

Belonging (Equity, Diversity and Inclusion) Policy	
Approval Route	<i>ELT November 2025</i> <i>Board December 2025</i>
Applies to:	All individuals and organisations associated with ExtraCare, including staff, agency staff, volunteers, trustees, residents, visitors, suppliers, partners, contractors, and subcontractors. All forms of interaction: face-to-face, written, telephone and digital. All employment practices (including recruitment) and all aspects of service delivery.

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1. Introduction - Policy Purpose & Aim

This policy outlines how The ExtraCare Charitable Trust (ExtraCare) promotes and upholds the principles of *Belonging* at ExtraCare our approach to - equity, diversity, and inclusion - (EDI).

We aim for all ExtraCare locations, shops and Head Office to be welcoming spaces where residents, their families, friends, and the wider community feel included and respected. We want ExtraCare to be an inclusive organisation, committed to providing equal opportunities throughout its employment practices as well as its service delivery, and to pro-actively tackle and eliminate discrimination.

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We are committed to creating an environment where everyone - staff, residents, volunteers, visitors, and suppliers - is treated with respect and feels valued for their individuality.

We want staff and residents to feel comfortable, accepted, and able to always be themselves.

At ExtraCare, we value the diversity that the unique backgrounds, experiences, and perspectives that each individual brings. Creating an inclusive culture enables us all to benefit from this diversity, helping to create happier, more supportive, and more productive place to live and work.

We are committed to challenging any behaviour that undermines these values.

Our Belonging (& EDI) vision is:

“Better Lives – where everyone is valued as part of their ExtraCare community.”

2. Objectives

The objectives of this policy are to:

- Create an inclusive, high-quality living and working environment that is welcoming to all and free from discrimination.
- Attract, recruit, and retain a diverse range of residents, staff, and volunteers through fair and inclusive practices.
- Ensure policies and processes are fair, transparent, and fully compliant with the Equality Act 2010.
- Communicate and educate all stakeholders about our Belonging (& EDI) vision, expected behaviours, and commitment to inclusion.
- Provide equitable learning, development, and career opportunities.
- Encourage everyone to respect our Belonging (& EDI) commitment.

3. Regulatory and Legal Considerations

ExtraCare is subject to the Equality Act 2010 Public Sector Equality Duty

This requires organisations delivering public services to pay due regard to:

- Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not.

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Other legal considerations are the Health & Safety at Work Act 1974 and Human Rights Act 1998.

4. Detailed responsibilities are below:

<i>Board</i>	• Approving policy and ensure it is in line with the Belonging Strategy
<i>Executive Leadership Team (ELT) and Managers</i>	• Leading by example, preventing discrimination and valuing Belonging (&EDI) to improve services and opportunities. • Supporting everyone to follow the aims of this policy.
<i>Employees and volunteers</i>	• Taking relevant training to improve knowledge and sharing good practice with others.
<i>Residents</i>	• Complying with the Community Charter (2018) and abiding by their tenancy or leasehold agreement in respect of equality and diversity.
<i>Suppliers, Partners and Sub Contractors</i>	• Being aware of this policy and their legal duties as well as those of their own organisation.
<i>All</i>	All people in scope of this policy have legal duties and responsibilities to comply with the Equality Act 2010. They are also required to comply with this policy (whether residing at ExtraCare premises, taking part in ExtraCare activities and/or acting on ExtraCare's behalf.) They are responsible for: • Treating everyone with dignity and respect and being mindful of what might offend others. • Helping create an environment at work and in living/leisure spaces that is inclusive, welcoming, and free from discrimination, harassment, bullying, or victimisation. • Speaking up against unacceptable behaviour and taking responsibility to make changes, asking for help when needed.

5. Policy Statement

5.1 Protected characteristics

Protected characteristics apply to everyone. The Equality Act 2010 protects all individuals from discrimination, because every person has characteristics that are safeguarded under the law.

The Equality Act 2010 prohibits discrimination because of certain protected characteristics which are:

- Age;
- Sex;
- Race (including colour, nationality, ethnic or national origin);
- Disability;
- Religion or belief;
- Being pregnant or on maternity leave;
- Sexual orientation;
- Gender reassignment; and
- Being married or in a civil partnership.

Discrimination means treating an individual unfairly because of who they are or because they possess certain characteristics.

Discrimination that occurs because someone has or is associated with someone who has one or more of the above characteristics is unlawful under the Equality Act.

If someone is being treated differently from other people only because of who they are or because they possess certain characteristics, they may have been discriminated against. People with multiple characteristics (such as a gay person with a disability) may experience multiple levels of discrimination.

Appendix A gives examples of the different types of discrimination covered by the Equality Act 2010.

5.2 Bullying and Harassment

Bullying is repeated, offensive, intimidating, or insulting behaviour that makes someone feel upset, threatened, or humiliated.

Harassment is unwanted behaviour related to a protected characteristic that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples include:

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- Spreading malicious rumours or gossip;
- Repeatedly shouting, humiliating, or undermining a colleague;
- Making offensive jokes, comments, or gestures linked to a protected characteristic; and
- Unwelcome physical contact or inappropriate messages.

Example: A group of workers encounter derogatory name calling, racist jokes and abusive language from their colleagues. The behaviour is offensive and creates an intimidating atmosphere in the workplace. This is unlawful harassment.

All forms of bullying and harassment are unacceptable and will be treated seriously. Please refer to our Bullying and Harassment policy.

5.3 Victimisation

Victimisation means treating someone badly because they have done (or are thought to have done or are planning to do) a protected act. A protected act is:

- Making a claim or complaint of discrimination (under the Equality Act 2010);
- Helping someone else to make a claim by giving evidence or information;
- Alleging that you or someone else has breached the act; and
- Doing anything else in connection with the act.

Example: A manager excludes a team member because he thinks she supports a fellow team member's sexual harassment claim. This will be unlawful victimisation under the Equality Act 2010.

5.4. How this policy applies to ExtraCare employment practices

This policy applies to all behaviour in the workplace including head office, locations and shops. It also covers behaviour outside of the workplace such as at meetings, social events or in social interactions with colleagues as well as actions that could affect ExtraCare's reputation (e.g. posts on social media that go against this policy.) We aim to prevent unlawful discrimination in all areas of employment including recruitment, promotion, training opportunities, pay and benefits, discipline and selection for redundancy.

We set out below some specific areas of application:

5.4.1 Recruitment and selection

ExtraCare aims to advertise job opportunities widely and welcomes all applications. All candidates will be assessed objectively against the requirements of the role. Any reasonable adjustments will be made for candidates with a disability. Interview panels will always have more than one person and will be gender balanced.

Job and promotion candidates are selected based on their skills, qualifications and experience, as measured against the role profile and person specification, regardless of their background or personal circumstances.

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In some cases, internal applicants whose job is at risk of redundancy, or who need to be redeployed due to health or disability reasons may be considered before a job is advertised more widely.

5.4.2 Working conditions and terms of employment

ExtraCare will not tolerate any form of discrimination, harassment, bullying or victimisation, including on the basis of any protected characteristic. All of our employment policies are applied consistently, and any form of unacceptable behaviour will be managed in line with our *Disciplinary Policy*.

ExtraCare supports cultural and religious practices where it is reasonable to do so, so long as it does not affect the needs of the organisation and the residents, and where there is no conflict with other legislation, e.g. health and safety.

If a colleague becomes disabled or has any other change in circumstance during their employment with ExtraCare, we will make reasonable adjustments wherever possible to enable them to continue in their role. If this is not possible, we will try to find another role suited to their skills, experience and ability.

5.4.3 Training and development

All staff must complete mandatory Equity, Diversity and Inclusion training as part of their Induction and as required during their employment.

We provide training in Equity, Diversity and Inclusion to managers and anybody else likely to be involved in recruitment or other decision-making processes. Such training will address the steps that decision-makers can take to avoid the impact of biases.

In addition, all colleagues have access to training and development opportunities to support them in achieve the standards required for their job, improving their performance and learning new skills.

The performance and development review (PDR) process ensures all colleagues are clear about their job role, responsibilities and objectives; and identifies individual training and development needs.

5.5 How this policy applies to ExtraCare service delivery

5.5.1 Identifying resident needs

ExtraCare takes a person-centred approach to residents to make sure their physical and mental needs are understood and met. This approach is central to how we deliver belonging, equity, diversity and inclusion in the services we provide. Everyone working for ExtraCare is expected to support this approach and help ensure all residents, volunteers, and visitors are treated fairly and inclusively.

5.5.2 Community building

Our villages and schemes are designed to be suitable and welcoming to all people, regardless of their health, wealth or background. We aim to attract and create communities which reflect the demographic make-up of the surrounding area. This is reflected in our *balanced communities policy*. Our sales marketing process is aimed at a wide audience. As a provider of retirement accommodation,

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we have an age restriction, only people over 55 can move into our locations. This is in accordance with the lawful age exemption for retirement housing providers and is not an example of unlawful discrimination.

5.5.3 Care and wellbeing

We provide wellbeing assessments as appropriate to understand each resident's individual needs, preferences and aspirations. Our approach is person-centred, involving residents in decisions about their care.

Wellbeing and Care assessments are delivered in an inclusive and respectful way that recognises diversity across our community. We make reasonable adjustments and adapt how support is provided so that no resident is disadvantaged due to disability, identity, background or communication needs.

Our Wellbeing Advisors and care staff work in line with the Nursing and Midwifery Council Code and Care Quality Commission expectations for safe, effective, caring, responsive and well-led practice. This includes treating every resident with dignity and respect, providing personalised evidence-based support, responding to changing needs and upholding fairness, confidentiality and non-discrimination. This ensures our wellbeing and care services are clinically sound, equitable and supportive of each resident's dignity, independence and sense of belonging.

5.5.4 Property

It is in the interests both of our customers and ExtraCare that our properties are as accessible as possible. We promote accessible homes for our residents in the following ways:

- Our properties are built to be accessible, with apartments featuring wide doorways to accommodate wheelchair access, wet rooms rather than shower trays and spacious hallways to facilitate easy access into all rooms; and
- Ensuring that the accessibility of our locations, (both residents' apartments and the adjoining communal areas) are assessed as part of our property surveys. The outcomes from these surveys drive our future investment decisions.

5.5.5 Allowing residents to have a say in shaping our services

ExtraCare has a strong commitment to involve residents in the shaping of our services, as per our *Customer Involvement Policy*.

Location Residents' Associations are actively involved in decisions that affect the location. In addition, the Residents' Forum holds regular meetings with the ExtraCare Executive, allowing them a voice on how we deliver services and promote belonging, equity, diversity and inclusion.

5.5.6 Suppliers and contractors

All ExtraCare's contractors and suppliers are expected to promote belonging, equity, diversity and inclusion in their own practices. As part of the tender process and general supplier set up procedure,

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suppliers are required to complete a declaration confirming that their employment practices comply with the Equality Act 2010.

5.6 Taking action against behaviour that is in breach of this policy

Any report of bullying, harassment or discriminatory behaviour will be taken seriously. If an employee feels they have seen, heard or experienced such behaviour (either as a witness or a victim) they should first speak to their line manager. If the complaint cannot be resolved informally, then the formal grievance procedure should be followed, in line with our *Grievance* and *Bullying and Harassment Policies*.

If the unwanted behaviour is seen, heard or experienced by others, such as residents, visitors or volunteers, they are encouraged to report this to the manager of the location where the behaviour was witnessed, so it can be resolved or escalated.

All reports of potential breaches of this policy will be treated seriously through the appropriate policy. Anyone who reports in good faith will not be victimised or treated less favourably as a result. However, deliberately false claims of a breach of this policy which are found to have been made in bad faith will be dealt with under ExtraCare's disciplinary procedure.

Whether or not a complaint is raised formally, action will be taken quickly and professionally to put a stop to the behaviour and appropriately deal with those concerned.

If, after an investigation, ExtraCare decides that someone has acted in breach of this policy they may be subject to disciplinary action up to and including dismissal and referral to the relevant authorities.

5.7 Data

We use data collected about our residents, employees and volunteers to help us understand who we are providing services to and ensure that access to services and facilities is happening in a fair and consistent way. We do so in compliance with the General Data Protection Regulation, GDPR. We treat personal data collected for reviewing equality of opportunity in recruitment and selection and employment practices in accordance with our data protection policy. We will monitor the ethnicity, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

Information about how data is used and the basis for processing is provided in our privacy notice available on our website.

6. Monitoring & Review

The success of this policy in delivering its aims and ensuring that ExtraCare complies with the Equality Act 2010 will be monitored by ExtraCare. This policy will be subject to a full review at least every three years.

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We will regularly check how well this policy is working and update it if laws change. We will monitor the diversity of our workforce, job applicants, and promotions, including ethnicity, gender, and disability. We will also produce an annual pay report and use this information to improve the policy and ensure it remains effective. We will share progress and insights with staff and residents.

7. Associated Policies

General	Corporate Plan 2022-27	Belonging Strategy 2025-2028
Related Policies	- Health and Safety Policy - Bullying and Harassment Policy - Procurement Policy - Grievance Policy - Disciplinary Policy - Balanced Community Policy - Customer Involvement Policy	- Attendance Management Policy - Whistleblowing Policy - Data Protection Policy - Complaints Management Policy - Recruitment Policy - Safeguarding Adults and Children at Risk Policy - Dignity Privacy and Respect Policy

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Appendix A Types of Discrimination

The different types of discrimination covered by the Equality Act are:

Direct Discrimination

This is where someone is treated less favourably than someone else would be in the same situation due to their protected characteristics.

Example: A manager is recruiting a new member of the care team. Before conducting any interviews and choosing the person with the right skills and experiences, they have already decided that they won't recruit a man into the position.

In some rare cases, an employer can treat someone differently if a protected characteristic is essential for the job. This is called an *occupational requirement*, for example, a care service may require a female carer to support a woman who asks for personal care from another woman for reasons of privacy and dignity.

Indirect Discrimination

This is where a rule, policy, or practice is applied that appears neutral but puts people with a protected characteristic at a disadvantage.

Example: An employer has a policy which states reception staff aren't allowed to cover their hair. This policy applies to everyone, but particularly disadvantages practicing Muslim women who wear a hijab in public. Unless the employer can specifically justify the policy, this is likely to be considered indirect discrimination on the grounds of religion.

Discrimination by Association

This is a form of direct discrimination against someone because they are associated with one or more others who possesses a protected characteristic.

Example: A candidate has her job offer withdrawn after revealing she has a disabled child with complicated care needs. The withdrawal of the job could be discrimination because of her association with a disabled person and the manager's assumptions about how this might impact on her capability to do the job.

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Discrimination by Perception

This is a form of direct discrimination where a colleague believes that another colleague possesses a protected characteristic and discriminates against them because of that 'perceived' characteristic.

Example: A colleague is being excluded from team social activities and is the victim of inappropriate name calling because the team assume they are gay and do not 'fit' in the team culture. This could be considered discrimination by perception, regardless of whether the colleague is in fact gay.

Discrimination Arising from Disability

This happens when someone is treated unfairly because of something connected with their disability, and the treatment cannot be justified.

Example: An employee with a disability is passed over for promotion because their manager assumes they cannot handle certain tasks, even though they are fully capable.

Failing to Make Reasonable Adjustments

Employers must make reasonable adjustments to ensure that a disabled person is not put at a substantial disadvantage at work. Reasonable adjustments could include allocating some duties to a colleague, changing working hours or location, adjusting recruitment or assessment procedures, or modifying disciplinary or grievance processes. Failing to do so is unlawful.

Example: A member of staff who uses a wheelchair is not given access to a suitable workspace or equipment, putting them at a disadvantage.

Discrimination can take many forms, including less obvious and subtle behaviours, and may arise from assumptions or biases. Examples include steering employees into certain types of work based on stereotypes, recruiting or promoting people based on assumptions about how colleagues or clients will react, or applying different standards to judge the performance of different groups. All forms of discrimination are unacceptable at ExtraCare.

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