

Equality, Diversity, and Inclusion Policy

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| Who this policy applies to: | This policy applies to all staff, Board & committee members and co-optees, volunteers, contractors, partners, tenants, and service users. |
| Review Date (minimum every three years) | This Policy is subject to a review in 2025 |
| Policy Author/Reviewer and Job Title | Shahron Shah, Chief Executive |

1.0 Purpose and scope

1.1. Waltham Forest Housing Association (WFHA) is a housing provider and employer. We are opposed to all forms of unlawful and unfair discrimination. We are dedicated to fostering an environment that values and celebrates diversity.. This commitment underpins everything that we do.

1.2. This policy is informed by feedback from tenants, employees, and Board members, and:

- [The Equality Act \(2010\)](#) see section 4.0
- [Our Code of Governance](#) see section 5.0
- [The Better Social Housing Review and Action Plan](#) see section 6.0
- [The Social Housing \(Regulation\) Act \(2023\)](#) see section 7.0.

2.0 Policy statement

2.1. We are proud of the diversity of WFHA and relentless in our pursuit of fairness and equality in the way we and our partners treat our people, tenants, and service users and how we deliver and improve our services.

2.2. We are an anti-racist organisation ([see section 8.0](#)) with zero tolerance for discrimination. We will use our influence to uphold this commitment in all of our relationships and in all opportunities to represent WFHA, the social housing sector and our tenants and communities. We will use all sanctions at our disposal to deal with breaches of this Policy.

3.0 Definitions of equality, diversity, and inclusion

3.1. Equality – Equality is about treating people fairly; ensuring that everyone has access to the same opportunities, including housing and employment. As everyone’s needs vary, modifications may be necessary to ensure accessibility..

3.2. Diversity – Diversity describes the unique characteristics between people and between groups of people. We appreciate diversity for what it brings to the table with respect to of perspectives, areas of expertise, and practical experience

- 3.3. Inclusion – Inclusion involves people feeling a sense of investment and belonging, as well as feeling respected and valued for who they are. Only then will people be able to fully contribute, participate, and thrive..

4.0 The Equality Act 2010

- 4.1. The Equality Act 2010 prohibits all employers and service providers from discriminating against, harassing or victimising individuals, on the basis of a “protected characteristic”.

- 4.2. The protected characteristics under the Act are:

- 1.0 Age
- 2.0 Disability
- 3.0 Gender reassignment
- 4.0 Marriage and civil partnership
- 5.0 Pregnancy and maternity
- 6.0 Race
- 7.0 Religion and belief
- 8.0 Sex
- 9.0 Sexual orientation

- 4.3. To a certain extent, the law can be interpreted in various ways. If a person is offended by comments made about them that relate to a legally protected characteristic, that person has been offended. The law cares only about the individual's lived experience, not the perspectives of others..

- 4.4. A legal equality duty exists in the workplace for public sector organisations and any organisation working on their behalf. This duty is to prevent and eliminate discrimination, promote equality and equal opportunities, and promote good relations between protected characteristic groups. Housing Associations are not public sector organisations under the Act, but WFHA has adopted this equality duty in the workplace..

- 4.5. Sexual equality and equal pay – Equal pay means the same pay, benefits, and terms and conditions of employment for equal work at WFHA and in law..

- 4.6. Recruitment and selection are covered by formal policies for both staff and Board members. WFHA complies with the law in terms of taking action to ensure an equal, diverse, and inclusive workforce:

4.6.1. Upon receiving an application for a vacancy, all names and equality monitoring information are removed from the applicant's pack. The selection process does not view such information.

4.6.2. We will make reasonable adjustments for a job applicant or employee with a disability. We will guarantee an interview to all disabled job applicants. We seek specialist legal and other advice where required.

4.6.3. We will take reasonable “positive action” to help applicants and employees where we consider they:

- Are at a disadvantage because of a protected characteristic and / or
- Are under-represented in the organisation because of a protected characteristic and / or
- Have specific needs connected to a specific characteristic.

4.7. Breaches of the [Equality Act](#) carry significant penalties related to *injury to feelings* and / or *loss of earnings*.

5.0 Our Code of Governance

5.1. We have adopted, and fully comply with, the National Housing Federation’s model Code of Governance 2020.

5.2. The Code stresses the importance of equality, diversity, and inclusion in governance, and requires providers to embed inclusion through mission, social purpose, values, and delivery.

5.3. Our compliance with the Code was self-assessed in October 2021 and will be subject to external review in early 2024.

6.0 The Better Social Housing Review and Action Plan

6.1. The Chartered Institute of Housing and National Housing Federation commissioned the 2022 independent Better Social Housing Review. The Review suggested seven housing and complaint handling improvements.

6.2. The Review identified that structural inequalities in society lead to higher rates of low-quality housing for individuals from Black, Asian, Minority Ethnic, and disabled backgrounds . The review determined that Black and Asian households have three times more likely than white households to have damp homes.

6.3. In 2023, the Better Social Housing Review Action Plan was published. It addresses each of the seven recommendations; structural inequalities and the experiences of Black, Asian, and Minority Ethnic people are at the core of all of them.

6.4. We are working on delivering the Action Plan and reporting progress to our Human Resources, Remuneration and Governance Committee.

7.0 Social Housing (Regulation) Act 2023

7.1. The Grenfell fire tragedy in 2017 prompted concern about the adequacy of social housing and shone a light on tenant voice, tenant involvement and empowerment. The Government

responded in 2018 with the *Social Housing Green Paper: A New Deal for Social Housing*. The Social Housing (Regulation) Act 2023 followed the Green Paper and developments such as Awaab Ishak's death.

7.2. The Act has three core objectives, to:

- Facilitate a new, proactive consumer regulation regime.
- Refine the existing economic regulatory regime; and
- Strengthen the Regulator's powers to enforce regulation.

7.3. At the time of writing, the Regulator has commenced a 12-week consultation period on implementation of the Act.

7.4. Certainties include the Regulator's vision that the relationship between tenants and landlords is underpinned by shared expectations of fairness and respect, and a new regulatory standard of Transparency, Influence and Accountability will be implemented to support that.

7.5. New regulation is expected to be introduced in April 2024 and compliance reports will be provided to the Human Resources, Remuneration and Governance Committee.

8.0 Race and anti-racism

8.1. According to the 2010 Equalities Act, race is a protected characteristic. The term "race" can refer to a person's colour, nationality, ethnicity, or national origin. Race can mean or include a person's colour, nationality, ethnic or national origin.

8.2. Anti-racists not only accept the existence of racism, and institutional and structural racism, they take action to challenge it. WFHA is an anti-racist organisation.

8.3. After the tragic Grenfell Tower fire in 2017, the government made concerted efforts to better regulate the sector, and in 2023, they finally published the Social Housing Regulation Act. The Act's goals are to ensure the safety of tenants who may not have the same access to or satisfaction with housing and services as their white counterparts, and to give those tenants a voice.

8.4. We at WFHA are dedicated to ensuring that our anti-racism programmes and services meet the needs of all people. This means we are proactive in challenging racism and will use our voice and platforms in this regard.

9.0 Discrimination, intersectionality, and privilege

9.1. There are four types of discrimination:

- Direct discrimination – treating someone with a protected characteristic less favourably than others.
- Indirect discrimination – putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage. It can be lawful to have specific rules or arrangements in place, as long as they are justifiable.
- Harassment – unwanted behaviour (linked to a protected characteristic) that violates someone’s dignity or creates an offensive environment for them. Please refer to our Harassment Policy.
- Victimisation – treating someone unfairly because they have complained about discrimination or harassment.

9.2. Intersectionality - We know that individuals are more than the sum of one protected characteristic. Many people have interconnected and overlapping protected characteristics that exacerbate disadvantage and discrimination.

9.3. Privilege - We know that many people operate from positions of privilege (e.g., inherent advantages possessed by a white person that the person may or may not be aware of) and / or unconscious bias (e.g., automatically favouring someone who looks like you). WFHA will ensure that these issues are addressed through appropriate learning and development opportunities.

10.0 Delivery

Our commitments are delivered through an annual Equality, Diversity and Inclusion Action Plan that includes:

- 10.1. Living our values, particularly our value of Respect (We respect people and communities through our belief in equality, diversity, and inclusion. We believe that structural inequalities in our society create systemic disadvantages. We are an anti-racist organisation with zero tolerance to discrimination.)
- 10.2. Our Governance arrangements, Business Plans, strategic and policy documents and procurement and contract management practices.
- 10.3. Equality Impact Assessments.
- 10.4. Provision of training, learning and development.
- 10.5. Appropriate recruitment and retention policies.
- 10.6. Equality, Diversity, and Inclusion accreditation.
- 10.7. Active membership of relevant organisations (e.g., the Housing Diversity Network).

- 10.8. Liaison, shared initiatives, and collaboration with other (specialist) organisations (such as, BME London Landlords, BME National and G320). This includes delivery of our commitment to the Social Housing Anti Racism Pledge (SHARP).
- 10.9. Keeping abreast of current affairs and news where issues have the potential to impact our EDI Policy commitment. Where new issues emerge, we will strive to learn and gain knowledge to support and empathise with affected employees, tenants, local communities, and stakeholders.
- 10.10. To use our EDI data to ensure fair and equal access to services and opportunities, to ensure that our Board and staff team reflect the communities we serve, and that diverse talent is developed.

11.0 Data and data protection

- 11.1. Equalities data will be collected, stored, managed, and retained according to our Data Protection Policy.
- 11.2. We will use anonymised equalities data to monitor, evaluate and improve our performance in meeting our commitments under this Policy.

12.0 Responsibilities and review

- 12.1. It is the responsibility of all individual staff and Board members to maximise opportunities for learning, development, and open discussion, to own their learning regarding equality, diversity, and inclusion issues, and share that learning within the organisation.
- 12.2. The Chief Executive is responsible for implementing this Policy, and related annual action plan, scrutiny of which lies with the Board Diversity Lead and Human Resources, Remuneration and Governance Committee, on behalf of the Board.
- 12.3. The Chief Executive and Board Diversity Lead will review this Policy every two years.