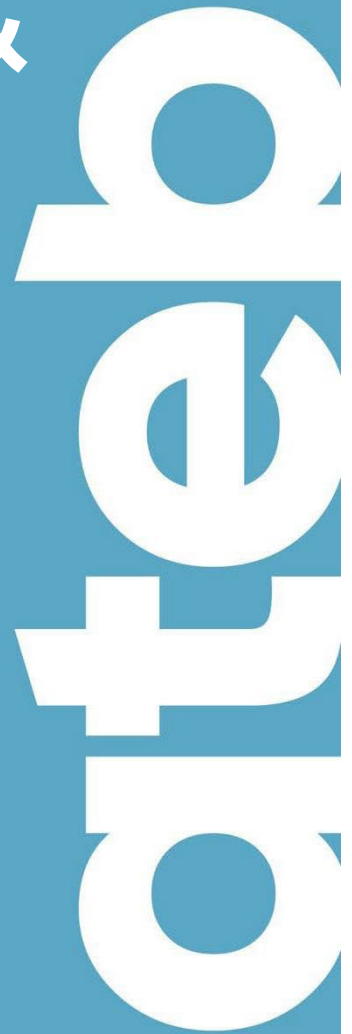


SA/15 - Togetherness & Inclusivity Policy

Creating
better
Living Solutions



“Our policies embed our culture, establish boundaries and outline our expectations. They have been agreed by our Board(s) as best practice documents for the Group’s decision making.”

Policy Statement

This policy outlines ateb’s commitment to be inclusive, fair and equitable in the way it interacts with its customers, team members and partners.

The aim of the policy is to:

- Demonstrate an ongoing and determined commitment to embedding our DNA principles of #AccessAllAreas throughout our group.
- To ensure we follow regulatory and legislative requirements in relation to equal opportunities.

This policy applies to ateb, West Wales Care & Repair and Mill Homes Limited, the ‘group.’ All ema members and contractors working on our behalf have a responsibility for understanding, promoting and implementing this policy.

Approval Date	Lead Contact	Review Date
September 2025	Head of People & Communications	September 2026

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2. Principles

This policy document sets out how the Group will manage and meet both legal obligations under The Equality Act 2010 and identified best practice.

This policy applies to all Board Members and team members in the Group and to all activities undertaken by the Group and any appointed contractors.

The Group is fully committed to the principles of non-discrimination and equality opportunities to all aspects of:

- recruitment and selection
- people management,
- all customer facing activities
- procurement of all activities/services on behalf of the Group

This policy is aimed at eliminating discrimination and harassment, advancing equality of opportunity, and fostering good relations, the principles underlying The Equality Act 2010. We will provide equality of opportunity regardless of any of the following protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race

- religion and belief
- sex and sexual orientation

The Group will embed its DNA of #AccessAllAreas for everyone across the organisation. We will be inclusive in everything we do as a diversity of background; experiences, skills, and views enrich our work and services.

We will actively oppose unlawful or unfair discrimination or harassment and believe in best practice in all aspects of our work. We will not tolerate any form of harassment, discrimination, victimisation or intimidation by our Board Members, team members, consultants, contractors, suppliers, visitors, customers, and service users, and will take appropriate action against any perpetrators of discrimination or harassment.

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

- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic
- **Indirect discrimination:** a provision or criterion which disadvantages one group of people more than another.
- **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- **Disability discrimination:** this includes direct or 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.

The Group takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure for team members. Serious cases of deliberate discrimination may amount to gross misconduct

If anyone believes that they have suffered discrimination by the Group or those acting on behalf of the Group, they can raise this through the:

- the Grievance Procedure or Positive Work Environment Procedure (team members)
- Customer Feedback Policy and Hate Crime Policy (customers/prospective customers)

Complaints will be treated in confidence and investigated in accordance with the relevant procedure/policy. Individuals raising a complaint will not be victimised or retaliated against for complaining about discrimination.

We will ensure that adequate equal opportunities/diversity training, development and guidance and support are provided for all our Board Members and team members. New Board Members and team members will be provided with this training as part of their induction.

Board Members, team members, and customers involved in recruitment and selection will receive training in fair selection procedures.

As an organisation we will review and revise this policy annually

3. Responsibilities

Group

This is a Group Policy which applies to all companies within the Group structure. All Companies within the Group are responsible for ensuring the policy is available to their customers, stakeholders, and team members and for ensuring appropriate training, support and guidance is given on its application and use.

Board of Management/ Board of Directors

Responsibilities:

- Effectively challenge strategic plans made by management to ensure the principles of this policy are adhered to.

- Ensure key business leadership positions within the company have the relevant skills, knowledge, and experience to manage equality of opportunity.
- Ensure that equal opportunity targets are met by the management team.
- Monitor the performance of the Executive Management Team in embedding equality of opportunity across the Group.

Chief Executive

Responsibilities:

- Effective implementation of the Equal Opportunities & Diversity Policy across the Group as a whole.
- Ensure all consultants (legal, financial, and technical) and contractors the Group engages with have in operation an equal opportunities policy or comply with the requirements of this policy.
- Ensure the physical features of the office premises are monitored to consider whether they place disabled team members, job applicants, customers, visitors at a substantial disadvantage compared to other non-disabled people, where reasonable, ensure all steps are taken to improve disabled access.
- Ensure responsibilities of Equal Opportunities are effectively delegated.
- Ensure that the structure, processes, competency, leadership, and resources required to deliver these aims and objectives, are in place.
- Ensure that equal opportunities are fully considered, promoted, and resourced through the Strategic Plan, Service Delivery Plans, Budgets and Business Plans.
- Ensure all operational policies consider issues that relate to equality and diversity through the implementation of Equality Impact Assessments.
- Ensure equal opportunities performance data is considered and debated at Board and Corporate Level.
- Have formal training to ensure they are fully aware of their legal and

moral responsibilities towards equality of opportunity.

Executive Directors

Responsibilities:

- Demonstrate leadership of equal opportunities through a total commitment to the aims and objectives of this policy.
- Ensure all consultants (legal, financial, and technical) and contractors the Group engages with have in operation an equal opportunities policy or comply with the requirements of this policy.
- Assist in the review of this policy.
- Review performance against targets and take corrective action as required.
- Ensure all operational policies consider issues that relate to equality and diversity through the implementation of Equality Impact Assessments.
- Know and understand applicable legislation, best practice guidance, policy and procedures covering equal opportunities at work which is applicable to all functions which are the Manager's responsibility.
- Ensure all Managers are trained in and understand their equal opportunities responsibilities.
- Report breaches of this policy to the Board and initiate action on their behalf.
- Be held accountable by the Chief Executive on their directorate's equal opportunities performance.
- Have formal training to ensure they are fully aware of their legal and moral responsibilities towards equality of opportunity.

Senior Management Team

Responsibilities:

- Know and understand applicable legislation, best practice guidance, policy and

procedures covering equality of opportunity which is applicable to all functions which are the Manager's responsibility.

- Ensure all consultants (legal, financial, and technical) and contractors the Group engages with have in operation an equal opportunities policy or comply with the requirements of this policy.
- Ensure all operational policies consider issues that relate to equality and diversity by undertaking Equality Impact Assessments.
- Demonstrate leadership of equality of opportunity through a total commitment to the aims and objectives of this Policy.
- Set an example to all team members, promoting equality of opportunity.
- Ensure activities of work and working practices meet the policy requirements.
- Ensure adequate training of team members, including compliance with induction procedures.
- Facilitate and evaluate investigations into any complaints within their responsibility to ensure appropriate action is taken.
- Ensure the managers, team members, and volunteers under their direction are competent and suitably trained in equal opportunities appropriate to their job/activity.
- Be held accountable by the Directors on their department's equal opportunities performance.
- Have formal training to ensure they are fully aware of their legal and moral responsibilities towards equality of opportunity.

Line Managers

Responsibilities:

- Know and understand applicable legislation, best practice guidance, policy and procedures covering equal opportunities which are applicable to all functions which are the Manager's responsibility.

- Ensure all consultants (legal, financial and technical) and contractors the Group engages with have in operation an equal opportunities policy or comply with the requirements of this policy.
- Be aware of and enforce the appropriate equal opportunities standards applicable to their area of responsibility.
- Demonstrate leadership of equal opportunities through a total commitment to the aims and objectives of this policy.
- Set an example to all team members, promoting equality of opportunity.
- Ensure activities of work and working practices meet the policy requirements.
- Complete investigations into any complaints within their responsibility to ensure appropriate action is taken.
- Be held accountable by the Senior Management Team on their department's equal opportunities performance.
- Have formal training to ensure they are fully aware of their legal and moral responsibilities towards equality of opportunity.

Team members

All team members (permanent and temporary) regardless of whether they have managerial or supervisory responsibilities and Volunteers.

Responsibilities:

ALL team members while at work must: -

- Understand and own their responsibilities under this policy.
- Comply with and actively promote this policy in all dealings with colleagues, customers, visitors, and anyone else who they would engage with during the course of their employment. This policy applies not only when team members are working on the Group's premises or those of any customer or contact,

but also includes work related social or hospitality events.

- Report all concerns relating to a breach of this policy to an appropriate person (Line Manager).
- Have formal training to ensure they are fully aware of their legal and moral responsibilities towards equality of opportunity.

Partners

All consultants, contractors, volunteers, or any other partner that engages with/acts on behalf of the Group.

Responsibilities:

- Understand and own their responsibilities under this policy.
- Comply with and actively promote this policy in all dealings with colleagues, customers, visitors, and anyone else who they would engage with during the course of their partnership with the Group. This policy applies not only when partners are working on the Group's premises or those of any customer or contact, but also includes work related social or hospitality events.
- Report all concerns relating to a breach of this policy to an appropriate person within the Group (Contract Manager).
- Have formal training to ensure they are fully aware of their legal and moral responsibilities towards equality of opportunity.

Additional Role Responsibilities

In addition to the responsibilities listed above the following key roles have additional responsibilities for the operational delivery of equal opportunities across the Group.

Executive Director for Customer

Responsibilities:

- Ensure that no person, or groups of persons, in receipt of services will be treated less favourably than any other person or groups of persons.
- Ensure the Group adopts practices to ensure that discrimination does not occur in the provision of its services.
- Ensure all operational policies consider issues that relate to equality and diversity by undertaking Equality Impact Assessments.

Head of Customer

Responsibilities:

- Develop policies and procedures in relation to customers ensuring they promote equality of opportunity and comply with this policy.
- Ensure that no person, or groups of persons, in receipt of support will be treated less favourably than any other person or groups of persons.
- Ensure the Group adopts practices to ensure that all reports of discrimination are properly investigated, and appropriate action taken to support victims and deal with perpetrators.
- Ensure data is collected, reported and analysed to improve delivery of services to a diverse group of customers.

Head of West Wales Care & Repair

Responsibilities:

- Develop policies and procedures in relation to West Wales Care & Repair ensuring they promote equality of opportunity and comply with this policy.
- Ensure that no person, or groups of persons, in receipt of services will be treated less favourably than any other person or groups of persons.
- Ensure the Group adopts practices to ensure that all reports of discrimination are properly investigated, and appropriate action taken to support victims

and deal with perpetrators.

- Ensure data is collected, reported and analysed to improve delivery of services to a diverse group of customers.

Procurement Manager

Responsibilities:

- Ensure the Procurement Policy and supporting processes promote equality of opportunity and comply with this policy.
- Ensure that no person, or groups of persons, during procurement services will be treated less favourably than any other person or groups of persons.
- Ensure discrimination does not occur during procurement of services.
- Ensure all consultants (legal, financial and technical) and contractors the Group engages with have in operation an equal opportunities policy.
- Develop policies and procedures in relation to procurement ensuring they promote equality of opportunity and comply with this policy.
- Ensure that no person, or groups of persons, during procurement services will be treated less favourably than any other person or groups of persons.
- Ensure discrimination does not occur during procurement of services.
- Ensure all consultants (legal, financial, and technical) and contractors the Group engages with have in operation an equal opportunities policy or comply with the requirements of this policy.

Head of People & Communications

Responsibilities:

- Develop policies and procedures in relation to recruitment, selection, and people management, ensuring they promote equality of opportunity and comply with this policy.

- Ensure an equal opportunities policy statement is provided to all job applicants.
- Ensure that no job applicant suffers discrimination because of any protected characteristic.
- Ensure all job applicants are asked to complete an equal opportunity monitoring form covering the protected characteristics. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. This form is kept separate from all other application documents in an anonymised format and will not form part of the selection process.
- Ensure our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all team members who should have access to them and that there are no unlawful obstacles to accessing them.
- Ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- Ensure that disciplinary procedures and sanctions are applied without discrimination, whether they result in disciplinary warnings, dismissal, or other disciplinary action.
- Oversight of the training needs of team members across the Group and oversight over the delivery of appropriate induction procedures.

Head of Corporate Services

Responsibilities:

- Oversight of the training needs of Board members across the Group and oversight over the delivery of appropriate induction procedures.

4. Control

The Head of People & Communications is the lead contact for this policy and for ensuring it remains operationally effective. The Head of People & Communications will review this policy annually. This policy is a dynamic document and will be amended as required following service reviews or

changes to the operating environment.

Any non-compliance resulting from monitoring will be reported to the Board and appropriate action will be taken.

This policy will be reviewed in line with feedback from complaints and changes to regulatory or legislative requirements.

Board approval will be obtained before any amendments are published and Board Members and team members will receive refresher training as applicable.

5. Link to other documents

This policy is the overarching policy for equality of opportunity and is underpinned by additional policies and procedures.

Internal

Disciplinary Procedure

Grievance Procedure

Positive Work Environment Procedure

[Customer Feedback Policy](#)

[Hate Crime Policy](#)

External

[Equality Act 2010](#)

[ACAS Best Practice Guidance](#)

[Tai Pawb - Deeds Not Words Pledge](#)

Contact our customer team
quoting the policy reference:

Tel: 0800 854 568

Email: hello@atebgroup.co.uk

Facebook: @theatebgroup

Face to Face: Get in touch and we can arrange a
location

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Version History

Ver.	Date	Changes
5	27/8/2020	Policy reviewed
6	30/09/2021	Policy reviewed and approved by Board
7	11/11/2022	Policy Reviewed
8	10/08/2023	Policy reviewed and approved by EMT
9	05/08/2024	Policy reviewed and approved by EMT
10	25/09/2025	Policy reviewed and approved by EMT