



CODE OF CONDUCT

2025-2028

CODE OF CONDUCT

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Policy Links:	<ul style="list-style-type: none"> • LHP Constitution including: Rules, Standing Orders, Terms of Reference & Financial Regulations • Colleague terms and conditions including contracts of employment • Non-Executive Director Service Agreements • Raising Concerns Policy • Legal and Regulatory Standards • NHF Code of Governance 2020 • Disciplinary Policy • Member Conduct, Performance & Grievance Policy

Brief Policy Summary:

This Code sets standards of conduct for colleagues to maintain the good reputation of Lincolnshire Housing Partnership (LHP) and social housing.

All colleagues need to apply good judgement even where the Code does not contain specific requirements. It is always important to consider how any action taken or decision made aligns with LHP's purpose and values, and what impact it may have upon customers and reputation.

The Code is written on the assumption that colleagues will comply with all legal and regulatory requirements relevant to this Code and with all LHP's policies, procedures, and employment contracts.

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PART 1: Acting in the best interests of LHP and its customers

You have a responsibility to perform your role in line with the purposes and values of LHP.

1. Meeting your responsibilities

The principle - You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of LHP and for the delivery of its strategic objectives.

Expected of all

- 1.1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- 1.2 In carrying out your role, you must always seek to further LHP's strategic objectives, reflecting LHP's desired culture.
- 1.3 You must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups, or interests, including on the basis of any protected characteristics they may have.
- 1.4 You must consider the impact of your actions on the safety and wellbeing of customers.

Expected of Non-Executive Directors and Involved Customers

- 1.5 You must respect the principle of collective decision-making and corporate responsibility.
- 1.6 You must ensure that you declare to LHP any relevant personal relationships, employment, and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a non-executive director or involved customer.

Expected of Colleagues

- 1.7 You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment.

2. Representing LHP

The principle - In representing LHP in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for LHP and must uphold and promote its values, objectives and policies.

Expected of all

- 2.1 In representing LHP, you must act in accordance with its values, policies, and goals.

- 2.2 You must not conduct yourself in a manner that could reasonably be regarded as bringing LHP into disrepute.
- 2.3 You must not make derogatory, false, or otherwise damaging comments, in person or through any medium, about LHP or any person, service or organisation connected with it.
- 2.4 You must not seek to officially represent the views or position of LHP without prior authority.
- 2.5 You must adhere to LHP's policies in the use of email, intranet and internet services including social media.
- 2.6 When representing LHP through any medium, including social media, you must at all times act with professionalism.
- 2.7 Where any personal social media accounts refer to your role with LHP, you must make it clear in what capacity you are communicating.
- 2.8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect LHP, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to LHP.

Expected of Non-Executive Directors

- 2.9 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long- standing, and in the opinion of the Board cannot be managed appropriately.

PART 2: Behaving with integrity

The reputation and good name of LHP depends on compliance with this Code, and with the laws, policies, and procedures that it refers to. The integrity of those involved needs to be beyond doubt and seen so to be.

3. Conflicts of interests

The principle - You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to LHP and your personal interests, other duties, and relationships.

Expected of all

- 3.1 You must formally declare to LHP, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- 3.2 You must declare any known relationship to a person applying for or performing a role within LHP and must not be involved in their appointment, performance management or reward.

- 3.3 You must declare any known relationship to a customer, potential customer of LHP. You must not be involved in decisions relating to their relationship with LHP or seek or accept preferential treatment for them.
- 3.4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to LHP and must not be involved in procurement processes such as their appointment, performance management or reward.
- 3.5 Except where specifically permitted, as set out in LHP's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- 3.6 You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business, or other organisation for personal gain.

Expected of Non-Executive Directors and Involved Customers

- 3.7 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long- standing, and in the opinion of the Board / Customer Group, cannot be managed appropriately.

4. Bribery, Gifts and Hospitality

The principle - In your role with LHP, you must not offer, seek, or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

Expected of All

- 4.1 You must not solicit or seek gifts or hospitality or other benefits.
- 4.2 Any gifts or hospitality offered to or by you must be either declared or declined according to LHP's policies.
- 4.3 If you are offered a bribe, hospitality, or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

5. Funds, resources, and personal benefit

The principle - You must not misuse LHP's funds or resources or seek preferential treatment for your own personal benefit.

Expected of All

- 5.1 You must ensure that LHP's funds and resources are used properly and efficiently.

- 5.2 Your procurement decisions must be guided by LHP's policies and fairness in decision-making and in line with relevant law.
- 5.3 You must take all reasonable measures to protect LHP's funds, resources, property and assets from fraud, theft, damage, and misuse.
- 5.4 If you claim reimbursement for any expenses, you must do so in line with LHP's policies and procedures.

6. Confidentiality

The principle - You must process information in accordance with the law and LHP's policies and procedures.

Expected of All

- 6.1 You must not disclose, without the required permission and authority, any personal data about customers or colleagues.
- 6.2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left LHP or stepped down from your position.
- 6.3 You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to LHP, unless you are doing so in accordance with LHP's whistleblowing policy and procedure.
- 6.4 You must not prevent another person from gaining access to information to which they are entitled to by law.

7. Reporting concerns

The principle - You must report to the appropriate person within LHP any reasonable suspicions you have about wrongdoing in line with LHP's relevant policies and procedures.

Expected of All

- 7.1 If you have a concern about wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety.
- 7.2 If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.
- 7.3 You must not victimise or disadvantage any person who uses or intends to use LHP's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

PART 3: Conducting yourself professionally and treating others well

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity, and inclusion, are fundamental to the delivery of social purpose.

8. Respect for others

The principle - You must treat all others with respect and consideration.

Expected of All

- 8.1 You must treat everyone you meet in the performance of your role with equal respect, care, and consideration.
- 8.2 You must show respect for individuals' chosen identities. This includes using the names and pronouns that individuals identify with and avoiding misgendering.
- 8.3 You must promote, through your own behaviours, an organisational culture that is welcoming, accepting, and accommodating to people of all backgrounds, cultures, and personal and protected characteristics.
- 8.4 You must not harass, bully, or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour.
- 8.5 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 8.6 You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

9. Working with Customers and External Partners

The principle - You must be professional, fair, and courteous in all your dealings with customers and external partners.

Expected of All

- 9.1 You must seek and value views from customers and external partners when making decisions that will affect them.
- 9.2 You must not allow any personal relationship with a customer or external partner to influence how you perform your role and responsibilities.
- 9.3 You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, customers or external partners.
- 9.4 You must handle external partner and customers' money only where necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with LHP's financial policies, procedures, and controls to ensure appropriate handling of all funds.

- 9.5 You must not invite or influence a customer or external partner unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee, or beneficiary.

10. Professional relationships

The principle – Non-Executive Directors, colleagues and involved customers must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of All

- 10.1 You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

Expected of Non-Executive Directors

- 10.2 Your relationships with colleagues and involved customers must be constructive and professional.
- 10.3 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies, and objectives of LHP.

Expected of Non-Executive Directors and Involved Customers

- 10.4 Where it is necessary to raise issues of colleagues, non-executive directors or contractor performance, these must be raised constructively and through the appropriate channels.
- 10.5 You must not undermine or appear to undermine the authority of a senior officer in your dealings with more junior colleagues.
- 10.6 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with colleagues, Non-Executive Directors and involved customers.
- 10.7 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any colleague or contractor.

Expected of Colleagues

- 10.8 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with colleagues, non-executive directors and involved customers.
- 10.9 You must not use informal channels to lobby or influence non-executive directors or involved customers on matters of LHP business.
- 10.10 You must not knowingly mislead the Board or any of LHP's committees or panels. In presenting information, you must set out the facts and relevant issues and risks transparently and truthfully.

11. Learning and development

The principle - In partnership with LHP, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of All

- 11.1 You must play an active part in LHP's supervision and performance appraisal processes as applying to you.
- 11.2 You must offer open and constructive feedback to others and invite feedback about your own performance.
- 11.3 You must make your personal training and development needs relevant to your role known to LHP.
- 11.4 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of Non-Executive Directors

- 11.5 You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to LHP and the wider housing sector.

PART 4: Protecting yourself, other people, and the environment

You have a responsibility while on LHP's business to protect your own health, safety, security, and wellbeing and that of others, and to minimise harmful environmental impacts.

12. Health, safety, and security

The principle - Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

Expected of All

- 12.1 You must not knowingly put your own or others' health, safety, security, or wellbeing unnecessarily at risk.
- 12.2 If you have any concerns about the health, safety, security, or wellbeing of yourself, another individual or a group of individuals connected with LHP, you must report this immediately through the appropriate channels.

13. Protecting the environment

The principle - Within your role at LHP, you must strive to avoid or reduce possible negative environmental impacts.

Expected of All

13.1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

Expected of Non-Executive Directors

13.2 You should consider the long-term environmental impact of your decisions.

Appendix A: Terminology used in this Code

Board - Includes any board of management, management committee, board of trustees, and all similar governing bodies however named.

Non-Executive Director - Includes all members of governing bodies whether they are formally known as non- executive directors, trustees, board members, management committee members, etc. It includes co-optees, trainees and any other nominees, whether they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Contractors - Includes those other than non-executive directors, colleagues and involved customers who are directly involved in delivering LHP's business activities. This includes contractors, sub- contractors, consultants and agents.

Involved Customer - Includes customers (as defined below) who are formally involved in improving, delivering, or scrutinising, LHP's performance and business activities.

Known relationship - For the purposes of this code - means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.

Microaggression - Is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.

People with whom you are closely connected - In broad terms, means your family, relatives, or business partners as well as businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren, and grandparents.

Customers - Includes residents, tenants, leaseholders, shared owners, wider community residents and users of other services provided by LHP.

Colleagues - Includes LHP's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.

Appendix B: Lincolnshire Housing Partnership (LHP) Equality and Quality Impact Assessment (EQIA)

Title of Policy/Event/Decision: Code of Conduct Policy

Lead Officer(s): Jess Hyland, Corporate Head of Governance & Regulation

Date of EQIA: 24 April 2025

Scope and Purpose	
Briefly describe the policy/event/decision being assessed:	This policy sets out the standards of conduct for colleagues, Non-Executive Directors (NEDs) and involved customers to uphold the reputation of LHP and social housing, emphasising the importance of good judgement. Actions and decisions should align with LHP's purpose, values and the potential impact on customers and LHP's reputation.
What is the aim or purpose of this policy/decision?	To promote high standards of conduct amongst colleagues, NEDs and involved customers by clearly setting out the process for acting in the best interests of LHP and its customers, behaving with integrity, being professional and treating others well and protecting one another and the environment.
Which departments or groups will be affected by this policy/event/decision?	<ul style="list-style-type: none"> • LHP Colleagues • Non-Executive Directors • LHP Customers, including Involved Customers • External Partners
Data Collection and Evidence	
What data or evidence have you used to identify how different groups may be affected? (e.g., tenant demographic data, service usage statistics, consultation feedback)	<ul style="list-style-type: none"> • Anonymised Colleague Disciplinary & Grievance Data (2023/24) • All Colleague Data (Culture Assessment, ARK Survey 2025) • Board Member EDI Data (March 2025) • Involved Customer Data (Culture Assessment, ARK Survey 2025)
What does this data tell you about the potential impacts on different equality groups?	<p><u>All Colleague Data</u></p> <p>The majority of LHP colleagues describe themselves as white, heterosexual, of no religion and with no disabilities. There is a fairly even split between male (43%) and female (46%) colleagues, with a third of the workforce working for LHP for more than 8 years and a fairly even split across those</p>

	<p>working between 1-6 years. The highest number of colleagues working for LHP are in the 35-44 age range. This indicates very limited diversity in terms of ethnicity, religious belief (other than 'no religion' or 'Christian') and those colleagues who describe themselves as other than 'heterosexual'.</p> <p><u>Anonymised Colleague Disciplinary & Grievance Data</u></p> <p>From the evidence/data reviewed, the majority of LHP colleagues who do not uphold the Code of Conduct policy are white males (68%) who are either married or living with a partner, with an even split between Gen X (32%) and Millennials (34%). Over half of these describe themselves as 'white, British'. There is some data available on sexual orientation with limited data on religion, ethnicity and any disabilities.</p> <p><u>Board Member EDI Data</u></p> <p>The Board's composition demonstrates a positive gender balance. However, representation of individuals with disabilities remains low. Additionally, while there is a high proportion of members aged between 45-54 (37.5%) and over 55 (37.5%), there is limited diversity in terms of religious background and racial or ethnic representation. The highest number of Non-Executive Directors are aged between 45-54 (35.71%).</p> <p><u>Involved Customer Data</u></p> <p>LHP Customer demographics indicate the majority are customers living independently, who have been with LHP for more than 5 years, are mainly of white ethnicity and in the 65+ age range. One of their main concerns highlighted is addressing anti-social behaviour and tenancy enforcement issues which may link with Codes of Conduct.</p> <p><u>All Data Sets</u></p> <p>From reviewing the data, there could be a risk that formal procedures may be perceived as intimidating or inaccessible for people from under-represented groups or those with particular needs (e.g. neurodiverse members, those with mental health concerns).</p> <p>The data suggests that while the policy aims to be neutral, monitoring is essential to prevent potential adverse impacts</p>
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	on specific groups. For instance, employees with disabilities or those from ethnic minority backgrounds may experience unique challenges during any follow-on processes.
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RAG Impact Assessment on Protected Characteristics

Use the RAG system to assess the level of potential impact for each protected characteristic:

- **Red (High Risk):** Significant potential for negative impact requiring immediate action to mitigate.
- **Amber (Medium Risk):** Some potential for negative impact, which can be mitigated with changes.
- **Green (Low or No Risk):** Little to no negative impact identified.

Ensure that you state reasons (the why) for your justifications.

Protected Characteristic	Impact (Positive Negative Neutral)	RAG Rating	Description of Potential Impact	Mitigation/ Enhancement Actions	Responsible Officer
Age	Neutral		No impact anticipated, though younger and older colleagues may interpret expectations differently	Provide accessible guidance through different mediums such as use of summaries, animation as well as verbal reminders through all team meetings / toolbox talks.	CHoGR / CHoH&W / SLCI
Disability	Potential Barrier		The requirement to “perform your role to the best of your ability” could unintentionally disadvantage neurodivergent or colleagues who are disabled unless reasonable adjustments are clearly acknowledged e.g. colleagues with dyslexia who require software support to conduct admin duties	Meeting and event scheduling should be planned with consideration for disabled colleagues as the workforce becomes more diverse. Ensure reasonable adjustments are offered and are inclusive for all colleagues.	CHoGR / CHoH&W / SLCI

			Limited representation of disabled individuals at present.	Continue to offer neurodiversity and inclusive development sessions to managers	
Gender Reassignment	Neutral		No impact anticipated however the policy lacked specific reference to transgender or non-binary inclusion.	Explicitly include respect for gender identity and pronouns in 'Respect for Others' – completed	CHoGR
Marriage and Civil Partnership	Neutral		No impact anticipated directly however indirect issues may arise if preferential treatment or exclusion occurs due to personal relationship	Inclusion of spouse / partner relationships in declarations of interest are managed appropriately	CHoGR / CHoH&W / SLCI
Pregnancy and maternity	Neutral		No impact anticipated	Whilst no direct impact, ensure that any cases involving those on pregnancy / maternity are fair and sensitively handled with appropriate reasonable adjustments	CHoGR / CHoH&W / SLCI
Race	Neutral		No impact anticipated	N/A	N/A
Religion or Belief	Potential Barrier		Currently no direct impact.	Meeting and event scheduling should be planned with consideration for different religious and cultural needs as the workforce becomes more diverse.	CHoGR / CHoH&W / SLCI

Sex	Potential Barrier		Males more likely to breach the code of conduct	Provide accessible guidance through different mediums such as use of summaries, animation as well as verbal reminders through all team meetings / toolbox talks. This will include working with the comms team on how to reach males to increase awareness. Review use of targeted campaigns and discussions through further analysis of trends / patterns	CHoH&W / CHoGR / SLCI
Sexual Orientation	Neutral		No impact anticipated	N/A	N/A

Mitigating Negative Impact

What actions will you take to reduce or mitigate any identified negative impacts?

Provide specific mitigation measures for each characteristic where a negative impact (Red or Amber rating) was identified.

AGE – Neutral

Use multiple formats (written summaries, visual aids like animations, and verbal reinforcement) to make expectations accessible to different groups.

Disability – Potential Barrier

Ensure events, meetings, and communication are accessible (e.g., accessible formats, flexible timing reasonable adjustments such as software support to conduct admin duties) and continue to offer neurodiversity training to managers.

Gender Reassignment – Neutral

Code updated to explicitly refer to gender identify and pronouns

Marriage & Civil Partnership – Neutral

Ensure personal relationships are transparently managed through declarations of interest.

	<p>Pregnancy & Maternity – Neutral Ensure all managers are aware of their responsibilities to apply reasonable adjustments and avoid indirect discrimination. Monitor conduct and performance actions involving pregnant staff or those returning from leave to ensure fairness.</p> <p>Religion – Potential Barrier Ensure consideration is given to cultural / religious needs</p> <p>Sex – Potential Barrier Use multiple formats (written summaries, visual aids like animations, and verbal reinforcement) and work with the communications team to make expectations accessible to different groups – particularly males - and conduct deeper analysis of gender patterns in breaches, roles, and team cultures.</p>
Who is responsible for implementing these actions?	<p>Corporate Head of Governance & Regulation</p> <p>Corporate Head of HR & Wellbeing</p> <p>Strategic Lead of Customer Insight</p>
Consultation and Engagement	
Have you consulted any stakeholders or equality groups? If so, who and how?	<p>Customer Forum</p> <p>Colleague Forum</p> <p>Leadership Group</p> <p>People & Governance Committee</p> <p>Board</p>
What feedback have you received, and how has this influenced your assessment?	<p>From the data findings, it highlighted the need to engage with colleagues that are potentially impacted by the policy to ensure that both the policy and processes are inclusive. Additionally, we will ensure that younger colleagues and male colleagues are fully aware of the expected conduct through use of different mediums which the Colleague Forum gave feedback on potential methods.</p>
Decision Making	
How has this EQIA informed or influenced the final decision?	<p>The EQIA helped ensure the policy included:</p> <ul style="list-style-type: none"> • Clear expectations • Proactive approach to try and mitigate patterns of non - compliance • Supportive work environment • Strengthening of respect for others section to ensure use of preferred pronouns
Were any changes made to the policy/decision as a result of the EQIA?	<p>A direct change included an update the policy to ensure it was explicit in the respect for gender identity and pronouns.</p> <p>Additional mitigations and enhancements to ensure inclusive identified as part of impact assessment. Although no specific changes to the Policy, we will ensure:</p> <ul style="list-style-type: none"> • reasonable adjustments are available for accessibility;

	<ul style="list-style-type: none"> • respectful and sensitive to diversity by using appropriate pronouns and avoidance of key religious observances; and • flexible options in scheduling to meet individual needs. <p>Reinforced the need for accessible communications – and a commitment to complete diversity monitoring on colleague, customer and NED data/surveys.</p>
Monitoring and Review	
How will you monitor the actual impact of the policy/decision once it is implemented?	<p>Regular monitoring of breaches of the Code of Conduct e.g. warnings, disciplinaries and dismissals etc. From the data, findings can be analysed by protected characteristics.</p> <p>Seek feedback from participants that have been through the process to evaluate the extent to which the experience was equitable, supportive and inclusive.</p>
When will the policy/decision be reviewed?	Every three years, with interim reviews if the feedback or data suggests changes are necessary.
Sign-Off EQIA Completed By: <i>Lead Officer(s)</i> <i>Name(s):</i> <i>Date:</i>	<p>Corporate Head of Governance & Regulation</p> <p>09 May 2025</p>
Approved By: <i>Approval Name:</i> <i>Date:</i>	<p>Abigail Iyaho</p> <p>09/05/2025</p>