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ORBIT

EQUALITY, DIVERSITY & INCLUSION POLICY

Executive Summary	This document outlines Orbit's Equality, Diversity & Inclusion Policy and links to the following Policies and Procedures: Data Protection Policy. This policy provides the framework for continuous improvement, to meet Orbit's commitment to equality, diversity and inclusion.
Approved by	People SMT – May 2018
EA completed	EA completed on 10 May 2018
Explain how customers have been involved.	N/A
Consultation	<i>This Policy was previously approved by various employee forums (OIO and Workability, E&D forum), People SMT have approved new content relating to employee data.</i>
Applies to	All employees

SCOPE: This policy outlines how we will promote equality, diversity and inclusion across our organisation. This should be followed in conjunction with the relevant procedures and linked policies. These include; Data Protection Policy, Disciplinary policy and procedure and Reasonable adjustments at work policy and procedure.

1. INTRODUCTION

This policy sets out how we will promote equality, diversity & inclusion across the entire business. Our aim is to have an inclusive environment where every employee can flourish. This policy ensures compliance with the Equalities Act 2010, General Data Protection Regulations, Public Sector Health Duty and the Regulator of Social Housing Standard.

2. DEFINITION

The objectives of the policy are to tackle social exclusion in its widest sense. Equality, diversity and inclusion are key parts of our business plans and fundamental to our success. Orbit will regularly report through multiple stakeholders on equality and diversity matters using unidentifiable data:

- To access opportunities that foster a culture of equality;
- To discourage and/or actively oppose any unfair or unlawful discrimination;
- To take into account the needs of all, particularly those with protected characteristics.

We believe in providing an environment that gives everyone an equal chance to live, learn and work free from discrimination, harassment, victimisation and prejudice. We respect and celebrate our differences.

3. THE LEGAL AND REGULATORY REQUIREMENTS

3.1 Equality Act 2010

We are committed to meeting the duties of the Equality Act 2010. The Equality Act protects people with 'protected characteristics' of; Age, disability, sex, gender identity, ethnicity, religion/ belief, sexual orientation, pregnant / on maternity leave, those who are married or in a civil partnership from discrimination.

We will ensure that no employee or job applicant is discriminated against or receives less favourable treatment on the grounds of their protected characteristic or their; health, family circumstances (responsibility for dependents), criminal convictions, HIV status, plus any other ground which cannot be shown to be justified.

3.2 Regulator of Social Housing Standard

Our Regulator specifies the requirements on housing associations through its Standards framework. Regulatory standards contain specific expectations and the outcomes that we are expected to achieve in relation to Governance, Value for Money, Rents, Tenant Involvement and Empowerment, Homes, Tenancies, and Neighbourhood and Communities.

3.3 Public Sector Duty Act

Under this duty all organisations providing a public service are required to have due regard to the need to achieve the following objectives:

- (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.

4. OUR COMMITMENT

4.1 Customers - as a Service Provider we will:

- Seek to ensure that we are governed by board members whose understanding of our customers is key to their board member role.
- Seek to understand who our customers are and provide a range of services and housing options for people, in the communities in which we work.
- Actively seek the views of customers and potential customers, when planning, reviewing or making significant changes to our services, ensuring that our services are accessible, relevant and of use to our customers.
- Provide clear and meaningful information in ways that are accessible and which meet the diverse needs of our customers.
- Investigate promptly any complaint and take immediate action where there is evidence of direct or indirect discrimination.
- Work with community groups and others to contribute to an environment and community free from harassment and violence.
- Monitor and evaluate the services that we provide to ensure they do not discriminate or exclude individuals or people from different groups.

4.2 Employees - as an Employer we will:

- Not tolerate prejudice, discrimination or harassment. Breaches of our Equality, Diversity and Inclusion policy will be regarded as misconduct and could lead to disciplinary proceedings.
- Provide reasonable adjustments for any employees who are disabled where reasonable and possible.
- Provide relevant training and skills for employees and managers to ensure we value diversity and reduce inequality.
- Monitor and reviewing diversity across our employees that will help Orbit to be a Great Place to Work
- Monitor our employment policies and practices to ensure that they are fair and demonstrate our commitment to diversity.

4.3 Stakeholders and Partners – 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.
- Encourage and support people to be active in community life by celebrating contributions and respecting the variety of lifestyles and cultures.
- Ensuring that equality and diversity is embedded throughout our procurement activity.

5. DATA PROTECTION

- 5.1 We will actively monitor our performance to ensure we are meeting our commitments in relation to equality, diversity and inclusion.
- 5.2 Orbit will use personal data (age, disability, sex, gender identity, ethnicity, religion/belief, sexual orientation, pregnant / on maternity leave, those who are married or in a civil partnership) to monitor and improve equality for employees using psuedonymised data to report on trends.
- 5.3 Orbit will follow the Data Protection Principles when using personal data to report on trends and inform company wide initiatives to address any inequalities.
- 5.4 Orbit will ensure employee data is processed fairly and lawfully. Any personal data will be maintained by each employee on the myHR self-serve system. However, employees do have the option of providing this data or not. Orbit will use this data for reporting purposes and are committed to complying with all relevant data protection legislation when handling your data. Orbit will ensure that employee personal data will not be retained for longer than is necessary and any inaccuracies will be erased or rectified without delay.
- 5.5 Orbit obtains and processes personal data for limited purposes outlined below:
- Generating confidential reports using psuedonymised data for each SMT on absence, leavers and recruitment (for example – the senior People Team will undertake analysis of job applicants with protected characteristics applying for roles. If this is significantly disproportionate we would look to advertise roles and attract candidates from other avenues working with other partners, advertising routes etc)
 - Generating confidential reports using psuedonymised data for the Orbit Leadership Team and senior People Team on grievance and disciplinary cases (for example analyse proportion of males v females and white British vs black and minatory ethnic cases to ensure we have a fair and equitable approach to performance management. If this is significantly disproportionate we would look to rollout further training and support to managers improving awareness in this area such as unconscious bias awareness)
 - Progression and development opportunities (for example the senior People Team analyse confidential report using psuedonymised data to tailor people development programmes for females, lesbian, gay, bi sexual trans or black and minority ethnic employees to move into management roles or work on various orbit projects)
 - Generating Gender pay reports in line with UK and EU legislation
 - Generating confidential reports using psuedonymised data¹ on our employee engagement levels by protected characteristic. This helps to inform the annual plan for diversity, inclusion and equality working with the diversity forum comprising of LGBT reps, workability/disability forum reps, board members, customer facing employees, policy specialists, policy specialists and people specialists (i.e. lower engagement scores on career opportunities for disabled employees drives Orbit to work more closely with employee forums and

¹ GDPR defines pseudonymization in Article 3, as “the processing of personal data in such a way that the data can no longer be attributed to a specific data subject (individual) without the use of additional information.”

workability reps to put actions in place to address this)

- Personal data will be kept secure and shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

5.6 Orbit will retain and erase personal data after 6 years following leave date.

6. **DISABILITY PASSPORT/REASONABLE ADAPTATIONS IN THE WORKPLACE**

6.1 Orbit's policy on reasonable adjustments in the workplace outlines the approach for employees and managers.

6.2 Orbit have also introduced disability passports to help discussions between managers and employee. This ensures continuity in adjustments made and the ongoing review of the situation is maintained.

6.3 Orbit has access to a Workplace+ Profiler. This is an online assessment package that helps identify dyslexia-type traits, and other learning difficulties that often overlap. It provides a better understanding of strengths and challenges relating to dyslexia and other related Specific Learning Difficulties.

7. **EQUALITY AND DIVERSITY**

7.1 Orbit policies are developed in line with our **Equality, Diversity and Inclusion policy** approach. An Equality Analysis has been conducted and the details can be accessed via myPolicy. If you do not have access to myPolicy please contact the Policy and Standards team who will be able to provide you with a copy.

8. **COMPLAINTS**

8.1 Anyone is able to make a complaint about the service they have received and this is managed under our **Complaints Policy**.

9. **PRIVACY STATEMENT**

9.1 Orbit are collecting information ('personal data') so that we can manage and support our relationship with our customers and employees, comply with legal obligations, improve our services and achieve our legitimate business aims. We are committed to complying with data protection legislation when handling customers' and employees data. Customers and employees have rights around their data, including the right to access their data, and to object to the way it is processed. For more information on how and why we process customers' and employees' data, and how customers can exercise their rights, please see our full Privacy Policy on our website at www.orbit.org.uk/privacy-policy/.

10. **MONITORING AND ACCOUNTABILITY**

10.1 Compliance with this policy will be monitored by the People Senior Management Team and the Equality, Diversity and Inclusion group comprising employees, Board Members and Resident Board Members twice annually.

10.2 The Senior Leadership Team is responsible for ensuring that Orbit's business

plan encompasses our commitment to equality of opportunity and action plans deliver equality.

11. **REVIEW**

11.1 We aim to carry out a fundamental review of this policy every three years or sooner if there are legal or regulatory changes or if internal changes are required.