Equity, Diversity & Inclusion (EDI) Framework

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1. Scope

The purpose of this framework is to identify and eliminate discriminatory practices in the provision of goods and services at Bernicia and to ensure Bernicia meets its legislative and regulatory obligation with regard to equity and diversity.

It sets out our commitment to creating and sustaining a workplace where equity, diversity and inclusion are embedded in how we work, make decisions and support our people. We aim to provide equal opportunity, fairness and respect for everyone, and to eliminate unlawful discrimination, harassment, victimisation and bullying.

2. Legal Framework

Bernicia is fully committed to the elimination of unlawful and unfair discrimination and to take positive action against discrimination in all areas of our business.

The Equality Act 2010 legally protects people from unlawful discrimination, harassment, and victimisation in the workplace and in wider society. There are nine protected characteristics in the Equality Act. The protected characteristics are basically elements of human identity. The protected characteristics are as follows:

- Age
- Disability
- Gender Reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race, including colour, nationality and ethnic or national origin
- Religion and belief
- Sex
- Sexual orientation.

3. Our Commitment

All our colleagues and tenants are equally important, but we recognise they may have different needs that require specialist services and management. We acknowledge our role in helping to tackle deprivation and discrimination through providing better services which are more inclusive and accessible and introducing measures to combat discrimination in day-to-day operational services. We believe a socially inclusive society is more likely to prosper and thrive than one where exclusion and inequalities are left unchecked.

We are committed to:

- Treating everyone equally, fairly and with respect.
- Ensuring there are no discriminatory practices in any aspect of our work and will be proactive in challenging prejudice, complacency, and lack of concern.
- Creating an environment free from discrimination.
- Achieving a diverse board and workforce, recognising the value of a wide range of talent and abilities.

- Making a contribution to the overall prosperity and well-being of colleagues and communities by addressing factors that leave people and communities socially isolated and excluded.
- Working towards the make-up of our colleagues being reflective of the population of the areas in which we operate.
- Taking steps to mitigate the risks of modern slavery and human trafficking within our supply chain and in other aspects of our business. The methods by which we will do this are set out in our Slavery and Human Trafficking Statement Modern Slavery | Bernicia Homes
- Supporting reasonable adjustments for disabled colleagues, workers, tenants and applicants.
- Encouraging open communication and providing safe routes for raising concerns.
- Building awareness through appropriate campaigns, training, guidance and leadership accountability.
- Meeting the communication needs of the diverse range of tenants, by offering interpretation, translation services and providing documentation in accessible formatting, with our website enabled with accessibility software to meet individual needs.
- Ensuring a diverse range of people with protected characteristics are represented through positive images in our literature and general publicity.
- Monitoring, reviewing and improving our approach to EDI using relevant evidence and feedback.

4. Framework Standards

4.1 Governance

We recognise that Bernicia Group can be better served by Boards that are representative of the communities which we serve. Consequently, our Board recruitment procedures conform to established equity principles, including that of positive action where there is under-representation.

We have an ongoing commitment to train all our Board members and Executive Team in equity, diversity & inclusion with the objective of:

- Ensuring an understanding of the business case for diversity.
- Enabling a clear and consistent leadership in its promotion throughout the Group.
- Providing members with the knowledge and expertise necessary to judge, from the reports they receive, whether we are delivering on equity commitments.

4.2 Housing Services

We apply the principles of EDI to the provision of housing and related services. We work with partner organisations, local authorities and other stakeholders to understand and respond to the needs of local communities and individuals.

We are committed to providing accessible, fair and non-discriminatory housing management, maintenance and support services. We will make reasonable

adjustments where required and provide information in accessible formats to help tenants access our services and participate in decision-making.

We are committed to protecting tenants from discrimination, harassment, victimisation and other unacceptable behaviour and will take appropriate action where concerns are identified.

We actively promote tenant involvement opportunities and seek feedback from a diverse range of tenants to help shape, review and improve our services.

Properties are allocated through local authority nomination agreements and choice based lettings schemes in accordance with our Allocations Policy and relevant legislative requirements. Equality impact assessments are undertaken as part of policy development and review to help ensure fair access to housing services.

4.3 Development

All our new homes are consciously designed to ensure our tenants can live in a quality, safe, accessible, and welcoming home, and environment.

We will aim to consult with local communities, partners and stakeholders when designing and developing new homes to ensure the housing needs of our communities are met.

4.4 Attraction, Recruitment and Selection

Attraction, recruitment, selection, promotion and development decisions will be fair, transparent and based on skills, experience, potential and role requirements.

We will aim to attract a diverse range of applicants, use inclusive language in job advertisements and role profiles, provide reasonable adjustments during recruitment and reduce bias in decision-making wherever possible.

We will actively encourage applications from under-represented groups.

Applicants will automatically be progressed for interview in cases where they meet the essential criteria and have declared any of the following on their application:

- A disability;
- A care leaver between the ages of 16 to 25 years old;
- Have worked for the Armed Forces.

4.5 Reasonable adjustments and accessibility

We will consider and implement reasonable adjustments to remove or reduce disadvantages experienced by disabled colleagues, workers and applicants. Adjustments may relate to recruitment processes, working arrangements, equipment, communication methods, workplace access, duties or support arrangements.

4.6 Employment and Training

We will aim to achieve an ability-based workforce, which reflects the working population mix in the areas in which we operate. We seek to:

- Remove barriers that may discourage access to employment within the Bernicia Group as set out in our Attraction, Recruitment and Selection Framework.
- Operate work-life balance practices to enable people to be employed or remain in employment who have needs and responsibilities not just those protected by the law such as carers and parents.
- Offer training and development opportunities on an equitable basis and ensure colleagues are promoted and treated fairly on the basis of their relevant merits and abilities.
- Request and monitor colleague ED&I data for the purpose of ensuring underrepresented groups are identified and relevant actions put in place to address any gaps.
- Complete and publish our annual Gender Pay Gap report
- Carry out an EDI Impact Assessment when creating or reviewing policies to ensure no-one is disadvantaged.

4.7 Suppliers, Partners, Contractors and Consultants

Suppliers, partners, contractors and consultants working with and on behalf of us are expected to demonstrate commitment to equity and diversity and this is assessed at procurement, or as part of any on-going quality assessments.

We will work towards ensuring that all suppliers, contractors, and consultants to the Group warrant that they have thoroughly investigated their labour practices and those of their direct supply chain, to ensure that there is no slavery or forced labour used anywhere in their organisation or by any direct suppliers or subcontractor to their organisation. We will ensure they confirm that they have put in place all necessary processes, procedures, investigations, and compliance systems to ensure that this situation will continue to always be the case, and they are fully compliant with the Modern Slavery Act 2015.

5. Responsibilities and Action

- **Senior leaders** are responsible for setting expectations, providing resources and ensuring EDI is considered in organisational decisions.
- **Managers** are responsible for applying this framework fairly, supporting inclusive teams and responding appropriately to concerns.
- **People Services** is responsible for advising on framework application, supporting training and monitoring the effectiveness of this framework.
- **Colleagues** are responsible for behaving inclusively, completing required training and raising concerns in good faith.

We do not tolerate bullying, harassment, victimisation or unlawful discrimination. Concerns may relate to behaviour by colleagues, managers, tenants, suppliers,

contractors or others connected with work. Any concern will be taken seriously. Where informal resolution is not suitable or does not resolve the issue, formal procedures may be used.

6. Raising Concerns

Anyone who believes this framework has been breached, or who has experienced or witnessed discrimination, harassment, victimisation, bullying or exclusionary behaviour, should raise the concern. Our Complaints Policy outlines a clear process which should be used if any tenant or service user feels that they have been treated in an unfair way within the scope of this framework. The Zero Tolerance Framework outlines the process which should be used if any colleague or contractor feels that they have been treated in an unfair way within the scope of this framework.

Concerns will be handled confidentially as far as possible and no one should be treated unfavourably for raising a concern in good faith.

7. Definitions

Word/Phrase	Definition
Equity	Equity protects people in minority groups from being discriminated against on the grounds of group identity, i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. This is a legal requirement – it is the things we do to level the playing field.
Diversity	Recognising, respecting, and valuing the difference between individuals within the workforce and among service users. Recognising the value that access to a wide range of talent and abilities brings to the Group and the whole community.
Inclusion	The things we do to make everyone feel welcome.

Version Number: **V6.0**

Effective From: **October 2026**

Applicable To: This framework applies to all members and colleagues of Bernicia Group, including Board Members, Trustees, Independent Committee Members, Directors, Involved Tenants, and colleagues whether full-time, part-time, fixed-term, casual employees, and volunteers of Bernicia, and subsidiaries of the group. It applies to contractors, consultants and agency workers and anyone working on behalf of Bernicia Group.

It applies to all work-related activities, including recruitment, onboarding, training, development, pay and benefits, flexible working, performance management, formal meetings, social events and interactions with tenants, suppliers and the public.

Associated Documents:
The following resources support the EDI Framework. These can be found in the policies section of the intranet unless shown otherwise below:

- Zero Tolerance Framework
- Gender Pay Gap Report
- Attraction, Recruitment and Selection Framework
- Slavery and Human Trafficking Statement 2026
- Allocations Policy
- Complaints & Compliments Policy
- Procurement Policy
- Standards of Behaviour Policy
- The Bernicia Way – Values and Behaviours Framework.

Equity, Diversity & Inclusion: An ED&I screening assessment was completed in August 2026. Please contact the Governance team if you require a copy.

Approved By: Deputy Chief Executive & Executive Director, People & Place

Framework Author: People Services Manager

Framework Owner: People Services Director

Next Review: **October 2029**

Reference Number: **FRW-0037**

Change Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
6.0	October 2026	People Services Manager	Deputy Chief Exec & Exec Dir, People & Place	1. Added that the framework also applies to contractors, partners, consultants and agency workers and anyone working on behalf of Bernicia Group. 2. Additional points added to Bernicia's Groups commitments 3. Additional standards added: Attraction, recruitment & selection; reasonable adjustments and accessibility; responsibilities and action. 4. 4.2 Housing Services section updated. 5. Equality revised to Equity