



Equality, Diversity, Inclusion and Belonging Policy

Revision Date: November 2025

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 late 2027
Policy Author/Reviewer and Job Title	Shahron Shah, Chief Executive

1.0 Purpose

1.1 Waltham Forest Housing Association (WFHA) is a housing provider and employer, that is firmly committed to the principles of equality and non-discrimination. We reject all forms of unlawful and unjust discrimination. We are dedicated to fostering an inclusive environment that values and celebrates diversity and fosters a sense of belonging. This commitment underpins everything that we do. This Policy is direct reflection of our organisational vision and core values:

1.2. Our vision

WFHA is committed to building a future where everyone, in every community we serve, has a safe, genuinely affordable home and great life chances in a society where they are valued and respected.

1.3. Our REACH¹ values

- We **RESPECT** people and communities through our belief in equality, inclusion and the value of diversity. We believe that structural inequalities in our society create systemic disadvantages. We are an anti-racist organisation with zero tolerance to discrimination.
- We **EMPOWER** people and communities by maximising strengths and opportunities and building resilience.
- We are **AMBITIOUS**, constantly improving, delivering better value for money and striving to provide more homes and services.
- We **CARE** about what we do, step up to take responsibility and are passionate about our social purpose and making a positive difference.
- We are **HONEST**, act with integrity and are accountable to our tenants, our partners and each other.

¹ REACH – Oxford Dictionary definition: (verb) 1. Stretch out so as to touch or grasp something 2. Be able to touch something 3. Arrive at or get as far as 4. Achieve or come to a particular point or state 5. Make contact with (noun) 1. The distance to which someone can stretch to touch something 2. The extent to which someone or something has power, influence or the ability to do something

1.4. This policy is also 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 take pride in the diversity within WFHA and remain steadfast in our commitment to fairness and equality. This is reflected in the way we and our partners treat our people, tenants, and service users and how we deliver and improve our services.
- 2.2 WFHA is an anti-racist organisation ([see section 8.0](#)) with a zero-tolerance approach to discrimination in all its forms. We are committed to upholding this principle across 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. Recognising that everyone's needs may vary, reasonable adjustments may be necessary to ensure full accessibility and participation.
- 3.2 Diversity: Diversity describes the unique characteristics and experiences that differentiate individuals and groups of people. We value diversity for what it brings to the table with respect to of perspectives, areas of expertise, and practical experience.
- 3.3 Inclusion: Inclusion involves fostering a culture where people feel a genuine sense of investment and belonging, as well as feeling respected and valued for who they are. Only then will people be able to fully, engage, 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".

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
-
- 4.2 The law prioritises individuals lived experiences. If a person is offended by comments made about them that relate to a protected characteristic, their perception is valid, regardless of intent.
 - 4.3 While Housing Associations are not classified as public sector bodies under the Act, WFHA voluntarily adopts this equality duty in the workplace. This includes, preventing and eliminating discrimination, promoting equality and equal opportunities, and promoting good relations between different protected characteristic groups.
 - 4.4 Sexual equality and equal pay: Equal pay means ensuring the same pay, benefits, and terms and conditions of employment for equal work at WFHA and in law.
 - 4.5 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:
 - Applications are anonymised by removing equality monitoring forms from the recruitment process (e.g., shortlisting)
 - Reasonable adjustments are made for a job applicant or employee with a disability. We will guarantee an interview to all disabled job applicants who meet the essential criteria. Specialist advice is sought when necessary.
 - Positive action may be taken to support individuals who:
 - Experience disadvantage because of a protected characteristic and/or
 - Are under-represented in the organisation
 - Have specific needs connected to a specific characteristic.
 - 4.6 Breaches of the [Equality Act](#) may result in significant legal consequences, including compensation for 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 places strong emphasis on 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 assessed and demonstrated via an external governance 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.
- 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 are 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 addressed 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 In 2023/24 we designed and delivered service improvements in response to the Action Plan.

7.0 Consumer Regulation

- 7.1 Consumer Regulation was introduced in April 2024 in response to the Grenfell fire tragedy in 2017. It comprises of four standards, each focused on ensuring tenants and prospective tenants are treated with fairness, dignity and respect.
- 7.2 In 2024/25, we developed and delivered a Consumer Regulation Action Plan and implemented improvements to ensure full compliance.
- 7.3 We self-assess to monitor and evidence our compliance with the Consumer Standards on an annual basis.

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 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 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 Conducting Equality Impact Assessments to ensure our decisions and services are inclusive and equitable.
- 10.4 Providing ongoing of training, learning and development opportunities to build awareness and capability across the organisation.
- 10.5 Implementing inclusive recruitment and retention policies to promote diversity and equal opportunity.
- 10.6 Pursing formal Equality, Diversity, and Inclusion accreditation to benchmark and validate our progress.
- 10.7 Maintaining active membership of relevant networks and organisations, such as the Housing Diversity Network.
- 10.8 Collaborating with specialist organisations, including such as, BME London Landlords, BME National and G320, to deliver shared initiatives and uphold our commitment to the Social Housing Anti Racism Pledge (SHARP).
- 10.9 Staying informed of current affairs and news where issues have the potential to impact our EDIB 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 Using our EDIB 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 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.