



EQUALITY, DIVERSITY AND INCLUSION POLICY

Fair access • respectful service • accountable decisions

PURPOSE

To ensure that NEWPOINT's housing services, property decisions, employment and partnerships are fair, accessible and free from unlawful discrimination, harassment and victimisation.

Document owner	Applies to	Review
NEWPOINT Housing Group	Residents, applicants, landlords, staff, contractors and partners	At least annually and after material change

1. Commitment, scope and status

NEWPOINT values difference and treats people with dignity. We will identify and remove avoidable barriers, make fair and evidence-led decisions, provide reasonable adjustments, challenge discriminatory conduct and learn from outcomes.

This policy applies to

- Property sourcing, advertising, viewing, offers, checks, acceptance and allocation processes within NEWPOINT's control.
- Resident communication, repairs, inspections, complaints, conduct action and property exit.
- Landlord, council, prime-contractor, supplier and contractor relationships.
- Recruitment, employment, work allocation, training, development and workplace conduct.

Core commitments

Commitment	NEWPOINT approach
Fairness	Use relevant, transparent and consistently applied criteria.
Accessibility	Anticipate barriers and respond promptly to adjustment needs.
Respect	Use inclusive communication and challenge harassment or degrading treatment.
Evidence	Record material decisions and reasons; test outcomes for avoidable disadvantage.
Accountability	Provide routes to question decisions and report discrimination without retaliation.

EQUALITY IS NOT IDENTICAL TREATMENT

Applying the same process to everyone can create disadvantage. Fair treatment may require a different method, format, time, channel or practical adjustment.

2. Legal framework and protected characteristics

The Equality Act 2010 protects people in employment and in access to services and premises. The protected characteristics are:

Protected characteristics	
Age	Disability
Gender reassignment	Marriage and civil partnership
Pregnancy and maternity	Race, including colour, nationality and ethnic or national origins
Religion or belief	Sex
Sexual orientation	

Forms of unlawful treatment

Type	Plain-language meaning
Direct discrimination	Less favourable treatment because of a protected characteristic, including some association or perception cases.
Indirect discrimination	A rule or practice applied generally that disadvantages a protected group and cannot be objectively justified.
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation	Disadvantage because a person raised, supported or gave evidence about an equality concern.
Disability-related discrimination	Unfavourable treatment arising from disability without objective justification, or failure to make reasonable adjustments.

WIDER FAIRNESS

NEWPOINT also seeks fair treatment for characteristics or circumstances not always protected in the same way by the Equality Act, including caring responsibilities, socio-economic disadvantage, language, immigration experience, benefit status and having children—subject to current law and the housing model.

3. Fair housing and property decisions

Decision standard

- Use criteria linked to genuine property, safety, occupancy, contract, affordability or service requirements.
- Apply the same relevant checks at the same stage to comparable applicants or properties.
- Do not rely on assumptions, stereotypes, appearance, name, accent, postcode, family status or perceived characteristics.
- Record the criterion, evidence and reason for material acceptance, rejection or restriction decisions.
- Provide a route to correct inaccurate information and request review or adjustment.

Children and benefit status

For assured and regulated tenancies in England, current rental-discrimination measures prohibit landlords and persons acting for them from making a person less likely to rent because they have children or receive benefits, subject to limited statutory exceptions. NEWPOINT will not use blanket ‘no children’, ‘no benefits’ or equivalent practices where those rules apply.

Objective property limits

A property can still be unsuitable because of lawful occupancy, overcrowding, licence, safety, accessibility or contract requirements. The record must show the genuine requirement and why the decision was proportionate—not use a neutral label to conceal discriminatory treatment.

PARTNER NOMINATIONS

Where a council or partner controls nominations, NEWPOINT should not second-guess lawful allocation decisions. NEWPOINT remains responsible for fair treatment in the parts of the service it controls and must challenge an instruction that appears discriminatory or unlawful.

4. Advertising, enquiries, viewings and checks

Stage	Required control
Advertising	Use accurate, inclusive language; state objective property criteria; avoid wording that discourages protected groups, families or benefit recipients.
Enquiries	Give equivalent availability and property information through accessible channels.
Viewings	Offer reasonable times and adjustments; do not create obstacles for a particular group.
Identity / right-to-rent checks	Where applicable, follow the current code and check all adults at the same stage rather than selecting people by appearance, name or assumed nationality.
Affordability / evidence	Use a consistent evidence-based method; consider lawful income sources fairly and offer an adjustment where the process itself creates disability disadvantage.
Decision / feedback	Record reasons and provide an appropriate review or complaint route.

Instructions from landlords or others

NEWPOINT will not follow, publish or pass on an instruction to discriminate. If a landlord, contractor or partner requests an exclusion that may be unlawful, staff pause the instruction, record it and escalate for compliance/legal review.

AUTOMATION NEEDS REVIEW

Digital screening, scoring or CRM filters must not introduce hidden discriminatory outcomes. A human reviewer must be able to explain and correct material decisions.

5. Reasonable adjustments and accessible service

NEWPOINT will think ahead about disability barriers and respond when a person asks for help or when a need is reasonably apparent. A request does not require legal language, a special form or a particular diagnosis.

Adjustment process

Step	Action
1. Listen	Ask what barrier the person experiences and what would help.
2. Clarify	Understand the service task, urgency, safety and preferred outcome; avoid unnecessary medical detail.
3. Decide promptly	Assess effectiveness, practicality, cost/resources, disruption, safety and alternatives.
4. Implement	Record the adjustment, owner, start date, review trigger and any consent needed to share it.
5. Explain	If the exact request is not reasonable or possible, give reasons and offer an effective alternative.
6. Review	Check whether the adjustment works and update it when needs or services change.

Examples

- Telephone or face-to-face contact instead of digital-only communication.
- Easy-read, large print, translated or audio information; interpreter or communication support.
- Extra time, reminders, flexible appointment windows or permission for an advocate.
- A quieter meeting, step-free venue, home visit or alternative method where appropriate.
- Safe contact arrangements for mental-health, domestic-abuse or safeguarding needs.

NO AUTOMATIC MEDICAL EVIDENCE

Ask only for evidence that is necessary and proportionate. Many straightforward communication adjustments can be agreed without medical proof.

6. Accessible communication and inclusive practice

Communication standard

- Use plain language, short explanations and clear next actions.
- Ask how the person prefers to communicate and whether they need support.
- Use qualified interpretation where accuracy, consent, safeguarding or confidentiality matters; do not rely on a child or suspected perpetrator.
- Respect names, titles and pronouns; correct mistakes without argument.
- Do not make assumptions about literacy, capacity, culture, religion, family or finances.

Service design

Barrier	Inclusive response
Digital exclusion	Maintain a telephone or assisted route; do not require app use for essential access.
Language / literacy	Offer explanation or interpretation and check understanding.
Sensory impairment	Use suitable format/channel and accessible appointment communication.
Mobility / physical access	Offer accessible venue, reasonable home visit or alternative service method.
Cognitive / mental-health need	Break steps down, allow support, use reminders and avoid unnecessary repetition.
Religious / cultural consideration	Accommodate reasonably while maintaining safety, law and service requirements.

CONFIDENTIALITY

Do not disclose a disability, gender history, religion, sexual orientation, immigration information or other sensitive matter to landlords, contractors, household members or partners unless necessary, lawful and appropriately authorised.

7. Resident service, repairs and property management

Fair service delivery

- Triage repairs by risk, essential service, vulnerability and impact—not by who reports most forcefully.
- Consider how disability, pregnancy, age, children or health conditions change the impact or urgency of a defect.
- Make appointment, notice and access arrangements that are reasonable and safe.
- Do not dismiss damp, mould, noise, anti-social behaviour or safeguarding concerns using stereotypes about lifestyle, culture, disability or family.
- Separate objective evidence of conduct or breach from assumptions about a protected characteristic.

Property suitability

Accessibility and household needs should be considered early in viewing and acceptance. NEWPOINT will be honest about physical constraints and will explore reasonable adjustments or alternative solutions rather than promise adaptations without authority or feasibility.

Enforcement and conduct

Warnings, restrictions and property decisions use recorded facts, applicable agreements and proportionate action. Communication controls may address genuinely unacceptable behaviour, but must not punish disability-related communication or a person for raising an equality concern.

VULNERABILITY IS NOT A LABEL

Record the practical need or barrier and the safe adjustment required. Avoid broad labels that expose sensitive information without helping service delivery.

8. Employment, contractors and workplace inclusion

Employment

- Recruit, select, pay, train, develop and manage performance using relevant and transparent criteria.
- Offer reasonable adjustments during recruitment and employment; review them as roles or needs change.
- Prevent and address bullying, harassment, sexual harassment, discrimination and victimisation.
- Use lawful positive action only with appropriate advice and evidence.

Contractors and suppliers

Control	Requirement
Selection	Relevant competence, quality, conduct and equality expectations included in procurement.
Briefing	Resident adjustments and access needs shared only on a need-to-know basis.
Conduct	Respectful language, boundaries, privacy and zero tolerance for discriminatory behaviour.
Reporting	Contractors report access barriers, discriminatory incidents and adjustment failures promptly.
Performance	Complaints, incidents and repeat concerns influence supervision and future instruction.
Flow-down	Key equality duties and service standards included in subcontracting where appropriate.

NEWPOINT REMAINS ACCOUNTABLE

Outsourcing a task does not remove responsibility for the treatment residents, landlords, applicants or staff receive from someone acting on NEWPOINT's behalf.

9. Reporting discrimination and resolving concerns

A person may report discrimination, harassment, victimisation, inaccessible service or an adjustment failure verbally or in writing. They do not need to identify the legal category or complete a special form.

Immediate response

- Make safe and use safeguarding, police or emergency routes where necessary.
- Record what happened, impact, people involved and outcome sought.
- Preserve relevant adverts, messages, calls, CRM entries and decision evidence.
- Consider an immediate adjustment or service recovery while the concern is reviewed.

Route

Concern	Primary route
Service or housing discrimination	Complaints and Service Resolution Policy; compliance oversight.
Workplace discrimination / harassment	Grievance or appropriate people process; independent review.
Contractor conduct	Complaint plus contractor-management action.
Safeguarding / hate crime / threat	Safeguarding and police route alongside internal handling.
Data misuse involving sensitive equality information	Data-protection incident/complaint route.
Rental discrimination involving children/benefits	Compliance review; council/redress route explained where applicable.

NO VICTIMISATION

No one will be disadvantaged for making, supporting or giving evidence about an equality complaint or requesting an adjustment.

10. Decision checks and equality impact review

Before a material policy or process decision

Question	Evidence to record
What is the objective?	The legitimate service, safety, legal or commercial aim.
Who may be disadvantaged?	Protected groups and people facing access barriers, including intersectional impacts.
What evidence supports this?	Data, feedback, complaints, professional advice and operational experience.
Are there alternatives?	Less discriminatory or more accessible ways to achieve the aim.
Is the decision proportionate?	Why the benefit and necessity justify remaining disadvantage.
How will it be monitored?	Owner, measures, feedback route and review date.

Individual decision check

- Would we make the same decision for a comparable person without the characteristic?
- Has a neutral rule created a group disadvantage?
- Have we considered reasonable adjustments and relevant vulnerability?
- Is the evidence accurate, complete and free from stereotypes?
- Can the reason be explained respectfully and reviewed?

PAUSE AND ESCALATE

Staff must pause and seek compliance/legal advice where a proposed criterion, advert, instruction or refusal could exclude a protected group, families or benefit recipients.

11. Data, monitoring and CRM controls

Equality monitoring can identify barriers but also involves sensitive personal data. NEWPOINT collects only what has a clear purpose, explains why it is needed, restricts access, protects it and applies the approved retention schedule.

CRM control	Minimum standard
Adjustment flag	Practical requirement and safe method visible only to relevant service users.
Sensitive detail	Diagnosis or characteristic recorded only where necessary and access restricted.
Decision reason	Objective criterion, evidence, reviewer and date for material decisions.
Complaint / incident	Issue, impact, protected characteristic where volunteered/relevant, action and outcome.
Consent / sharing	Authority and need-to-know disclosure recorded.
Review	Adjustment effectiveness, decision trends and recurring barriers tracked.
Security	Role-based access, audit trail and correction route.

Monitoring

- Review service access, complaints, outcomes and adjustments for patterns of disadvantage.
- Use sufficiently reliable data and avoid conclusions from very small samples.
- Combine data with lived experience, partner feedback and case audit.
- Act where an apparently neutral process produces unexplained unequal outcomes.

DO NOT PROFILE

Equality information must not be used to make unsupported assumptions about risk, behaviour, affordability, suitability or service entitlement.

12. Roles, assurance and document control

Role	Responsibility
Board / directors	Approve policy, set culture, provide resources and review assurance.
Senior / EDI lead	Advise on high-risk decisions, adjustments, complaints, impact reviews and improvement.
Managers	Apply fair criteria, implement adjustments, challenge conduct and support staff.
All workers	Treat people respectfully, recognise barriers, record needs and report concerns.
Contractors	Follow NEWPOINT standards and protect adjustment/confidentiality information.
Partners	Share relevant requirements and cooperate on fair, accessible service delivery.

Assurance measures

- Adjustment requests, time to decision, delivery and repeat failures.
- Discrimination complaints, findings, remedies and recurrence.
- Property/application decisions and relevant outcome disparities.
- Accessible communication and contractor performance.
- Training, policy compliance and completed improvement actions.

Document control

Version	Date	Owner	Review
1.0	August 2026	NEWPOINT Housing Group	August 2027 or earlier trigger

13. Quick-reference fairness card

Situation	Action now
Someone asks for help using the service	Treat it as a possible adjustment request; ask about the barrier and what would help.
A landlord asks for 'no benefits' or 'no children'	Do not act or publish; pause and escalate for current-law review.
A person cannot use the CRM/app	Provide an assisted telephone or alternative essential-service route.
A contractor uses discriminatory language	Make safe, record, report and use contractor/complaint action.
A neutral rule excludes a group	Assess indirect impact, objective and less-disadvantaging alternatives.
Sensitive information is disclosed	Restrict sharing to what is necessary, lawful and authorised.
Discrimination is alleged	Log without requiring legal terminology; preserve evidence; prevent victimisation.
You are unsure	Pause the decision and seek compliance/legal advice.

FOUR QUESTIONS

What is the genuine requirement? Who could be disadvantaged? What adjustment or alternative is possible?
Can we evidence and explain the final decision?

14. Authoritative framework and review sources

This policy is written for England and must be reviewed against NEWPOINT's final housing, employment and contractual arrangements before adoption.

- **Legislation.gov.uk — Equality Act 2010**

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

- **GOV.UK — Disability guidance for service providers**

<https://www.gov.uk/government/publications/equality-act-guidance/disability-quick-start-guide-for-service-providers-html>

- **GOV.UK — Rental discrimination under the Renters' Rights Act 2025**

<https://www.gov.uk/government/publications/rental-discrimination-under-the-renters-rights-act-2025/rental-discrimination-under-the-renters-rights-act-2025>

- **GOV.UK — Rental discrimination guide for landlords**

<https://www.gov.uk/rental-discrimination-landlords/overview>

- **GOV.UK — Avoiding discrimination in right-to-rent checks**

<https://www.gov.uk/government/publications/right-to-rent-landlords-code-of-practice>

- **Acas — Discrimination and the Equality Act 2010**

<https://www.acas.org.uk/discrimination-and-the-law>

CONTROL NOTE

Obtain legal/compliance and employment review before formal adoption. Confirm the named EDI lead, adjustment channels and authority, complaint routes, data-retention controls, right-to-rent responsibilities and application of the current rental-discrimination rules to each NEWPOINT occupancy model.