



Equality, Diversity and Inclusion Policy

AUTHOR

Governance

APPROVED BY

Board

REVIEW DATE – January 2026

REVIEW DUE – January 2029

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1. Introduction

This policy has been produced in accordance with the requirements of our Regulator, the Regulator of Social Housing.

In April 2010, Parliament passed the Equality Act. Its main purpose was to bring together the many acts and regulations in UK law that has been introduced to combat discrimination. Much of the Act came into force on 1st October 2010.

The Act requires equal treatment in access to employment and private and public services, on the basis of 'protected characteristics': disability, gender reassignment, pregnancy and maternity, race (including ethnic and national origin, colour, and nationality), religion or belief, sex and sexual orientation, age, marriage and civil partnership. In the case of disability, employers and service providers are under a duty to make reasonable adjustments to their workplaces to overcome barriers experienced by disabled people.

The Association also recognises and has regard to best practice guidance issued by the Equality and Human Rights Commission.

2. Aims

Halo Housing Association recognises its responsibilities to provide equality of opportunity, eliminate discrimination and promote good relations in its activities as a landlord, managing agent, employer, contractor, partner, and purchaser.

The Association is entirely opposed to all forms of discrimination on the grounds of 'race', national origin, ethnic origin, nationality, religion, belief or lack of religion or belief, gender, gender reassignment status, being married or a civil partner, pregnancy or maternity, sexual orientation, disability, or age.

3. Scope

The policy applies to all employees of the Halo Housing Association.

4. Policy Statement

This policy aims to summarise how the Association is working to eliminate discrimination, promote good relations and increase equality of opportunity.

This policy applies to any person or organisation that any member of Halo Housing Association has contact with in undertaking its activities as landlord, managing agent, employer, contractor, partner, and purchaser.

5. Definitions

Equality – A revised term for equal opportunities, being the same/treated the same.

Diversity – Recognising the differences in everyone that make them unique and responding to an individual's needs.

Disability – in line with the **Equality Act 2010**, this includes anyone who has, or has had a disability, as well as anyone who is perceived to have a disability. It also includes anyone who is associated with someone with a disability, which could result in that individual experiencing discrimination (e.g., a carer).

6. Our Approach

As a landlord we will:

- Establish Policies and Procedures that are regularly monitored and reviewed to ensure that the delivery of all housing services is fair and without discrimination.
- Operate, and monitor, lettings practices that reduce the chance of discrimination.
- Ensure that published documents do not contain any graphics that portray stereotypes.
- Make interpreting services available to those customers who need them.
- Endeavour to provide a welcoming and informative environment for customers and where possible ensure that all offices and public areas are accessible to physically disabled people or make alternative arrangements to meet individual needs.

- Provide a website that is accessible to the widest possible audience, by consulting with users on its design and adhering to available standards and guidelines.
- Encourage all groups within the local community to become involved in the delivery of service; The Tenant Involvement Framework provides tenants with the opportunity to give feedback.
- Respect and, where possible, accommodate the religious practices of customers.
- Maintain accurate customer profile records in accordance with the General Data Protection Regulations.
- Prioritise repairs requests from Tenants with known support needs in line with our repairing obligations.
- Investigate any differences in customer satisfaction between different groups, taking action where the cause of dissatisfaction is within our control as the landlord.
- Operate harassment and domestic violence procedures that provide support for the victim.
- Require that any recognised tenant group complies with and operate this policy and the equality and diversity values of the Association.
- Liaise with an Occupational Therapist to assess requests for disabled adaptations.
- Maintain accurate records of adaptations to our homes.

As an employer we will:

- Aim to recruit and retain a workforce to reflect the diversity of its customer-base.
- Operate, and monitor, recruitment practices that reduce the chance of discrimination.
- Continue employing, wherever practicable, employees who become disabled during their employment and assist in their retraining.

- Provide regular training for staff on equality and diversity issues, starting at induction.
- Respect the religious practices of staff in the workplace.
- Monitor recruitment and pay to ensure terms and conditions are equally applied irrespective of any “protected characteristics”.
- Have a zero-tolerance approach to harassment, where this may be linked to a “protected characteristic”.
- Equally apply terms and conditions irrespective of any “protected characteristics.”
- Take reasonable and proactive steps to prevent sexual harassment of employees in the course of their employment, in line with the Worker Protection (Amendment of Equality Act 2010) Act 2023.

As a purchaser we will:

- Require maintenance contractors to comply with the Association’s expectations regarding equality and diversity.
- Ensure that our contractors’ service delivery is consistent with our equality and diversity commitments.
- Ensure that any allegations of discrimination or harassment made against contractors and consultants will be taken seriously and investigated thoroughly and if necessary reported as a crime. Contractors and consultants will be expected to take prompt and appropriate action against any of their staff found to be acting in an unacceptable way.

As a Contractor and Partner, we will:

- Maintain our commitment to provide equality of opportunity, eliminate discrimination, and promote good relations.
- Not accept instructions from any client or partner that indicates an intention to discriminate unlawfully.

7. Monitoring and Delivery

This policy will be reviewed a minimum of once **every three years**, unless changes in statute, contract, or regulatory code and guidance require otherwise.

The Managing Director will have responsibility for the implementation of this strategy in accordance with the Association's Scheme of Delegation. All employees will also be responsible for maintaining and continually improving fairness and equality for customers, staff, and partners for all according to their needs regardless of who they are. A Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2015.

8. Legislation and Regulation

- Protection from Harassment Act 1997
- Equality Act 2006
- Equal pay act 1979
- Human Rights Act 1998
- Gender Recognitions Act 2004
- Civil Partnerships Act 2004
- Race and Religious Hatred Act 2006
- Equality Act 2010
- Codes of Practice (Services, Public Functions and Associations, Employment and Equal Pay) Order 2011
- Modern Slavery Act 2015

9. Equality and Diversity Implications

HHA is committed to treating people with honesty, dignity, respect and trust. This applies to Colleagues, Tenants, Potential Tenants, Contractors and Board Members.

At Halo Housing Association:

- Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents.
- Diversity is recognising difference and responding positively to those differences
- Inclusion is about creating an environment where our services and employment opportunities are accessible to all.

We will adhere to Equality Act 2010 in all its actions and will consider all the protected characteristics of the Act which are: Race, Sex, Gender Reassignment, Disability, Sexual Orientation, Religion or Belief, Age, Marriage/Civil Partnership and Pregnancy and Maternity. Further to the protected characteristics, HHA will be mindful of socio-economic disadvantage and will do everything in its power to minimise this and other forms of disadvantage.

10. Related Policies and Procedures

- Code of Conduct
- Group Financial Regulations
- Anti-Social Behaviour (ASB) Policy

11. The following characteristics are protected characteristics.

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

12. Policy Review

This policy will be reviewed **every three years** and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.