





# *Our* Equity, Equality, Diversity and Inclusion Policy 2025



 **PA Housing**  
Case House,  
85-89 High Street, Walton-on-Thames  
Surrey KT12 1DZ

 [hello@pahousing.co.uk](mailto:hello@pahousing.co.uk)  
 [www.pahousing.co.uk](http://www.pahousing.co.uk)  
 0300 123 2221

 @pa\_housing  
 pahousing  
 @PAHousingUK



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Owning manager: **Sally-Anne Underhill & Emma Macnish**

Department: **Customer Services & People**

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# 1. Foreword from **Suki Kalirai** and **Michael McDonagh**

Whether you're a resident, a colleague, or one of our stakeholders, we're all people and we're in this together to make your homes and communities the best that they can be.

At PA Housing, we are dedicated to treating everyone with fairness, respect, and equity. Our Equity, Equality, Diversity, and Inclusion Policy demonstrates our commitment to creating a welcoming environment where differences are celebrated, and we will actively challenge, and take

action where we see examples of poor behaviour from others.

We believe in providing equal opportunities for all, whether they are our colleagues, or our residents and we strive to make sure that our workforce reflects the diverse communities we serve, thereby promoting a sense of belonging, mutual respect, and equity.

We recognise that our residents are at the heart of our neighbourhoods, and their diverse backgrounds and experiences enrich our identity; so, we're committed to ensuring that our practices and policies not only meet their needs but also contribute to an environment where everyone feels valued, respected, and treated equitably.

This policy guides our efforts to prevent discrimination, promote diversity, and cultivate an inclusive workplace for everyone.

*Mike*  
**Michael McDonagh**  
Chief Executive

*Suki*  
**Suki Kalirai**  
Board Chair



## 2. Background

PA Housing has responsibilities under legislation, regulation and codes of governance including, but not limited to:

- the Equality Act 2010 (incorporating the Public Sector Equality Duty).
- the Human Rights Act 1998.
- the National Housing Federation - Code of Governance 2020; and
- those Standards and Regulations set by the

Regulator of Social Housing, • Any relevant amendments to such legislation or further codes/ frameworks of practice.

PA Housing must have regard to the Public Sector Equality Duty and ensuring compliance with Section 149 of the Equality Act, 2010 and the need to:

- End unlawful discrimination, harassment and victimisation and other conduct prohibited

by the Equality Act 2010.

- Advance Equality of opportunity between people who share a protected characteristic and those who do not.
- Nurture good relations between people who share a protected characteristic and those who do not.

## 3. Scope

This policy applies to residents, employees, volunteers, job applicants and board members. Any external contractors, third parties or subcontractors providing services based on a specification set by PA Housing are responsible for adhering to this policy.

We will monitor their performance to ensure the culture/ethos of PA Housing is being represented and take all necessary steps to ensure performance and appropriate behaviour. Any issues that arise with regards to equality or diversity will be taken seriously and raised in the strongest possible terms where appropriate. The new EEDI lead will be responsible for this.







## 4. Defining equity, equality, diversity, and inclusion

At PA Housing, while equity, equality, diversity, and inclusion are often intertwined, it's important to recognise their distinct meanings.

The following definitions used in this policy align with the definitions outlined in the Equality Act 2010:

### Equity

Recognising that each individual has different circumstances and allocating the exact resources and opportunities needed to reach an equal outcome. The is mean addressing barriers and providing tailored support to ensure fair treatment and opportunities for all, particularly those from marginalised groups.

### Equality

The definition of Equality used in this policy is that of equality of

opportunity. This entails providing fair and impartial treatment, addressing systemic inequalities to ensure equal opportunities for all individuals with those identified protected characteristics established in legislation.

### Diversity

This encompasses the presence of individuals with a broad spectrum of characteristics, both visible and invisible, acquired or inherent, extending beyond the boundaries of legally established protected characteristics.

### Inclusion

This concept takes diversity further, valuing individuals' differences and leveraging them to adopt an environment where everyone can thrive. In an inclusive workplace,

every person feels a sense of belonging, free from the need to conform, knowing that their contributions are valued, and they can perform at their best, regardless of their background, identity, or circumstances. Such an environment is underpinned by fair policies and practices, enabling effective collaboration among a diverse array of individuals. Ensuring that all individuals have the necessary resources, skills, and opportunities to access and effectively use digital technologies is crucial. This includes providing support for those who may face barriers due to socio-economic status, disability, age, or other factors.





## 5. Duties under the Equality Act 2010

We are committed to meeting our obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. The Equality Act 2010 protects people with 'protected characteristics' from unlawful discrimination, harassment, and victimisation (as defined in the Equality Act 2010).

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion/ belief
- Sex
- Sexual orientation

## 6. Duties under the Public Sector Equality Duty

We are mindful of our duties under the Public Sector Equality Duty (Section 149 of the Equality Act 2010), as far as it applies to our organisation as a Registered Provider of Social Housing. Therefore, we continue to have regard for the need to achieve the objectives set out under Section 149 of the Equality Act 2010 to:

a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Equality Act 2010.

b) Advance Equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with a focus on promoting equity and ensuring a fair treatment to all.

## 7. Other duties

In accordance with the Equality Act 2010, PA Housing acknowledges the broader spectrum of diversity and the associated risks of discrimination that extend beyond the outlined protected characteristics. Recognising our moral obligation as an employer, landlord, and provider of services, we are dedicated to combating discrimination in all its forms. Our commitment extends to promoting diversity comprehensively and confronting discrimination rooted in various social and cultural attributes.

We include the following in our thinking:

- Socio-economic background
- Social class
- Physical appearance
- Linguistic diversity
- Regional accents
- Digital inclusion
- Educational background
- Neuro-diverse learning styles
- Political beliefs
- Caring responsibilities
- Mental health
- Any other factor contributing to unjust treatment of individuals.



## 8. Accountability and reporting

We will publish information annually about work we've done to deliver on our EEDI commitments and objectives, and the progress we have made. Statistics such as demographic (i.e. age, gender, ethnicity), recruitment, promotion, retention, pay gap and employee survey and customer satisfaction data, will be scrutinised and compared with recognised benchmarks such as the latest census to identify any areas of weakness and so that positive action such as training programmes or procedure changes can be taken when and where required.

This information will include:

- Statutory progress reports – these will be publications available on our website
- 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.
- Analysis of equity measures taken to address barriers and ensure fair treatment and opportunity for all individuals particularly from marginalised groups.

Reports to the EEDI Advocates Group who are responsible for overseeing the implementation of changes based on these reports, will also include:

- Customer satisfaction
- Complaints
- Antisocial behaviour
- Involved residents
- Diversity analysis of PA Housing Board
- Procurement and contractors.



## 9. Review and monitoring

We undertake 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, we'll take corrective action to eliminate it.

The make-up of our workforce and employment practices are monitored by our Equity, Equality, Diversity, and Inclusion Advocates Group to ensure compliance with legislation and best practice. Our statistics and analysis are provided and those relating to the workforce are shared with our Colleague Committee which includes the trade unions as members. Additionally, this data is disseminated to key stakeholders and relevant PA Committees to give transparency, facilitate informed decision-making, and promote collaborative efforts

towards achieving our diversity and inclusion goals.

Surveys are conducted regularly 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.

We also benchmark and participate in the National Housing Federation Diversity data tool. This tool, designed and developed by the National Housing Federation, enables housing associations to compare workforces to the communities they serve, based on population in stock location. It looks at all nine protected characteristics as well as caring responsibilities and socio-economic background.



## 10. The Board's role

Our Board is committed to taking a clear and active lead in its commitment to achieving equity, equality of opportunity, diversity, and inclusion. This is in all the activities of our organisation, including understanding the needs of our residents and communities, as well as the composition of the Board and Committees.

We have a clear commitment from the Board to ensure equity, equality, diversity, and inclusion are embedded throughout the organisation. The Board has established effective leadership and has implemented robust governance arrangements to support the organisation in meeting its equity, equality, diversity, and inclusion objectives and commitments.

The Board is also responsible for overseeing the organisation's compliance with all legal and

regulatory requirements. It will seek regular updates on how PA Housing is meeting its commitments and objectives in relation to equity, equality, diversity, and inclusion. Also, how these are being delivered in practice and at least once every 12 months will review the continuing relevance and appropriateness of the commitments and objectives set by the organisation. The Board's review will be supported and informed, in part, by the review and monitoring data and information collected by the organisation as set out in Section 9, above.

People with direct lived experience of (or insight into) the communities we serve should also be meaningfully engaged in our governance structures.

Effective Board leadership behaviours at PA Housing

concerning equity, equality, diversity, and inclusion include:

1. Committing to diversity: Demonstrate a clear commitment to embracing diversity in all aspects of operations.
2. Championing inclusion: Actively promoting an inclusive environment where all individuals feel valued and respected.
3. Setting clear expectations: Establishing clear expectations for equity, equality, diversity, and inclusion within the organisation's culture and policies.
4. Prioritising education and training initiatives to raise awareness and understanding of equity, equality, diversity, and inclusion issues among Board Members and colleagues.
5. Dialogue: Encouraging open and honest dialogue about equity, equality, diversity, and inclusion matters within the Board and throughout the organisation.
6. Holding accountable: Holding individuals and departments accountable for upholding equity, equality, diversity, and inclusion principles in their decision-making processes and actions.
7. Monitoring progress: Regularly monitoring and assessing progress towards equity, equality, diversity, and inclusion goals, and adjusting strategies as needed.
8. Leading by example: Leading by example through demonstrating inclusive behaviours and ensuring equitable practices are consistently applied across all levels of the organisation.







## 11. Colleagues

All our colleagues have a responsibility to guard against any form of discrimination and avoid actions which go against the spirit of this policy. Colleagues 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.
- cooperate 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.

All colleagues and job applicants will be treated in an equal

and fair manner, free from any forms of unlawful discrimination, harassment, bullying or victimisation regarding the protected characteristics set out in the Equality Act 2010 as well as Membership or non-Membership of a trade union, spent convictions, any caring responsibilities or part-time employment. We will also make reasonable adjustments where necessary to overcome any disadvantages due to disabilities.

All workforce-related codes of conduct, policies, practices, and procedures reflect our values and commitments to equity, equality, diversity, and inclusion and our aims to recruit and retain a diverse and inclusive workforce reflecting the communities we serve. We shall also consult colleagues diversity networks when making changes to workforce-related codes of conduct, policies, practices, and procedures where appropriate.

Ensure that equity is considered in all decision-making processes, providing tailored support and resources to address individual needs and promote fair treatment and opportunity for all colleagues.

We will not tolerate any forms of unlawful discrimination, harassment, victimisation, or bullying.

All employees, Board Members, and Committee Members of PA Housing are expected to pay due regard to this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing PA Housing. All our employees have a responsibility to champion the principles of equity, equality, diversity, and inclusion.

Acts of discrimination or harassment by employees or Board Members or Committee

Members of PA Housing will result in disciplinary action, in line with the Disciplinary Policy and Procedure. Failure to comply with this policy will be treated in a similar fashion.

Any external contractors, sub-contractors, agents or third parties providing services to, for or on behalf of PA Housing are responsible for complying with this policy and we shall act against any actions or behaviours of non-compliance as appropriate.



## 12. Board and committee recruitment

We are committed to ensuring that our committee(s) and Board's composition comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities that we serve. Our Appointments and Renewal Policy and Board succession planning also reflect our commitment to achieving a diverse and inclusive Board.



## 13. Training

We're dedicated to ensuring that all colleagues and Members undergo suitable training in equity, equality, diversity, and inclusion on a consistent basis, with full awareness of this policy. Equity, equality, diversity, and inclusion training are integrated into our induction program for all new starters, ensuring that all new colleagues and Members are acquainted with this policy from the outset. Additionally, regular refresher sessions on equity, equality, diversity, and inclusion will be provided to all colleagues.

We're committed to equipping our workforce with the necessary training in equality and diversity, ensuring that managers are proficient in implementing this policy. Training will cover

various aspects including race, gender, gender identity, disability, sexuality, age, religion, or belief. Moreover, specialised training will be offered on crucial customer service issues such as hate crime awareness, recognising extremism, addressing domestic abuse, and managing hoarding situations.

Equity, equality, diversity, and inclusion training are fundamental components of our induction program. Managers will ensure that all new recruits are briefed on this policy, as well as the Bullying and Harassment and Whistleblowing policies. We subscribes to an independent service facilitating anonymous whistleblowing complaints to the Executive and Board level.

This policy is accessible on PA Housing's intranet and website and will be actively promoted to all employees. equity, equality, diversity, and inclusion will consistently feature on the agenda of each team meeting.

We're also committed to providing unconscious bias training, alongside other learning approaches or training methods utilised by our organisation, to all colleagues and Members, including those involved in housing services provision to our residents, as well as those engaged in management and recruitment decisions.





## 14. Commitments to our residents

### Meeting housing need

To ensure equality of opportunities when meeting housing needs, we will implement the following:

- Schedule meetings with third party agencies to discuss the housing needs of our neighbourhoods. We will share data and insights about the specific needs of any groups facing discrimination.
- Collaborate with social workers, community leaders, and other experts who have a deep understanding of the needs of disadvantaged and marginalised groups in our neighbourhoods. This could involve joint workshops, training sessions, or projects aimed at addressing housing needs.
- When planning new housing developments, consult local communities and stakeholders

through surveys or community meetings to understand the needs of diverse communities. This could include considerations for family size, cultural practices, accessibility needs, etc. The feedback received should influence the design process, and this can be demonstrated in design documents and planning permissions.

- Ensure that new homes are built in accordance with accessibility standards, such as the guidelines provided by the local government or disability rights organisations.

### Access to housing

We will ensure equal opportunities and fair access to housing by implementing the following measures:

- A fair allocation process and maintaining of the

records of all applications and the decision-making process. This will include scoring systems, any notes on decisions, and any other relevant documentation. We'll ensure that these are regularly reviewed to ensure fairness and transparency.

- Ensure that housing needs assessments and allocation processes consider equity, providing tailored support and resources to address the specific needs of marginalised and disadvantaged groups, ensuring fair access and opportunities for all residents.
- Have accessible information by creating a user-friendly website with all necessary information. Where possible, offer printed material and provide the resources available to our customer services front line teams to enable them to answer queries first hand. Where possible,

ensure that information is available in other languages.

- Organise regular opportunities for engagement in our neighbourhoods where residents can voice their concerns and needs. Wider collaboration with the communities in where our neighbourhoods sit to better understand the needs of different cultural groups.
- Ensure that our policies encompass a clear anti-discrimination stance and make it easily accessible to all colleagues and residents. Take immediate action on any reports of discrimination and provide a safe and confidential process for reporting such incidents.
- Conduct regular training sessions for colleagues on equality and diversity issues. This will be in varying formats but could include workshops, seminars, or e-learning



- Implement a robust system for monitoring and evaluating how our homes are allocated. Involve regular audits, resident surveys, and data analysis to identify any patterns of inequality. Making necessary adjustments to policies and procedures based on the findings.

#### Our services

We'll ensure equal opportunities, address discrimination, and promote fair access to our services through the following actions:

- Regularly monitor and assess interactions between colleagues and residents to ensure that all residents and colleagues are treated with fairness and respect.
- Provide regular training sessions for colleagues on equity, equality, diversity,

and inclusion. Ensuring that we document these training sessions and keep a record of those colleagues in attendance. We'll also consider where necessary bringing in external experts to ensure unconscious bias training.

- Ask our involved resident groups to discuss their views on our equity, equality, diversity, and inclusion commitments.
- Further promote resident involvement in our decision-making processes. Showing examples of where these have been a success through our Resident Assembly and Board.
- Ensure that digital access is considered in housing needs assessment, and allocation processes providing necessary resources, training and support to address the specific needs of marginalised and disadvantaged groups, ensuring fair access and opportunities for all residents.

- Ensure all of our policies and procedures are easily accessible and understandable, providing these in other languages and formats where possible.
- Uphold our zero-tolerance policy against resident and colleague harassment as set out in Our People Promise.
- Ensure all forms of information and communication are accessible to residents, providing information in large text, audio tapes, or through translation or interpretation services where possible.
- Ensure that the services we provide and those of our contractors consider the sensitivities and needs of different groups. This will involve conducting regular assessments of our residents' needs and adjusting services accordingly.

## 15. Projects and Initiatives/ Partnerships etc.

We're committed to working with voluntary and community support groups in a variety of diverse communities within the areas we operates. We are members of the Housing Diversity Network and there is an opportunity to make further use of the various benefits that provides.

If you have any questions about this policy, please contact.



**Sally-Anne Underhill**


Director of Neighbourhoods & Customer Services  
sally-anne.underhill@pahousing.co.uk



**Emma Macnish**

Director of People  
emma.machnish@pahousing.co.uk

 @pa\_housing

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 @PAHousingUK