

Equity, Diversity and Inclusion (EDI) Policy

Our policy to create a diverse, equitable, and inclusive organisation

Our approach

Leeds Federated is a stronger organisation for embracing equity, diversity, and inclusion and accommodating abilities, cultures, skills, needs and strengths. This manifests itself in satisfied customers who feel respected, confident partners and stake holders, and a motivated workforce with diverse skills.

Our commitment to these ideals goes beyond compliance with regulations. We believe that they are fundamental to our mission to help people make a home.

The basics

What does Equity mean at Leeds Federated?

Our definition of Equity relates to the culture and service that each person coming into contact with Leeds Federated experiences. We believe that everybody should be afforded the same Equity of opportunity, and we recognise that in order to achieve this, action is required to clear obstacles that individuals may face. This is something we continually strive for at Leeds Federated in relation to both service provision and employment practice.

What does Diversity mean at Leeds Federated?

Diversity means difference and describes a group where no two people are the same. Diversity embraces both the visible differences, such as sex, ethnicity, physical disability as well as the invisible, such as nationality, sexual orientation, and neurodiversity.

We embrace the natural differences between people and within communities. Diversity is positive and we strive to create a culture that seeks, respects, and values difference.

What does Inclusion mean at Leeds Federated?

Inclusion is the principle that everybody should feel that they belong and able to use our services, or to work within our organisation. We recognise that some people will experience barriers to this and that to be an inclusive organisation means striving to break down these barriers. We're committed to creating an environment where no individual is made to feel uncomfortable because of who they are.

Overall Aim

Our policy aims to:

- demonstrate the commitment of our Board to achieving Equity of opportunity, diversity and inclusion across all of Leeds Federated
- ensure diversity across the Board

- ensure progression against our set goals and transparency in our work to ensure that the fundamental importance of EDI is embedded and valued throughout the organisation. This is based on an understanding of how a culture of inclusivity enhances the success of Leeds Federated's business and its customers.
- ensure that a commitment to providing inclusive services which are aligned with the diverse needs of our customers is embedded in the organisation's culture and operations and embraced by colleagues at all levels.

This policy supports our mission to help people make a home and is aligned with our following objectives:

Objective 1: Thrive

Objective 2: Engage

Objective 3: Evolve

Key points for customers

Delivery of services

To make sure our services to customers are delivered in an inclusive and accessible way, we have a number of policies and procedures which underpin our commitment to EDI and provide details on how we achieve this. e.g. our Lettings Policy and Adaptions Policy.

Our contractors

Contractors and partners play a pivotal role in the delivery of services and must align with our principles.

We work with our contractors, partners and suppliers to ensure that they understand our EDI commitment and require assurance that they have a similar commitment and approach to EDI as us.

Key points for colleagues

Policy statement

We're committed to achieving Equity of opportunity, diversity, and inclusion, embedding it into everything we do. We want to ensure that all colleagues are treated equally, without bias, and with respect and dignity. This commitment is led by our Board, who are responsible for embedding these values in Leeds Federated.

Our employees, customers, job applicants, board members, consultants, contractors, agency, and casual workers will not be treated unfairly or differently because of any of the following characteristics:

race (which includes colour, nationality, ethnic or national origin), **disability**, **sex**, **sexual orientation**, **gender reassignment**, **marital or civil partnership status**, **pregnancy** and **maternity**, **age**, **religion** or **belief** (Protected Characteristics).

We seek to create an inclusive work environment where individuals' qualities and differences are valued as assets. We aim to extend our inclusivity beyond the standards set by legal requirements or compliance.

We support positive practices in delivering our EDI vision and goals and challenge discriminatory actions or expressions.

Workforce

We've implemented a number of policies which are regularly reviewed and updated by the Board, e.g. People and Culture Policy, Whistleblowing Policy, Flexible Working Policy, Probity Policy, Transparency and Accountability Policy. These policies ensure we offer an inclusive work environment to all of our colleagues.

We're committed to making reasonable adjustments to remove barriers and support employees with disabilities.

We're keen to ensure that we attract and retain staff from diverse social, educational, family, racial and cultural backgrounds as we firmly believe that the diversity of our staff is an integral part of our ability to deliver high quality inclusive services to our customers and to run a successful business. We will advertise job vacancies in a range of ways to include under-represented groups.

Complaints and whistleblowing

We have a zero-tolerance approach to breaches of our EDI policy. We encourage colleagues and customers to report any breaches or suspected breaches via our Complaints and Whistleblowing Policies.

We will fully investigate breaches to ensure fair and appropriate outcomes are achieved. Where we find failings we're committed to learning from these and implementing measures to prevent breaches from re-occurring.

Communication plan

We'll communicate this policy through team meetings, briefings for colleagues, and training and development. The policy will be included with other policies on our intranet 'One Place' and on our teams channels.

Monitoring, evaluation, and reporting

We will monitor, evaluate and report on the activities in Policy, through:

- Customer satisfaction surveys
- Customer profile information
- Equality Impact Analyses
- HR and Board statistics
- Colleague Opinion Surveys
- Balanced scorecard
- Complaints

Customer, Colleague and Board Profiles

We understand that the people who use our services have diverse characteristics, different experiences, needs and aspirations. The profile of our customers is updated on a regular basis. A report is produced annually which profiles our customers on areas such as tenancy, preferred communication methods and personal information. We collect and update this data in various ways, taking into account GDPR regulations, example e.g. when customers contact us, when Housing colleagues visit customers and when customers access their account online.

The make-up of our team of colleagues and Board members is monitored against available data for our customer base and the city of Leeds more widely. We will collect and maintain protected characteristic data on customers, colleagues and Board members as follows:

	Customers		Staff		Board	
	Collect	Maintain	Collect	Maintain	Collect	Maintain
Ethnicity	✓	✓	✓	✓	✓	✓
Disability	✓	✓	✓	✓	✓	✓
Sex	✓	✓	✓	✓	✓	✓
Age	✓	✓	✓	✓	✓	✓
Religion & Belief	✓	✓	✓	✓	✓	✓
Sexual Orientation	✓	✓	✓	✓	✓	✓
Pregnancy & Maternity	✓	x ¹	x ²	x ²	x ²	x ²
Gender re-assignment	✓	✓	✓	✓	✓	✓
Marriage & Civil Partnership	✓	x ¹	✓	✓	✓	✓

¹ this information is collected from customers at housing application stage, and at any subsequent application for a transfer or house exchange, but is not considered of any practical benefit to maintain this on an ongoing basis

² this information is not requested at application stage for employment or Board membership in line with employment legislation. However it is recorded when a colleague or Board member tells us that there is a change in their maternity status

Background

The communities of Leeds and areas surrounding Leeds are varied and diverse. We recognise this variety of diversity and work hard to ensure that the provision of its services and support are appropriate and accessible.

We understand our customer profile and strive to ensure that the profiles our team of colleagues and Board reflect the communities we work in.

Business context

This policy addresses the requirements of:

- the Equality Act 2010
- the Regulatory Standards issued by the Regulator of Social Housing on responding to the diverse needs of customers in relation to service delivery and communication

- the NHF Code of Governance 2020 in relation to EDI, Workforce, Functions of the Board and Board Election, Selection and Appointment.

This policy applies to all colleagues including Board and Committee Members of Leeds Federated and all its legal entities.

Equality Act 2010

The Equality Act 2010 (the Act):

- Protects people from discrimination based on 9 “protected characteristics”, which are age, disability, gender re-assignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- States that the following forms of discrimination are unlawful:
 - Direct discrimination: treating someone less favourably because of a Protected Characteristic.
 - Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not 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 and 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.
 - Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.
- Requires all organisations providing a public service, such as Leeds Federated, to observe the public sector Equality duty which requires them to demonstrate how they will:
 - eliminate discrimination, harassment, and victimisation and other conduct prohibited in the Act; and
 - advance Equality of opportunity between people who share a protected characteristic and those who don’t by:
 - removing or minimising disadvantages suffered by people due to their protected characteristics;
 - taking steps to meet the needs of people from protected groups where they are different from the needs of other people;
 - encouraging people from protected groups to participate in public life or in activities where their participation is disproportionately low.
 - foster good relations between people who share protected characteristics and those who do not.

- The Regulatory Standards issued by the Regulator of Social Housing require us to:
 - Provide choices, information and communication that is appropriate to the diverse needs of our customers in the delivery of all services;
 - Understand and respond to the diverse needs of our customers, including in relation to the Equality strands and customers with additional support needs, in the way we provide services and communicate with customers.

Key points for board members and committee members and the regulator

The Board, Leadership Team, Operational Managers and all colleagues are responsible for ensuring that this Policy is implemented.

Our Board has access to insight into the views of colleagues on a variety of issues via periodic colleagues satisfaction survey results. This enables the Board to ensure that the views and opinions of our colleagues are taken into account in their decision making.

Leadership

The Board is responsible for embedding EDI in Leeds Federated which it achieves through:

- Setting priorities and objectives on EDI which it does through the approval of this policy;
- Seeking regular assurance on how these commitments and objectives are being delivered in practice by receiving an annual EDI report which also assesses performance against the targets set in this area;
- Publishing, on an annual basis, EDI information about colleagues (including Board and Committee Members) and customers. The report also includes updates about our work to delivering our EDI commitments and objectives, and the progress we've made against those objectives.

Board election, selection, and appointment

Our Board supports our EDI commitments and is aware of the advantages that a diverse membership brings to the governance of Leeds Federated. The Board make up aims to match customer profiles and this is achieved through the election, selection and appointment processes as outlined in our Board Recruitment, Tenure and Succession Policy.

Our Board and Committee recruitment activity is undertaken in a fair, open and transparent way, following a competitive and merit-based process. We will use various methods to attract underrepresented groups to the organisation but will always appoint the most skilled person to do the job.

Board Terms of Reference

Section 2.1: Strategy and management

Links to Risk Register:

- 21. Non compliance with data protection regulatory requirements
- 23. Poor customer perception of service quality and/or value for money

Equality Analysis

As a private sector body, Leeds Federated does not fall automatically within the scope of the Public Sector Equality Duty as defined in the Equality Act 2010, except insofar as it can be considered to be acting as a public authority in delivering public functions. No such functions are directly governed by this policy document and hence an Equality Analysis is not required.

Policy updates

The Head of Corporate Services and Head of Services Improvement are responsible for updating this policy.

Policy updated and approved March 2025. Next review due March 2027.