/679 EU)
- Regulator of Social Housing Transparency, Influence and Accountability Standard.

Document control	
Version	1.0
Policy applies from	11 June 2025
Policy applies to	Livv Housing Group; Livv Homes; Livv Maintenance; First Ark Social Investment
Approved by	Executive Directors Team
Approved on	10 June 2025
Replacing	Equality, Diversity and Inclusion Policy 2022-2025 v.3
Next review due by	June 2028
Responsible Executive Director	Executive Director - Resources
Policy author	Manager – Human Resources
Equality Analysis	June 2025
Environmental Impact Assessment	Not required
Circulation	Intranet and Livv Housing Group website

Version control		
Version	Date of Review	Summary of changes made
1.0	June 2025	Scheduled three-year periodic review. Updated to bring policy in line with current best practice, Equality Act 2010 related case law, Employee Rights Bill and current thought leadership.

