Equality and Diversity Policy

McHattons LTD | 10 Lias Road, Porthcawl, CF36 3AH

Updated: 24 September 2026 | **Next review:** September 2027, or sooner if the law changes

Policy contact: Managing Director | terence@mchattons.co.uk | 01656 331577

Please contact us if you need this policy or information about our services in format.

1. Purpose and scope

McHattons LTD is committed to fair treatment and dignity at work and in the estate agency, lettings and property management services we provide. This policy applies to directors, employees, temporary staff and anyone acting on our behalf. It explains the standards that applicants, customers, sellers, buyers, landlords, contract-holders, occupiers and contractors can expect.

Everyone working for McHattons LTD must follow this policy, raise concerns promptly and cooperate with reasonable measures to prevent discrimination, harassment and victimisation. Managers are responsible for putting it into practice.

2. Protected characteristics and prohibited conduct

The Equality Act 2010 identifies nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The protections differ between employment and services; in particular, marriage and civil partnership is protected in employment, but is not a general service provision protected characteristic. We will apply the law in the relevant setting and treat everyone fairly.

- **Direct discrimination:** treating someone less favourably because of a protected characteristic, including an assumed characteristic or association with another person, where the law applies.
- **Indirect discrimination:** applying a rule or practice that puts people sharing a protected characteristic at a particular disadvantage without lawful justification.
- **Harassment:** unwanted conduct related to a relevant protected characteristic, or unwanted conduct of a sexual nature, that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation:** subjecting someone to a detriment because they have brought, supported or may bring a protected complaint or have done another protected act.
- **Disability discrimination:** this can include unfavourable treatment because of something arising from disability without lawful justification, and failure to make reasonable adjustments.

Bullying and disrespectful conduct may breach this policy even where they do not meet a statutory definition. We will consider complaints about such conduct under our relevant procedures.

3. Recruitment, work and progression

We will advertise and recruit using relevant job requirements and consistent criteria. Decisions about selection, pay, training, promotion, performance, discipline and dismissal will be made on fair and relevant grounds. We will consider reasonable adjustments for disabled applicants and workers throughout recruitment and employment. A person may request an adjustment from their manager or the policy contact; we will discuss practical options and respond promptly.

Staff must act respectfully in offices, at property visits and viewings, at work events, on calls and in digital communications. Managers must address behaviour they observe or which is reported to them. Staff may raise concerns without having to confront the person involved.

4. Preventing harassment and protecting staff

McHattons LTD will assess the risks of sexual harassment and other harassment in our work, including lone viewings, home inspections, contact with customers and contractors, online contact and work events. We will take reasonable preventive steps, communicate standards, provide suitable training and review arrangements following incidents or changes in risk. Staff should report incidents and situations where they felt unsafe, even if no harassment occurred. We will consider immediate support and practical safeguards, such as another colleague attending, changing contact arrangements or ending an unsafe appointment.

We will also address inappropriate behaviour by customers, applicants, landlords, contractors and other third parties. The law on employer liability for third-party harassment and the duty to take *all* reasonable steps to prevent sexual harassment is due to change on 30 October 2026; our procedures and risk assessment will be reviewed before then.

5. Services, advertising and property decisions

Access and reasonable adjustments

We will identify and remove avoidable barriers to using our services and make reasonable adjustments for disabled people where required. Staff should consider accessible ways to give information, communicate, arrange appointments and conduct viewings without making assumptions. Some adjustment duties are anticipatory and require us to plan ahead, not simply respond after someone encounters a barrier. Where an adjustment concerns a property we do not control, we will consider the steps within our control and discuss the issue with the person and relevant landlord or seller.

Marketing, applications and offers

We will describe and market properties fairly. Enquiries, viewings, offers, applications and affordability checks will be handled on relevant and consistently applied criteria. We will not conceal availability, refuse a viewing, change terms or withhold an opportunity unlawfully because of a protected characteristic. Staff must not follow a discriminatory instruction from a landlord, seller or anyone else; refer it to management and keep an accurate record of the decision.

Benefits and children in Wales

Since 1 June 2026, additional Welsh rules prohibit landlords and those acting for them from discriminating against prospective contract-holders because they receive benefits or have children. We must not use blanket “No DSS”, “No benefits” or “No children” restrictions, or discourage enquiries, withhold information or viewings, or reject an application for either reason. We will assess affordability consistently and count benefit income when considering an applicant’s means. Any property-specific issue, such as lawful occupancy limits, must be assessed individually and escalated to management before any restriction is communicated. Staff must not assume an insurer’s or lender’s preference permits a blanket ban.

For occupation contracts to which the new fundamental terms apply, contract-holders may claim benefits and, subject to the statutory qualification concerning a proportionate legitimate aim, permit children to live at or visit the dwelling. Management must ensure applicable written statements include

the required terms; any proposed exception requires a specific legal check. This policy does not itself vary an occupation contract.

Management of occupied property

We will approach repairs, inspections, communications, facilities, enforcement and other management decisions fairly. We will not retaliate against someone for raising an equality concern. Information about disability, health, family circumstances or other sensitive matters must be recorded and shared only when necessary for a legitimate work purpose, in line with our privacy procedures.

6. Reporting, investigation and outcomes

Staff can report concerns to their manager or the Managing Director. If the concern involves their manager, they can contact the Managing Director directly. If it concerns the Managing Director, they may report it to another director; McHattons LTD will arrange a person independent of the concern to handle the investigation where needed. Customers and members of the public may use our complaints procedure or contact the policy contact above. We will accommodate reasonable adjustments to help someone report a concern.

Please give relevant dates, people, messages and other evidence if available. Lack of a document or an exact date will not prevent us from considering a concern. We will assess any immediate safety needs, investigate fairly and proportionately, give the people concerned an opportunity to respond, keep a record and explain the outcome as far as confidentiality allows. We will share information only with those who need it. Staff misconduct may be addressed under the disciplinary procedure, and contractor or customer conduct may lead to appropriate protective or contractual steps.

No one will be penalised for raising a concern or supporting an investigation in good faith, even when it is not upheld. Deliberately false allegations may be dealt with under the appropriate procedure after fair investigation. Nothing in this policy prevents someone seeking advice or using an external statutory process.

7. Responsibilities, training and review

The Managing Director is responsible for this policy, ensuring staff receive it during induction, arranging suitable refresher training, recording and reviewing risk assessments, and reviewing complaints, adjustment requests and decision patterns. Managers must apply the policy in day-to-day decisions and escalate uncertain legal or property-specific issues. Monitoring records will be handled under our privacy procedures. This policy will be reviewed at least annually and sooner following a material legal change or identified problem. It is guidance on conduct and service delivery and is not incorporated into employment contracts.

Legal framework and official guidance

Equality Act 2010; Renting Homes (Fees, Discrimination etc.) (Wales) Act 2019 as amended by the Renters' Rights Act 2025; Renting Homes (Wales) Act 2016; Worker Protection (Amendment of Equality Act 2010) Act 2023; Employment Rights Act 2025. Read alongside McHattons LTD's complaints, grievance, disciplinary, lone-working and privacy procedures. Current legislation prevails over this summary.

Rent Smart Wales: implications of the Renters' Rights Act in Wales

Welsh Government: guidance on new occupation contract terms

Acas: preventing sexual harassment at work

Acas: changes to harassment law from 30 October 2026