Equality, Diversity and Inclusion Policy

Document Control Sheet

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Reason for review	Refreshed policy, drafted in the THA Policy Template and aligned to the rationalised Policy Framework (April 2026). Strengthened to reflect the RSH Transparency, Influence and Accountability Standard (2024) – fairness and respect, diverse needs, and accessible services. Reasonable adjustments substantially expanded, reflecting the anticipatory duty under the Equality Act 2010 and the Housing Ombudsman's findings on attitudes, respect and rights.
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Date	**Reviewed by (name and title)**	**New version number**	**Summary of changes**
July 2026	House of Risk Ltd (Becky Tucker)	V1.0	Refreshed policy in the THA Policy Template. Aligned to the RSH Transparency, Influence and Accountability Standard (2024). Reasonable adjustments expanded into a full section reflecting the anticipatory duty, with a recognise – respond – record approach and an at-a-glance appendix.

Table of Contents

1. Scope 3
2. Purpose and objectives 3
3. Policy statement 3
4. Definitions 4
5. Policy 4
6. Compliance 6
7. Sustainability 6
8. Responsibilities 6
9. Equality and diversity 7
10. Related documents 7
11. Legislation and regulation 7
12. Review 8

Appendix A – Reasonable adjustments at a glance 9

1. Scope

This policy applies to everyone Teachers' Housing Association (THA) works with and for: residents and prospective residents, applicants, Board members, staff, contractors, and anyone acting on THA's behalf. It covers how THA delivers its services and how it behaves as an employer and a governing body.

It applies to every service THA provides – lettings, tenancy management, repairs and safety, complaints, anti-social behaviour, income collection and engagement – and to the way decisions are made about those services.

2. Purpose and objectives

THA is a small housing association, and the people who live in its homes are not all the same. Fair treatment does not mean treating everyone identically; it means understanding what different people need in order to get the same quality of service and then providing it.

The objectives of this policy are to:

- • treat residents, prospective residents and colleagues with fairness, courtesy and respect;
- • understand the diverse needs of THA's residents and take them into account in the way services are delivered;
- • make reasonable adjustments for disabled residents and colleagues, and anticipate what may be needed rather than waiting to be asked;
- • remove barriers that stop people accessing THA's services, and make sure communication is accessible;
- • eliminate discrimination, harassment and victimisation, and deal promptly with any complaint of discrimination; and
- • be an inclusive employer and a diverse, well-informed Board.

3. Policy statement

THA is committed to equality, diversity and inclusion in everything it does. No one will be treated less favourably because of who they are, and THA will take positive steps to make its services accessible to everyone who needs them.

THA recognises that fairness is not the same as sameness. Some residents face barriers that others do not, and treating everyone in exactly the same way can produce unequal outcomes. THA therefore looks at the outcomes its services actually deliver for different groups, not only at whether its processes were followed.

THA also recognises that its duty to make reasonable adjustments is anticipatory. It does not wait to be asked: it thinks in advance about what disabled residents may need in order to use its services, and it acts when a need becomes apparent.

4. Definitions

The following terms are used in this policy:

- **Equality:** making sure people are treated fairly and have fair access to services and opportunities, whatever their background or circumstances.
- **Diversity:** recognising, respecting and valuing the differences between people.
- **Inclusion:** making sure people feel welcome, heard and able to take part, and removing the barriers that stop them.
- **Protected characteristics:** the nine characteristics protected by the Equality Act 2010 – age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- **Discrimination:** treating someone worse because of a protected characteristic (direct), or applying a rule that puts people sharing a characteristic at a disadvantage without good reason (indirect). It also includes treating a disabled person unfavourably because of something arising from their disability.
- **Harassment:** unwanted behaviour related to a protected characteristic that violates someone's dignity or creates a hostile or degrading environment.
- **Victimisation:** treating someone badly because they have complained about discrimination or supported someone who has.
- **Reasonable adjustment:** a change THA makes so that a disabled person is not put at a substantial disadvantage – to the way it does things, to a physical feature, or by providing an aid or extra support.
- **The anticipatory duty:** the requirement to think ahead about what disabled people may reasonably need, rather than waiting until an individual asks.
- **Diverse needs:** the range of needs among THA's residents, including those arising from protected characteristics, language barriers and additional support needs.

5. Policy

5.1 Fairness and respect

THA treats residents and prospective residents with fairness, courtesy and respect, and expects the same of its contractors and of anyone acting on its behalf. Residents are listened to, taken seriously, and told the reasons for decisions that affect them. Fairness and respect underpin every service THA delivers, and are not a separate activity.

5.2 Understanding our residents' diverse needs

Residents are encouraged, but not required, to share information about their protected characteristics or support needs. THA explains why it asks for this information and how it will be used. This information is collected sensitively, kept accurate and up to date, held securely in line with data protection law, and used to shape services rather than simply stored.

THA uses what it knows to check whether its services are delivering fair outcomes for different groups of residents, and to identify barriers that need removing. Where it finds a gap, it acts.

5.3 Reasonable adjustments

THA makes reasonable adjustments so that disabled residents, applicants and colleagues are not put at a substantial disadvantage. Adjustments may be made to the way THA does things, to a physical feature, or by providing an aid or additional support.

The duty is anticipatory. THA thinks in advance about what disabled people may reasonably need in order to use its services, and designs services accordingly – it does not wait to be asked. Where an individual need becomes known, THA responds to it.

THA follows a simple approach – recognise, respond, record:

- **Recognise.** Colleagues ask about, and stay alert to, support needs and disabilities, including those that are not visible. A resident does not need to use the words "reasonable adjustment", or to have a formal diagnosis, for a need to be recognised.
- **Respond.** THA considers each request on its own facts and acts promptly. It does not apply a fixed list. Where an adjustment is not reasonable, THA explains why in writing, considers what else it can do instead, and tells the resident how to challenge the decision through the Complaints Policy.
- **Record.** THA records reasonable adjustments and keeps them under review. Adjustments are recorded in THA's Reasonable Adjustments Register to help ensure they are applied consistently and reviewed appropriately.

Examples of adjustments THA may make include communicating in a resident's preferred format or language, allowing longer to respond, offering appointments at particular times, arranging home visits, providing information in large print or easy read, allowing a representative or advocate to act or be present, and adapting how a service such as repairs or income collection is delivered. Adaptations to the home are dealt with through THA's aids and adaptations arrangements, and this policy is not a substitute for those.

5.4 Accessible services and communication

THA makes its services accessible and publicises how to use them. Communication is clear, timely and appropriate to residents' needs, and is available in other formats and languages on request. THA supports residents to use online services where they wish to, and always keeps non-digital routes open so that no one is excluded. Residents may be supported by a representative or advocate in any dealings with THA.

5.5 Discrimination, harassment and victimisation

THA does not tolerate discrimination, harassment or victimisation – by colleagues, by contractors, or between residents. Any complaint of discrimination is taken seriously and

investigated promptly under the Complaints Policy, and the resident is told the outcome and the reasons for it. Discrimination or harassment between residents is also dealt with under the Anti-social Behaviour Policy, and hate incidents are treated as a priority.

A resident is never treated less favourably because they have complained, asked for an adjustment, or supported someone else who has.

5.6 Equality in decision-making

Equality Impact Assessments should be proportionate to the significance of the decision being taken. Where THA carries out public functions, it has due regard to the public sector equality duty; more generally, it applies the same discipline as a matter of good practice, proportionate to its size.

Every THA policy carries an equality and diversity section, and an Equality Impact Assessment is completed where the Policy Framework requires one.

5.7 Inclusive employment and Board

THA recruits, develops and treats its colleagues fairly, makes reasonable adjustments for disabled colleagues and applicants, and does not tolerate discrimination or harassment at work. THA seeks a Board whose members bring a range of backgrounds, experience and perspectives, and supports Board members to carry out their role.

5.8 Training and awareness

All colleagues and Board members receive equality, diversity and inclusion training that is proportionate to their role, refreshed as the law and good practice change. Training covers recognising and responding to support needs and disabilities, making reasonable adjustments, and identifying discrimination and hate incidents. Contractors are expected to work to the same standards, and this is reflected in what THA asks of them.

Training effectiveness is periodically reviewed to ensure colleagues can apply it in practice.

6. Compliance

The Chief Executive is accountable for equality, diversity and inclusion, and the Board receives regular reporting on it. Reporting covers the diversity of THA's residents and how well THA knows them; reasonable adjustments requested, agreed and declined; any complaints involving discrimination and their outcomes; tenant satisfaction and service outcomes broken down where the data allows; and the equality impact of significant decisions.

THA reviews whether its services deliver fair outcomes for different groups of residents, acts on what it finds, and reports the learning to the Board. This policy is subject to an annual Policy MOT and a formal review in line with its tier. Where the policy is not followed, THA takes appropriate action, which may include further training, contractual measures for contractors, or, in serious cases, action under THA's disciplinary procedures.

Where monitoring identifies inequalities in outcomes, THA develops and monitors improvement actions.

7. Sustainability

At Teachers' Housing Association, we recognise the importance of sustainability in our operations and services, and we are committed to practices that contribute to environmental protection, social equity and economic viability. Equality, diversity and inclusion sit at the heart of the social dimension of sustainability. Services that people can actually access, and homes that meet people's needs, reduce failure demand, avoidable complaints and rework, and support residents to sustain their tenancies over the long term.

8. Responsibilities

Responsibilities under this policy are as follows:

- • **The Board** approves this policy, sets the tone, gains assurance that THA's services deliver fair outcomes, and considers the equality impact of the decisions it takes.
- • **The Chief Executive** is accountable for equality, diversity and inclusion, ensures sufficient resources are available to implement this policy, and makes sure it is embedded rather than treated as an add-on.
- • **Managers** make sure their services are accessible, that adjustments are made and recorded, and that colleagues are trained and supported.
- • **All colleagues** treat people with fairness and respect, ask about and act on support needs, make and record reasonable adjustments, and challenge discrimination when they see it.
- • **Contractors and others acting on THA's behalf** work to the standards in this policy, including making reasonable adjustments. THA remains responsible for the service residents receive.
- • **Residents** are encouraged to tell THA about any support need or adjustment that would help and can expect to be listened to.

9. Equality and diversity

This policy is itself THA's statement of its approach to equality and diversity. THA applies it fairly and consistently, considers the needs of people with protected characteristics in the way it delivers every service, and makes reasonable adjustments so that no one is disadvantaged. An Equality Impact Assessment is completed for this policy in line with the Policy Framework.

10. Related documents

This policy should be read alongside the following related documents:

- • the Reasonable Adjustments Procedure (the companion procedure to this policy);
- • the Complaints Policy and Complaints Handling Procedure;

- the Anti-social Behaviour Policy (including hate incidents);
- the Tenancy Policy and the Allocations and Lettings Policy;
- the Housing Safety Compliance Policy and the Damp and Mould Policy;
- the aids and adaptations arrangements;
- the Safeguarding Policy;
- the Data Protection Policy;
- THA's employment policies, including recruitment and dignity at work; and
- the Risk Management Policy and Framework.

11. Legislation and regulation

The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, which requires adherence to all relevant law, THA will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate. Any queries relating to the applicable legislation should be directed to the policy owner.

Legislation and regulation directly relevant to this policy includes:

- the Equality Act 2010, including the duty to make reasonable adjustments and, where THA exercises public functions, the public sector equality duty;
- the Human Rights Act 1998;
- the RSH Transparency, Influence and Accountability Standard (consumer standard, 1 April 2024) – fairness and respect, diverse needs, and accessible services;
- the RSH Neighbourhood and Community Standard, and the RSH Tenancy Standard;
- the Social Housing (Regulation) Act 2023;
- the Housing Ombudsman's Complaint Handling Code (statutory since 1 April 2024), including the requirement to make and record reasonable adjustments;
- Supported Housing (Regulatory Oversight) Act 2023;
- the Care Act 2014;
- the UK GDPR and the Data Protection Act 2018; and
- the RSH Governance and Financial Viability Standard.

THA will comply with all applicable current and future legislation and will work cooperatively with the Regulator of Social Housing and the Housing Ombudsman. THA manages the risk of not meeting its duties through the monitoring and assurance arrangements set out in this policy.

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12. Review

This is a Tier 1 (Strategic & Regulatory) policy. It is owned by the Chief Executive, approved by the Board, and reviewed every two years.

THA will review this policy earlier than its scheduled date where there is a relevant change – for example a change in equality law or the RSH consumer standards, a Housing Ombudsman finding, or learning from a complaint involving discrimination or a reasonable adjustment. The review will consider the policy's continued relevance, its legal and regulatory compliance, and what THA has learned in practice.

Appendix A – Reasonable adjustments at a glance

This summary supports the Reasonable Adjustments Procedure, the companion procedure to this policy. It is not a fixed list: every request is considered on its own facts.

Barrier	What it might look like	Adjustments THA may make
Communication	A resident cannot read our letters, or finds phone calls difficult	Large print, easy read, another language, email or text instead of phone, a named contact
Understanding	A resident struggles to take in information, or needs longer	More time to respond, plainlanguage summaries, repeating information, involving an advocate
Access to appointments	A resident cannot attend at usual times, or cannot travel	Home visits, appointments at particular times of day, longer appointment slots
Representation	A resident needs help to deal with THA	Accepting a representative or advocate, allowing someone to be present at meetings
Service delivery	A standard process disadvantages a disabled resident	Adapting how repairs, income collection or tenancy visits are carried out
The home itself	A resident cannot use part of their home safely	Referral through THA's aids and adaptations arrangements
Digital access	A resident cannot access or confidently use online services	Telephone, paper correspondence, face-to-face support or assisted digital help

Recognise · Respond · Record. Ask about needs, act on what you learn, and write it down so the resident never has to explain twice.