



Lochaber Housing Association

Equality, Diversity and Inclusion Strategy

2025-2030

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Contents

1. Introduction.....	2
2. Equality, Diversity and Inclusion Statement	3
3. Governance and Legal Framework	4
4. Supporting Documentation.....	6
5. Training.....	7
6. Code of Conduct	7
7. Accreditation & Membership.....	7
8. General Data Protection Regulations	7

1. Introduction

The main purpose of this Equality, Diversity and Inclusion Strategy is to support our Strategic Objectives by underpinning our Mission, reflecting our Company and Core Values, and provide a framework for directing effective operations, both internally and externally.

Our Mission

“Our mission is to facilitate the provision and maintenance of good quality, truly affordable housing opportunities and services for local people in their preferred communities and helping to sustain and develop thriving communities throughout Lochaber.”

LHA Group Core Values

The following Core Values inform and direct our Strategic Objectives. They are the basis on which we work with our residents and the community, with partner organisations, and with each other as board members and colleagues.



2. Equality, Diversity and Inclusion Statement

The Equality, Diversity and Inclusion (EDI) Strategy has been developed to outline our commitment to achieving equality, diversity and inclusion; ensuring a consistent approach in promoting this throughout the organisation in all aspects of our operations and service provision.

EDI is at the heart of everything we do. It is an essential part of delivering on our commitment to provide homes and services that make life better for our tenants and service users.

Equality is not always about treating everyone the same – it is about recognising our differences and treating people accordingly so that the outcome for each person is the same.

We recognise that there are specific groups and individuals in society who experience discrimination, harassment and exclusion as a result of different aspects of their identity. This can have a profound impact on their lives and adversely affect the opportunities open to them. The LHA Group is committed to proactively tackling this discrimination and disadvantage.

We are committed to EDI because we know that it helps us create the homes that people need and improve the services that we deliver to all our customers. We want our organisation to respect our service users and tenants so that they get the support and services that they need to feel safe and welcome in their homes. To do this we need a workforce that understands the diverse needs of people and a workforce that carries out their work with dignity and respect for others.

We are committed to ensuring our people, and the tenants and residents in our communities do not face discrimination, victimisation, harassment or social exclusion due to any of the following protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief; and
- sex or sexual orientation.

This Strategy aims to set out our approach to equalities and human rights as both a landlord and employer, in line with the requirements of relevant legislation and regulatory frameworks

The aims and objectives of this Strategy are to provide a clear understanding of our commitment to ensuring that equality and diversity are central to everything we deliver.

These aims and objectives include:

- Eliminating discrimination and advancing equality of opportunity for all, in our role as a housing provider and employer.
- Treating all our tenants, residents, service users, employees, management committee members and those who engage with the LHA Group, fairly and with dignity and respect.
- To comply with relevant legislation, best practice guidance and regulatory requirements.
- To encourage our partners, contractors and suppliers to promote equality, respect diversity and prevent discrimination.
- Ensure integration and promotion of equality and diversity practices in all our work and activities and ensure that all who we engage with are treated with fairness and respect.

- Using the collection of data to provide appropriate services to all employees, tenants, board members and other service users.
- We are aware of the seven types of discrimination as defined under the Equalities Act;
 - Direct
 - Indirect
 - Associated
 - Perceptive
 - Harassment – including sexual
 - harassment by a third party
 - victimisation; and
 - institutionalised discrimination.
- To consider positive action both general and through recruitment and promotion that are in certain circumstance permissible under the Equalities Act.

This list is not exhaustive, and equality and diversity should underpin every service or action the LHA Group takes to deliver high quality services to our tenants and service users and offer a safe, attractive and inclusive environment for our staff and board of management to operate within.

3. Governance and Legal Framework

We will seek to meet all our legal obligations as set out in the following legislation:

- The Equality Act 2010
- The Human Rights Act 1998 and associated European Union Directives
- The Scotland Act 1998
- The Housing (Scotland) Acts 2001 and 2010
- Data Protection Act 2018; and
- Data (Use and Access) Act 2025

The Equality Act 2010 sets a UK-wide legal framework for protecting the rights of individuals and for advancing equality of opportunity for all. There are nine protected characteristics listed in the Act:

- Age
- Disability
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Gender (referred to as 'sex' in the Act)
- Gender reassignment; and
- Sexual orientation.

The Human Rights Act 1998 specifies that every individual has the right to own and enjoy the ownership of property; the right to respect for private life; the right to respect for family life; and the right to respect for their home. The Act provides protection against discrimination regarding any of these rights and could affect many of the housing and other services that we provide.

While equal opportunities is a matter reserved to the UK Parliament, the Scottish Parliament also has powers under the Scotland Act 1998 to 'encourage and promote' equal opportunities. Equal opportunities requirements are written in to Section 106 of the Housing (Scotland) Act 2001, amended by the Housing (Scotland) Act 2010, Section 39 which states 'Social landlords when performing housing services must act in a manner which encourages equal opportunities and in particular the observance of the equal opportunity requirements of the law for the time being related to equal opportunities'.

Relevant Scottish Housing Charter Outcomes

The Scottish Social Housing Charter came into effect on 2 April 2012.

1. **Equalities** - Social landlords perform all aspects of their services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.
2. **Communication** - Social landlords manage their businesses so that: tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.
10. **Access to Social Housing** - People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed.
11. **Tenancy Sustainment** - Tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations.

Regulation of Scottish Social Housing

The Regulation of Social Housing Scotland was updated by the Scottish Housing Regulator in February 2024, in the form of the Regulatory Framework February 2024.

Section 3, Regulatory Requirements requires Registered Social Landlords (RSLs) to:

1. Have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.
2. Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.
3. To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff.

Relevant Regulatory Standards

Lochaber Housing Association must also comply with Regulatory Standards of Governance and Financial Management with the following Standards and Guidance being relevant to this strategy:

1. The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

Specifically - The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users.

2. The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.

Specifically - The RSL actively seeks out the needs, priorities, views, concerns and aspirations of tenants, service users and stakeholders. The governing body listens to its tenants and service users and takes account of this information in its strategies, plans and decisions.

5. The RSL conducts its affairs with honesty and integrity.

Specifically - The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including governance arrangements.

4. Supporting Documentation

This Strategy and the associated information detailed below ensures that the LHA Group takes appropriate consideration of the legislation and good practice, to provide an environment which is open to all, has a zero tolerance approach on any forms of discrimination, and recognises the individuality of anyone who comes into contact with us.

Equality Diversity and Inclusion Policy

Our policy principles describe the core values that we incorporate throughout our services, including employment practices.

Equality Diversity and Inclusion Action Plan

We have a detailed Equality Action Plan which lists agreed actions to ensure that we are maintaining our commitment to manage EDI for our staff, board and our service users. The plan is regularly reviewed with a report detailing progress presented to the board on an annual basis.

Equality Diversity and Inclusion Charter

Our Charter has been drafted considering not only the law but good practice and includes how we manage our relationships with both employees and board members, those accessing our services, communications, the homes we provide and our requirements for suppliers and contractors. The Charter was approved by our Your Voice group in 2023.

Collection of Equalities Data

We collect equality data on a three year cycle from our tenants, staff and board members. We have adopted the SFHA model monitoring form which we use across all three categories with the information collected anonymously. A report detailing the information is presented to the board and is used to better support the delivery of our services and support the management of our staff and board relationships.

Equality Impact Assessments

We produce Equality Impact Assessments (EIA) for organisational policies, procedures and decision making where applicable. We use this by following a template which has been updated to include Human Rights legislation. We have an EIA Register in place and our Policy Schedule details if an EIA is in place to support the policy.

Accessible Information

We have a Communications Strategy and Communications Strategy Action Plan in place which have been drafted to ensure that we publish information in line with a range of standards. We seek to produce information in an accessible format to meet the needs of individual people, whether this is in electronic or paper format or on our website.

5. Training

We deliver a range of equality training to address the different training needs of our staff and board of management members. The training can be part of the induction process for staff and board members which a programme of regular training in place to ensure knowledge

6. Code of Conduct

Staff and board members are required to abide with the equalities, inclusion, human rights and diversity and dignity at work policies.

7. Accreditation & Membership

We maintain our membership of the following organisations:

- Happy to Translate
- Positive Action in Housing
- The Disability Confident Scheme



8. General Data Protection Regulations

The LHA Group will use all personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how an individual's data will be used and the basis for processing this data is provided in the LHA Group's own Privacy Notices.