

# Equality, Diversity and Inclusion Policy

Paragon Asra Housing Limited



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Department: **Organisation-wide**  
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1. Purpose

**1.1** Paragon Asra Housing Limited (PA Housing) is committed to promoting equality, diversity, inclusion and a culture that actively values difference. We recognise that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work. PA Housing aims to be an inclusive employer, where diversity is valued, respected and built upon, with the ability to recruit and retain a diverse workforce that reflects the communities it serves. Within this framework PA Housing specifically refers to measures it has in place to provide equality of opportunity and the facilities it can provide to its diverse workforce and to job applicants.

**1.2** This policy also reflects PA Housing’s responsibility for equality and diversity obligations to its customers. In doing so it takes into account the Equality Act 2010 and other relevant legislation, i.e. Care Act 2014, the ASB, Crime and Policing Act 2014 and the Counter-Terrorism and Security Act 2015. Other issues such as hoarding, child grooming and modern day slavery are addressed under its Safeguarding policy. The tenancy agreement contains obligations which tenants must comply with regarding nuisance, antisocial behaviour and threats to staff, visitors, and contractors.

**1.3** PA Housing continues to have due regard to the Public Sector Equality Duty 2011 and the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

**1.4** PA Housing aims to tackle discrimination or disadvantage proactively and ensure that no individual or group is directly or indirectly discriminated against for any reason with regard to employment or accessing its services. However, it is also mindful of the provision in discrimination law for the rare circumstances when an organisation may need to justify discrimination. This could be, for instance, where there is a conflict with other relevant legislation or between service needs.

In such circumstances PA Housing is committed to following the required proper assessment and objective justification of any decision in order to demonstrate that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

2. Definition of Equality and Diversity

**2.1** 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; the basis of which is supported and protected by legislation.

**2.2** Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions, which is beneficial not only for the individual but for PA Housing.

**2.3** Equality and diversity are not interchangeable but are interdependent. There can be no equality of opportunity if difference is not valued, harnessed and taken account of.

3. Scope

**3.1** This policy applies to customers, employees, workers and job applicants. It also applies to board members, involved residents and volunteers who represent PA Housing or its customers.

**3.2** Any external contractors, third parties or sub-contractors providing services on the basis of a specification set by PA Housing are responsible for adhering to this policy. PA Housing will monitor their performance and take all necessary steps to ensure good performance and appropriate behaviour. Any issues that arise with regards to equality or diversity will be taken very seriously and raised in the strongest possible terms where appropriate.

4. Policy Statement

**4.1** PA Housing is committed to ensuring that its employees, workers and job applicants are treated fairly in an environment

which is free from any form of discrimination with regard to the nine protected characteristics in the Equality Act which are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (includes colour, nationality and ethnic origins)
- religion and or belief
- sex
- sexual orientation.

**4.2** Employees, workers and job applicants are treated fairly in an environment which is free from any form of discrimination in relation to caring responsibilities, part-time employment, membership or non-membership of a trade union or spent convictions:

- All employment-related policies, practices and procedures are applied impartially and objectively.
- Equality of opportunity is provided for all staff, who are given the opportunity to develop and realise their full potential.
- PA Housing works towards achieving a diverse workforce at all levels.
- Employees can work in an atmosphere of dignity and respect.
- PA Housing will actively consider participation in initiatives to develop its employees, such as mentoring, apprenticeships and the Leadership 2025 programme.
- Data required by law, such as the gender pay gap, will be published and targets set and monitored to rectify imbalance.

**4.3** This policy provides a clear framework for translating our aims into action. It outlines the responsibilities of the Board, Chief Executive, Executive Team, managers and individual staff members in order to comply with the Equality Act. The Board and senior managers, PA Housing Staff Committee and the workplace representative trade unions are strongly committed to its full and active implementation.

**4.4** PA Housing will not tolerate processes, attitudes and behaviour that amount to direct discrimination, associative discrimination, discrimination by perception, indirect

discrimination including harassment by a third party, victimisation and bullying through prejudice, ignorance, thoughtlessness and stereotyping.

**4.5** PA Housing recognises the importance of monitoring, reviewing and reporting on this policy and measuring progress in meeting our policy statement.

**Ten Point Commitment:** PA Housing has chosen a simple ten point commitment to equality, diversity and inclusion that reflects the priorities for our services 2018-20. This is set out in Appendix A.

5. Practical support for a diverse workforce

**5.1** As an employer committed to equality and diversity, PA Housing recognises that its success depends on creating a working environment that supports the diverse makeup of its staff, underpinned by supportive employment policies and procedures. PA Housing will celebrate and actively promote a range of diverse cultural events.

**5.2** PA Housing is committed to helping its employees fulfil their potential at work whilst finding the right work/life balance, through its flexitime scheme and Flexible Working policy, and provides opportunities to job share where appropriate. It is also committed to supporting employees with family commitments, such as by offering family friendly initiatives, e.g. salary sacrifice scheme as a flexible way to meet childcare costs.

**5.3** All PA Housing's policies are designed to promote equal opportunity and protection against discrimination for both employees and customers.





## 6. Review and monitoring

**6.1** PA Housing undertakes monitoring to meet statutory requirements and achieve best practice. This is used to inform and improve our employment practices. If any discrimination is identified as a result, PA Housing will take corrective action to eliminate it.

**6.2** The make-up of PA Housing’s workforce and employment practices are monitored by the PA Equality and Diversity Advisory Group to ensure compliance with legislation and best practice. Statistics and analysis are provided and those relating to the workforce are shared with the PA Housing Staff Committee which includes the trade unions as members.

**6.3** Surveys are conducted regularly in order to gain the views of employees and these include a section on diversity and the working environment. The survey results are used to measure whether the aims of this policy are met.

**6.4** PA Housing will publish its progress and achievements on equality and diversity in an annual report, which will include:

- Statutory progress reports (which can be on areas of any equality schemes, plans or action plans)
- Our performance on employment practices, such as recruitment, promotion, turnover, grievances, training and development and performance management
- An analysis of diversity statistics across key protected strands.

**6.5** Reports to the Diversity and Inclusion Group will also include:

- Customer satisfaction
- Complaints
- Antisocial behaviour
- Involved customers
- Diversity analysis of the Board
- Procurement and contractors.

**6.6** Statistics will be scrutinised and compared with recognised benchmarks such as the latest census in order

to identify any areas of weakness and so that positive action can be taken when and where required.

## 7. Training

**7.1** PA Housing is committed to ensuring that its employees are trained in equality and diversity, and that managers are able to operate this policy. Specific training will be given on race, gender, gender identity, disability, sexuality, age, and religion or belief. There will also be training on key customer service issues, e.g. hate crime, recognising extremism, domestic violence and hoarding.

**7.2** Equality and diversity training forms an integral part of PA Housing’s induction programme. Managers will ensure that all new entrants are made aware of this policy and the Bullying and Harassment and Whistleblowing policies. PA Housing subscribes to an independent service that allows whistleblowing complaints to be made anonymously to the Executive and Board level.

**7.3** This policy is available on PA Housing’s intranet and website and it will be promoted to all employees. Equality and diversity will be on the agenda at each team meeting.

## 8. Discrimination – what does it mean?

**8.1** Discrimination may take seven main forms and is defined in law along with the protected characteristics associated with each provision as listed below:

**i.** Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic. This includes age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity. For example, if a manager does not select a pregnant woman for promotion because they are pregnant, even though they meet all of the competencies. This is probably direct discrimination and cannot be justified.

**ii.** Associative discrimination occurs when someone discriminates against a person because they associate them

with someone else who possesses a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example is when a manager does not give a job applicant the role, even though s/he has met all of the competencies, because the applicant has a disabled partner. This is probably associative discrimination because of disability by association.

**iii.** Discrimination by perception occurs when someone discriminates against an individual because they think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. An example is when a manager selects a person for redundancy because they incorrectly think they have a progressive condition, (i.e. that they are disabled). This is probably discrimination by perception because they believe the individual is disabled.

**iv.** Indirect discrimination occurs when a seemingly neutral provision, criterion or practice that applies to everyone places a group who share a characteristic, e.g. type of disability, at a particular disadvantage. Indirect discrimination may be justified if it can be shown that it is a proportionate means of achieving a legitimate aim. An example is when an employer decides to include a “no hats or headgear” rule in the dress code. If this rule is applied in exactly the same way to every member of staff, those who may cover their heads as part of their religion or cultural background, (e.g. Sikhs, Jews, Muslims and Rastafarians) will not be able to meet the dress code and may face disciplinary action as a result. Unless the employer can objectively justify using the rule, this will be indirect discrimination. Relevant protected characteristics include age, marriage and civil partnership, race, religion or belief, sex and sexual orientation. In addition, the Act extends protection against unjustified indirect discrimination to gender reassignment and disability.

**v.** Dual discrimination occurs when someone is treated less favourably because of a combination of two relevant protected characteristics. This means that it will be possible for an applicant to claim that they have been treated less favourably

not just because of their race but also because of their gender, e.g. an Asian woman. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

**vi.** Detriment arising from a disability due to treating a disabled person unfavourably because of something connected to their disability. This is unlawful where the employer or other person acting for the employer knows, or could reasonably be expected to know, that the person had a disability. This type of discrimination is only lawful if the action can be justified and the employer can show that is a proportionate means of achieving a legitimate aim. An example is an employer imposing a “no beards” rule. If the employee is a disabled person with a skin condition which makes shaving painful, they will have been treated unfavourably, if threatened with disciplinary action, because of something arising from their disability (their inability to shave). Unless the employer can objectively justify the requirement, this may be a detriment arising from a disability. It may also be a failure to make a reasonable adjustment.

**vii.** Victimisation occurs when an employee is treated unfavourably, or is disadvantaged or subjected to a detriment because they have made or supported a complaint of discrimination or raised a grievance under the Equality Act, this policy, or the Bullying and Harassment policy, or because they are suspected of doing so. (An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint). E.g. when an employee requests to work flexibly and their manager refuses their request because the employee supported a colleague in a complaint of discrimination.

**viii.** Third party harassment occurs when an employee is harassed by someone who does not work for PA Housing, such as a customer, visitor, client, contractor or someone from another organisation. The employer will become legally responsible if they know an employee has been harassed on two or more occasions, even by different individuals each time, and fails to take reasonable steps to protect the employee from further harassment.

9. Complaints of discrimination

9.1 PA Housing takes all claims of discrimination very seriously and will take appropriate action against those concerned. This covers all behaviour, including remarks and insinuation, verbal and non-verbal, which causes offence.

9.2 Any employee who is subject to bullying, harassment or discrimination should refer to the Bullying and Harassment policy. This shows the steps that can be taken. Employees can obtain external confidential help through HR, and there is an independent whistleblowing service called “In Touch” that protects the identity of the whistleblower.

9.3 If a worker (engaged through an employment agency) considers they have been discriminated against they should raise their complaint with their employer.

10. People strategy and corporate social responsibility

10.1 PA Housing aims to be an employer of choice and through its People strategy aims to ensure its workforce is able to make a valuable contribution to its objectives, whilst ensuring that their health and wellbeing is supported.

10.2 PA Housing is also committed to its corporate social responsibility and seeks to have a positive impact within local communities. Our aim is to improve the quality of life for our customers and the wider local community in the areas where we work.

10.3 Where appropriate, PA Housing actively encourages its employees to participate in local voluntary initiatives and provides support to encourage social inclusion. This may involve participation in local tidy-ups, financial literacy schemes or acting as mentors to local school children, as well as other volunteering opportunities.

11. Who is responsible?

11.1 All employees have a responsibility to guard against any form of discrimination and avoid action which goes against the

spirit of this policy. Employees at all levels must ensure that there is no discrimination in their decisions or behaviour.

They must:

- report any suspected discriminatory acts or practices
- not induce, or attempt to induce, others to practice unlawful discrimination
- co-operate with any measures introduced to ensure equality of opportunity
- not victimise anyone who has complained about, reported or provided evidence of discrimination
- not harass, abuse or intimidate others.

11.2 Customers that breach a term of their tenancy agreement in relation to equality and diversity will have appropriate action taken against them in line with our policies.

11.3 There are specific responsibilities within this policy as follows:

The Board, Chief Executive and the Executive Team are responsible for:

- Providing leadership on this policy and acting as overall champions to ensure that it is implemented;
- Communicating the policy, internally and externally.

Managers at all levels are responsible for:

- Implementing the policy as part of their day to day line management and applying employment policies and practices in a fair and equitable way
- Ensuring equality and diversity issues are addressed in performance management
- Ensuring all employees act in accordance with this policy, providing necessary support and direction;
- Effectively managing and dealing promptly when investigating issues relating to potential discrimination, including complaints from customers
- Ensuring all policy or service decisions that will change provisions and practices and affect the workforce are assessed as being compliant with this policy.

Each employee is responsible for:

- implementing the policy in their day-to-day work and dealings with other employees and customers
- ensuring their behaviour is appropriate to this policy and that they treat people with respect and dignity
- not discriminating against customers or other employees
- notifying their line manager of any concerns with regard to the conduct of other employees, customers, the public, contractors or third parties.

11.4 PA Housing will not tolerate any behaviour from its employees which breaches this policy. Any such breaches will be regarded as misconduct. Serious offences such as discrimination on protected grounds, including bullying, harassment or victimisation will be treated as gross misconduct. Disciplinary action may include dismissal without notice.

12. Promotion of equality, diversity and inclusion

12.1 PA Housing is committed to making effective use of the data it collects from employees and customers to identify gaps or trends and tailor its services where possible to advance equality of opportunity.

12.2 PA Housing will continue to make use of provisions within the Equality Act to adopt positive action in ensuring board members, employees and customers (to some degree), reflect as far as is reasonable, the diversity demographics of the geographical areas where it works.

12.3 The Equality Act allows for ‘more favourable treatment’ in respect of disabled employees and customers and PA Housing will make use of these provisions when required. PA Housing will continue to sign up to the ‘Disability Confident’ scheme.

12.4 Mindful of the GDPR Data Protection requirement only to collect information that is necessary, up to date and with a clear reason for collecting it, PA Housing has carefully considered what data it will gather. Knowing that members of the LGBTQ+ community can be subjected to discrimination, PA Housing will collect gender, transgender status and sexual

orientation data in order to support its stance against hate crime in any form.

12.5 PA Housing prides itself in being a gay friendly organisation. It will continue to promote equality within the LGBTQ+ employee and customer communities in learning and development, newsletter articles, support of regional LGBTQ+ activities such as taking part in Pride events and applying a zero tolerance towards homophobic bullying, harassment or discrimination. This is in addition to its stance on tackling homophobic hate incidents and hate crime. PA Housing recognises the “rainbow flag” as a powerful emblem within the LGBTQ+ community and beyond, and will endeavour to display it in its reception areas and on the website and promote it in publicity and communication materials.

12.6 PA Housing is also proud of its roots as a BME specialist housing provider and the policy statement at Appendix B entitled “PA Housing - a modern BME housing specialist” sets out how its heritage as a BME organisation is relevant today.

13. Foster good relations

13.1 PA Housing is committed to working with voluntary and community support groups in a variety of diverse communities within the areas it operates. With continuing cuts in statutory services associated with housing management, such as social services and community mental health teams, fostering relations with community groups and the “third sector” has never been more relevant and necessary.



APPENDIX A

PA Housing’s commitment to Equality, Diversity and Inclusion

We will focus on the following ten aims:

- 1. To have a more representative board and workforce, reflecting the diverse makeup of the areas in which we operate, and employment policies enabling employees to fulfill their potential at work.
- 2. To continue to encourage everyone to challenge stereotyping and discriminatory practices within our offices and outside.
- 3. Employees are to continue to receive the latest best practice and training on equality, diversity and inclusion.
- 4. Our procurement practices will ensure contractors and suppliers demonstrate through monitoring and action a genuine culture of inclusion and equality of opportunity.
- 5. A zero tolerance approach towards hate incidents and hate crime.
- 6. To improve our performance in ensuring customer-facing policies and procedures are subject to effective equality analysis.
- 7. Victims and survivors of domestic abuse and serious antisocial behaviour are to be supported and signposted to the most appropriate agencies.
- 8. Customers representing the widest range of protected characteristics are encouraged to become involved in shaping services.
- 9. We will increase awareness of diversity-related safeguarding issues including extremism and radicalisation, child grooming, child sex exploitation and modern day slavery.
- 10. We will develop working relations with more “third sector” agencies representing and supporting diverse communities and groups.



APPENDIX B

PA Housing – a modern housing provider with BME housing specialist services

Asra Housing Association (one of the founding organisations of PA Housing) originated as a Black and Minority Ethnic (BME) housing provider in 1984 and its initial remit was to provide homes and services for Asian older people. We are proud of this heritage. Today PA Housing is a prominent provider of housing services to multi-cultural communities. PA Housing contains the former Asra Greater London HA, Asra Midlands HA and Black Roof HA – these were at the forefront of the BME housing agenda in the 1980s and 1990s. PA Housing has been the managing agent of two independent BME Housing Co-ops in Leicester for the last 25 years and it is the largest specialist provider in the UK of housing services to older Asian people.

The Asra name derives from the Hindi word “Asara” – meaning shelter. In the 1980s when most BME housing associations were formed, racism in society was an acute concern to BME communities in the UK. The role of BME housing associations was to act in the interests of these communities and to challenge the discrimination and disadvantage that they faced.

Racism is still a major social issue, but equalities legislation has now been embedded and discriminatory practice and racism is not as overt as it was when BME housing associations were first formed. Consequently the role of BME housing associations, and of PA Housing, has moved on. To most young BME people today, the thought of living in specialist accommodation would not be attractive, but to older Asian people the possibility of living in specialist accommodation with no language barriers and neighbours who share the same cultural identity, is very attractive and will continue to be for some years to come.

So what does PA Housing’s vision for BME housing services look like today?

• **More about skills than a campaigning cause.** In the past PA Housing was at the forefront of campaigning against discrimination and racism and we are proud to have made a

difference. Today PA Housing prides itself on having a core competence in the provision of culturally sensitive services to older Asian people. This means that we will observe cultural requirements and be mindful of the expectations of BME communities and respectful and courteous in meeting these when engaging with BME customers. More specifically we guarantee to:

- Speak to an Asian customer in their own language if they request this either directly through a member of the PA Housing team or an interpretation service
- Ensure that communications can be translated into different languages
- Observe cultural requirements when carrying out adaptations for customers
- Offer Friday afternoon appointments for repairs to avoid disruption to customers’ worship practices
- Train staff and contractors on cultural sensitivity standards in service provision
- Maintain a list of staff who can communicate in diverse languages including sign.

• **Less about specialist housing and more about strong diverse communities.** In the past PA Housing developed a lot of specialist accommodation for Asian elders and this accommodation still provides a useful role in society. We will continue to invest in our existing accommodation for years to come, but rather than building new schemes, we will bring our core competency of providing culturally sensitive services to diverse residential environments. For instance this has been achieved with great success at The Wolsey and Abbey Mills in Leicester and we will build on this approach in the future and play our part in delivering community cohesion.

• **Equalities and diversity will be among our top priorities.** PA Housing will do much more than comply with legislation and will strive to be a pace-setter for high standards in demonstrating equality and diversity in the housing sector.

• **Partnering on BME issues.** Where we can, PA Housing will partner other organisations with a BME agenda to help them achieve their objectives. E.g. over recent years we have assisted Apna Ghar HA (who champion the needs of disabled

BME people) to develop new homes. PA Housing is also a member of Housing Diversity Networks and BME National.

Our role has changed slightly over the years but we are as committed today as we ever were about challenging racism, discrimination and trying to make a difference in tackling disadvantage in society. We are proud that part of our origins was as a BME housing association and that PA Housing reflects the diverse communities that it serves.