



Equality, Diversity and Inclusion Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Purpose and Scope

D2 PropCo Ltd provides accommodation to people and families experiencing homelessness, including vulnerable adults, care experienced young people, and unaccompanied asylum seeking children (UASC) aged 16–17. We also deliver repairs and maintenance services, meaning our staff and contractors work directly in residents' homes and communities.

Many of the people we support face multiple disadvantages, discrimination, trauma and structural inequality. This policy sets out our commitment to advancing equality, diversity and inclusion (EDI) across our workforce, our services, our properties, our repairs operations and our partnerships. It applies to:

- All employees, directors, consultants and volunteers
- Contractors, agents and suppliers acting on behalf of D2
- All residents, applicants, visitors and members of the public who interact with our services

Our purpose is to ensure that every person is treated with dignity, fairness and respect, and that our services actively reduce inequality rather than reinforce it. We recognise that homelessness and housing inequality are deeply connected to discrimination, poverty, trauma and social exclusion, and that our approach must be proactive, not reactive.

2. Legal and Regulatory Framework

D2 PropCo operates within a complex legal and regulatory environment. This policy supports compliance with:

- Equality Act 2010
- Human Rights Act 1998
- Children Act 1989 and 2004 (relevant to UASC and 16–17 year olds)
- Protection from Harassment Act 1997
- Public Sector Equality Duty (where applicable through commissioned services)
- Health and Safety at Work Act 1974
- Data protection legislation

We recognise our anticipatory duty to consider the needs of disabled people in advance and to make reasonable adjustments in both employment and service delivery. We also recognise that people experiencing homelessness or housing insecurity are disproportionately likely to have protected characteristics or face barriers to accessing services.



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3. Our Equality, Diversity and Inclusion Principles

Our work is guided by the following principles:

- **Safety first** - safeguarding and health & safety risks are never compromised.
- **Dignity and respect** - every person is valued and treated fairly.
- **Antidiscrimination** - we challenge discrimination, harassment, victimisation and hate in all forms.
- **Trauma aware practice** - we recognise the impact of trauma and avoid retraumatisation.
- **Accessibility** - our services, communication and decision making must be accessible to all.
- **Representation** - our workforce and contractors should reflect the communities we serve.
- **Transparency** - decisions affecting residents and staff must be fair, evidence based and clearly communicated.
- **Continuous improvement** - we monitor outcomes and adapt our approach to reduce inequality.
- **Intersectionality** - we recognise that overlapping identities shape people's experiences of homelessness, housing and discrimination.

These principles apply equally to staff, residents, contractors and partners.

4. Equality, Diversity and Inclusion in Employment

4.1 Fair and lawful employment practices

We will:

- Provide equality, fairness and respect for all employees, whether temporary, part time or full time.
- Not unlawfully discriminate on the basis of protected characteristics.
- Ensure recruitment, promotion, training and development are based on merit and capability.
- Ensure job adverts, role descriptions and recruitment processes are accessible and inclusive.
- Encourage applications from underrepresented groups



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4.2 Workplace culture

We will:

- Promote a culture where individual differences are valued.
- Ensure staff understand their responsibilities under this policy.
- Provide training on EDI, unconscious bias, trauma informed practice and cultural competence.
- Support staff who experience discrimination or harassment.

4.3 Addressing misconduct

We will:

- Take seriously all complaints of bullying, harassment, victimisation or discrimination.
- Investigate concerns promptly and sensitively.
- Apply disciplinary procedures where misconduct occurs, including potential dismissal for serious breaches.
- Recognise that harassment may also constitute a criminal offence.

5. Equality, Diversity and Inclusion in Service Delivery

5.1 Fair access to services

We will:

- Ensure placement and decision making processes are fair and evidence based.
- Avoid stereotyping or assumptions based on protected characteristics, homelessness history or perceived risk.
- Ensure that no resident is disadvantaged due to literacy, digital exclusion or language barriers.

5.2 Respectful and inclusive communication

We will:

- Use respectful, non stigmatising language in all communication.
- Provide information in accessible formats (e.g., large print, easy read, translation, verbal explanation).
- Ensure staff understand how to communicate effectively with people with cognitive, sensory or mental health needs.



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5.3 Inclusive property management

We will:

- Ensure repairs, inspections and property visits are carried out respectfully and sensitively.
- Consider cultural, religious and gender specific needs when arranging access.
- Ensure residents feel safe and respected during all interactions with staff and contractors.

5.4 Challenging discrimination

We will:

- Challenge discriminatory behaviour between residents.
- Address hate incidents, harassment or targeted behaviour through tenancy and safer communities procedures.
- Work with partners to support victims and address perpetrators' behaviour.

5.5 Supporting Unaccompanied Asylum Seeking Children (UASC) aged 16–17

We recognise that UASC are children in the eyes of the law and may have experienced trauma, exploitation, trafficking or persecution. We will:

- Ensure staff understand child safeguarding duties and the specific vulnerabilities of UASC.
- Provide culturally competent, age appropriate communication and support.
- Treat age disputed young people as children until formal assessment is completed.
- Ensure accommodation arrangements reflect safety, privacy and developmental needs.
- Work closely with local authority children's services and other safeguarding partners.

6. Trauma Informed and Psychologically Informed Practice

We will:

- Train staff in trauma aware and psychologically informed approaches.
- Promote environments that support safety, choice, empowerment and collaboration.
- Recognise that trauma can affect communication, behaviour and engagement.
- Avoid practices that may retraumatise residents, such as unexpected visits, insensitive language or punitive responses to distress.
- Ensure staff understand how trauma intersects with protected characteristics, migration experiences and homelessness.



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7. Accessibility and Reasonable Adjustments

We will:

- Provide accessible communication formats and alternative methods of engagement.
- Make reasonable adjustments to policies, procedures and service delivery.
- Ensure homes and communal areas are as accessible as reasonably practicable.
- Support residents with sensory, cognitive, mental health or mobility needs.
- Ensure staff understand their responsibilities under the Equality Act.
- Record, review and monitor adjustments to ensure they remain effective.

8. Contractors, Partners and Supply Chain

Contractors and partners play a critical role in resident experience. We will:

- Include EDI expectations in contracts, procurement processes and performance monitoring.
- Work only with organisations that demonstrate a commitment to equality, diversity and inclusion.
- Require contractors to treat residents with dignity, respect and cultural sensitivity.
- Require contractors to report safeguarding concerns, hate incidents or discriminatory behaviour immediately.
- Take action where contractors breach this policy, including potential removal from site or contract termination.
- Ensure contractors understand trauma informed practice and the needs of vulnerable residents.

9. Equality Diversity and Inclusion in Repairs and Maintenance Services

D2 PropCo delivers repairs and maintenance services. Repairs operatives enter residents' homes and therefore play a significant role in ensuring dignity, safety and inclusion. We will:

- Ensure repairs operatives treat all residents with respect, cultural sensitivity and professionalism.
- Provide residents with clear information about who will attend, including gender where relevant to cultural or safety needs.
- Make reasonable adjustments to appointment times, communication methods and access arrangements.



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- Ensure operatives use plain, accessible language when explaining repairs, safety issues or follow up actions.
- Provide translation or interpretation support where needed.
- Ensure operatives understand trauma aware practice and how to respond sensitively to distressed or anxious residents.
- Require operatives to report safeguarding concerns, hate incidents or signs of exploitation immediately.
- Monitor repairs outcomes to identify any disproportionate impacts on protected groups.
- Ensure operatives understand how to work safely and respectfully in homes where residents may have experienced trauma, domestic abuse, exploitation or discrimination.

10. Safeguarding, Hate Incidents and Safer Communities

Equality Diversity and Inclusion is integral to safeguarding and resident safety. We will:

- Protect residents from harassment, hate incidents, discrimination and exploitation.
- Ensure staff know how to report and respond to concerns.
- Work with partners to address hate crime, domestic abuse and targeted harassment.
- Ensure discriminatory behaviour by residents is addressed through tenancy and safer communities procedures.
- Recognise that some residents may be at heightened risk due to protected characteristics, migration status or past trauma.

11. Monitoring, Data and Continuous Improvement

We will monitor:

- Workforce diversity and recruitment outcomes
- Training completion and staff confidence in Equality Diversity and Inclusion
- Resident satisfaction and complaints
- Housing outcomes – evictions and sustainment
- Repairs access and service delivery patterns
- Any disproportionate impacts on protected groups

Monitoring will inform an annual Equality Diversity and Inclusion Action Plan, reported to the Board. All data will be collected and stored in line with data protection legislation. We will use learning from complaints, incidents, audits and resident feedback to improve our approach.



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12. Governance and Accountability

The Board has overall responsibility for Equality Diversity and Inclusion at D2 PropCo. The Senior Management Team is responsible for implementing this policy and ensuring compliance. Managers are responsible for embedding Equality Diversity and Inclusion in day to day operations. All staff, contractors and partners must comply with this policy and challenge discrimination where it occurs.

13. Review

This policy will be reviewed annually or sooner if legislation, regulation or organisational needs change.

14. Policy Approval & Version Control

Policy Owner:	Managing Director
Approval:	Board
Date:	09/04/2026
Tier:	1 – Core Governance Policy
Review Cycle:	Annual

Lets Talk

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