WILLIAMSBURGH
HOUSING ASSOCIATION LTD

Equality and Diversity Policy

Revision History

Policy	Equality and Diversity
Reviewer(s)	HR
Committee Name	FAC
Number and Date of Meeting	18 – 4th November 2026
New Policy or Description of Revision	Revisions to language, addition of Sexual harassment information along with the need for Equality impact assessments to accompany all policies -
Equality Impact Assessment Complete	22nd October 2026
Data Protection Impact Assessment Complete	n/a
Health and Safety Risk Assessment Complete	n/a
Consultation Complete	Minor changes sent to all staff
Next Review Date	November 2029

Introduction

Williamsburgh Housing Association (WHA) is committed to promoting an environment of respect and understanding whilst encouraging diversity and eliminating discrimination by providing equality of opportunity for all. Throughout the organisation, there will be a consistent approach in promoting equality and diversity through the entire employment relationship.

All employees are required to abide by this policy. This policy also covers discrimination by and towards members of the public, governing body members, contractors and staff from other agencies. WHA opposes all forms of unlawful discrimination in relation to employment.

Background

The Equality Act 2010 was introduced to address inequalities in previous legislation. This policy will be compliant with the current legislation and promote a culture of dignity and respect for all.

WHA aim to ensure that all employees are treated with fairness and respect and not be discriminated on the grounds of marriage & civil partnership, sex, race, disability, age, religion or belief, gender reassignment, pregnancy & maternity and sexual orientation, or disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance. WHA will therefore ensure all employees are provided with equality of opportunity in the course of their employment starting from the recruitment process.

Definitions

Diversity is about valuing individual differences. WHA is committed to valuing and managing people's differences to enable all employees to contribute and realise their full potential. WHA recognises that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit WHA and its customers.

Equality is making sure people are treated fairly and given fair chances. ***Equality is not about treating everyone in the same way, but instead recognises that needs are met in different ways.*** Equality focuses on those areas covered by the law, and described in the Equality Act 2010 under the nine Protected Characteristics of race, sex, disability, age, gender reassignment, marriage & civil partnership, pregnancy & maternity, religion or belief and sexual orientation.

Direct Discrimination is treating someone less favourably than others based on a protected characteristic.

Indirect Discrimination is where a policy, practice, procedure, provision or criteria that applies to everyone in the same way but might disadvantage a particular protected group, and which cannot be objectively justified in relation to the job.

Harassment is conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive environment. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

Victimisation is treating someone less favourably because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

Associated Discrimination is discrimination against a person because they have an association with someone with a particular protected characteristic. E.g. a non-disabled person is discriminated against because of the action they need to take care of disabled dependent.

Discrimination by Perception is discrimination against a person because the discriminator **thinks** the person possesses that characteristic. E.g. A candidate is not shortlisted because the recruiting manager incorrectly assumes that the candidate has a particular protected characteristic.

Discrimination arising from disability occurs where a disabled person is treated unfavourably because of something arising in consequence of their disability, and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim.

Employees

All permanent, temporary fixed term staff, including all managers, Chief Executive, and agency workers.

Stakeholders

Contractors, consultants, tenants, customers, management committee members, service users, other outside agency workers

Positive Action is about addressing imbalances in the workforce, by encouraging members of underrepresented groups to apply for jobs/join our committee. Positive action may be applicable in setting equality targets. WHA may encourage people from a particular group or groups to apply for a vacancy in WHA where there is under representation in comparison to the local community.

Reasonable Adjustments

WHA will comply with its duty under the Equality Act 2010 to make reasonable adjustments where a disabled job applicant, employee or worker is placed at a substantial disadvantage. This may include adjustments to premises, working

arrangements, hours, duties, recruitment processes, communications, equipment, policies or practices, or the provision of an auxiliary aid.

WHA will consider adjustments where they are requested and where WHA knows, or could reasonably be expected to know, that an individual is disabled and may be experiencing a substantial disadvantage. Requests will be considered individually and in consultation with the person concerned. Medical or occupational health advice may be obtained where appropriate, but responsibility for deciding and implementing reasonable adjustments remains with WHA.

Policy Principles

This Equality and Diversity policy aims to:

- Ensure integration with equality and diversity practices throughout everything WHA does and ensure that employees are treated with fairness and respect from each other and from members of the public, committee members, and contractors.
- Implement fair and just employment practices ensuring that no job applicant or employee will receive less favourable treatment on any grounds.
- Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions will be based on only relevant merits.
- Provide an environment appropriate to the needs of those from all walks of life, and offer a culture that respects and values differences and promotes dignity, equality and diversity.

Implementation of Policy

All new employees and management committee members will receive induction on this policy. The policy will be widely promoted and integrated into all policies and procedures. Copies of the policy will also be freely available to staff and advertised on WHA website.

Appropriate training and guidance will be available to promote equality and diversity among staff.

This policy applies to everyone in WHA and everyone has a responsibility to be alert to discriminatory behaviours and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the equality and diversity policy will be regarded as misconduct and will lead to disciplinary action which may include dismissal.

WHA will not tolerate harassment of its employees or workers by third parties. Where WHA knows, or ought reasonably to know, that harassment has occurred or may

occur, it will take all reasonable and proportionate steps to prevent it, stop it and protect affected employees.

Action may include adjusting contact arrangements, providing two-person visits, issuing behavioural warnings, restricting the method or location of contact, reallocating a point of contact, excluding an individual from WHA premises, reporting criminal conduct to the police or taking other action permitted by WHA's Unacceptable Behaviour or relevant customer management procedures.

Recruitment & Selection

Recruitment, selection and promotion decisions will be based on objective, job-related and consistently applied criteria. In order to achieve this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

A fair recruitment process will remove barriers to the employment of people of different backgrounds. This will enable us to recruit from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving. A more diverse workforce will improve the organisation's service delivery, as it will include staff with more knowledge and experience, meet and aid in meeting the needs and aspirations of service users and potential service users.

To highlight WHA's commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying. WHA will ensure that all applications have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.

This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

Sexual harassment and preventative duty

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

WHA will take all reasonable steps to prevent sexual harassment in the workplace and in any situation connected with work. This includes conduct by employees,

workers, committee members, tenants, customers, contractors, consultants, suppliers and other third parties.

WHA will proactively identify and assess the circumstances in which sexual harassment could occur and will implement proportionate preventative measures. These may include risk assessments, appropriate training, clear reporting arrangements, action to address known risks and regular monitoring of the effectiveness of preventative measures.

Employees and workers are encouraged to report sexual harassment, whether they experience it directly or witness it. Reports will be taken seriously and dealt with promptly, sensitively and without victimisation.

A report concerning sexual harassment may, depending on the circumstances, also amount to a protected disclosure under whistleblowing legislation. No employee or worker will be subjected to dismissal, detriment or victimisation because they have raised a concern in good faith, made a protected disclosure, supported another person's complaint or participated in an investigation.

Training and Development

It is crucial that all employees can participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials reinforce an image and of equality of opportunity.

Redundancy Selection

Whilst WHA hope that the situation never arises, should Redundancy selection be necessary, then it will be made according to the statutory requirements. Criteria will be discussed with the Trade Union and nominated representatives. The criteria will be set out and will be objective, fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in a discriminatory way.

Complaints

Employees may raise concerns informally or formally. Informal resolution may be appropriate where the employee wishes this and where the circumstances are suitable. Employees will not be required to attempt informal resolution before making a formal complaint. Serious allegations, including sexual harassment, violence, threats, victimisation or an abuse of authority, may require formal investigation even where the individual initially seeks informal resolution.

Employees

Informal Stage

An employee should aim to resolve the matter informally as this can help to maintain good working relations.

The employee should raise the issue informally with their line manager (if the complaint is against their manager then the manager next in line.) The manager will

speak to the employee whom the complaint is against. If it is found that the behaviour was in breach of this policy, the behaviour may be managed under the Disciplinary Procedures.

Appropriate confidential records will be maintained by HR in accordance with WHA's retention schedule and Data Protection Policy. Records of equality, harassment or discrimination complaints will be access-restricted and will not be used to disadvantage a person because they raised, supported or participated in a complaint.

Dealing with the matter informally does not remove the complaining employee's right to have the matter dealt with formally.

Formal Stage

If the manager believes the complaint to be very serious then it will be referred for investigation under the Disciplinary Procedures.

If the employee is dissatisfied with the outcome, they should raise the matter in writing, detailing the complaint to their line manager in accordance with the Grievance Policy.

If the outcome of the investigation is that a formal disciplinary hearing should take place this will be conducted in line with the Disciplinary Procedures.

Complaints made against an employee

Where a complaint is made against an employee by another employee, Committee member or stakeholder, it will be investigated and dealt with under the Disciplinary Policy.

Stakeholders

Informal Stage

The stakeholder should report the matter to their lead contact as soon as possible.

The manager will discuss the situation with the individual whom the complaint is against and explain the expected standards of behaviour and the consequences of failing to comply with these. It will be made clear to the individual that continuation of such conduct may result in being refused access to WHA premises, or services.

Formal Stage

Where informal action is not appropriate, or the matter is of a serious nature the complaint will be dealt with using the formal procedure. Where the formal procedure is instigated a thorough investigation will take place in the first instance. Where it is found that the individual has acted in an inappropriate manner, they will be written to officially by the relevant senior manager informing them that their comments, actions, behaviours are not acceptable and potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in being refused access to WHA premises or contact with its customers/employees/committee members. In

cases of physical violence or serious threats the appropriate manager will notify the police.

Complaints by stakeholders

Where stakeholders are in receipt of inappropriate behaviour from an employee , committee member or another stakeholder in connection with the business, the stakeholder should also raise the issue with their lead contact. The lead contact will then investigate into the complaint and deal with it in accordance with the appropriate procedure (depending whether the complaint is against an employee, a committee member, a contractor, a partner, etc.).

Governing Body Members

Where a committee member feels they have been discriminated against, victimised or harassed, the aim should be to deal with it informally in the first instance.

Informal Stage

If a committee member feels they are in receipt of inappropriate behaviour from another committee member, an employee or any stakeholder in connection with WHA, they should raise this immediately with the appropriate senior manager. The manager will discuss the issue with whom the complaint is against, explaining the required standards of behaviour and the consequences of failing to comply.

Formal Stage

Where formal action is the most appropriate, a thorough investigation will take place into the complaint. The complaint then will be dealt with in accordance with the appropriate procedure (depending whether the complaint is against an employee, a committee member, a contractor, a partner, etc.). In cases of physical violence or serious threats an appropriate manager will notify the police.

Complaints made against a committee member

Where a complaint is made against a committee member, WHA committee complaints procedure will be used as appropriate. The complaint will be investigated by the Chair or another authorised person. If it is found that the inappropriate behaviour occurred, the committee member will be warned and informed of consequences of failure to comply with the expected standards of behaviour, which may include removal from the committee.

Confidentiality safeguard

WHA will handle complaints as confidentially as reasonably possible. However, confidentiality will not be used to prevent a person from reporting discrimination or harassment, making a protected disclosure, reporting a criminal offence, co-operating with an investigation or regulator, or obtaining legal, medical, counselling or trade union support.

General Data Protection Regulations

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how your data will be used and the basis for processing your data is provided in WHA privacy notice.

Monitoring

New and materially revised employment policies should be equality-impact assessed. These assessments should be readily available within the suite of policies.

Review

The Management Committee will have regard to this policy, as per our review schedule. As such, the policy will be considered every three years to ensure that it responds to any changing circumstances.