



Equality, Diversity and Inclusion Strategy 2026



Author: Steven Brook, Chief Executive

Date Issued: January 2026

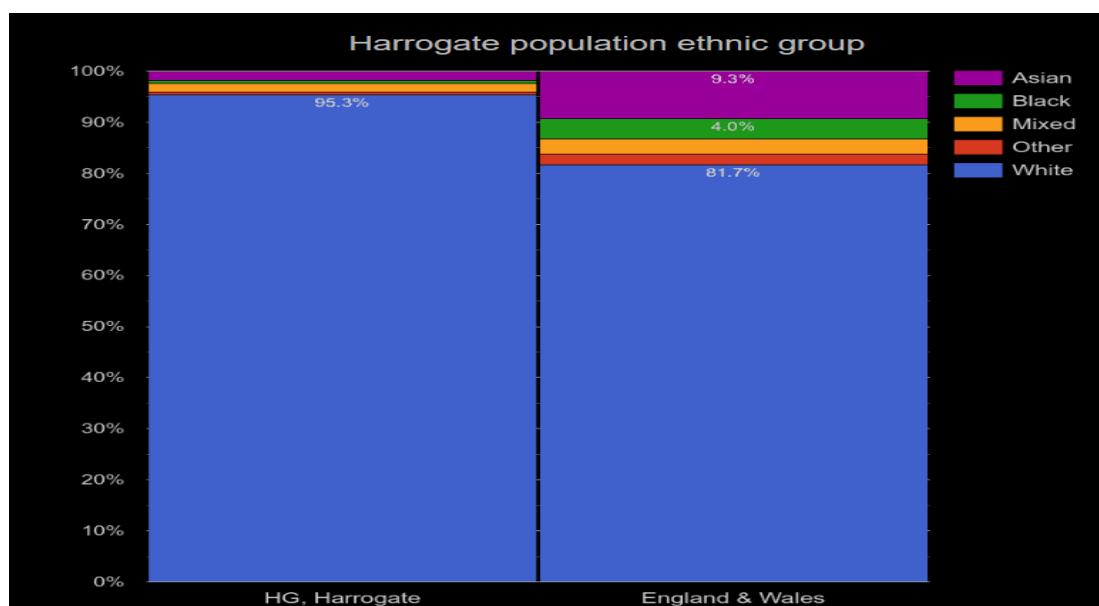
Date of next review: January 2027

Contents

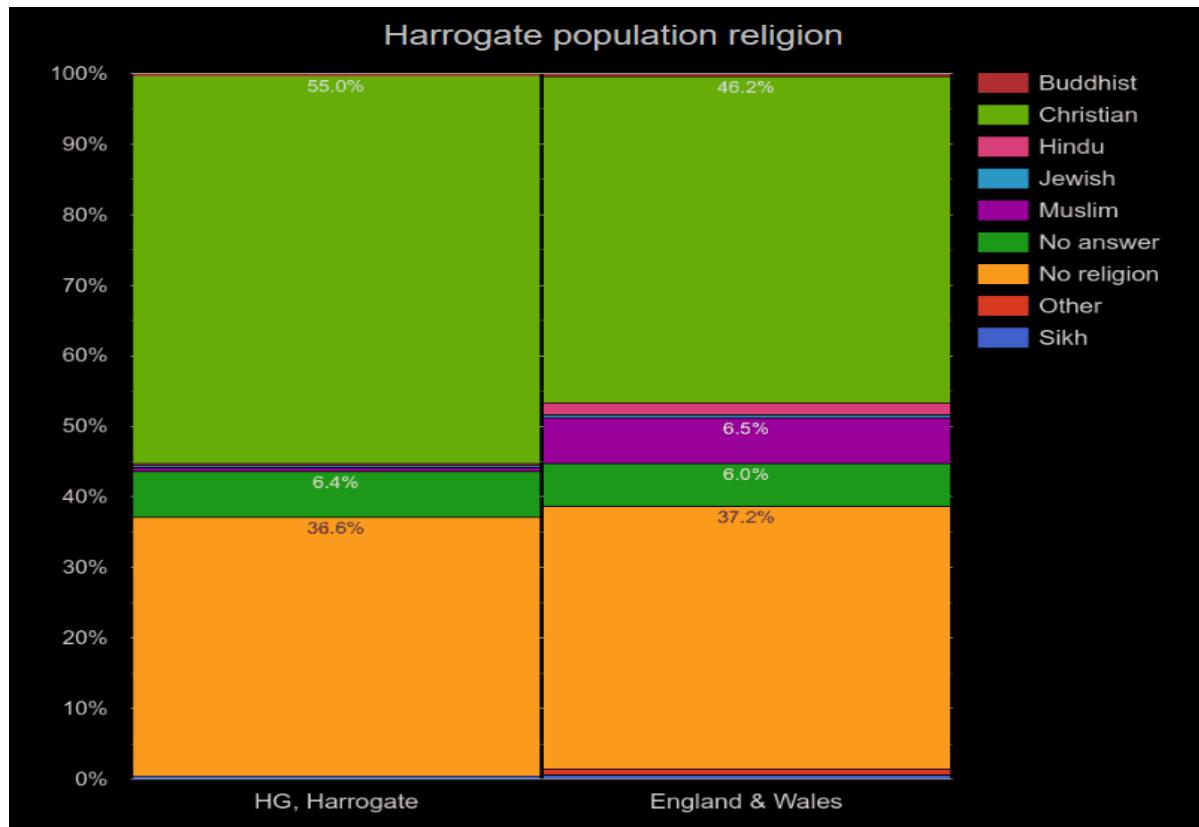
Items	Page No
1. Introduction	1
2. Aims and Objectives	2
3. Link to purpose and values	3
4. Obligations (and definitions)	3
5. Where we are now	5
6. Targets and actions	6
7. Continuous Improvement and Review	7
8. Related strategies and policies	7

1.0 Introduction and context

- 1.1 Harrogate Housing Association (HHA) provides affordable homes for residents 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 We strive to deliver the aims and objectives of this strategy in everything we do and will take every opportunity to promote equality, diversity and inclusion. It is recognised our size impacts our ability to effect wider change.
- 1.4 The Board have previously agreed the collection, storage and safeguarding of residents 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.
- 1.6 Harrogate's population is predominantly White British with self-reported good health with a lower number of disabled people than the national average. The area has a higher proportion of residents aged 65+ than the average and is generally affluent, but there are pockets of deprivation. The BME community is small but there is increasing diversity from Eastern European origins.
- 1.7 The ethnicity of the population can be broken down as follows:



1.8 The religious breakdown of the population also shows a marked difference to the national position:



2.0 Aims and Objectives

2.1 HHA will ensure that every employee and person we employ to provide services on our behalf, residents 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 residents individual requirements and put these in place where possible and practicable, taking into consideration value for money and the resident benefits to be obtained from the changed approach. We will always inform the resident 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 residents 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 residents 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 prides itself on knowing its residents as individuals and building rapport with them. This rapport increases the likelihood that they 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 them. A local, accessible office in the heart of our main neighbourhood facilitates this interaction as do our bi-annual Home Reviews, a face to face meeting at least every two years with the resident in their own home.

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 as a result of Brexit, 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 if 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 the employer potentially liable for harassment of its employees by people (third party) such as residents or contractors. The employer will only be liable when harassment has occurred on at least two previous occasions, it is aware that it has taken place and it has 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, residents, 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 residents that are aligned with their needs.

5.0 Where we are now

5.1 HHA prides itself on knowing its residents as people and not by the characteristics they possess. Its values of approachable and customer-focussed further embed this. Resident satisfaction is high (80% in the 2024 survey) with a net promoter score of 42 obtained from responses from 49% of residents. 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 70 residents have asked us to change our standard service to better meet their needs out of 258 records. All residents 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. A representative from the Housing Diversity Network (HDN) attended a team meeting in October 2025 to show staff the resources available to them through the HDN website. These resources include historic webinars, information and guidance on approaches to diversity matters.

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 residents at Customer Liaison Committee meetings. HHA has had no racial harassment issues in the last 4 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, the latter is now not the case with 5 women and 4 men being employed.

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 through its choice based letting system Home Choice. HHA does not challenge the housing need criteria of a Council nomination.

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 job 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 (and other) vacancies are promoted to diverse groups through the Housing Diversity Network and HQN websites.

5.9 We collect diversity information for new residents and submit it to the CORE system. In line with the first action in the 2025 EDI strategy we have collected and retained the diversity data identified by the NHF as being required. In most cases we hold the data on 99% of residents who rent. We only hold the “preferred language” for 91%. We do not undertake any performance analysis with this data as we believe the results 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 residents 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 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 for its shared owners (26 properties) and that missing from its rented residents. This will be done by 30 June 2026.
- to keep the information captured pertaining to changes in service delivery requested by residents up to date and ensure the data remains “live”
- through the marketing plan use social media and other opportunities to increase the number and diversity profile of engaged residents (there has been limited success to date through this route)
- undertaking regular training for staff and engaged residents on EDI matters – some update training will be undertaken in 2026
- promoting job and Board vacancies to both the LGBTQ and disabled communities when they arise as these are groups identified as being underrepresented in our staff profile. Advertising through HDN and HQN to reach other diverse groups will continue
- reporting allocation information on diversity and allocation band to the Board on an annual basis. With choice based lettings in use analyse applicant data to identify if diverse groups bid for our homes if possible
- 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 but will be undertaken for the survey due in 2026
- continuing to support residents 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 residents) and supporting their attendance wherever possible
- collaborating with any community groups that represent or support minorities in Harrogate where such collaboration would be mutually beneficial
- reminding staff of the resources available through HDN and to promote EDI development opportunities to staff and Board
- undertake some analysis of the diversity data held to identify if there are any opportunities for improvement of services or targeting of support – this will be done by 30 September 2026

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.