

Equality, Diversity and Inclusion Policy



Our Viability

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.

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:

- 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.

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.

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.

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

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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

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
- Class
- Appearance
- Language
- Accents
- Education
- Learning styles

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- Political affiliation
- Domestic violence / abuse
- Spent convictions

COMITMENTS

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 2021–2022.

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.

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.

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 or shortcomings within our organisation and to tailor our approach in correcting these.

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 inclusions.

ACCOUNTABILITY & REPORTING

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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 2021-2022. This data will be used to identify areas for improvement. Progress will be published on our website for customers regularly, and at least once every 12 months.

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 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 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. 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.

People with direct lived experience of, or particular insight into, the communities we serve shall also be meaningfully engaged in our governance structures.

COLLEAGUES, CONTRACTORS, VOLUNTEERS & BOARD

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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 this 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 disabilities.

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. All workforce related 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 People 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 or bullying.

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 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, on a regular basis

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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 taken into account when procuring and commissioning services from contactors, 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 Chief Executive Officer 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 2021-2022.

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;
- Not treat individuals or groups less favourably because they belong to one of the protected groups;
- Challenge interpersonal, structural or systemic discrimination and bias including and beyond the protected characteristics;
- 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;
- Ensure our services and procedures reflect issues of concern for members of protected groups;
- Monitor allocations to ensure direct or indirect discrimination is not occurring;

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- Work with local authorities to eliminate direct or indirect discrimination in the nominations processes;
- Ensure systems for housing or rehousing residents reflect your equality principles.
- Ensure all residents are treated with fairness and respect;
- 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;
- 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 and pro-active working with other agencies to tackle all forms of harassment;
- Ensure that all forms of information and communication are accessible to residents; and
- Ensure housing and associated services take into account 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 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.

DATA PROTECTION

When handling data related to equality, diversity and inclusion, colleagues will encounter personal information. The handling and use of this data will be practised in accordance with the General Data Protection Regulations 2018.

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.

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An equality impact assessment has been carried out on this policy, finding that this policy has a positive impact on the protected characteristics.

PROJECTS & PARTNERSHIPS

WHA is a member of the Housing Diversity Network, an organisation that aims to share best practice to support those working to address inequality and celebrate diversity.

POLICY REVIEW

This policy will be reviewed every 3 years, or sooner as required by statutory, regulatory or best practice.

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

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