

INCLUSION & BELONGING POLICY

PEOPLE POLICY

Inclusion and Belonging Policy

Responsible Officer	Strategic Equality, Diversity and Inclusion Lead
This policy is applicable to	• Karbon Group • Customers and potential customers • Colleagues and potential colleagues • Board members, involved residents and volunteers • Partner organisations and subcontractors • Internal and external stakeholders
Policy version	3
Date this version implemented	August 2026
Date of next review	April 2028

Policy Statement

Our vision for Inclusion and Belonging is one where everyone, is treated fairly and has the right to the same opportunities, freedom, respect and equal access to our services and employment. It's our approach to equality, diversity and inclusion.

We aim to eliminate discrimination, promote equality of opportunity and foster good relations.

We recognise that people from different backgrounds and experiences can bring valuable insights to the organisation either as customer or colleagues. We aim to be an inclusive employer, where diversity is valued, respected and built upon and where our workforce understands and reflects the communities we work with.

We are committed to providing equitable treatment to all those we deal with as an organisation, including colleagues, customers, partner organisations and suppliers regardless of any protected characteristics.

Beyond this we also take into consideration additional factors such as socio-economic status and language barriers which may be relevant.

The Inclusion and Belonging Policy (Policy) aims to detail our approach as to how this is achieved.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Risk the policy is designed to control

10. People. Risk that the Group does not maintain a workforce with the capability, capacity and culture to deliver our strategic objectives.

Key performance measures

- Reporting of progress against our action plan through the inclusion and belonging annual report and the environmental, social and governance report.
- Reporting of progress against the RSH Consumer Standards
- Colleague and customer lifecycle data will be monitored with key elements reported annually.
- Annual self-assessment against Code of Governance.
- Workers Protection Act Risk Assessment

Definitions

Protected characteristics:

Specific attributes that are legally protected from discrimination under the Equality Act 2010 in the UK. These characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Abbreviations

People and OD team:
KLT

People and Organisation Development Team
Karbon Leadership Team

Table of contents

1.0	Purpose.....	4
3.1	Understanding the legislation	4
3.2	Our commitment.....	5
3.3	Responsibilities	7
3.4	Discrimination and harassment	8
3.5	Training and support	9
3.6	Breaches of this policy	9
4.0	Customer Vulnerabilities.....	10
5.0	Monitoring and Review.....	10
6.0	Equality and Diversity.....	10
7.0	Data Protection and Privacy.....	10

1.0 Purpose of policy

- 1.1 To make sure that everyone is covered by this policy understands their roles and responsibilities under it.

2.0 Objectives

- 2.1 To manage Inclusion and Belonging effectively.
- 2.2 To make sure that everyone is covered by this policy understands their roles and responsibilities under it.
- 2.3 To meet the legal and regulatory requirements for our equality, duty.
- 2.4 Linked to the following related policies: (Complaints, Compliments and Suggestions Policy, Dignity and Respect at Work Policy, Workers Protection Act Policy Statement, Procurement Policy)

3.0 Policy detail

3.1 Understanding the legislation

- 3.1.1 We have considered legislation, regulation and best practice to minimise the risk. The following list is not exhaustive but explains the legal and guidance framework that underpins the development of this policy.

3.1.2 Equality Act 2010

The Equality Act 2010 brought together and updated prior acts and regulations which, formed the basis of anti-discrimination law.

We are committed to meeting the duties of the Equality Act 2010 as a minimum and work to create a fair approach for all by eliminating barriers and making reasonable adjustments.

3.1.3 Workers Protection Act 2024

The Worker Protection (Amendment of Equality Act 2010) Act 2023 is a significant piece of legislation in the UK aimed at enhancing protection against harassment in the workplace.

This Act is part of broader efforts to address workplace harassment and improve the working environment, and employers are now required to take reasonable steps to prevent sexual harassment in their organisation.

3.1.4 Public Sector Equality Duty

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.

3.1.5 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.

3.1.6 Code of Conduct and Code of Governance

The National Housing Federation Code of Conduct sets out standards for housing associations that are members. Their Code of Governance sets out a framework that all organisations can use to achieve a baseline for excellent governance. The Group have adopted both codes.

3.2 Our commitment

3.2.1 Organisation

- Act responsibly, provide equality of opportunity, value diversity and create inclusive environments for people to thrive.
- Treat people fairly, with dignity and respect.
- Collect information about colleagues and customers to help us to develop and tailor our services.
- Make reasonable adjustments, adaptations and discuss ways that we can work to remove any barriers. This support can be requested where they are not automatically offered.
- Have policies and practices which are inclusive and respectful of diverse needs.
- Equality impact assessments will include a consideration of the protected characteristics, in the context of the relevant legislation.

3.2.2 Bullying and harassment

- We will not tolerate discrimination, bullying or harassment (including sexual harassment) and will act upon any allegation of this nature.
- We will take all reasonable steps to prevent bullying and harassment (including sexual harassment).
- We will work with third parties and contractors to ensure they understand their obligations and expect them to take appropriate action against any breach of this policy.

3.2.3 Colleagues

- Make our recruitment process accessible and aim to reduce bias.
- Aim to have a workforce, representative at all levels, of the diverse communities we operate in.
- Offer the guaranteed interview scheme for people with disabilities or long-term health conditions who meet minimum requirements for our vacancies.
- Offer flexible working arrangements to colleagues to support their personal circumstances, aligned to our Karbon Way of Working.

3.2.4 Customers

- We will ensure that our services are accessible and tailored to meet diverse needs.
- We will involve and consult with customers and others who reflect the diversity of the communities we work with to improve our services.
- We will ensure our housing management procedures reflect areas of concern for members of protected groups. For example, hate incidents/crime are given high priority within our community safety procedures.
- Work in partnership to improve outcomes for specific communities or groups.

3.2.5 Governance

- The Board is committed to ensuring there's equality of opportunity, diversity, and inclusion in overseeing the Group activities.
- Will provide leadership and direction in relation to equality and diversity and drive ongoing improvement.
- Oversee progress against the action plan and ensuring that legislative requirements are met.

3.2.6 Inclusive communications and translations

- Make our information and services more accessible by using Plain English, providing accessible formats and offering sign language and language interpreters.
- Use assistive tools to support accessibility on digital platforms.

3.2.7 Procurement

- Promote social value and diversity within the procurement and supply chain.
- Require all third parties to comply with equal opportunities' requirements.
- Expect all contractors, partner organisations and suppliers to treat Group customers and colleagues with dignity and respect.
- Ensure contractors and suppliers adhere to equalities legislation and have a modern slavery statement in place as a minimum.

3.2.8 Reasonable adjustments

- We will provide reasonable adjustments in line with the Equality Act 2010.

3.3 Responsibilities

3.3.1 The primary responsibility rests with the Group to eliminate unlawful discrimination. Measures to eliminate discrimination should be understood and supported by all customers, colleagues, board members, volunteers and contractors.

3.3.2 The Board, Chief Executive and Executive Team

- Provide leadership and act as overall champions to ensure policy implementation.
- Lead by example and create an environment where difference is valued.
- Embed equity in decision making processes.

3.3.3 Line Managers

- Lead by example and encourage colleagues to engage in learning opportunities.
- Implement the policy as part of their day-to-day line management and apply employment practices fairly and equitably.
- Ensure all colleagues act in accordance with the policy and provide necessary support and direction.

- Manage and investigate issues relating to potential discrimination in a timely way

3.3.4 Colleagues

- Implement the policy in their day-to-day work ensuring that their practices are consistent with its contents.
- Ensure their behaviour is appropriate and they treat people with respect and dignity without discrimination.
- Notify line managers or the People & OD team of any concerns regarding conduct and report inappropriate behavior in breach this policy

3.3.5 Third parties

- Represent the Group in alignment with this policy.
- Ensure their behaviour is appropriate to this policy and treat people with respect and dignity without discrimination.

3.4 Discrimination and harassment

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

3.4.1 Direct discrimination

Treating someone less favourably because of a protected characteristic. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a protected characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a protected characteristic.

3.4.2 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.

3.4.3 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.

3.4.4 Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

A person may be harassed even if they were not the intended target. For example, if they are in the same room as someone who is engaging in conduct of a harassing

nature that may have the relevant effect on them. A single incident can amount to harassment.

3.4.5 Sexual harassment

Sexual harassment is harassment of a sexual nature. We have a duty to seek to prevent and respond to such behaviour.

3.4.6 Unlawful behaviour and hate crime

Any unacceptable behaviour, incident or criminal offence that is targeted at a person or group of people related to a protected characteristic is unlawful and can be defined as a hate crime. This includes behaviour which can be physical, verbal, visual or written (including on social media).

3.4.7 Victimisation

Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.

3.5 Training and support

- 3.5.1 We will provide all colleagues with regular training and support to ensure that everyone is aware of and understands the contents of this policy. Colleagues will be required to confirm that they have read, understand and will comply with this policy. We will review this on an annual basis in line with the Code of Conduct and Declaration of Interest.

3.6 Breaches of this policy

- 3.6.1 Customers can raise their concerns as detailed in our complaints, compliments and suggestions policy.
- 3.6.2 Colleagues can raise their concerns through their line manager or People and OD team. These are supported by the Dignity and Respect at Work and Speak Out policies.
- 3.6.3 Any breaches of this policy will be investigated. Where evidence of wrongdoing established in line with the relevant policies, it may lead to;
- Disciplinary action, up to and including dismissal for colleagues.
 - Expulsion for Board, Committee members, volunteers and involved residents.
 - Relevant action being taken against tenants.
- 3.6.4 Everyone reserves the right to report hate incidents and hate crime to the authorities, regardless of whether the matter is raised through the Group.

4.0 Customer Vulnerabilities

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our website.

5.0 Monitoring and Review

- 5.1 This policy will be reviewed every three years (or sooner where legislation and regulatory changes are made) by the Strategic Equality, Diversity and Inclusion Lead. Any amendments to be agreed at Board.
- 5.2 We will measure performance against the key performance indicators. Progress will be published in our Inclusion and Belonging Annual Report.

6.0 Equality and Diversity

- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

7.0 Data Protection and Privacy

- 7.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.