Diversity, Equity, & Inclusion Policy

This policy sets out Bromford Flagship LiveWest's approach to Diversity, Equity and Inclusion in support of delivering safe, fair, and responsive services. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Corporate Services
Policy Owner	Chief Corporate Services Officer
Approved Date	**27 October 2026**
Date for Review	**27 October 2029**
Approving Body	BFL Board
Associated Legislation/Regulation	Equality Act 2010, Human Rights Act 1998, The Employment Rights Act 1996, Modern Slavery Act 2015, The Work & Families Act 2006, Data Protection Act 2018/UK GDPR, H&S at Work Act 1974, Trade Union and Labour Relations (Consolidation) Act 1992, National Minimum Wage Act 1998, Agency Workers Regulations 2010, Worker Protection Act 2023, Competence and Conduct Standard
Equality Impact Assessment Date	24 September 2026
Version Number	**2.0**
Publication status	Internal intranet and customer websites
Approval	This Policy was approved by the BFL Board and is applicable to: • Bromford Flagship LiveWest Ltd • Bromford Housing Association Ltd (operating as Bromford) • Bromford Home Ownership Ltd (operating as Bromford) • Bromford Developments Ltd (operating as Bromford) • Flagship Housing Limited (operating as Flagship) • LiveWest Homes Ltd (operating as LiveWest) Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.

Purpose / Principles

This policy outlines Bromford Flagship LiveWest's commitment to creating an environment where everyone feels respected, valued, safe and able to contribute to their fullest potential throughout their journey with us. It supports our organisational culture of high performance, customer focus and accountability, ensuring that diverse perspectives are championed, valued and celebrated.

We are committed to ensuring that diversity, equity and inclusion are embedded in all aspects of operations in line with our legal and moral obligations under the Equality Act 2010, and we actively strive to remove barriers for the following 9 protected characteristics:

- Age
- Disability
- Gender
- Religion and Belief
- Race
- Gender reassignment
- Marriage and civil partnership
- Sexual Orientation
- Pregnancy and Maternity

We are also committed to understanding and, where possible, removing the barriers faced by colleagues and customers who face multiple disadvantages or forms of discrimination. We recognise that when these experiences overlap, the challenges people face can be greater and more complex than any single issue on its own. We will also consider the experiences of other groups who may be at risk of marginalisation who are not explicitly mentioned within the Equality Act 2010, to, where possible remove the barriers they face.

This policy also aligns with our obligation under Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity, and foster good relations amongst diverse communities throughout our activities.

The principles of this policy include:

- **Diversity**: A mix of people with different backgrounds, identities, experiences and perspectives.
- **Equity**: Providing the right support and resources so everyone can thrive.
- **Inclusion**: Creating an environment where everyone feels valued, heard and able to contribute fully.
- **Fairness**: Decisions are clear, explained and open to scrutiny.
- **Respect**: Every individual is treated with dignity.
- **Opportunity**: Equal access to development, progression and service provision.
- **Understanding**: Listen and understand individual needs and embrace different viewpoints.

Roles / Responsibilities

- **The Board:** Responsible for promoting fairness and valuing diversity, leading by example to foster an inclusive culture and support individuals to fulfil their responsibilities, while ensuring that decision-making is informed by the diverse backgrounds, perspectives and experiences of the communities we serve.
- **Executive Leadership Team**: are responsible for championing DEI and allocating resources.
- **Leaders:** are responsible for implementing inclusive practices within teams and monitoring compliance.
- **HR, Academy & Culture Teams:** are responsible for providing guidance, training, and monitoring policy effectiveness.
- **Inclusion Networks:** are responsible for raising awareness, monitoring effectiveness of inclusion activities and advocating for colleagues.
- **All Colleagues:** are responsible for demonstrating inclusive behaviours, challenging discriminative behaviours and reporting concerns.

Policy Content

Recruitment and Selection Practices

We will ensure recruitment processes are inclusive, transparent, and designed to attract diverse talent that reflects the communities we serve. Selection decisions will be based on merit and capability, while actively removing barriers to participation and promoting equal opportunity for all candidates.

Inclusive Leadership & Management Behaviours

Leaders are expected to be people driven and model inclusive behaviours, creating environments where every colleague feels respected, valued, listened to and empowered to contribute. They create environments of psychological safety, where colleagues feel comfortable to speak up, share ideas and raise concerns without fear of negative consequences.

Unacceptable Colleague Behaviour

All colleagues are expected to demonstrate inclusive, professional and ethical behaviours in line with our values and behavioural framework. Colleague conduct will be assessed as part of our performance management process in line with our Colleague Code of Conduct to ensure how a colleague behaves is valued as highly as what they deliver, ensuring an inclusive people-driven approach. Any unacceptable colleague conduct will be reviewed in line with our Approach to Managing Capability.

Reporting and Addressing Discrimination, Hate Crimes, Harassment, Sexual Harassment or Victimisation

We maintain a zero-tolerance approach to discrimination, hate crimes, harassment, sexual harassment, or victimisation. We provide clear reporting channels for colleagues and customers, and prompt, fair investigation processes will ensure issues are addressed effectively, reinforcing a culture of respect and responsibility throughout our organisation and communities. Those affected will be supported and signposted to support services appropriate to their individual needs.

Accessibility and Reasonable Adjustments

We will provide reasonable adjustments to remove barriers for colleagues, customers and applicants with disabilities, alternative language/ format requirements or specific needs. Accessibility will be considered in all aspects of employment and service delivery, ensuring equitable experiences and opportunities. Reasonable consideration will also be given to faith-related needs and practices where operationally feasible.

Monitoring and Reporting DEI Metrics

We will regularly monitor representation, customer data, progression, attrition rates, and engagement data to identify trends and areas for improvement. Transparent reporting will hold us accountable for progress and ensure DEI remains integral to organisational performance and customer satisfaction

Allocation and Lettings

When assessing whether a home can be let to a customer, we will follow a clear, transparent and fair process. All applicants will be treated equally, and we will implement the necessary reasonable adjustments to the application process to ensure equal opportunities for customers who require them.

Customer Engagement

Customer engagement opportunities will be designed to be open, inclusive, and accessible to all customers. The aim is to ensure a representative understanding of the customer voice when reviewing, co-creating, and supporting the development of services.

Policy Review

From 1 August 2026, we will conduct equality impact assessments to assess all our policies for potential impact upon colleagues, customers, and third parties from protected or vulnerable groups. Where a negative impact is identified, we will document mitigating actions to remove or reduce the impact, ensuring our services are inclusive, accessible and equitable.

EIA statement

An Equality Impact Assessment (EIA) has been completed for this policy on 24 September 2026.

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The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

Training statement

This policy will be trained to all colleagues during onboarding and refreshed biannually.

Measuring Effectiveness

The effectiveness of this policy will be measured through:

- Annual engagement survey results
- Representation metrics across all levels
- Customer feedback related to inclusivity
- Review of recruitment and promotion decisions
- Regular review of people-related metrics for trends, patterns and forecasting
- Regular review of customer data

Review Period

This policy is updated as required and formally reviewed every three years by the Group Director of Culture and Organisational Design. It is approved by the BFL Board or its nominated subsidiary.

Supporting Documents

This policy is supported by:

- DEI Procedures
- Code of Conduct
- Equality Impact Assessment
- Inclusive recruitment guidance
- Vulnerability and Inclusive Services procedure
- Aids and Adaptations procedure
- Anti-Social Behaviour Policy
- Hate Crime Policy
- Managed Behaviour Policy
- Disability Confident Membership
- Armed Forces Covenant

Version Control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First Issue	BFL Board	29 January 26
1.1	Updated template to include the Approval section	Delegated Authority	April 26
2.0	Revised policy provides clearer direction on protected characteristics, Public Sector Equality Duty, inclusive leadership, colleague conduct, customer engagement, reasonable adjustments and our commitment to equality impact assessments.	BFL Board	27 October 26