

# WARRINGTON HOUSING ASSOCIATION

## EQUALITY ANALYSIS



### INTRODUCTION

This Equality Analysis should be completed whenever a new policy, strategy, project or service is being developed or a review of an existing one is being carried out.

Document Equality Analysis applies to:	Equality, Diversity & Inclusion Policy WHA 0090
Version number of document:	V3

### WHY CARRY OUT AN EQUALITY ANALYSIS?

An Equality Analysis identifies the potential impact of proposed policies, strategies, projects and services on 'protected groups' and identifies how any disproportionate impact will be reduced, eliminated or mitigated. It also informs decision-making in relation to the policy, strategy, projects or service delivery.

### PROTECTED CHARACTERISTICS

Protected groups have one or more of the following characteristics, which should be considered when completing an equality analysis:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity (relates to staff only)
- Race
- Religion and Belief
- Sexual Orientation

You may also want to consider other groups, including: people on a low income, carers, ex-offenders, people with a debilitating illness such as dementia, refugees and people seeking asylum. Examples of impact are provided in the relevant section.

### PERSON RESPONSIBLE FOR THIS ASSESSMENT

The assessment should be carried out by the lead officer responsible for developing or reviewing the policy, strategy, project or service. If required, consultation with customers should be carried out at this stage.

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Name:	Jodie Williams
Job title:	Performance & Policy Officer
Date of Assessment:	01/12/2021-05/01/2022

## OTHERS INVOLVED IN CARRYING OUT THE ANALYSIS

Name:	Gerry Kiddle, Director of WHA and LifeTime
Name:	Lorri Holding, Head of Customer Services
Name:	Mark Myers, Head of Asset Management

## DOCUMENT DETAILS

Is it new?	Yes <input type="checkbox"/>	No X
Is it a review of an existing?	Yes <input type="checkbox"/>	No X
Is it adopted from a specialist organisation?	Yes X	No <input type="checkbox"/>

## AIMS AND OBJECTIVES

Consider: 1. What does it do? 2. Why is it doing it?

*The policy states the rights and responsibilities of WHA and all WHA board members, colleagues, customers, residents, contractors, volunteers and other persons or other stakeholders who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services in relation to equality, diversity and inclusion. WHA is committed to establish and maintain an equal, diverse, and inclusive culture in the organisation, and to promote equal opportunities both in the provision of services and in our employment practices. Stating that these obligations and commitments go hand in hand with our organisational aim.*

*This policy is written in recognition of and not in place of WHA's responsibilities under legislation, regulation and codes of governance including, but not limited to:*

- the Equality Act 2010, incorporating the Public Sector Equality Duty;*
- the Human Rights Act 1998;*
- the National Housing Federation Code of Governance 2020; and*
- the Regulatory Framework for Social Housing.*

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*WHA is committed to meeting its obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment and victimisation, as defined in the Equality Act 2010. The protected characteristics are:*

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

*WHA is mindful of its duties under the Public Sector Equality Duty, section 149 of the Equality Act 2010, so far as it should apply to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard to the need to achieve the objectives set out under section 149 of the Equality Act 2010 to:*

- *Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Equality Act 2010;*
- *Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and*
- *Foster good relations between persons who share a relevant protected characteristic and persons who do not share it*

*WHA understands that risks of discrimination go beyond the protected characteristics set out in the Equality Act 2010. As an employer, landlord, and service provider, WHA recognises that there is a moral duty to address discrimination and inequality in the broadest sense to enable the potential of individuals and communities to be realised. WHA will challenge discrimination based on the protected characteristics, above, as well as a variety of other social and cultural characteristics, including:*

- *Socio-economic background*
- *Class*
- *Appearance*
- *Language*
- *Accents*

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- *Education*
- *Learning styles*
- *Political affiliation*
- *Domestic violence and abuse*
- *Spent convictions.*

## EQUALITY ACT 2010

How does the document enable the Association to actively meet its Aim and Objective?  
(Write 'no contribution' where applicable.)

### Eliminate unlawful discrimination

*(such as harassment, victimisation and other prohibited conduct)*

*The policy enables WHA to eliminate unlawful discrimination by outlining WHA's duties under the law/Equality Act 2010 and the Public Sector Equality Duty. The policy outlines roles including rights and responsibilities of various stakeholders from Board to customers, contractors and colleagues to access and advance the WHA's legal duty to "eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010." The policy is WHA's commitment to eliminate unlawful discrimination specifically in provision of services and employment practices, the policy commits to training, progress monitoring and reporting on equality, diversity and inclusion. Failure of colleagues, contractors and other stakeholders to comply with the policy or the law will be managed accordingly, all complaints of unlawful discrimination will be taken seriously.*

### Advance equality of opportunity

*(between people who share a protected characteristic and people who do not share it)*

*The policy sets out that WHA's commitment to promote equal opportunities both in the provision of services and in our employment practices. The policy sets to establish and maintain an equal, diverse and inclusive culture in the organisation whereby persons are neither advantaged or disadvantaged due to their belonging or perceived affiliation with none, one or multiple of any of the protected groups under the Equality Act 2010 or to a range of other social groups including political and class. The policy sets out responsibilities and roles as well management reporting to monitor the advancement of equality of opportunity. Colleagues, contractors and others will be subject to proportion action if failing to advance the policy and it's aims.*

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## Foster good relations

*(between people who share a protected characteristic and people who do not share it. Consider if it has an adverse impact on relations between different diverse groups.)*

*The policy is WHA's commitment to equality, diversity and inclusion. The intention of the policy is to promote an equal and anti-discriminatory culture in WHA, the provision of its services and employment. The policy will foster good relations by protecting those with a protected characteristic from discrimination and by proactively advancing a culture of inclusion and equality of opportunity in terms of being treated with dignity, being able to be oneself, accessing services and employment. The policy will be a compulsory read for all colleagues, all colleagues are required to advance the policy, training provided as required, the policy will be included in contractor briefings, the policy will be available for customers to read and access, non-compliance will be addressed.*

## EVIDENCE AND RESEARCH

Did you use any information, evidence or research? If so, please detail below. If not, please leave blank.

*(This can include equality monitoring information, CENSUS data, customer satisfaction surveys and feedback, inspection reports, desktop research (local, regional and national), professional journals, feedback from individuals and groups and other Group documents.*

Information Source	What this was used for
Housing Diversity Network and Penningtons Manches Cooper LLP: template Equality, Diversity and Inclusion Policy, 2021. Accessed December 2021.	Aid to understanding of the law and good practice in terms of equality, diversity, and inclusion in the provision of services and employment. Used as a benchmark of good practice on EDI.
The British Council digital guide on Race Equality Through Anti-Racism. Accessed December 2021: <a href="https://www.britishcouncil.org/sites/default/files/race_equality_through_anti-racism_guide.pdf">https://www.britishcouncil.org/sites/default/files/race_equality_through_anti-racism_guide.pdf</a>	Outlining discrimination, source can be interpreted to support WHA's EDI policy's broad understanding of equality and discrimination in going beyond the protected characteristics when advancing equality. Also supports WHA approach to take seriously all complaints of bullying and discrimination etc. as intentions and existence of evidence do not

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	invalidate or validate experiences of discrimination specifically in relation to racial discrimination.
<p>The British Council digital guide to Disability Equality.</p> <p>Accessed December 2021:  <a href="https://www.britishcouncil.org/sites/default/files/guide-disability-equality.pdf">https://www.britishcouncil.org/sites/default/files/guide-disability-equality.pdf</a></p>	<p>Worked example and best practice approach to promoting inclusion and equality specifically in relation to disability (awareness, access, adjustments, inclusion and individual). References intersectionality. Used as a framework to compare relevant aspects of our policy to including reference to reasonable adjustments, culture and right to dignity.</p>
<p>National Housing Federation digital report on How diverse is the housing association workforce in England?</p> <p>Accessed December 2021:  <a href="https://www.housing.org.uk/globalassets/files/edi/new-edi-national-data-report-final.pdf">https://www.housing.org.uk/globalassets/files/edi/new-edi-national-data-report-final.pdf</a></p>	<p>Data supports common belief that we live in a society which is not equal access to opportunities, including in relation to employment in our sector.</p>

## ASSESSING POTENTIAL IMPACTS

An impact is the consequence that the policy, strategy, project or service has on the customer. There are 2 types of impact, positive or negative, that will be measured throughout the process. If there is neither a positive nor negative impact then the impact is neutral. For example:

Impact	Description	Example
<b>Positive impact</b>	This is an impact that has positive results for a particular group, improves equal opportunities and promotes positive relationships between different groups.	Advertising jobs in publications aimed at ethnic minorities may have a positive effect in raising awareness of vacancies at the organisation but this would not have a negative effect on other groups or people.

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<b>Negative/ adverse impact</b>	This is an impact that would disadvantage one or more groups of people.	If a policy is in place that repairs can only be reported via telephone on weekdays during 8.30am and 5pm then this would be a disadvantage to people who work during those hours, people who are deaf and people who have speech impediments.
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Complete the following sections considering any equality information, research or other intelligence you have used to carry out this analysis. In all cases make a decision about the potential impact using one of the following options provided: Negative; Positive; or Neutral.

<b>Protected Characteristics</b> (Choose negative, positive or neutral in each area. Use the space at the end of this section to report the rationale behind your impact assessment scores)	<b>Negative</b>	<b>Positive</b>	<b>Neutral</b>
<b>Age</b> Consider: The way younger and older people access services may be different. Use of technology. Child care / care of other dependant. Timings / flexibility, such as work patterns. Transport arrangements. Venue location.		x	
<b>Disability – Includes:</b> physical, learning, sensory (deaf/ blind), mental health and people with a debilitating illness such as dementia. Consider: Communication methods. Accessibility- venue, location, transport. Range of support needed to participate. Hearing Loops / Interpreters. Disability Awareness and bias Training for employees.		x	
<b>Race – Includes:</b> gypsy, travelling, refugee and migrant communities. Consider: The size of the BME communities that your service / project affect. Language(s) spoken / understood. Culture, such as hygiene, clothing, physical activities, mixed gender activities. What access support can you offer?		x	
<b>Religion, Faith or Belief</b> Consider: The diversity within the communities that your service / project affect. Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan. Awareness training for employees.		x	
<b>Pregnancy and Maternity</b> Consider: Flexible hours of the service / project. Is there access to private area for breastfeeding mothers?		x	
<b>Sex / gender</b>		x	

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Consider: The impact on males and females. Child care / care of other dependant. Mixed/single sex groups / activities. Timing of services / projects.			
<b>Sexual Orientation – Includes:</b> lesbian, gay, bisexual Consider: LGBT people should be able to disclose their sexual orientation without fear of prejudice. Awareness training for employees.		X	
<b>Transgender</b> Consider: LGBT people should be able to disclose their gender identity without fear of prejudice. Awareness training for employees.		X	
<b>Marriage and Civil Partnership</b> Consider: All couples or partners, regardless of gender, should be able to access services.		X	
<b>Other Potential Impacts</b>			
Ex-Offenders		X	
Carers		X	
Refugees and people seeking asylum	X		

Sum up the rationale behind your positive ratings.

<p>The policy specifically states that discrimination against individuals or groups who have a protected characteristic is unlawful.</p> <p>The policy states that WHA will challenge discrimination and pursue equality of opportunity and inclusion in relation to the protected characteristics and membership and non-membership of several social groups (socio-economic background, class, appearance, language, accents, education, learning styles, political affiliation, domestic violence and abuse, spent convictions).</p> <p>WHA commits to an action plan and performance reporting to proactively and consistently positively affect access to our services and employment.</p>
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Sum up the rationale behind your negative ratings.

<p>One negative rating.</p> <p>The policy does not specifically state that WHA will seek to challenge discrimination and equality of opportunity for refugees and those seeking asylum. Asylum seekers have specific housing and employment rights by law due to their status as asylum seekers, WHA follow these laws and restrictions to access public funds.</p>
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Notably, due to intersectionality, members of this social group may directly benefit from other aspects of the policy namely our moral duty to allow all to access dignity and the celebration of our differences. This is also reflected in the policy under non-compliance whereby all complaints of bullying or victimisation will be taken seriously.

To do more from an EDI perspective for refugees and asylum seekers, WHA may need to improve signposting services.

Sum up the rationale behind your neutral ratings.

No neutral ratings.

Use this space for any final comments you would like to make (optional)

The policy is set to be reviewed in two years' time. The policy provides a point of contact should customers require further information or would like to provide feedback. The policy recognises that our work in anti-discrimination and equality should be a consistent, collaborative, inclusive and a long-term effort for the benefit of our communities and people.

#### Summary of Recommendations (Action Plan)

Actions	By Whom	By When
1. To review equality analysis/impact of policy after a period of implementation (2 years), before if changes to law are made or a comment, complaint or suggestion is raised in relation policy or the aims of the policy. At next review, consider consulting colleagues and WHASP.	PPO	November 2023
2. Compulsory read, all colleagues. Training.	Corporate Services	January 2022
3. EDI action plan and policy to be available on WHA website for customers to access as per policy.	Corporate Services	January 2022
4. Action plan – what, where – inclusive of training, reporting, EDI policy to job applicants, signposting for asylum seekers, comms strategy to include EDI lessons etc.?	PPO	January 2022
5. In next review of policy – question language re domestic violence vs domestic abuse	PPO	November 2023

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SIGNED: Jodie Williams

DATED: 11/01/2022

SIGNED: Lorri Holding

DATED: 11/01/2022

Document Owner (author):	Jodie Williams
Date applies from:	01/12/2021

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