



Equality, Diversity and Inclusion Strategy 2025



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1.0 Introduction

1.1 Harrogate Housing Association (HHA) provides affordable homes for customers near family and work.

1.2 The Association, Board and staff are committed to promoting equality, diversity and inclusion and having a culture that values difference and recognises the contribution that people from different backgrounds, and with different life experiences, can make.

1.3 It needs to be recognised that with only 275 properties and 9 staff the resources available to the Association to effect change in the wider community are limited. The low staff and property numbers also impact on our ability to align our workforce with the customer mix or the population at large in Harrogate.

1.4 The Board have previously agreed the collection, storage and safeguarding of customers personal sensitive information (ie diversity data) would not be undertaken due to the risks associated with its loss or theft and, that any reporting of performance which would use the information to compare and contrast between different characteristics, would not be statistically sound due to the low volumes of data.

1.5 The Regulator through the Social Housing (Regulation) Act 2023 have confirmed diversity data must be collected and the NHF have provided details of the information to collect. This data is being collected. The Board, however, still believe its use will be limited for the reasons set out in 1.4 above.

2.0 Aims and Objectives

2.1 HHA will ensure that every employee and person we employ to provide services on our behalf, customers and other stakeholders are treated with dignity and respect and, where this is not the case, appropriate action is taken

2.2 HHA will ensure that in the course of conducting its business it will have due regard to:

- the elimination of unlawful discrimination, harassment and victimisation
- advancing equality of opportunity between people who share a protected characteristic and those who don't
- fostering good relations between people who share a protected characteristic and those who do not

2.3 HHA will identify what changes need to be made to its service delivery to meet customers individual requirements and put these in place where possible and practicable, taking into consideration value for money and the customer benefits to be obtained from the changed approach. We will always inform the customer when their requirements will not be delivered.

2.4 HHA will meet the Equality, Diversity and Inclusion (EDI) obligations placed on it by law (the primary one being the Equality Act 2010), by the

Regulator of Social Housing (through the consumer standards) and by the Code of Governance it adopts.

3.0 Link to purpose and values

3.1 As set out in the rules of the Association it exists to provide social housing and assistance to help house people and associated facilities and amenities or services for poor people or for the relief of aged, disabled (whether physically or mentally) or chronically sick people. By virtue of this purpose HHA's customers are more likely to be connected to groups which legislation has been put in place to protect.

3.2 This strategy sets out the actions which will be taken by HHA to ensure it delivers on its core purpose fairly and transparently and that its customers are treated with dignity and respect in the area they choose to live near family and work.

3.3 HHA's values are Local, Approachable and Customer-focussed and these form the bedrock underpinning the services it provides. HHA's prides itself on knowing it's customers as individuals and building rapport with them. This rapport increases the likelihood that customers will inform us of equality, diversity or inclusion related incidents which in turn will enable HHA to take the necessary action to improve the outcome for the customer. A local, accessible office in the heart of our main neighbourhood facilitates this interaction.

4.0 Obligations (and definitions)

4.1 HHA are committed to promoting equality, diversity and inclusion. It is important therefore that they are defined. Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups, both in employment and for goods and services. Diversity can be described as celebrating differences (visible and non-visible) and valuing everyone for the contributions they can make. They are not interchangeable and there is no equality of opportunity if difference is not valued. Inclusion describes when the two are working together in harmony to produce an environment where all individuals are treated fairly and respectfully, have equal access to opportunities and resources, and are able to contribute fully to the matter at hand.

4.2 The Equality Act 2010, as enhanced by the Equality Act 2010 (Amendment) Regulations 2023, is the primary equalities legislation. It contains statutory requirements stating HHA must provide protection for people against discrimination, harassment and victimisation because they have (are perceived to have, or are associated with someone who has) a protected characteristic.

4.3 The Act defines the protected characteristics as

- disability
- age
- gender/sex
- gender reassignment
- race (includes colour, nationality and ethnic origins)
- religion and/or belief
- sexual orientation

- marriage and civil partnerships
- pregnancy, maternity and breastfeeding

4.4 In addition discrimination, harassment and victimisation can be defined as follows:

- Direct Discrimination - Treating a person less favourable than another person because of a protected characteristic they have or are thought to have or because they associate with someone who has a protected characteristic
- Indirect Discrimination - Applying any requirement, rule, policy or condition which, though applied equally to everybody, is such that it particularly disadvantages people who share a protected characteristic, unless the requirement or condition can be shown to be justifiable or proportionate having considered all fair and reasonable factors
- Perceptive Discrimination - Directly discriminating against an individual because others think they possess a particular protected characteristic. This applies even if the person does not actually possess that characteristic
- Associative Discrimination - Directly discriminating against someone because they associate with another person who possesses a protected characteristic
- Harassment - Harassment is 'unwanted conduct related to a relevant characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees will now be able to complain of behaviour that they find offensive even it is not directly at them and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association
- Third Party Harassment - The Equality Act makes you potentially liable for harassment of your employees by people (third party) such as your customers. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place and have not taken reasonable steps to prevent it from happening again
- Victimisation - Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act 2010, or they are suspected of doing so

4.5 Processes, procedures and policies must ensure appropriate protection is given to people (including Board members, employees, customers, contractors and those living in our neighbourhoods) with a protected characteristic.

4.6 HHA must have due regard to the Public Sector Equality Duty as set out in the Equalities Act 2010 (as per 2.2 above).

4.7 Under the Tenant Involvement and Empowerment Standard published by the Regulator of Social Housing HHA must:

- treat all tenants with fairness and respect
- demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

4.8 By implementing this strategy HHA will be better placed to deliver services to customers that are aligned with their needs.

5.0 Where we are now

5.1 HHA prides itself on knowing its customers as people and not by the characteristics they possess. Its values of approachable and customer-focussed further embed this. Customer satisfaction is high (80% in the 2024 survey) with a net promoter score of 42 obtained from responses from 49% of customers. EDI data was collected from respondents but the volume was insufficient to enable any meaningful analysis to take place.

5.2 Our records indicate that 65 customers (including those of the managed contracts) have asked us to change our standard service to better meet their needs out of 289 records. All customers have been asked but this is not recorded as “live” data.

5.3 All staff have attended EDI training which was refreshed in May 2024.

5.4 Complaints and incidences of racial harassment are monitored and recorded. Details are reported to the Board on a quarterly basis. They are also discussed with customers at Customer Liaison Committee meetings. HHA has had no racial harassment issues in the last 3 years and complaints volumes are low.

5.5 Board members and staff have completed the National Housing Federations base line diversity survey in 2021 and 2023. All responses were completed fully without any “prefer not to say” answers. This demonstrates respondents are at ease with being open and honest. The survey identified that disabled and LGBT groups were not represented in either the Board or staff group and men were underrepresented in staff.

5.6 We allocate properties using a banding system based on need. All direct applicants are placed in band a, b or c depending on their circumstances. Those in band a are offered properties before those in band b and then if still available to those in band c. First allocations to new properties and 50% of allocations to other vacancies are undertaken by the Council who use a points based approach. HHA does not challenge the housing need criteria of a Council nomination. The Council are moving to a choice based lettings system in the near future.

5.7 Due to the small number of staff and their roles it is not possible to collect and keep separate the diversity information of applicants so this is not done. Where an external consultant manages a recruitment diversity information is collected separately from the application form and not seen by those shortlisting applicants for interview.

5.8 Board vacancies are promoted to the BME community through the Housing Diversity Network.

5.9 We collect diversity information for new customers and submit it to the CORE system. We do not retain the information on our systems. As a consequence we can not analyse performance or other service information by any protected characteristic. The analysis, if undertaken, would not be statistically sound due to the low numbers involved. A report on lettings though is submitted to the Board each year.

5.10 Customer Engagement Strategy recognises the need to broaden the diversity of engaged customers and has actions to improve the current mix.

5.11 HHA enables ad hoc flexible working where this aligns with the needs of the business and considers applications from employees to change their working patterns to achieve a better work life balance or to better accommodate personal circumstances. Salary sacrifice schemes for child care and cycle to work schemes are in place.

5.12 The Association is a member of the Housing Diversity Network (HDN).

6.0 Targets and actions

- 6.1 HHA will build on its current position and further advance EDI by:
- collecting the diversity data identified by the NHF as being required. By 31 December 2025 diversity data on at least 50% of customers will have been collected
 - to keep the information captured pertaining to changes in service delivery requested by customers up to date and ensure the data remains “live”
 - through the marketing plan being developed use social media and other opportunities to increase the number and diversity profile of engaged customers
 - undertaking regular training for staff and engaged customers on EDI matters
 - promoting job and Board vacancies to both the LGBTQ and disabled communities when they arise
 - reporting allocation information on diversity and allocation band to the Board on an annual basis. When choice based lettings is introduced analyse applicant data to identify if diverse groups bid for our homes
 - obtaining diversity data in customer satisfaction surveys to identify if any statistically sound discrimination information can be obtained – to date this has not been the case.
 - continuing to support customers who are financially disadvantaged as a result of the cost of living crisis
 - robustly tackling perpetrators of discrimination, harassment and victimisation and supporting those experiencing it
 - regularly refreshing the Board and staff diversity information to identify if any changes in approach on recruitment needs to take place and participate in the NHF EDI surveys
 - identifying learning and development opportunities for those from disadvantaged groups (both staff and customers) and supporting their attendance wherever possible

- better using the resources of the HDN to promote EDI opportunities to staff and Board

7.0 Continuous Improvement and Review

7.1 HHA recognise that improvements can always be made in ensuring a fairer society with equal opportunities for all and therefore this strategy will be reviewed on an annual basis to ensure it remains fit for purpose and is adapted to include any emerging priorities as they arise.

8.0 Related strategies and policies

8.1 All the strategies policies and action plans of the Association are related to the delivery of this strategy. They can be found at www.hhal.org.uk.