

Equality, Diversity, Inclusion and Human Rights Policy

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Stakeholder Consultation	<input type="checkbox"/> All Staff <input type="checkbox"/> Customer Engagement <input type="checkbox"/> Union <input type="checkbox"/> Employee Voices Group <input type="checkbox"/> Head Office Managers <input type="checkbox"/> C&S Managers <input checked="" type="checkbox"/> Department/Other: EDI&HR Working Group	This policy will be reviewed every 5 years from the date of implementation or earlier if deemed appropriate for any legislation or regulatory changes. If this policy is not reviewed within the above timescale, the latest approved policy will continue to apply.	
Equality Impact Assessment		Complete	June 2025
Data Protection Impact Assessment		N/A	N/A

Version Control

Date	Owner	Version	Reason for Change
June 2025	Head of People & OD	1.0	Replacing G34 Equality Policy and G55 Equality & Diversity Procedure.

Summary of Changes

Section	Change
All	New Policy replacing G34 Equality Policy and G55 Equality & Diversity Procedure.

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1.0 Policy Statement

We are committed to providing a working environment free from discrimination, harassment, and victimisation, where everyone is treated with fairness, dignity, and respect. We actively promote equal opportunities for employees, supported people, tenants, and all others who engage with our organisation, fostering an inclusive culture that values diversity.

In line with our legal and regulatory obligations, we uphold human rights and anti-discrimination laws, taking proactive steps to remove barriers faced by underrepresented and disadvantaged groups. Where appropriate, we will implement positive action initiatives to support greater equity and representation. Through inclusive leadership and meaningful engagement with diverse communities, we strive to build a fairer and more inclusive environment for all.

We are committed to measuring the impact of our Equality, Diversity, Inclusion and Human Rights (EDIHR) efforts through data collection, analysis, and transparent reporting to ensure continuous improvement as outlined in our EDIHR Strategy. Breaching this policy may result in disciplinary action, depending on the severity of the violation.

1.1 Legal & Regulatory Framework

Our policy aligns with relevant UK employment laws and regulatory guidelines to promote EDIHR while preventing and addressing discrimination, harassment and victimisation. This policy complies with the following:

- The Equality Act 2010 – Protects individuals from discrimination based on protected characteristics, ensuring equal treatment in the workplace and beyond.
- The Human Rights Act 1998 – Safeguards fundamental rights and freedoms, reinforcing dignity, respect, and fairness for all.
- The Public Sector Equality Duty (Equality Act 2010) – Requires public bodies to consider equality in decision-making, policy development and service delivery.
- The Worker Protection (Amendment of Equality Act 2010) Act 2023 – Introduces a duty for employers to take reasonable steps to prevent sexual harassment in the workplace.
- The Employment Relations (Flexible Working) Act 2023 – Grants employees the right to request flexible working from the start of their employment.
- The Employment Rights (Amendment) (Flexible Working) Regulations 2024 – Strengthens flexible working rights in alignment with the Employment Relations (Flexible Working) Act 2023.
- The Protection from Redundancy (Pregnancy and Family Leave) Act 2023 – Extends redundancy protections to cover pregnancy and family leave.
- The ACAS Code of Practice on Equality and Diversity – Provides best practice guidance to ensure fair treatment and prevent discrimination in the workplace.

- The Scottish Social Services Council (SSSC) Codes of Practice – Establishes professional conduct standards for social service workers and employers in Scotland.
- Disclosure Scotland Guidelines – Promotes fair and inclusive recruitment practices, particularly for individuals with criminal records.
- General Data Protection Regulation (GDPR) and the Data Protection Act 2018 – Ensures the protection of personal data, supporting privacy rights and ethical information management.
- Scottish Housing Regulator (SHR) Equalities Statement 2023-2026 – Requires social landlords to comply with equality and human rights legislation, understand the diverse needs of tenants and service users, and tailor services accordingly.
- Public Sector Equality Duty (PSED) in Scotland – Mandates public authorities, including housing associations, to collect and report on workforce equality data, publish gender pay gap information, and create equal pay statements to promote transparency.
- Equality and Human Rights Commission (EHRC) Guidance – Provides detailed support for compliance with the Equality Act 2010 and the Public Sector Equality Duty, ensuring organisations proactively promote equality and prevent discrimination.

By adhering to these legal and regulatory requirements, we reinforce our commitment to an equitable, diverse, and inclusive workplace, ensuring that all employees, supported people and tenants are treated with dignity and respect.

2.0 Scope

This policy applies to all Ark employees, including but not limited to:

- Employees;
- Agency Workers;
- Students;
- Volunteers;
- Contractors;
- Board of Management Members.

This policy also extends to interactions within Ark's premises, off-site work locations including digital platforms, hybrid work environments and virtual communication, and any work-related events such as meetings, training, and social gatherings.

3.0 Roles & Responsibilities

There is a range of standard expectations which underpin all policies. Read more about standard [role and responsibilities](#) in addition, the following specific responsibilities apply to this Policy.

Ark's Board, Executive Team and Leadership Team is responsible for championing EDIHR at a strategic level, ensuring we have an EDIHR strategy in place that is aligned with organisational goals and legal obligations.

Every individual is responsible for contributing to a workplace that values equality, diversity, inclusion and human rights. This involves treating all colleagues with respect, promoting fairness, and ensuring no one is excluded or discriminated against based on any protected characteristic. All employees are expected to actively embrace and respect diversity, recognising the unique contributions of individuals from various backgrounds. They should take appropriate steps to prevent any discrimination, harassment, or exclusion, thereby creating an inclusive environment where everyone's dignity is upheld.

Line Managers play a critical role in fostering an inclusive and respectful workplace culture. They are responsible for modelling inclusive behaviours, addressing concerns promptly and supporting employees in embracing diversity, ensuring that everyone feels valued. Line Managers must ensure that any incidents of discrimination, exclusion or failure to respect human rights are dealt with in line with Ark's policies and procedures.

The People & Organisational Development Team is responsible for providing support and guidance on matters related to EDIHR. They are responsible for providing training on equality, diversity, and inclusion matters. They ensure that any concerns are handled confidentially and appropriately while also tracking and reporting on diversity and inclusion metrics. The HR Team plays a role in ensuring continuous improvement in policies and practices related to EDIHR. They ensure that staff have access to the necessary resources and knowledge to support the promotion of an inclusive and respectful workplace environment.

4.0 Related Policies, Procedures & Documentation

- G02 – Board of Management Code of Conduct
- HR01 – Recruitment & Selection Policy & Procedures
- HR04 – Staff Code of Conduct Policy
- HR15 – Whistleblowing Policy & Procedure
- HR18 - Disciplinary Policy & Procedure
- HR19 – Grievance Policy & Procedure
- HR25 – Flexible Working Policy & Procedure
- HR29 – Redundancy Policy & Procedure
- [Ark's Vision, Mission & Values](#)

5.0 Equality, Diversity, Inclusion & Human Rights

EDIHR are fundamental principles that ensure fair treatment and opportunities for all. This Policy outlines the commitment to these principles, based on relevant legal frameworks, societal and organisational values. Ark is committed to eliminating discrimination, promoting equality of opportunity, and fostering an inclusive workplace where everyone's rights are respected and protected.

5.1 Equality

Equality refers to ensuring that all individuals, regardless of their characteristics or background, have equal access to opportunities and are treated fairly and with dignity. Ark is committed to creating a workplace where no one is disadvantaged or excluded due to personal characteristics. This policy explicitly prohibits discrimination, harassment, or victimisation on the basis of:

- Race, ethnicity, or nationality;
- Gender or gender identity;
- Sex;
- Sexual orientation;
- Disability;
- Age;
- Religion or belief;
- Pregnancy or maternity;
- Marriage and civil partnership.

Ark recognises the importance of supporting neurodiverse individuals and those experiencing menopause, ensuring appropriate accommodations, understanding, and organisational awareness are in place to support their wellbeing and success.

We recognise that promoting equality is not only a legal obligation but also a moral and organisational imperative. By fostering a culture where fairness and respect underpin every aspect of our work, we empower individuals to reach their full potential.

By promoting a diverse environment, we aim to create a culture of inclusion where everyone feels valued, respected, and able to contribute their best.

5.2 Diversity

Diversity involves recognising, respecting, and valuing the differences among individuals. Ark understands that diversity is essential to the organisation's success and growth. This includes, but is not limited to, differences in ethnicity, culture, nationality, gender, gender identity, sexual orientation, age, disability, religion or belief, socioeconomic background, education, neurodiversity, and personal experiences.

We believe that embracing a wide range of ideas, perspectives, and lived experiences strengthens our organisation. A diverse workforce fosters innovation, enhances creativity, and improves decision-making and problem-solving by bringing together multiple viewpoints. Ark is committed to building an environment where everyone feels seen, heard, respected, and able to thrive.

5.3 Inclusion

Inclusion involves cultivating an environment where all employees feel valued, supported, and empowered to reach their full potential. Ark is dedicated to nurturing a culture in which every voice is heard, and diversity is celebrated. It is essential that all employees feel a sense of belonging, with their contributions recognised and valued in every aspect of their work.

5.4 Human Rights

Ark upholds the principles outlined in international human rights law, including the UN Universal Declaration of Human Rights (UDHR) and the Human Rights Act 1998. As part of our commitment to these principles, we ensure that all employees are entitled to work in an environment that respects their fundamental rights, which include:

- The right to dignity and respect in the workplace;
- The right to work free from discrimination, harassment, and victimisation;
- The right to equal pay for equal work;
- The right to access opportunities for professional growth and development.

Ark actively promotes a culture where human rights are recognised, respected, and embedded in every aspect of our operations.

5.5 Raising a Complaint

Any individual who experiences or witnesses' discrimination, exclusion, or violation of their rights should report the incident in accordance with our Grievance Procedure (HR19).

If the complaint concerns an individual's Line Manager, employees should report directly to the People & Organisational Development team. Complaints will be taken seriously and addressed in a fair and timely manner. Where necessary, corrective actions will be taken in line with Ark's Disciplinary Policy & Procedure (HR18).

As a general principle, the decision whether to progress a complaint is up to the employee making the complaint. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

Ark is committed to protecting individuals who report concerns related to discrimination, exclusion, or human rights violations from any form of retaliation. We will ensure that those who raise concerns are supported, and their rights are upheld throughout the process

5.6 Equality Impact Assessments

Ark is committed to promoting equality and inclusion in all activities affecting employees and external stakeholders. To support this, we use Equality Impact Assessments (EIAs) as a tool to ensure our policies, practices, and decisions are fair, inclusive, and free from unintended discrimination. An EIA helps:

- Assess the impact of activities on different groups, especially those with protected characteristics.
- Identify and address any adverse effects or barriers to participation.
- Ensure transparent, evidence-based decision-making.

A screening process within the EIA template helps determine whether an activity requires a full assessment, based on its potential equality impact. Key elements include:

- Understanding discrimination and mitigating bias—whether intentional or not.
- Consultation, where appropriate, to ensure decisions reflect diverse perspectives.
- Evaluation, leading to one of four outcomes: proceed unchanged, stop, adapt, or proceed with justification despite potential barriers.

The EIA supports Ark in meeting its legal duties under the Equality Act and in upholding our core values of fairness, dignity, and respect.

5.7 Support

The People & Organisational Development Team and your Line Manager (where appropriate) are here to support you throughout the process of addressing any concerns of discrimination, exclusion or human rights violations. If you need additional support, we encourage you to access Ark's Employee Assistance provider, which can offer confidential support, advice, and resources. You can contact them at 0808 168 2143 or visit www.carefirst-lifestyle.co.uk. The username and password are available on Ark's intranet.

Additionally, external support is available from the following organisations:

- Equality Advisory and Support Service (EASS) – Offers free advice on discrimination and human rights issues under UK law, including the Equality Act 2010.
- Equality and Human Rights Commission (EHRC) – The UK-wide statutory body promoting equality and human rights. Provides guidance on the Equality Act and related legislation.
- Equality Advisory Support Service (EASS) – A free helpline offering advice and support on discrimination and human rights issues.
- ACAS (Advisory, Conciliation and Arbitration Service) – Provides free and impartial advice to employees and employers on workplace rights, good practice, and dispute resolution.
- Citizens Advice Scotland (CAS) – Offers free, confidential advice on a wide range of issues including employment, discrimination, housing, and accessing services.

- Scottish Human Rights Commission (SHRC) – An independent public body dedicated to promoting and protecting human rights in Scotland, with resources and guidance relevant to individuals and organisations.
- Stonewall – Provides advice and advocacy for LGBTQ+ individuals facing discrimination or exclusion.
- Mind – Offers support for employees facing mental health-related discrimination or challenges.
- Equally Ours – A UK charity that brings together organisations working across equality, human rights, and social justice to influence policy and practice.
- Fawcett Society – Campaigns for gender equality and women’s rights in the UK, including equal pay, political representation, and workplace fairness.
- Race Equality Matters – A not-for-profit initiative focused on tackling racial inequality in UK workplaces through collaborative action and practical solutions.
- Business in the Community (BITC) – Offers tools and support for employers to build inclusive workplaces, with a focus on race, gender, age, and wellbeing.
- Operation Black Vote (OBV) – Supports political and civic engagement among Black and Asian communities in the UK, promoting representation and equality.
- Neurodiversity in Business (NiB) – A business-led forum that supports neurodivergent individuals in the workplace and promotes inclusive employment practices.
- Menopause Matters – Provides information and support for individuals experiencing menopause, helping employers create inclusive policies.

6.0 Training & Monitoring Requirements

6.1 Training

Staff will receive training that reflects both their individual development needs and the organisation’s priorities as identified on their individual learning plans. Ark will ensure that relevant employees have an awareness of this policy and receive adequate training to enable them to effectively fulfil their roles and ensure a safe, respectful, and discrimination-free workplace for all employees and stakeholders.

6.2 Monitoring

To ensure the effectiveness and continuous improvement of the Equality, Diversity, Inclusion and Human Rights Policy, regular monitoring and review processes will be carried out. This includes:

- Cyclical Review: The Policy will be formally reviewed every 5 years to ensure it remains in compliance with relevant laws and reflects best practice.
- Ongoing Monitoring: The implementation of the policy will be continuously monitored by the HR team to ensure that it is being followed effectively.

- Diversity Metrics: Ark will track diversity metrics to identify any gaps and address any areas where discrimination may occur.
- Training Evaluation: The effectiveness of training programs will be assessed regularly, ensuring that employees are equipped with the knowledge and skills needed to foster an inclusive workplace.

The results of these activities will be used to refine and improve the Policy and Ark's overall approach to promoting EDIHR.

Appendix 1 - Equality Impact Assessment Guidance

We are committed to promoting equality and inclusion in all our activity for our employees and external stakeholders. We have an obligation to make reasonable adjustments and this document and the template included have been created as guidance to help highlight and understand the potential impacts on different groups of people when carrying out various internal activities including creating new policies/processes, introducing new initiatives and decision making.

Equality Impact Assessment (EIA)

An equality impact assessment (EIA) is an evidence-based approach designed to help ensure that our policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

The EIA will help to ensure that:

- We understand the potential effects of the activity by assessing the impacts on different groups both external and internal.
- Any adverse impacts are identified and actions identified to remove or mitigate them.
- Decisions are transparent and based on evidence with clear reasoning.

Screening

Not all activities in Ark will need an Equalities Impact Assessment. A screening process has been built into the EIA template that will determine which activities should be subject to impact assessment. This is not an exact science and will require some judgement, but the approach is to ask the questions below when reviewing each activity. Where the answer to any one question is “yes”, then an impact assessment will be carried out. Where the answer to all four questions is “no”, then no further action is needed and an impact assessment does not need to be completed.

1. Does the policy, practice or events affect people we provide a service to such as tenants, people we support, employees, volunteers or the wider community, and therefore potentially have a significant effect in terms of equality?
2. Is it a major policy, practice or events, significantly affecting how functions are delivered in terms of equality?
3. Does it relate to an area where Ark has identified a need to improve equality outcomes or to an area where there are known inequalities?
4. Does it relate to a policy, practice or events where there is significant potential for reducing inequalities or improving outcomes?

Discrimination

Discrimination is where someone is treated less favourably or put at a disadvantage because of one or more of their protected characteristics. The different groups covered by the Equality Act are referred to as protected characteristics: disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, sex (gender), and age.

Discrimination is usually unintended and can often remain undetected until there is a complaint. Improving or promoting equality is when you identify ways to remove barriers and improve participation for people or groups with one or more protected characteristics.

In cases of new policy, practice or events there may be little evidence of the potential effect on protected characteristic groups. In such cases you should make a judgement that is as reliable as possible.

Consultation

Consultation can add evidence to the assessment. Consultation is very important and key to demonstrating that we are meeting the equality duties, but it also needs to be proportionate and relevant. Thought should be given to the degree of consultation required and should involve a diverse range of people. There is no set process for the consultation as it should be considered relevant to the relating activity to avoid over-consultation on a small policy or practice and under consultation on a significant policy or an activity that has the potential to create barriers to our internal and external stakeholders.

Evaluation

There are four potential outcomes to assessment:-

1. No barriers or impact identified, therefore activity will proceed.
2. You can decide to stop the policy or practice at some point because the evidence shows bias towards one or more groups.
3. You can adapt or change the policy in a way which you think will eliminate the bias.
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy, practice or event (e.g. in extreme cases or where positive action is taken). Therefore you are going to proceed with caution with this policy, practice or event knowing that it may favour some people less than others, providing justification for this decision.

Appendix 2 - Equality Impact Assessment Form

1.0 Activity Details

Question	Response
1. Policy/practice/event being assessed	
2. Summary of aims and objectives	<i>State here what are the overall aims and objectives of the activity.</i>

2.0 Screening

Question	Response	
	Yes	No
1. Does the policy, practice or events affect people we provide a service to such as tenants, people we support, employees, volunteers or the wider community, and therefore potentially have a significant effect in terms of equality?	<input type="checkbox"/>	<input type="checkbox"/>
2. Is it a major policy, practice or events, significantly affecting how functions are delivered in terms of equality?	<input type="checkbox"/>	<input type="checkbox"/>
3. Does it relate to an area where Ark has identified a need to improve equality outcomes or to an area where there are known inequalities?	<input type="checkbox"/>	<input type="checkbox"/>
4. Does it relate to a policy, practice or events where there is significant potential for reducing inequalities or improving outcomes?	<input type="checkbox"/>	<input type="checkbox"/>

Where the answer to all four screening question is “no”, then no further action is needed and please proceed to section 5.0 Authorisation.

3.0 Consultation

Question	Response
1. Who is affected by this policy/practice/event and how?	<p><i>Staff, potential employees, tenants, people supported.</i></p> <p><i>Impact could be relating to wellbeing, capabilities, economic/social disadvantages or protected characteristics.</i></p>
2. Consultation with staff and other services affected.	<p><i>Please state below who was consulted with in the development of the activity.</i></p> <p><i>Consultation with:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>ARK Board of Management Team</i> <input type="checkbox"/> <i>ARK Executive Team</i> <input type="checkbox"/> <i>ARK Senior Leadership Team</i> <input type="checkbox"/> <i>ARK Regional Managers</i> <input type="checkbox"/> <i>ARK Working Group</i> <input type="checkbox"/> <i>Support Workers</i> <input type="checkbox"/> <i>Unite</i> <input type="checkbox"/> <i>No one</i> <input type="checkbox"/> <i>Other please state:</i>
3. If no one was consulted please state why?	<p><i>Describe the reasoning as to why no one was consulted on this?</i></p> <p><i>If we don't need to consult due to the change (It could be that internal/external data was only required) for example a complaint then there is learning and a policy is updated as a result.</i></p> <p><i>State here where we got the internal data (customer satisfaction surveys; equality monitoring data; customer complaints).</i></p> <p><i>State here where we got the external data (partner organisations, community/networking groups).</i></p>

4.0 Impact Assessment

Protected Characteristic Group	What is the potential impact on people who have this characteristic?	Action to address negative impact (e.g. adjustment to the activity)
Disability	<i>State here positive, negative or neutral.</i>	<i>What would we do to minimise negative impact and consider accessibility i.e. easy read alternative documents or signpost independent advocacy.</i>
Gender reassignment		
Marriage or civil Partnership		
Pregnancy and maternity		
Race		
Religion or belief		
Sexual orientation		
Sex (gender)		
Age		

5.0 Evaluation

Final Decision	Tick the relevant box
1. No barriers identified, therefore activity will proceed .	<input type="checkbox"/>
2. Stop the policy, practice or event as identified shows bias towards one or more groups.	<input type="checkbox"/>
3. Adapt or changes made to support elimination of the bias, activity will continue with mitigating actions in place.	<input type="checkbox"/>
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the activity. Decision to proceed with caution knowing that it may favour some people less than others, providing justification for this decision.	<input type="checkbox"/>

6.0 Authorisation

Name:	
Position:	
Date:	
Review Date (if applicable):	

This completed document should be saved in the relevant area dependent on what it relates to and also be forwarded to the Head of People & Organisational Development who will review the outcomes and record EIA completion.