



PRIMA
GROUP

**Equality, Diversity
and Inclusion Policy**

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Equality, Diversity and Inclusion Policy

1 Aim of the Policy

Prima Group is committed to promoting equality, diversity and inclusivity in all our activities. We recognise the importance of valuing diversity and eliminating discrimination in our organisation and understand how this will make us a stronger, more resilient, and more effective business as well as creating homes and places where people are respected and their uniqueness is valued

Prima is made up of brilliant people – our colleagues and those living in our homes. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all, as well as enabling us to deliver better services to all our customers.

To support this inclusive culture, this policy:

- Outlines our commitment to equality, diversity and inclusion and sets out how we put this commitment into practice for colleagues;
- Explains the behaviours we expect of our people in support of this commitment;
- Sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion strategy and how we ensure equality of opportunity for colleagues, and;
- Sets out how we will ensure customers benefit from our culture of promoting and delivering on equality, diversity and inclusion so their diverse needs are met.

2 Who does this Policy apply to?

This policy applies to anyone working for and with Prima. This includes employees, workers, contractors, volunteers and apprentices. The policy also relates to job applicants, and is relevant to all stages of the employment relationship.

The impact of this policy will reach across our colleagues, customers partners, contractors and other stakeholders.

3 Policy Statement

What is EDI?

- **Equality** – to ensure all people are treated fairly; where everyone can participate and has equal access to our services, employment and training opportunities.

- **Diversity** – to value difference, considering and appreciating all the unique characteristics that make people who they are. By valuing diversity we will have a greater chance to meet the needs of all employees, tenants, partners and all others we have contact with; regardless of background.
- **Inclusion** – to create and maintain a culture where we welcome and value people for who they are as individuals or as a group, for of all tenants, customers, stakeholders and employees. The term employees applies to all employees whether permanent, temporary, full-time or part time

EDI are tangible things and they are critical to our success, they are outcomes and they are measurable. Working on all three will deliver greater impact and change, and we can track these as our work continues on our EDI journey.

To maximise the impact we have we must ensure we focus on the multiple diversity characteristics. It is unlawful to discriminate directly or indirectly in recruitment or employment or delivery of services because of the following ‘protected characteristics’;

- Disability;
- Gender, gender identity or gender reassignment status;
- Marital status;
- Race, racial group, ethnic or national origin, or nationality;
- Religion or belief;
- Sexual orientation;
- Age;
- Civil partnership status;
- Pregnancy or maternity;

Employees should not discriminate against or harass a member of the public in the provision of services, goods or facilities. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

Prima believes that a culture of equality, diversity and inclusion not only benefits the organisation which is reflective of the people we serve, but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

4 Commitment to Our Colleagues

Prima is committed to;

- Promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.
- Ensuring that our recruitment, promotion and retention procedures do not treat people less favourably based on any protected characteristic.
- All those involved in recruitment have attended appropriate Equality, Diversity and Inclusion training and Unconscious Bias training.
- Complying with all legal and regulatory requirements including the Equality Act 2010, the three aims of the Public Sector Equality Duty, Human Rights Legislation and the Regulator of Social Housing's regulatory framework, and any amended or subsequent legislation.
- Adopting this policy in relation to all protected characteristics.
- Taking all reasonable steps to ensure our partners, suppliers and people connected to the Group demonstrate commitment to this Policy or indeed have their own Equality, Diversity and Inclusion (EDI) Policy.
- Promoting equality of opportunity, celebrating and valuing diversity, eliminating unlawful discrimination, harassment and victimisation, and promoting good relations.
- Achieving equality for all by reducing discrimination in employment and service delivery on the grounds of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership.
- Strive to treat people fairly be they employees, Board Members, customers, contractors, purchasers, volunteers and partners.
- Recruit and retain a diverse workforce, governance structures and volunteer base using recruitment and selection procedures that are equitable and fair as well as broadly representative of the diverse communities served.
- Providing a working environment where harassment, bullying and offensive behaviour are unacceptable and where individuals are able to bring complaints without fearing prejudice.
- Seek to make reasonable adjustments to the working environment where appropriate.
- Paying at least the National Minimum Wage and National Living Wage Rates.
- Seek to capture any equality issues when undertaking exit surveys for employees.
- Striving to create a workplace that is free from discrimination and where the employees, Board and tenant groups are appropriately trained in diversity issues.
- Providing an Employee Assistance Programme and Health Benefit Service for all employees. Providing a fully trained Mental Health Action Team (MHAT).
- Making reasonable adjustments for employees with known disabilities in order to help them carry out their role safely, and to the best of their ability.

5 Commitment to Our Customers

Prima will commit to;

- Understand and respond to the diverse housing needs in the areas in which we operate.
- Monitor the delivery of lettings to understand how they reflect the make-up of the communities in which we work.
- Provide suitable housing solutions for tenants with a disability/ mobility need.
- Ensure that information is available in a variety of formats and languages to suit the needs of our customers and provide translation services where applicable (including British Sign Language).
- Ensuring the accessibility software on the Website allows a range of changes to how information is displayed for tenants, including for sight impairment, literacy and translation into over 40 languages
- Providing an easy read tenancy agreement for people with learning disabilities.
- Gather a range of equality information, to inform our policies, decisions and work.

Undertake Equality Impact Assessments to accompany all new and reviewed Policies.

- Co-operate with relevant organisations' that provide an adaptation service that meets tenants' needs within allocated budgets and policies.
- Capture and identify through the Housing Management System all those people with additional support needs and provide or procure for those people the advice and support they need, through partner agencies or where appropriate assist them to sustain their tenancies.
- Actively encourage all tenants to be involved in the review of Group services by offering reasonable adjustments and support (such as childcare support) to tenants where appropriate.
- Provide a range of contact methods for tenants and promote inclusion and community cohesion within the communities we serve.
- Monitor and respond appropriately to incidents of Hate Crime and Domestic Violence.
- Monitor our performance on equality and diversity and report progress to the Board.
- Take appropriate action against any perpetrator under the appropriate policy and offer advice and support to victims and witnesses.
- Gather a range of equality information, to inform our policies, decisions and work.
- Monitor our performance on equality and diversity and report progress to the Board.
- Involve and consult with others including employees, Board members, potential customers, Tenant Panels and other Housing Associations to assess the effectiveness of this policy.
- Collaborate with or other housing associations to ensure the most up to date information is provided to tenants (Hoarding, Tenant Panels)

- Provide an Income and Support Hub through the Prima Website providing a wealth of information and services to tenants from energy to income management.
- Undertake Tenant Profiling exercises sign up and update intermittently .
- Provide adequate disabled services at sheltered schemes such as purpose built scooter storage units and opportunity for telecare services.

6 Employee Commitment

Prima would expect you, and all colleagues, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded.

Prima would expect you to treat your colleagues and everyone you come across (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under the Disciplinary Procedure.

You should be aware that you can be personally liable for discrimination and harassment.

7 Talking About Disability

Prima understands that some people find it hard to discuss their disabilities and that some disability can be invisible. This can be both as an employee or as a customer.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

Prima does not tolerate negative, inappropriate or offensive language within the organisation. Training on Equality, Diversity and Inclusion including disability will be provided to all employees. Budgets will be made available to enable reasonable adjustments to be made, to enable inclusion of those with a disability.

8 Making sure we do what we say

This policy will be reviewed as and when needed but as a minimum of every 2 years.

The Group will provide training to all existing and new employees to help them understand what they can do to help create an inclusive working environment that offers dignity and respect to all, values differences and is free of bullying and harassment. The Group provides additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

Prima provides annual equality, diversity and inclusion training which is mandatory for all employees and Board Members.

Prima provides annual Unconscious Bias training to the Extended Leadership Team which is mandatory.

All new starters to the Group will undertake EDI training as part of their induction programme.

Prima fully expects all employees to proactively support our equality, diversity and inclusion initiatives by attending any event or workshop to educate themselves on the challenges faced by others and how to help alleviate these in the workplace and for challenges faced by our customers with protected characteristics

Prima will report annually on how we meet the HDN baseline measures for EDI.

9 Other things to bear in mind

9.1 Prima policies and procedures

EDI is a cross cutting theme and therefore will be included in all Prima Policies accessible via the Information site on SharePoint. However, this policy should specifically be read together with:

- Prima Group Grievance Procedure
- Prima Group Anti Bullying and Harassment Policy & Procedure

- Prima Group Employee Handbook
- Prima Group Disciplinary Procedure
- Prima Group Recruitment and Selection Policy
- Customer Standards

9.2 Legislation and Guidance

A number of pieces of legislation and guidance have informed this policy including:

- Equality Act 2010
- RSH Consumer Standards

10 Consultation

This policy has been consulted on with the EDI Task and Finish Group, Executive Team, Head of HR and Group Services in April 2023.

11 Equality Impact Assessment

Prima welcomes feedback on this policy and the way it operates. This policy is part of our recognition of structural inequalities that exist in the workplace and wider society and sets out how we are committed to achieving equality, diversity and inclusion for our colleagues and customers. We are interested to know of any possible or actual adverse impact that this policy may have on any groups in respect of gender or marital status, race, disability, sexual orientation, religion or belief, age or other characteristics.

The policy has been screened to determine equality relevance for the following equality groups: gender or marital status, race, disability, maternity or pregnancy, sex, sexual orientation, religion or belief, age or other characteristics.

12 Data Protection

A number of our policies include the requirement that we collect and handle personal information. All handling of personal data will be conducted under the Group's Data Protection Policy ensuring compliance with the Data Protection Act 2018. Knowing demographic data and the protected characteristics of colleagues and customers will help us understand our baseline data on equality and diversity and enable us to understand the impact of our plans and activities as we can use this data to look at trends and report progress.

Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR (General Data Protection Regulation) requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the Information Commissioner

within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.

13 Document Control Data

Version:	V22023
Review Date:	11.04.2023
Name of Reviewer:	Lou Colton - Head of HR and Group Services
Owner of the policy:	Director of Insight and Group Services
Change Log:	<p>Policy has been moved to the new template.</p> <p>Legislation has been included around EDI.</p> <p>The Policy has been updated and expanded to provide a clearer expectation of Prima's commitment to EDI as well as that which is expected of its employees.</p> <p>Training has been included and an Appendix around definitions for Bullying, Harassment, Victimisation and Discrimination.</p>
Date approved by EMT:	14/08/2023
Date to Customer Voice Board:	N/A
Date approved by Committee:	PAG - 20/09/2023
Date approved by Group Board:	20/09/2023
Date of Equality Impact Assessment:	10/10/2023
Date due for next review:	April 2025

Appendix A – Definitions

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics (mentioned in the above Policy).

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments".

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage.

Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- Using different standards for different groups of employees to judge performance.

Different types of discrimination under the Equality Act 2010

Direct discrimination: Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).

Indirect discrimination: Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm.

It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.

Associative discrimination: Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.

Discrimination by perception: Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

Discrimination arising from disability: Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:

- Dismissing or failing to pay a bonus to someone because of their disability-related absence; or
- Disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.

Failing to make reasonable adjustments: Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:

- Allocating some of the disabled person's duties to a colleague;
- Changing their working hours or place of work;
- Adjusting procedures for assessing job candidates; and
- Modifying disciplinary and grievance procedures.

Bullying

Whilst there is not legal definition of bullying, Prima regards this as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

For details on how to report bullying please refer to Prima's Anti Bullying and Harassment Policy on [Prima Perspectives](#).

Harassment and Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- Violating someone else's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

For details on how to report harassment please refer to Prima's Anti Bullying and Harassment Policy on Prima Perspectives.

Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

Disability

The Equality Act 2010 defines a disability as a 'physical or mental impairment' that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities'

Someone has an 'impairment' if any of their physical or mental abilities are reduced in some way. It could be because of an illness or medical condition but it does not have to be.

A 'substantial adverse effect' means more than just a minor impact on someone's life or how they can do certain things. This may fluctuate or change and may not happen all the time.

'Long-term' means either:

- it will affect them or is likely to affect them for at least 12 months
- it's likely to last for the rest of their life

It can still be considered long-term if the effects come and go. For example, a fluctuating condition might affect someone for a few months at a time with other times when they're not affected.

'Normal day-to-day activities' could include things like (but is not exhaustive of):

- communicating with other people
- driving
- following instructions
- getting washed and dressed
- going to the shops
- lifting and carrying everyday objects
- preparing and eating food

- sitting down or standing up
- using a computer
- writing