

Equality Diversity & Inclusion Policy



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Introduction and Aim

1 Introduction

Cobalt is committed to ensuring that our working environment is inclusive and free from discrimination or harassment, alongside promoting equality of opportunity in all that we do. Our Equality, Diversity and Inclusion (EDI) Strategy (2024) and associated implementation plan set out how we will ensure we will treat all customers, colleagues and those in our wider communities fairly and equally.

2 Defining Equality, Diversity and Inclusion

Cobalt aligns its understanding of EDI with the National Housing Federation's definitions:

- Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents. It is also the belief that no one should have poorer life chances because of the way they were born, where they come from, what they believe, or whether they have a disability.
- Diversity is the different characteristics that occur in a group of people. It is made up of the things that make us unique and different which could include cognitive skills, personality traits or the things that make up the protected characteristics such as race, age, gender, religion or sexual orientation.
- Inclusion is including people in a way that is fair for all, values everyone's differences, and empowers and enables each person to be themselves and achieve their full potential and thrive at work and in their homes and communities.

3 Policy Aims

This Policy highlights and celebrates Cobalt Housing's commitment to achieve equality for all. In particular, the aims of this Policy seek to address the needs of people with the following protected characteristics as recognised in the Equality Act 2010:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Cobalt Housing recognises our requirements to eliminate the following types of unlawful discrimination:

- Direct Discrimination
- Direct Discrimination based on Perception and Association
- Indirect Discrimination
- Discrimination arising from a disability
- Failure to make a disability related reasonable adjustment

- Harassment
- Harassment based on Perception and Association
- Victimisation
- Instructing, inducing or causing discrimination

Alongside our organisational approach to EDI, which has been developed collaboratively with customers, colleagues, and the wider community, Cobalt will also strive to ensure that people do not experience disadvantage due to their socio-economic background or circumstances, educational attainment, employment status, digital exclusion, or wider determinants of inequity - irrespective of whether these related to one of the legally protected characteristics that are listed above.

Cobalt operates a zero-tolerance policy towards discrimination. We will seek to promote equality of opportunity in the provision of services, information, employment and training, and will seek to communicate in ways which reflect the needs of diverse groups.

In pursuit of this objective, we will:

- Recognise that people have different needs to be accounted for in the development and delivery of services;
- Ensure our policies and procedures do not discriminate and actively promote diversity;
- Treat all individuals with respect and in accordance with our core values;
- Monitor compliance with our regulatory and legal requirements;
- Consider positive action that will support equality amongst the protected characteristics;
- Investigate promptly and thoroughly any complaints of harassment or discrimination;
- Ensure the EDI agenda forms an intrinsic part of the organisational culture and all that we do.

4 Policy Statement

Cobalt Housing is committed to providing an environment free from discrimination, bullying, harassment or victimisation, where all customers, colleagues and others who work with and for us are treated with respect and dignity. We recognise and value the contribution that people from all areas of the community can make to our work and will seek to promote a culture that reflects this approach.

We will work to ensure that no one is disadvantaged on the grounds of any of the nine protected characteristics as outlined in the Equality Act 2010.

Through this Policy, we will ensure that we meet our legal and regulatory responsibilities. In line with the Equality Act 2010, we are committed to:

- Eliminating unlawful discrimination, harassment and victimisation;
- Advancing equality of opportunity between people;
- Fostering good relations between people.

In order to achieve this, we will provide on-going training to our colleagues and Board members, partners and customers to adopt a proactive approach, raise awareness,

adapt our policies and services and challenge discrimination, as set out in the Cobalt EDI Strategy 2024.

This Policy applies to Cobalt customers, Cobalt colleagues (including Cobalt Plus) and those who deliver services on our behalf or in our offices, including partners, contractors, agency, temporary staff and volunteers.

5 Responsibilities

In order to embed Cobalt's commitment to Equality and Diversity, responsibility will reside at **Board** level, with clear lines of accountability for implementation defined throughout the organisation. These commitments have been defined in the EDI Strategy (2024). The commitments contained within this Policy must be applied by everyone in their day-to-day operations.

As described in our EDI Strategy, the **Board** and Cobalt's **Senior Management Team** are responsible for ensuring that Cobalt takes every opportunity to challenge inequity, promote diversity and empower people and communities, and are responsible for the consistent application of this Policy.

Managers, Heads and Leads are responsible for driving forward EDI in their teams, ensuring that recruitment is undertaken fairly and recognising potential disparities in team opportunities and seek advice and develop their own understanding to address these.

All colleagues are responsible for their own behaviour and actions ensuring that they adhere to this Policy and challenge any behaviour contrary to this Policy in the course of their employment at Cobalt, as well as for completing mandatory training and raising or escalating any EDI-related issues that they become aware of in the delivery of their role.

Policy Principles

5.1 Service Provision

Cobalt Housing is committed to working towards the reduction and elimination of disadvantage that groups within the communities we serve may experience. We will be mindful of our commitment to equal opportunity, whilst seeking to achieve the highest standards of quality, service and value for money through the procurement of goods and services, appointing contractors, suppliers, consultants and other agencies to work for and on behalf of the Company.

We utilise a range of data about our homes and customers to ensure that we are able to provide differentiated services. We are continuing to develop our approach to collecting, maintaining and analysing our data to develop services and approaches to ensure that we are able to provide our customers with an individualised service that best reflects our customers' needs. As such, we will ensure physical access to services for vulnerable and disabled persons and provide specialist support to disadvantaged groups where possible by establishing links with referring agencies.

By marketing our homes through a variety of mechanisms, assessing and analysing housing need through a fair and consistent process we will monitor the allocation of lettings and the composition of application waiting lists.

Our organisational information is widely available in a variety of formats, to ensure that all sections of the community, and in particular people or groups who are most disadvantaged, can gain access to services. Our website includes automatic translation facilities so that it can be accessed by those for whom English is not a first or primary language.

Customer satisfaction levels are monitored on a regular basis with a view to improving services and specifically for those with protected characteristics.

5.2 Recruitment and Employment

Cobalt Housing aspire to have a diverse workforce, which has the skills and understanding to achieve its goals. We aim to ensure that all colleagues treat each other with dignity and respect and will not tolerate any form of discrimination or harassment within the workplace.

Job vacancies are advertised in a variety of ways to maximise our potential for recruiting to a diverse workforce from the broadest cross section of applicants and all adverts will reference our commitment to equal opportunities.

Cobalt also recognises that in order to recruit a diverse range of applicants, recruiting practices must encourage those from different communities and backgrounds to apply for roles. Cobalt therefore encourages use of different non-traditional recruitment techniques, including open days, video interviews, engagement with partners and other appropriate methods. We also encourage use of community networks and partners where possible to ensure job advertisements, recruitment events and other opportunities are widely disseminated and available to everyone in our community.

Job role, job descriptions and the short listing and interview processes utilised should take cognisance of Cobalt's EDI Strategy and Policy, including by modifying our processes and documentation to ensure that those with a range of different needs (for example due to neurodiversity) are able to equally access Cobalt job opportunities. Using a fair and systematic basis for selecting suitable candidates via a range of pre- specified criteria ensures no applicant receives less favourable treatment than another.

We maintain robust and accurate equal opportunities information as a means of identifying areas of inequality and look to encourage and maintain a colleague demographic that reflects the composition of the communities we serve. We regularly report this information as part of national data collections (for example, via the NHF's EDI data collection).

5.3 Colleagues

This Policy is available to all colleagues together with bullying, harassment and dignity at work processes which support our colleagues to operate within a safe and open environment.

We will make reasonable adjustments where necessary, to ensure all colleagues are able to continue in employment with us, provide a well-being programme and offer flexible working if required to ensure all colleagues can achieve a positive work-life balance, within service constraints.

We recognise that diversity is a key strength and will seek to foster this further through the mechanism of collecting relevant colleague equality monitoring information. Having sound monitoring systems in place ensures we can fully assess the impact of our policies on colleagues and enables us to establish whether we are adequately preparing to meet diverse needs. Equality monitoring information is collected and maintained in Cobalt's HR System (Cascade).

All personal information held is sourced and maintained securely and confidentially. Access to information is restricted to the Human Resources Team and those responsible for maintaining digital security and systems.

5.4 Customers

This Policy is available to Cobalt Housing customers. As set out in our and we will endeavour to make regular contact with representative groups to provide support with the issues they face and allow them to access information and advice.

We regularly consult with all customers and residents on the services they receive and encourage them to participate in the decision-making process and specifically with any customers facing discrimination about their needs. Customers are encouraged to adopt our equality and diversity principles. Membership of resident groups and forums is open to all including Board members who are representatives from the local community.

Cobalt Housing customers are expected to adhere to this Policy and the terms set out within their Tenancy Agreement by ensuring their behaviour respects Cobalt Housing's commitment to promoting community cohesion and the needs and cultures of all people within their community.

It is vital that we can recognise and understand who our communities are so that we can plan our services to meet the needs of these communities. Customer Profiling enables us to keep up to date with the diversity profile of our customers enabling us to respond accordingly. Whilst we are keen to encourage the disclosure of this information we recognise that the decision to disclose this sensitive information is a personal and individual decision. Customers are reassured that disclosure of this information is voluntary and is subject to the strictest levels of confidence and security and in compliance with the Information Security Policy.

5.5 Partners, Sub-Contractors and Supplier

Partners, sub-contractors and suppliers with whom we work with are expected to have their own Equality and Diversity Policy. This will be reviewed as part of but in the absence of one, as part of working arrangements, we will ask them to agree to adhere to this Policy.

5.6 Complaints

We aim to develop a culture where individuals can feel confident to bring complaints without fear of prejudice, and we will have the appropriate policies and procedures in place for dealing with bullying, harassment and its prevention.

Cobalt Housing takes all claims of discrimination very seriously and will take appropriate action against those concerned. Discrimination occurs when someone directly or

indirectly treats a person or a group of people unfavourably because of a protected characteristic. This covers all behaviour including remarks and insinuation, both verbal and non-verbal, which cause offence. Complaints should be raised as soon as possible so that the matter can be dealt with quickly.

Any customer who feels they have been unfairly treated in any way by Cobalt has a right to use the Complaints and Discretionary Compensation Policy. Specific anti-social behaviour, domestic violence and harassment policies have also been developed to ensure that we have an adequate, transparent and fast method of dealing with issues. These are all available on our website.

Any colleague who is subject to harassment, bullying or discrimination is encouraged to refer to the Dignity at Work Policy and seek guidance from a member of the Human Resources Team. If a colleague experiences any discriminatory behaviour from a third party such as customers or clients, they should raise the matter immediately with their line manager, or where this is not possible, with a member of the Human Resources team.

Applicants for employment and third parties concerned about the application of the policy should consult the Human Resources Team in the first instance.

5.7 Monitoring

Monitoring will be used to ensure that our policies and activities are fair, transparent and promote equity of opportunity and so that we can monitor progress towards being more representative of the communities in which we serve. Monitoring information will be used to help us understand where we might need to do things differently to maximise equitable outcomes in areas such as recruitment and staff development and retention. It will help shed light on potential barriers or biases within our processes and practices that could disadvantage people with shared protected characteristics, and therefore will help us modify and develop the EDI Strategy implementation plan based on what has been identified.

As set out in our EDI Strategy, we will include performance against our equality, diversity and inclusion objectives against the 2024 EDI Implementation Plan regularly to Board, providing an assessment of what we have achieved. As set out in our EDI Strategy, we will also engage with and complete returns for national EDI tools and data collection such as the National Housing Federation's EDI data return, equal pay monitoring and other audits, and use the information to drive our approach to identifying areas for improvement and challenge.

If through monitoring any discrimination is identified, Cobalt Housing will take necessary corrective actions to eliminate it. The Inclusive Decision-Making process will be completed on all strategies, policies and changes regarding SMT approval.

No information will be published or used in any way that allows any individual to be identified, without such individual's prior agreement. Individuals can request to have equality information that they have provided to be removed at any time.

5.8 Communication

We will make sure that this Policy is made available and publicised on a widespread basis:

- The Policy and associated Strategy will be made available on our website.
- All employees, board members, applicants for jobs and contractors and consultants working for Cobalt will be advised of the policy.
- Links to the Policy and the associated EDI Strategy will be included in the employee handbook and discussed with all new starters during their induction.
- Contractors, bidders and suppliers will be advised of the policy and associated EDI Strategy through the tendering and contract review processes and will be expected to uphold the standards of this Policy and Strategy in everything they do.

Regulatory & Legislative Compliance

- The **Equality Act 2010 (Public Sector Equality Duty)** requires organisations carrying out public functions to think about how they can improve society and promote equality in every aspect their day-to-day business.
- The new **Consumer Standards** require housing associations ensure that they take action to deliver fair access to, and equitable outcomes of, housing and landlord services for all customers.
- The **NHF Code of Governance** has placed a new emphasis on EDI, and boards are now required to take an active lead in committing to equality of opportunity, diversity and inclusion in all the organisation's activities as well as in their own composition.

Links to Other Key Documents

- EDI Strategy
- EQIA Policy
- Anti-Social Behaviour Policy
- Domestic Abuse Policy
- Safeguarding Policy
- HR Policies and Contract of Employment

Governance of this Policy

<p>Equality Diversity & Inclusion (ED&I)</p>	<p>An Equality Impact Assessment (EQIA) was completed. Date 07.05.2024</p>
<p>Financial and Links to VfM</p>	<p>No direct VFM impact.</p>
<p>Privacy and Data Protection</p>	<p>The use of personal information will be treated with appropriate levels of confidentiality and will be fair and lawful, in accordance with Cobalt’s Data Protection Policy. Cobalt will ensure that personal information is accurate; not kept for longer than is necessary; secure; and adequate, relevant and not excessive. All information will be processed in accordance with the data protection rights of the individual.</p>
<p>Health and Safety</p>	<p>All employers have a duty to make reasonable adjustments for disabled employees and those with other protected characteristics under the Equality Act 2010. Where these adjustments are required, a review will be undertaken to understand potential health and safety impacts.</p>
<p>Development and Consultation</p>	<p>A wide-ranging and vigorous consultation process was undertaken as part of development of the EDI Strategy, which forms the basis and driver for the associated EDI Policy. Consultation set out below has been undertaken for the EDI Strategy, which in turn has defined the parameters and expectations of the EDI Policy.</p> <p>A brief summary of the findings, and where consultation has influenced the policy is detailed within the policy checklist QR COB 0058</p>

