

Ongo's EDI Policy

September 2022

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<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
V5.0	Health / compliance check	15/09/2022	Group Common Board	July 2025
V4.1	Compliance update	11/11/2021	Heads of Service	September 2022
V4.0	Health check	13/11/2019	Heads of Service	September 2022
V3.0	Health check	20/07/2016	EMT	August 2019
V2.0	Full Review	04/07/2013	Ongo Partnership Board	June 2015
V1.0	New Policy	Oct 2010	Ongo Homes Board	October 2012

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1. Our policy is...

- 1.1 Ongo is actively committed to promoting and embedding a culture of equality, diversity and inclusion.
- 1.2 We value differences and encourage and support everyone to be their authentic selves. As an organisation, we want to be truly representative of all sections of the communities we serve and for our colleagues, residents, and other stakeholders to feel respected and valued and treated fairly, free from discrimination.
- 1.3 We have responsibilities under legislation, regulation, and governance, including, but not limited to:
 - The Equality Act 2010 (incorporating the Public Sector Equality Duty)
 - The Human Rights Act 1998
 - The National Housing Federation Code of Governance 2020
 - The Regulator for Social Housing's Regulatory Framework
 - Any relevant amendments to such legislation or further codes / frameworks of practice.

2. It applies to...

- 2.1 This policy applies to all areas of the Ongo group, including our Commercial companies; Ongo Roofing (trading as Ashbridge Roofing Solutions), Ongo Heating & Plumbing (trading as Hales and Coultas) and Trent Valley Electrical Services Ltd.
- 2.2 This policy also applies to our Board Members, volunteers, tenants, potential tenants and tenant volunteers, customers (collectively referred to as customers throughout this document), partners, committees, stakeholders and to any external organisation supported or engaged by us including contractors working on our behalf.

3. Because we want to...

- 3.1 At Ongo, we are committed to meeting our obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 (the Act) protects people with 'protected characteristics' from unlawful discrimination, harassment, and victimisation (as defined in the Act).
- 3.2 We are mindful of our duties under the Public Sector Equality Duty (section 149 of the Act) so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we have regard to the need to achieve the objectives set out under section 149 of the Act.

4. We will...

- 4.1 Our goal is equality of opportunity for everyone who we have contact with and we will deliver our services and employment practices accordingly.

- 4.2 We promote FREDIE (Fairness, Respect, Equality, Diversity, Inclusion and Engagement) amongst everyone we work with and our workforce and the services we provide reflect and are appropriate to the needs of the diverse individuals and communities we serve.
- 4.3 All colleagues and customers' needs are understood and all services we provide meet individual needs, including in relation to the protected characteristics and customers with additional support needs.
- 4.4 We encourage colleagues, residents, and all other stakeholders to challenge and eradicate discrimination wherever it is encountered in respect of any of the protected characteristics.
- 4.5 We keep up to date with changes in society, legislation and regulation and put actions in place to ensure we comply with the changes.
- 4.6 Ongo is a Hate Crime reporting centre and we will ensure that when incidents are reported, the victims and their families are supported, and that action is taken against the perpetrators by working with partner agencies as well as implementing our own internal practices where appropriate.
- 4.7 **The Board**
- 4.7.1 The Board is committed to taking a clear and active lead in its commitment to achieving equality of opportunity, diversity, and inclusion. This is in all the activities of our organisation, including understanding the needs of our residents and communities as well as the composition of our Board and committees.
- 4.7.2 Our Board have agreed a set of objectives and priorities that will help us to deliver our aims of equality, diversity and inclusion and address inequalities. These objectives and priorities have helped to create a roadmap of where we are and the things we are already doing and where we want to be. This is published and updated on our website.
- 4.7.3 The Board have established effective leadership and implements robust governance arrangements to support us in meeting the objectives and priorities set. In line with the NHF Code of Governance requirement to oversee the organisation's compliance with all legal and regulatory requirements, it shall seek regular updates on how we are meeting our commitments and objectives in relation to equality, diversity, and inclusion and how these are being delivered in practice. At least every 12 months, the Board will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation.

- 4.7.4 We strive to ensure that our Board and Committee's composition comprise of people from diverse backgrounds and with diverse attributes, having regard to the diversity of the communities that we serve.

4.8 Our colleagues

- 4.8.1 All our colleagues (including volunteers and people on work placements) and job applicants shall be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation in respect of the protected characteristics set out in the Equality Act 2010 as well as membership or non-membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We shall also make reasonable adjustments where necessary to overcome any disadvantages due to disabilities.

All our policies, procedures, practices, and codes of conduct reflect our values and commitments to equality, diversity and inclusion and our aims to recruit to retain a diverse and inclusive workforce reflecting the communities we serve.

4.9 Our customers

- 4.9.1 At Ongo we are committed to ensuring equality of opportunity in the provision of our services. All our services are designed to be inclusive and meet the needs of all our customers. We aim to remove or reduce barriers to accessing our services.
- 4.9.2 We will recognise and respond to the diverse needs of our customers by providing accessible information in their preferred format to make sure their needs are met.
- 4.9.3 All customers will be treated with fairness and respect, and we will consult with them and obtain their views, particularly in relation to our equality, diversity and inclusion commitments and our customer engagement and participation activities will promote involvement from all groups of residents.
- 4.9.4 We will make sure all our customer facing policies and procedures (e.g., complaints) are clear, accessible, and simple, and are made available in different languages where required.
- 4.9.5 All forms of information and communication to our customers are available and accessible where required (e.g., big text, translation, or interpretation services).
- 4.9.6 We will ensure our services consider the sensitivities and needs of our diverse range of customers, including in relation to the equality strands, social, cultural, and religious needs and customers with additional support needs.

4.10 External service providers

- 4.10.1 Any external contractors, sub-contractors, agents or third parties providing services for or on behalf of Ongo are responsible for having a fit for purpose policy of their own. If they do not, they have to ensure their compliance with this policy, and we shall take action against non-compliance as appropriate.

4.10.2 During the procurement process:

- We will request information from potential contractors on their Equality & Diversity Policy and/or guidance
- We will ensure equality, diversity and inclusion questions are included in the procurement process
- We will ensure equality, diversity and inclusion requirements are included in contract management reviews

4.11 **Training**

4.11.1 At Ongo, we are committed to ensuring all colleagues receive appropriate equality, diversity, and inclusion training and that everyone is aware of this policy.

4.11.2 Equality, diversity and inclusion training forms part of our induction programme and all colleagues receive refresher training at regular intervals.

4.11.3 We are also committed to providing unconscious bias training to all colleagues.

5. **Making sure we do what we say...**

5.1 The Board are responsible for leading on this policy and delegate authority to the Leadership team to ensure this policy is implemented.

5.2 All managers are responsible for ensuring due regard to this policy is paid by their teams and are responsible for ensuring compliance with it when undertaking the duties of their roles or representing Ongo internally or externally.

5.3 Everyone is responsible for ensuring they champion our values of equality, diversity, and inclusion.

5.4 Any actions that are witnessed to be inconsistent with this policy are brought to the relevant manager's attention at the earliest opportunity.

6. **Other things to bear in mind...**

6.1 This policy links to all our policies, strategies, and procedures.

6.2 The main pieces of legislation and regulation relevant to this policy include:

- Equality Act 2010
- Public Sector Equality Duty
- NHF Code of Governance
- Housing Ombudsman Complaint Handling Code
- RSH Tenant Involvement and Empowerment Standard
- The Prevent Strategy

6.3 In addition to the above, at Ongo we understand that diversity and risks of discrimination can go beyond the protected characteristics set out in the Act and that we have a moral duty to address discrimination as an employer, a landlord and as a provider of services. We are committed to tackling inequality in its widest

sense and challenging discrimination based on a variety of social and cultural characteristics, including those set out in the Act but also including:

- Socio-economic background
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation

7. We'll look at this again...

7.1 In 3 years' time, if anything changes in that time, we will review earlier.

8. What we mean...

Equality	Equality is the fair and unbiased treatment of others, considering systemic and structural inequalities. This ensures equal opportunity and access for all groups which are protected by legislation
Diversity	Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they were born with or have acquired. These differences can go beyond the protected groups set out in legislation.
Inclusion	Inclusion goes further and is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.
Protected characteristics of the Equality Act 2010	➤ Age ➤ Disability ➤ Gender reassignment ➤ Marriage and civil partnership ➤ Pregnancy and maternity ➤ Race ➤ Religion/belief ➤ Sex (gender) ➤ Sexual orientation
Public Sector Equality Duty	(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010 (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it
FREDIE	➤ Fairness ➤ Respect ➤ Equality ➤ Diversity ➤ Inclusion ➤ Engagement

