

IronOak



IRON OAK

**EQUALITY, DIVERSITY & INCLUSION
POLICY**

Control Sheet

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1. Introduction

- 1.1. This Equality, Diversity and Inclusion Policy is a statement of how we intend to promote equality and tackle discrimination and harassment. We will meet our legal obligations and statutory duties to promote Equality, Diversity and Inclusion within IronOak Homes Limited (IronOak).
- 1.2. The Company acknowledges the existence of discrimination and prejudice within the industry and seeks to address any such culture, if evident, within the organisation.
- 1.3. This value underpins our commitment to achieving equal opportunities in:
 - Access to housing
 - The quality of accommodation.
 - The provision of tenancy management, tenancy support, maintenance and other relevant services.
- 1.4. We are committed to respecting diversity in all aspects of our work, and we will not tolerate any form of discrimination. We will treat all colleagues and people accessing and using any of our services with fairness, courtesy and respect. We will work towards ending discrimination, including stopping victimisation and harassment on the grounds of a 'protected characteristic' as determined in The Equality Act 2010. These are:
 - Age
 - Disability
 - Gender Reassignment.
 - Marriage and Civil Partnership
 - Maternity and Pregnancy
 - Race
 - Religion or Belief
 - Sex
 - Sexual Orientation
- 1.5. The protection from discrimination afforded in The Equality Act 2010 applies in a number of ways:
 - **Direct Discrimination.** Where someone is treated less favourably because they have a protected characteristic.
 - **Discrimination by Association.** Where someone is treated less favourably because of their connection with a person with a protected characteristic.
 - **Discrimination by Perception.** Where someone is treated less favourably because it is perceived that they have a protected characteristic.
 - **Indirect Discrimination.** Where the application of a criterion or practice puts workers sharing a protected characteristic at a particular disadvantage.

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2. Purpose

2.1. IronOak has a set of organisational values that provide a shared purpose and create clear expectations for employee behaviour. They foster a strong culture of inclusivity and an environment that values and supports diversity, creating a sense of belonging where everyone feels welcomed, respected, and able to be their authentic selves.

2.2. The Company aims to:

- Treat all people who have contact with the Company on a fair and equitable basis.
- Ensure all individuals, receiving our services, or applying to do so, are treated in a non-discriminatory manner and without prejudice in terms of nationality, race, ethnicity, culture, colour, creed, economic status, physical or mental disability, age, marital status, gender, sexual orientation, disability and/or able bodied.
- Take action to remove from Company activities, any institutional discrimination.
- Ensure the promotion of equal opportunities is at the heart of the Company.
- Promote equal opportunities to organisations working with the Company.

3. Roles and Responsibilities

3.1. The CEO is legally and morally responsible for ensuring discrimination does not occur within the Company and for implementing and monitoring the Equality, Diversity and Inclusion Policy and Procedure.

3.2. Managers will:

- Ensure that reasonable adjustments to selection processes and working arrangements are made to accommodate applicants and employees with disabilities.
- Ensure your teams read and understand this Equality in Employment Policy, and that acts of discrimination, harassment and/or victimisation are treated as a disciplinary offence.
- Apply terms and conditions of employment objectively and consistently, for example granting of compassionate leave, job-share arrangements, maternity leave provisions, paternity leave, career breaks, and consideration of flexible working arrangements
- Ensure that the victims of discriminatory incidents are supported and perpetrators appropriately managed.

3.3. All staff will:

- Co-operate with measures introduced for the prevention of discrimination.
- Co-operate with measures introduced to ensure equal opportunities.
- Not harass, abuse or intimidate staff, other residents, clients, or the public.
- Not make remarks or commit acts of a racist or sexist nature.

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- Personally ensure that they do not act in a discriminatory or prejudicial manner.
- Challenge stereotypes and prejudice.
- Report discriminatory actions or incidents of harassment, bullying and victimisation promptly and advise customers with a complaint of how to report a discriminatory incident.
- Operate at all times in accordance with Company Equality, Diversity and Inclusion Policy and Procedures.

4. Implementation

4.1. This policy will operate in accordance with the statutory provisions laid down in the:

- Equality Duty found in the Disability Discrimination Act 1995 & 2005
- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Race Relations Act 1976, 2000 & 2003
- Rehabilitation of Offenders Act 1974
- Human Rights Act 1998
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Gender Recognition Act 2004
- Civil Partnerships Act 2004
- Equality Act 2010
- Race & Religious Hatred Act 2006

4.2. The Company recognises its responsibility under the above legislation and take account of the guidance provided by the Commission for Racial Equality and the Equal Opportunities Commission in their codes of practice.

4.3. The operational policies and procedures have been drafted to ensure they comply with good equal opportunities practice and the requirements of this policy.

4.4. Particular attention has been given to procedures relating to:

- Allocation of places to clients.
- Harassment of clients and staff.

4.5. Whilst in no way seeking to act to bar individuals with previous convictions or lifestyles, or infringe on their human rights, the Company acknowledges its duty to protect its clients, staff and the Company from harm.

5. Clients and Residents

5.1. Clients and residents will:

- Be deemed to be in violation of Company contractual agreements if they act in a way that constitutes harassment.

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- In cases of discrimination proved in law, be liable to receive a notice to quit being brought against them.
- In situations where complaints of discrimination cannot be substantiated in law, or the offence is not serious enough to warrant a notice to quit, the complainant may be considered for alternative accommodation. This would only be concluded with the full agreement of the person concerned and if alternative housing could be provided of an equivalent standard. Such transfers will be treated as a high priority.

5.2. Clients and residents who believe that they may have been discriminated against are encouraged to raise the matter through our Complaints Procedure

6. Equality in Employment

6.1. As an employer, IronOak values the diversity of the workforce and is committed to creating a working environment in which everyone can fully participate.

6.2. We believe our organisation will be a better, more creative and innovative place to work as a result of managing our people in a way that gets the best from their diversity, values their different perspectives and individual backgrounds; and integrates fairness and equity into every aspect of our employment practices.

6.3. We aim to develop, promote and deliver our employment and training opportunities without discriminating on the basis of a person's age, disability, gender, marital status, religion or belief, sexual orientation or any aspect of an individual's background or heritage which is used as justification for unfair treatment.

6.4. We will achieve this by:

- Attracting, recruiting, developing and retaining the most talented people and valuing the varied skills and experiences they bring to the organisation.
- Making sure that our employment opportunities are accessible to all, enabling us to recruit and retain a workforce representative of our community.
- Ensuring that all employees have access to promotion, learning and development opportunities so that their contribution and potential are maximised.
- Providing a safe and accessible working environment that values and respects the identity and culture of each person working here.
- Making sure that all our employees understand their rights and responsibilities concerning discrimination, bullying and harassment by referring to the Bullying, Harassment and Victimisation Policy and Procedure
- Implementing a fair and equitable approach to how we pay and reward our employees for equal work and regularly reviewing its application.
- Making sure that we treat seriously behaviour that is deliberately contrary to our principles of equality in the workplace and take appropriate action.

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6.5. Recruitment and Selection

- 6.5.1. Employment opportunities at IronOak are accessible to all and we welcome applications from all sections of the community.
- 6.5.2. No one will be treated less favourably because of protected characteristics at any stage of the recruitment process when applying for a job within any area of the company.
- 6.5.3. We will always endeavour to select all job applicants on merit and ensure our recruitment processes are objective.
- 6.5.4. We will not ask a job applicant to disclose information about their health or a disability before a job offer has been made, unless it is a permissible question, for example, relating to:
- the need for a reasonable adjustment in the recruitment process
 - monitoring
 - an intrinsic function of the job.
- 6.5.5. We guarantee an interview to disabled applicants who meet the minimum criteria for a job vacancy and consider those applicants on their merit and ability to do the job.
- 6.5.6. We will implement reasonable adjustments for applicants with disabilities in the recruitment and selection process.
- 6.5.7. Where a manager can identify and quantify under representation in the workforce, consideration may be given to implementing positive action initiatives to encourage applications from underrepresented sectors of the community.
- 6.5.8. The Equality Act 2010 does allow for a job applicant with a protected characteristic to be selected over another applicant where they both have been determined to be as qualified as each other for the role. However, it is not currently IronOak policy to exercise this power.
- 6.5.9. When seeking references, we will not ask questions that could be discriminatory, such as about marital status or medical conditions. When providing references, we will only give information which is accurate and not misleading.

6.6. Employment Terms and Conditions.

6.6.1. Pay

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6.6.1.1. We use external benchmarking to determine pay levels for all roles within the organisation. This is done to promote equitable and consistent pay levels and give transparency and clarity to the pay system.

6.6.2. Leave

6.6.2.1. We will consider all leave requests objectively; taking consideration of the practicality of the individual being away from work and whether the individual has sufficient leave entitlement. We will also consider the reason for the leave request, which could involve a protected characteristic, such as leave to attend periods of religious observance, festivals or holidays.

6.6.2.2. We recognise that all employees are entitled to unpaid time off work to deal with emergencies concerning a dependent.

6.6.2.3. Please refer to the Annual Leave and Authorised Absence Policy for further information about statutory leave entitlements to family leave arrangements e.g. maternity, adoption, paternity, carers leave and neonatal care leave.

6.6.3. Health & Attendance

6.6.3.1. When managing sickness absence, we give consideration to whether sickness is disability related and requires a reasonable adjustment under the Equality Act, including whether the absence itself could be discounted for any formal action under the Health and Attendance Policy as a reasonable adjustment.

6.6.4. Flexible Working

6.6.4.1. Flexible working requests will be considered from all employees.

6.6.4.2. We are mindful that a flexible working request could also constitute a request for a reasonable adjustment related to disability.

6.6.5. Job Share, Part-time Employees, Temporary and Fixed Term Employees

6.6.5.1. Except where specified in conditions of service or contracts of employment, all employees, regardless of hours worked, are entitled to the same conditions of service as permanent full-time employees. Where less than the standard working week is worked, entitlements and allowances are determined on a pro-rata basis or as defined within a particular scheme.

6.6.6. Training and Development

6.6.6.1. All employees have equal access to promotion and learning and development opportunities so that their contribution and potential are maximised.

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6.6.6.2. When devising a training event, managers will ensure they consider employees on maternity/adoption leave, making reasonable adjustments, and that sessions are accessible to employees on different working patterns, such as part-time employees.

6.6.6.3. Training and development will be planned, developed and monitored on the basis of equality of access for all. There will be equitable sharing of available training and development resources taking into account operational priorities and the principles of equal opportunities.

6.6.7. Promotion

6.6.7.1. All employees are encouraged to seek promotion by application to higher-grade vacancies as they occur throughout IronOak.

6.6.8. Redundancy

6.6.8.1. In redundancy situations, where possible, we will seek volunteers in the first instance. If the situation is not resolved by means of voluntary redundancy the selection of employees for compulsory redundancy will be carried out using fair, objective and non-discriminatory criteria.

6.6.9. Retirement

6.6.9.1. Employers cannot force an employee to retire based on age alone, unless there are specific circumstances related to their ability to do their role. Therefore, we no longer 'retire' employees because they have reached a particular age. Employees will continue to work until they choose to end their contract by resignation, or IronOak ends the contract using a fair dismissal process.

6.6.10. Complaints of Harassment and Discrimination

6.6.10.1. Employees can raise any issues of harassment and discrimination under IronOak's Bullying, Harassment and Victimisation Policy, the Grievance Policy or Whistleblowing Policy.

6.6.10.2. Agency workers, consultants, contractors, interns and volunteers can use the Complaints Procedure.

6.6.10.3. The Stephen Lawrence Inquiry Report (1999) recommended that local agencies work together to prevent and address racist incidents, facilitated by a comprehensive, uniform reporting and recording system. IronOak has adopted those recommendations, including the definition of an incident as one "which is perceived to be racist by the victim or another person"; and have extended our reporting to cover any discriminatory incidents concerning a protected characteristic.

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7. Monitoring and Review

- 7.1. The Company undertakes to monitor the effects of the Equality, Diversity and Inclusion Policy and review the policy annually unless a situation arises in change in legislation requires a review or there is a significant change in how the company operates that deems the policy to be reviewed.
- 7.2. We will monitor the following policies to ensure that we are meeting equality duties.
- Complaints
 - Hate Incidents
 - Satisfaction Surveys
- 7.3. Where appropriate we will use the equality monitoring categories for race, sex, religion and disability used by local authorities. This will ensure consistency of data and enable us to set targets that are comparable with other agencies.
- 7.4. We will disaggregate the results of monitoring by the equality profile (race, sex, religion and disability) to identify if there were any issues or outcomes particular to one specific group. The results of equality monitoring will be reported to the Board annually.
- 7.5. Where relevant, actions will be taken to improve any adverse outcomes for any group. Any identified improvements will be included in the Company's Equality, Diversity and Inclusion Improvement Plan. The results of such monitoring and analysis will be published, to enable viewing by any interested party.

8. Statistical Monitoring

- 8.1. The Company will monitor their referral process with regard to clients by recording statistics as part of that process with regards to arrival and departure statistics.
- Statistics will be recorded and processed by the relevant staff members.
 - The relevant Operational Manager will be responsible for collecting statistics.

9. Qualitative monitoring

- 9.1. The CEO and Company Employees will be expected to carry out their duties in the following manner with regard to Equal Opportunities:
- Treat everyone accessing, using or working for the Company with fairness, courtesy, dignity and with respect regardless of their race, nationality, gender, sexuality, religion, age or disability.
 - Ensure decisions made are based on an equitable assessment of the information they have.
 - Be alert to any circumstances where discrimination on grounds of nationality, race, ethnicity, culture, colour, creed, economic status, physical or mental disability, age, marital status, gender, sexual orientation, disability and/or able bodied is present and report any such acts of discrimination to their Line Managers, taking appropriate action in accordance with policy as required.

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- Familiarise themselves with the Company Whistle Blowing Policy and ensure they act in accordance with the Policy as and when necessary.
- Take personal responsibility to ensure that they act in ways neither discriminatory nor prejudicial to others.
- Familiarise themselves with IronOak's Equality, Diversity and Inclusion Policy and Procedures and always act in accordance with these.
- Exclude any applicant from waiting lists if they demonstrate an unreasonable unwillingness to accept IronOak's Equality, Diversity and Inclusion Policy.

10. EQUALITY IMPACT ASSESSMENT (EIA)

10.1. IronOak's Equality Impact Assessment will be carried out on all of our key policies at least once every three years. We will ensure that the Equality Impact Assessment process is updated in line with new legislation.

10.2. The Equality Impact Assessment template is based upon the relevant equality duties. For each of the organisation's functions the Equality Impact Assessment process will cover the following areas:

- The advancement of equality of opportunity
- The elimination of unlawful discrimination, harassment and victimisation
- To foster good relations between different groups of our community
- The promotion of positive attitudes to disability
- The participation by disabled people in public life
- The meeting the need of disabled people, even when that means treating them more favourably than non-disabled people.
- Improving health and wellbeing

10.3. The outcome of equality impact assessments will be reported to the Board. Any identified improvements will be addressed before the policy or change is implemented.

11. Breaches of this Policy

11.1. If you believe that you may have been discriminated against you are encouraged to raise the matter through our Complaints Procedure. Staff should use the Grievance Procedure to raise any complaint.

11.2. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

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11.3. Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal.

12. Review

The Policy will be reviewed every 12 months from the date of approval to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the equality and diversity obligations of IronOak, changes to IronOak business practices or in light of management system audits.

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