

Equality, Diversity and Inclusion Policy



Our Viability

Warrington Housing Association

WARRINGTON HOUSING ASSOCIATION

INTRODUCTION

Warrington Housing Association (WHA), the Group and wholly owned subsidiary LifeTime Homes Warrington, is actively committed to promoting and embedding a culture of equality, diversity and inclusion within our workplaces and the communities we serve. The aim of WHA is to help make Warrington a great place to live, in which the potential of individuals and communities can be realised. Our commitment to equality, diversity and inclusion goes hand in hand with our organisational aim.

WHA recognises that true inclusion requires not just equality of treatment, but equity of outcomes, ensuring fair access to opportunities and resources for all individuals regardless of their starting point or circumstances.

SCOPE OF POLICY

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.

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:

- o the Equality Act 2010, incorporating the Public Sector Equality Duty.
- o the Human Rights Act 1998.
- o the National Housing Federation Code of Governance 2020.
- o the Regulatory Framework for Social Housing;
- o the Protection from Harassment Act 1997 and
- o the Protection from Harassment Act 1997.

DEFINITIONS

Equality is the equal access to opportunities and services for all individuals and groups, promoted by proactively removing barriers to services or reducing the negative effects of systemic and structural inequalities and biases.

Equity goes beyond equality by recognising that people have different circumstances and allocating resources and opportunities needed to reach equal outcomes. Equity involves identifying and addressing structural barriers and systemic disadvantages.

Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen, which they are either born with or have acquired.

Inclusion is the welcoming of, ability to share and engagement with the ideas and perspectives of people with a wide range of characteristics whereby everyone is enabled to be themselves.

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These terms are interdependent in promoting a culture that is actively equal, diverse and inclusive; empowering individuals and communities to reach their true potential.

DUTIES UNDER THE EQUALITY ACT 2010

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 (including neurodivergent conditions)
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

DUTIES UNDER THE PUBLIC SECTOR EQUALITY DUTY

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:

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

OTHER DUTIES

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

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- Class
- Appearance
- Language
- Accents
- Education
- Learning styles
- Political affiliation
- Domestic violence
- Spent convictions
- Neurodivergent conditions and cognitive differences
- Mental health conditions

COMMITMENTS

WHA has agreed a set of objectives that reflect our strategy for embedding our duties to establish and maintain an equal, diverse and inclusive culture in the organisation. These objectives are set out throughout this policy with targets set out in our Equality, Diversity and Inclusion Action Plan.

This Policy and our Action Plan are imperative to our long-term commitment to equality, diversity and inclusion and progress will be reported regularly to board, colleagues and customers, as outlined within this policy.

EQUITY AND FAIR OUTCOMES

WHA is committed to achieving equitable outcomes, not just equal treatment. We recognise that different individuals and communities may require different levels of support to achieve the same opportunities and outcomes.

WHA will:

- Conduct regular equity audits to identify disparities in outcomes across different groups
- Implement targeted interventions to address systemic barriers and disadvantages
- Allocate resources proportionally to need, recognising that equal distribution may not result in equitable outcomes
- Monitor and analyse data to identify where additional support or different approaches are needed
- Engage with communities to understand their specific needs and barriers
- Develop tailored services and support to address identified inequities
- Challenge and address structural inequalities within our policies, procedures and practices

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- Set specific equity targets and measure progress towards achieving fair outcomes for all groups

PERFORMANCE REVIEW & MONITORING

WHA will develop and adopt a set of performance indicators to enable us to track progress against our equality, diversity and inclusion commitments and objectives. We will regularly, and at least once every 12 months, review and monitor our progress against our equality, diversity and inclusion commitments and objectives in order to ensure we are meeting organisational, legal, regulatory and best practice requirements. We shall also use this information to ensure our services are accessible to all and free from discrimination.

We shall regularly, and at least once every 12 months, carry out workforce surveys relating to equality, diversity and inclusion and the working environment to ensure all data is as up to date as possible and to gain the views of all staff. These surveys will help to inform our progress against our commitments and objectives and will include specific questions about neurodiversity support, equity experiences, and workplace culture including freedom from harassment.

All data and information collected will be used to track progress and monitor performance on our equality, diversity and inclusion objectives and commitments. We shall also collect information to understand the different needs of our customers. This information will form part of our regular reporting to the Board, as below. It shall also be used effectively to identify best practice as well as gaps and/or improvement opportunities within our organisation, informing a more tailored approach to service development and delivery.

Where barriers to collecting data exist, we will take action to identify, understand and remove these to ensure WHA has the best quality of data to inform our progress on our objectives and commitments to equality, diversity and inclusion.

ACCOUNTABILITY & REPORTING

WHA will monitor, report and publish information on our performance against our equality, diversity and inclusion commitments and objectives. Performance will be reported in areas such as Board membership, recruitment and promotion of colleagues, customer complaints and satisfaction in addition to our progress against our Equality, Diversity and Inclusion Action Plan. This data will be used to identify areas for improvement.

THE BOARD'S ROLE

The Board is committed to taking a clear and active lead in its commitment to achieve equality of opportunity, diversity and inclusion. This is in all of the activities of our

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organisation, including understanding the needs of our residents and communities, as well as the composition of the Board.

WHA recognises a clear commitment is needed from the Board to ensure equality, diversity and inclusion is embedded throughout the organisation. The Board establishes effective leadership and implements robust governance arrangements to support the organisation in meeting its equality, diversity and inclusion objectives and commitments. The Board shall provide leadership on this policy, including oversight from the appropriate Board Sponsor and, working with the Executive Management Team, ensure that it is implemented.

The Board is also responsible for overseeing the organisation's compliance with all legal and regulatory requirements, including those relating to neurodiversity support, equity outcomes, and sexual harassment prevention. It shall seek regular updates on how WHA is meeting its commitments and objectives in relation to equality, diversity and inclusion and how these are being delivered in practice and at least once every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation as set out by Review & Monitoring, above.

All reports to the Board shall include appropriate and robust considerations of equality, diversity and inclusion issues. Equality, diversity and inclusion shall regularly feature as an agenda item for Board meetings and decisions shall be made with effective equality, diversity and inclusion analysis.

Individuals with direct lived experience or deep insight into the communities we serve will be actively involved in shaping our approach, helping to foster a culture of inclusivity that reflects real-world perspectives and needs.

COLLEAGUES, CONTRACTORS, VOLUNTEERS & BOARD

All WHA colleagues, Board members, applicants, volunteers and contractors will be treated in an equal and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation with regard to the protected characteristics set out in the Equality Act 2010. WHA will promote a working environment that is also free of discrimination beyond the protected characteristics including membership or non-membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We shall also make reasonable adjustments where necessary to overcome any disadvantages due to impairment/ long term health conditions & disability, including neurodivergent conditions.

WHA is committed to ensuring that our colleague and Board's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve, including neurodivergent individuals. All workforce related

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codes of conduct, policies, practices and procedures reflect our values and commitments to equality, diversity and inclusion and our aims to recruit and retain a diverse and inclusive workforce, reflecting the communities we serve.

When appropriate, WHA will consult colleagues when making changes to policies, practices and procedures relating to Our Colleagues to promote inclusive and anti-discriminatory policies and practices, this is in addition to carrying out equality impact assessments on all policies and procedures.

WHA will not tolerate any forms of unlawful discrimination, harassment, victimisation, bullying, or sexual harassment.

All colleagues, Board members and volunteers of WHA are expected to pay due regard to this policy and are responsible for ensuring compliance to it when undertaking their jobs or representing WHA. All our employees have a responsibility to champion WHA's values of equality, diversity and inclusion.

Acts of discrimination, harassment, sexual harassment, or failure to comply with this policy by colleagues, Board members or volunteers of WHA will result in disciplinary action, in line with the Disciplinary Procedure (WHA 0068).

All contractors, agents and third parties providing a service to or on behalf of WHA have a responsibility to champion our values of equality, diversity and inclusion in compliance with their own policy on equality, diversity and inclusion or by agreement to promote and advance this policy. WHA will take action against non-compliance as appropriate.

WHA is committed to ensuring Board, colleagues and contractors receive appropriate equality, diversity and inclusion training, including on unconscious bias and equity principles, on a regular basis to enable the promotion of this policy. All colleagues will be familiar with this policy; this policy will also form part of our colleague inductions and contractor briefings.

WHA will ensure equality, diversity and inclusion are considered when procuring and commissioning services from contractors, suppliers, partners and consultants to maximise our economic and social value within Warrington.

Heads of Services and Line Managers are responsible for overseeing the day-to-day implementation of this policy for and by colleagues, volunteers and contractors including fair and equal service delivery to customers. The Director of Operations is the Executive Lead and Champion for Equality, Diversity and Inclusion.

CUSTOMERS & RESIDENTS

WHA is committed to ensuring equality of opportunities in the provision of its housing services and other services. Further details of these commitments are set out below with specific targets set out in the Equality, Diversity and Inclusion Action Plan.

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Whilst this whole policy is relevant to the advancement of equality, diversity and inclusion in the services WHA provides, the below are of specific concern for customers. WHA will:

- Proactively promote dignity and respect for all where individual differences, backgrounds, experiences and contributions are all recognised, celebrated and valued.
- Challenge interpersonal, structural or systemic discrimination and bias including and beyond the protected characteristics.
- Provide equitable access to services, recognising that different individuals may require different levels of support to achieve the same outcomes.
- Provide equitable access to services, recognising that different individuals may require different levels of support to achieve the same outcomes.
- Liaise with statutory agencies to share assessments of the housing needs of local communities and any groups facing discrimination, WHA will review how it can meet these needs.
- Partner with specialist agencies where appropriate to meet the needs of any disadvantaged groups.
- Consider the needs of a diverse range of communities when designing and developing new homes.
- Ensure new homes are suitable for people with disabilities and following approved guidance on this.
- Monitor allocations to ensure direct or indirect discrimination is not occurring.
- Work with local authorities to eliminate direct or indirect discrimination in the nominations processes.
- Ensure systems for housing or rehousing residents reflect our equality principles.
- Ensure all residents are treated with fairness and respect and are protected from all forms of harassment including sexual harassment.
- Consult with customers to obtain their views including in relation to equality, diversity and inclusion.
- Involve and consult with customers and others who reflect the diversity of the communities we serve and make changes to our services particularly when their feedback tells us this is necessary.
- Seek to ensure that customer involvement and participation activities promote involvement from all groups of customers.
- Ensure relevant policies and procedures are clear, simple and accessible to customers, including this policy, with alternative formats available for different communication needs.
- Communicate with you in the language you prefer, as enabled by interpretation services and technologies.
- Communicate with you in ways which are sensitive to the needs of different protected groups.
- Zero tolerance on harassment of residents, including sexual harassment and pro-active working with other agencies to tackle all forms of harassment.

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- Ensure that all forms of information and communication are accessible to residents; and
- Ensure housing and associated services consider the sensitivities and needs of different groups including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs.

NON-COMPLIANCE

WHA will take seriously complaints of bullying, harassment, victimisation, sexual harassment, and unlawful discrimination by colleagues, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. WHA will take proportionate action in all complaints. Failure to comply with this policy by colleagues, Board members or volunteers of WHA will result in disciplinary action.

Specific procedures are in place for addressing sexual harassment complaints, ensuring swift, confidential, and effective responses while providing appropriate support to all parties involved.

DATA PROTECTION

When handling data related to equality, diversity and inclusion, colleagues will encounter personal information, including sensitive personal data related to neurodivergent conditions and harassment reports. The handling and use of this data will be practised in accordance with the General Data Protection Regulations 2018 and will be processed lawfully, fairly, and with appropriate security measures.

EQUALITY IMPACT ASSESSMENT

In implementing this policy, we aim to promote and embed equality, celebrate diversity and create a more inclusive culture in which people can thrive.

An equality impact assessment has been carried out on this policy, finding that this policy has a positive impact on the protected characteristics and promotes equitable outcomes for all individuals.

PROJECTS & PARTNERSHIPS

WHA is a member of the Housing Diversity Network. WHA will seek partnerships with neurodiversity organisations, anti-harassment charities, and equity-focused groups to enhance our approach and effectiveness.

POLICY REVIEW

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This policy will be reviewed every 3 years, or sooner as required by statutory, regulatory or best practice requirements. Reviews will specifically consider developments in regulation, research and equity measurement methodologies.

If you have any questions about this policy, please contact WHA via admin@wha.org.uk.

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