

Pathways

Equality, Diversity and Inclusion Policy



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Scope

This policy applies to the Citra Pathways Ltd (Pathways) board, our customers, managing agents and contractors. We will seek to apply this policy to our suppliers through contract terms and will embed the policy intent in all our customer-facing systems, processes and service delivery. Our vision is to be a diverse and inclusive organisation supporting both colleagues and customers.

Policy Statement

We are committed to equality, diversity, and inclusion. As a wholly owned subsidiary of Lloyds Living and Lloyds Banking Group, we share the same values. They shape our culture, underpin our decision-making and form the foundation of this Equality, Diversity, and Inclusion Policy.



People-first

We put **people first** to go further for customers



Bold

We're **bold** and take action



Inclusive

We're **inclusive** to value everyone



Sustainable

We champion **sustainability** to care for our planet



Trust

We **trust** each other to achieve more together

We will challenge unfair treatment, prejudice, discrimination, harassment, victimisation and bullying on grounds of:

- Age
- Disability
- Gender identity
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Our commitments

Pathways seeks to achieve higher standards than the minimum set out in relevant legislation. We will do this by:

- Promoting a culture of diversity, inclusion, and equality
- Valuing the unique potential of every individual
- Treating all employees with respect and dignity, free from discrimination
- Extending our values through the supply chain
- Embedding equality, diversity, and inclusion in customer practices and outcomes
- Enforcing zero tolerance for bullying, harassment, victimisation, or discrimination.

In plans, policies and practices we will:

- Design services that reflect community needs through research, consultation, and best practice
- Prevent discrimination by conducting equality impact assessments and acting on findings
- Ensure all employees, volunteers, customers, residents, partners, and contractors understand this policy.

In service delivery we will:

- Deliver services that reflect customer needs and diversity
- Regularly review and monitor services to prevent discrimination and drive improvement
- Ensure compliance with legislation and codes of practice
- Go beyond legal requirements by adopting best practice
- Treat all customers fairly, positively, and with respect
- Investigate and resolve complaints of discrimination, harassment, victimisation, or bullying promptly
- Learn from mistakes and act on findings
- Continuously listen to customers to shape decisions.

In partnerships and contracting we will:

- Ensure partners and contractors share our equality and diversity values
- Embed equality requirements in contract specifications and monitor compliance
- Take action on any breaches by contractors
- Listen to the views of our partners and contractors to help us to improve our work and practice.

Reasonable adjustments

To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. Where appropriate and requested we will make reasonable adjustments such as:

- Providing information in alternative formats (e.g., large print, braille)
- Extending time limits where it is lawful to do so
- Using email or phone instead of hard copy letters where it is lawful to do so
- Using plain English.

Most adjustments can be agreed and implemented quickly. In complex cases, we may explore solutions in detail or seek advice from disability organisations.

The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission Suggest that the most relevant factors are:

- Effectiveness in reducing the disadvantage
- Practicality of implementation
- Available resources and support
- Potential service disruption.

Responsibilities

Board members are responsible for promoting our approach and commitment to equality, diversity and inclusion across the organisation and in the wider community, recommending changes and improvements where necessary.

Board members have a responsibility to develop a culture that promotes equality and values diversity in service delivery. They are also responsible for making sure that this policy is fully implemented and monitored.

All employees, volunteers and contractors must not:

- Discriminate against anyone
- Persuade or pressure another employee to discriminate
- Harass, bully, abuse or victimise other employees, volunteers or customers
- Condone harassment.

Breaches will usually be addressed through disciplinary procedures. We will request that our partners and contractors are aware of and comply with this policy.

Equality monitoring

We collect equality data on employees, applicants, and customers to understand our organisation, identify gaps in service use, and improve delivery. This includes feedback, complaints, and areas where monitoring is legally required.

Surveys and consultations may request equality information to ensure services meet customer needs. Questions cover all nine protected characteristics under the Equality Act to promote fairness and representation.

All data is handled securely and used solely to improve services, in compliance with legislation.

Monitoring this policy

This policy will be reviewed every three years or more frequently as a result of an incident occurring, feedback obtained, internal/external audits and/or change in legislation/regulatory requirements. This process ensures the policy's continuing suitability, adequacy, and effectiveness.

The Pathways Chief Strategy Officer has responsibility for this policy, but ultimate responsibility for performance and compliance sits with the board.

Review schedule

Next review date:

Current version	Date approved	Date for review	Document owner
1.1	16.12.2025	By 16.12.2028	Craig Luttmann

For more information, please visit:

www.lloydsliving.co.uk/pathways

This policy relates to Pathways only.

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It is a for-profit registered provider of social housing and registered with the Regulator of Social Housing (No. 5221).

Citra Pathways Limited registered office: X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB.

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