



**Equity, Diversity,
Inclusion and
Belonging**

Policy:	Equity, Diversity, Inclusion and Belonging
Version number:	4.0
Date effective from:	May 2025
Policy Owner:	People Director
Policy Author(s):	Senior Human Resources Business Partner
Accountable Executive:	Executive Director of Customer, People and Engagement
Approved by:	People Committee
Equality Assessment:	Yes
Next review of policy due:	May 2028
Policy Grade:	1
Scope:	The policy is applicable to all colleagues, customers, board and committee members, clients, communities, suppliers and contractors, whether permanent or temporary. The policy also applies to all processes relating to employment and training.
Purpose:	To set out the Group's approach to equity, diversity, inclusion and belonging.
Roles and Responsibilities:	<ul style="list-style-type: none"> • Human Resources - policy owner; ensure this policy is up to date, incorporates best practice and is legally compliant; provide advice and support; oversight of consistency of application. • Colleague – understand and adhere to policy; ensure actions are completed in a timely manner; ensure their own behaviour and conduct is appropriate; awareness of escalation of issues. • Line Manager – responsible for the implementation of the policy; decision making; carrying out the required actions in a timely manner; reporting, maintaining compliance and following the policy; escalation of issues.
For the full version history of this policy, see the back page	
If you require this policy in a different format, please speak to the HR Team.	

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Policy Statement

Gentoo is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

Gentoo is fully committed to fostering a strong culture that drives fairness, courtesy, and respect. It aims to eliminate unlawful and unfair discrimination and values the differences that a diverse workforce brings to business. The Group will not discriminate because of any other irrelevant factor and will take action to deliver fair and equitable outcomes and a culture that values openness, fairness, and transparency.

All colleagues are responsible for the promotion and advancement of this policy. Behaviour, actions or words that breach the policy will not be tolerated and will be dealt with in line with the Group's disciplinary policy.

Our Commitment to you

We are committed to the principles of equity, diversity, inclusion and belonging throughout the Group, and we will:

- Treat everyone equally, fairly, and with respect
- Welcome and value difference and not tolerate discrimination, harassment or victimisation of any individual or groups
- Challenge the behaviour of those who do not uphold our values and go against our principles
- Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities

We will take appropriate action to remove barriers faced by people from different groups, providing:

- Fair access to our services
- Fair outcomes for the people using our services
- Fair opportunities to participate and be involved in shaping our services

We will use relevant information and data to understand the diverse needs of individuals, including those arising from protected characteristics, language barriers, and additional support needs.

It does not form part of a colleague's contract of employment or otherwise have any contractual effect on Gentoo's Terms and Conditions.

What we expect from you

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others.

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

You should be aware that you can be personally liable for discrimination and harassment.

If you're unsure about any parts of this document, please reach out to your manager or the HR Team who will be able to support you.

Regulation and Legislation

- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Employment Rights Act 1999
- Gender Recognition Act 2004
- Equality Act 2010
- Modern Slavery 2015
- Regulator of Social Housing Consumer Standards 2024

Equity, Diversity, Inclusion and Belonging

We are passionate about celebrating differences and are clear on the approach we take. This means:

Equity	Treating people fairly; this is not the same as treating everyone the same way. We believe no one should experience less favorable treatment, discrimination or be at a disadvantage. Everyone should have the same chances and opportunities and we must acknowledge and make adjustments to ensure this happens. Providing fair and equitable outcomes for colleagues and customers.
Diversity	Recognising, respecting, and celebrating the differences in each of us. The many parts of a person's character and identity make them unique.
Inclusion	Creating an environment where everyone feels safe, valued, and involved. We understand someone's differences, so that they are included in a way that suits them and they are treated fairly.
Belonging	It's the level of inclusion people feel in their environment – it is feeling heard, supported, respected, and given equal opportunities to participate and contribute.

We are committed to the principle of diversity and inclusion for all colleagues and customers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.

We are committed to diversity and inclusion to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.

We aim to create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all colleagues are recognised and valued.

We will review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

Discrimination

Colleagues must not unlawfully discriminate against or harass other people, including current and former colleagues, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

Direct discrimination: treating someone less favorably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay, or treating a customer differently.

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. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

Associative discrimination: Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.

Discrimination by perception: Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

Disability discrimination: this includes direct and indirect discrimination, any unjustified less favorable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Harassment: is unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment is: conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Victimisation: retaliation against a colleague or customer who has complained or has supported someone else's complaint about discrimination or harassment.

Bullying: There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and

usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

Recruitment

We will monitor the composition of the existing workforce and of applicants for jobs (including promotion) and will aim to take steps to improve the diversity of our workforce and provide equality of opportunity.

Job Descriptions and Person Specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job.

All colleagues who participate in recruitment and selection activities will receive training in issues of diversity and inclusion in employment.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions

Candidates who identify with having a disability and meet the essential criteria will be shortlisted for interview for posts within Gentoo.

Job applicants should not be asked questions that might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

Gentoo is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective colleagues, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to

satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.

Training, Education and Development

We recognise the need to invest in a range of different learning and development opportunities to develop colleagues.

We will make opportunities for training, development, and progression available to all colleagues, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Group.

Access to such opportunities will be provided on the basis of the needs of the business. All colleagues will be given equal consideration for training and development.

We will provide training in diversity and inclusion to all colleagues. Mandatory training will be provided as part of the induction process for new starters and regular refresher training and additional workplace specific training will be made available.

Terms and Conditions

We will ensure all terms and conditions relating to pay and benefits, disciplinary, grievance and selection for redundancy are inclusive and non-discriminatory.

We will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked, and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the business considers it has good reasons, unrelated to any protected characteristic, for doing so.

We will comply with its obligations in relation to statutory requests for contract variations. We may also make reasonable adjustments to its standard working practices to overcome barriers wherever possible.

We will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the business. Colleagues should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

Leave and Flexible Working

To support our colleague wellbeing, we operate a program of work-life balance initiatives to support and promote a good work-life balance and recognise the variance in working patterns of colleagues.

We will ensure policies relating to flexible working, leave for parents, carers leave, maternity and paternity are inclusive and non-discriminatory, recognising and reflecting the needs of all colleagues within Gentoo.

Gender Pay Gap Reporting

In line with current legislative reporting requirements, we carry out Gender Pay Gap reporting under the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

This involves carrying out six calculations that show the difference between the average earnings of men and women within Gentoo.

It is required we publish its results on an annual basis, within one calendar year of April 5 every year.

Equal Pay

As part of its commitment to diversity and inclusion, we are committed to addressing inequality when it is identified.

We believe that its male and female colleagues should receive equal pay for:

- The same or similar work
- Work rated as equivalent under a job evaluation study; or
- Work of equal value.

Gentoo aims to ensure that it operates a fair and transparent pay system based on objective criteria and free from gender bias. We will do this by:

- Carrying out regular audits of pay and benefits for existing employees and initial pay and benefits for new starters within the Group, including those on maternity leave, sick leave, and career breaks
- Providing training for all managers and colleagues who are involved in salary reviews on equal pay issues
- Informing colleagues how their pay has been determined
- Treating any grievance in relation to equal pay as a priority

Terms and conditions of employment covered by collective agreements will be negotiated between Gentoo and recognised Trade Unions through HR. As part of those negotiations, the Group will consult on equal pay issues.

Transgender Status

We are committed to welcoming and supporting transgender colleagues and removing barriers to their recruitment, promotion, and retention. Providing a working environment that is free from discrimination, harassment, or victimisation because of

gender identity is an important step in ensuring that transgender colleagues are respected and valued.

We recognise that transgender job applicants and colleagues are not required to inform the Group of their gender status or gender history. The gender in which an individual chooses to present will always be acknowledged and respected.

To promote an inclusive workplace of transgender people, please refer to the Transgender Toolkit for further advice.

Protected Characteristics

We recognise our responsibilities in respect of each of the nine protected characteristics specified in the Equality Act 2010 and will not unlawfully discriminate because of age, disability, gender reassignment, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

We will:

- Commit to ensuring that all individuals are treated with dignity and respect
- Ensure that support is available to all colleagues to support them to fulfil their roles
- Provide training and guidance for all colleagues and managers on protected characteristics
- Ensure that where a colleague requires any workplace adjustments during the course of their employment, the appropriate adjustments are put in place
- Be committed to inclusion and equality of opportunity for all colleagues regardless of a protected characteristic
- Strive to ensure that the work environment is free from harassment and bullying
- Support colleagues in their role who are returning from a period of leave
- Report on its gender pay gap, in line with legislation
- Monitor the make-up and composition of the workforce regarding information relating to protected characteristics in encouraging diversity and inclusion, recruitment practices, and any other information relating to protected characteristics the Group believes appropriate to monitor

Intersectionality

We recognise that colleagues may have multiple, overlapping identities that impact their experience in the workplace, including multiple discrimination and disadvantage. The more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

Overcoming Barriers

We recognise the importance of taking proactive measures to remove barriers from the working environment. As an organisation, we firmly believe that equality matters.

We are committed to removing barriers and challenging discriminatory behaviours. It is recognised that this will benefit not only colleagues and prospective colleagues but also in many cases customers and visitors. It will ensure that we are able to recruit and retain the best employees on the basis of their abilities and individual merit.

The Equity, Diversity, Inclusion and Belonging action plan will aim to address physical access to premises, access to benefits of employment, terms and conditions of employment, recruitment, and arrangements for performance assessment, promotion, and retention.

Psychological Safety

We understand that some people find it hard to discuss their individual circumstances.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring equity, diversity, inclusion and belonging and is encouraged at Gentoo.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

Group Equity, Diversity, Inclusion and Belonging Principles

Here at Gentoo, we acknowledge that encouraging diversity in the workplace is good practice and makes business sense.

As part of our commitment to diversity, inclusion, and belonging the following Group Principles the Group will:

- Ensure that there is a supportive working environment
- Ensure that the Board, Executive, and Leadership team are accountable for the embedding of the principles and plan for reviewing performance
- Strengthen and embed the Group wide steering group to work with the Executive of Customer, Culture and Engagement to drive policy and shape the annual plan
- Embed a Group Wide Equity, Diversity, Inclusion and Belonging (EDIB) action plan on an annual basis, reviewing each year and reporting the outcomes to the Executive and the Board
- Involve customers and colleagues in identifying priority actions within the plan which is reviewed annually in collaboration with the EDIB Steering Group
- Develop colleague networking groups and encourage colleagues to join

- Ensure, through our Values and training colleagues know what standards of behaviours are expected of them
- Undertake equality impact assessments, which shows how equality and diversity informs business objectives and how the quality analysis is transparent, monitored, reported, and acted upon
- Take seriously complaints of bullying, harassment, victimisation, and unlawful discrimination by fellow colleagues, customers, suppliers, visitors, the public, and any others in the course of the organisation's work activities
- Initiate disciplinary proceedings against any colleague who is found to have committed an act of unlawful discrimination
- Take reasonable steps to ensure our partners, suppliers, and groups connected to Gentoo are committed to our EDIB principles

Disabilities

If a colleague is disabled or becomes disabled, we encourage colleagues to advise us about their condition so that we can consider what reasonable adjustments or support may be appropriate.

Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your our Occupational Health provider to help us get the right support in place.

For colleagues who are returning from long-term disability-related absence, we will support your return to work with support from our Occupational Health provider.

Support

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our Employee Assistance Programme for free, confidential advice. Details of how to access this service are on the People Sharepoint page.

Part-time and fixed-term work

Part-time and fixed-term colleagues should be treated the same as comparable full-time or permanent colleagues and enjoy no less favorable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

Board Diversity

In January 2021, the Group Board adopted the National Housing Federation's (NHF) 2020 Code of Governance. Section 1.3 states as follows:

Equality, diversity and inclusion: the board demonstrates a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation's activities, as well as in its own composition. It has policies and statements which meaningfully demonstrate this commitment and sets priorities and objectives for the organisation to achieve.

Board Composition

Gentoo recognises and embraces the benefits of having a diverse and inclusive Board and believes this enables a competitive advantage to the Board and organisation. A diverse Board will include, maximise and utilise differences in skills, experience, diversity of thought and protected characteristics. These differences will be considered in determining the skills needs of the Board and promote a good balance of diversity.

In reviewing Board composition, consideration will be given to the benefits of all aspects of diversity including, but not limited to, those described above, in order to maintain an appropriate range and balance of skills, experience and background on the Board.

All Board appointments and re-appointments will be made on merit against objective criteria aligned with the skills and experience that the Board requires to be effective. A Statement of Preferred Board composition is approved by the Board and the need for a balanced and diverse board is reflected in this document.

External executive search consultants that may be used for Board recruitment are expected to comply with this Board Diversity Policy.

Diversity will be considered as part of the performance evaluation of the effectiveness of the Board and Board Committees.

Gender balance has been of particular importance and we will continue to operate in the spirit of the Lord Davies Report which set a target for FTSE 350 Boards to have 33% female Board Directors by 2020.

The People Committee will review and propose to Group Board, the targets and objectives in relation to Board Diversity.

Monitoring and Review

The People Committee will review Board Diversity annually, or in line with business need. This review will include an assessment on its effectiveness and any objectives for achieving diversity and the People Committee will make recommendations to the Board where appropriate.

The People Committee reviews and assesses Board composition on behalf of the Board and recommends the appointment of new non-executive Directors.

The Committee will report on the process for Board Appointments in Gentoo Group's Annual Report. The report will include a summary of this Policy, and any objectives for implementing the Policy and progress made towards achieving those objectives.

Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our

If a colleague believes that they have suffered harassment, bullying, or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against colleagues who complain about or report discrimination. If a colleague believes they have been victimised for making a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, they should raise this through the Group's Grievance Procedure.

We encourage the reporting of all types of potential discrimination, as this assists Gentoo in ensuring that diversity, equity, and belonging principles are adhered to in the workplace. However, making a false allegation in bad faith, or that an employee knows to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

Modern Slavery and Human Trafficking

Here at Gentoo, we are absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

To ensure our colleagues are not subject to undue influence and are treated with dignity and respect, Gentoo has robust policies and procedures in place across all its operations to ensure compliance with employment legislation and prevent unethical working practices. We are committed to ensuring that all colleagues receive fair

remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace.

When using agencies and other bodies associated with the employment of the Group, we will ensure that steps are put in place to ensure that no slavery or human trafficking is in these supply chains and that thorough checks and procedures are in place to work with such bodies.

We produce an annual statement on modern slavery and human trafficking which details the actions to understand all potential modern slavery risks related to its business and the steps put in place to ensure this doesn't occur in its supply chains.

We also has a whistleblowing policy that allows concerns to be reported on a confidential basis and without fear of recrimination.

Complaints

If a colleague or candidate for employment considers that they have been unlawfully discriminated against, they should follow the Gentoo's grievance procedure to make a complaint. Details of any complaints will be retained confidentially for monitoring purposes.

Related Policies

This policy should be read in conjunction with the following policies:

- Diversity and Inclusion in Service Provision Policy and Toolkit
- Code of Conduct
- Ways of Working Policy
- Working Professionally Policy
- Joining Gentoo Policy
- Colleague Relations Policy
- Learning and Development Policy
- Data Protection Policy
- Information Security Handbook
- Vulnerability Policy

Version control

Version	Reason	Issuer	Date
V1.0	Approved	A Bell	2018
V2.0	<ul style="list-style-type: none"> • ‘General’ deleted reference to ‘orange book and red and green book • ‘Contribution and Goals’ deleted detail of vision and values • General Formatting 	N Young	July 2020
V2.1	<ul style="list-style-type: none"> • This policy has been reviewed by Muckle Law Firm • Reference to intersectionality • Definitions added regarding discrimination. • Reference to disabilities • Included section on breach of this policy 	S England	April 2024
V3.0	<ul style="list-style-type: none"> • Approved by the People Committee. • Updated to change to one Group policy and make contemporary and reflect the new direction for EDB. 	S Fulton	May 2024
V3.1	<ul style="list-style-type: none"> • Updated to reflect integration of Board Diversity so that there is one integrated Group policy. 	S Fulton	July 2024
V 3.2	<ul style="list-style-type: none"> • Renamed to Equity, Diversity, Inclusion and Belonging Policy • Changed review period to 3 years. • Updated to reflect further guidance and explanation if EDIB areas: <ul style="list-style-type: none"> • Other types of discrimination • Intersectionality • Psychological Safety • Reasonable Adjustments • General formatting to align to other HR policies 	S Fulton	April 2025
V4.0	<ul style="list-style-type: none"> • Approved by People Committee 	C Appleby	May 2025