

EDI Strategy 2022 - 2025

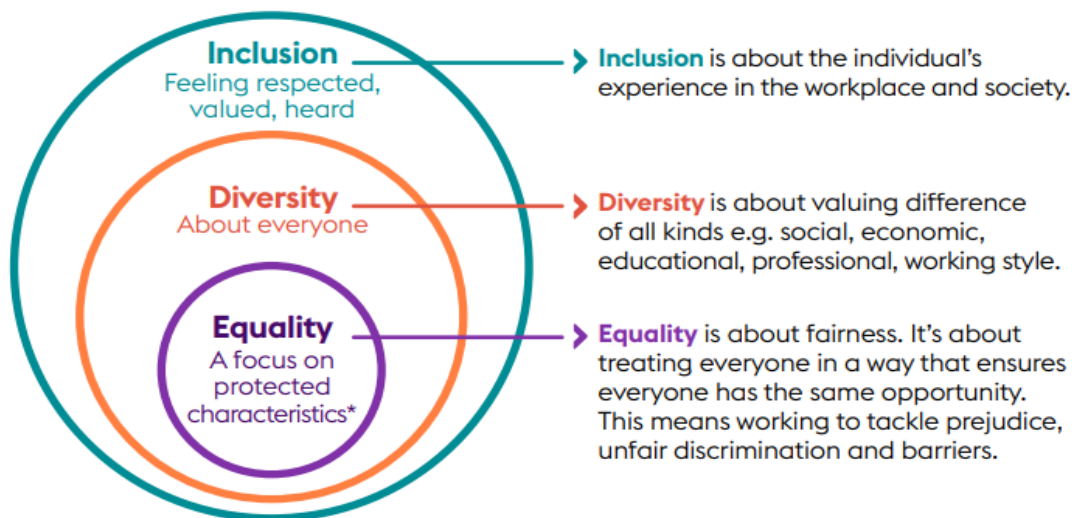
Introduction

It's vital that all our customers and employees can live and work in a welcoming and inclusive environment which fosters a culture of fairness and respect. That is why equality, diversity, and inclusion is integral to our business, the Group's vision and guides our values.

We celebrate the many initiatives currently supporting this work but recognise there is always room for growth. More so given the current socio-economic climate. Fuel and food poverty approaches a national crisis point and a disproportionate number of those living in Wales, disadvantaged as a result of this situation, fall under the protected characteristics (see definition below).

The internal EDI Steering Group, recently established to drive improvement, commissioned Tai Pawb to undertake an 'Equality Health Check' as a baseline for its work. This Strategy has applied the findings and sets proposals for not only fulfilling our legal, ethical and regulatory duties but also to promote a culture among our stakeholders where the diversity of our employees and customers are valued and supported. The EDI Policy has also been reviewed at this time and its aims align with this strategy.

What does EDI mean to us... defining the terms



*Protected characteristics – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. Equally MHA Group are committed to its Welsh Language Scheme and are also focussed on protecting those affected by the A More Equal Wales: The socio-economic Duty Equality Act 2010

The Protected Characteristics

(a) Age

Age discrimination is when someone is treated differently as they are, or someone thinks they are, a specific age or they are connected to someone of a specific age. Our customers have a broad age profile, ranging from under 20 to over 90 years of age, and our staff are aged between 16 and 74 years of age.

A recent EIA assessment² confirmed that tenants of all ages access our services. However, which services they access and how varies through the different age categories. We are committed to protecting individuals from discrimination on the

basis of age and/or because they are part of an age group (i.e. young people, elderly etc.) and we will ensure our policies and practices support this commitment.

(b) Disability

Disability discrimination is when someone is treated differently as they have, or someone thinks they have, a disability or they are connected to someone with a disability. The Equality Act defines a disability as a physical or mental condition which has a substantial and long-term impact on your ability to do normal day-to-day activities. 44% of our tenants have not reported any disability. We have no data for a further 15%, meaning 41% have self-reported a disability. The most common disability mentioned is mobility impairment. For staff, under 8% have reported a disability. A recent EIA assessment² confirmed that tenants with learning difficulties either do not engage with us or engage heavily, particularly with our Housing and Communities services, and registered disabled tenants are more likely to get in touch with repair requests.

We understand that disabilities are not always 'visible' or acknowledged by the individual (whose lives are complicated by poor mental health and/or learning difficulties, for example) and, where information is available, we will use it to improve service offering. For example, tenants with mental health are most likely to have a rent communication (71%).

We recognise the physical and mental barriers faced by individuals suffering with a disability. Therefore, as a business we will adopt an open and fair approach, removing restrictions which may prevent disabled people from fully contributing, and continue to improve accessibility of services and support, and making available consultation events and digital platforms.

(c) Gender Reassignment

The Equality Act says that you must not be discriminated against because you are a transsexual, or your gender identity is different from the sex assigned to you when you were born. Individuals do not need to have undergone any specific treatment or surgery to change from birth sex to preferred gender. We do not have any insight data available but will work on ensuring that tenants identified by this protected characteristic receive fair and equal treatment.

(d) Sex

The Equality Act says that you must not discriminate against because you are (or are not) a particular sex, someone thinks you are the opposite sex or you are connected to someone of a particular sex.

Our current data suggests that 31.9% of the customer-base are defined as men (46% for colleagues), 61.7% are women (54% for colleagues) with 6.5% where sex is undefined.

(e) Sexual Orientation

The Equality Act says that you must not discriminate against because you are heterosexual, gay, lesbian or bisexual, someone thinks you have a particular sexual-orientation, or you are connected to someone who has a particular sexual orientation. In the Equality Act, sexual orientation also includes how you choose to express your sexual orientation, such as through your appearance or the places you visit.

1% of our tenants have identified as Bisexual, Gay or Lesbian. Similarly, MHA Group have a diverse representation across its customer and colleague base. From a recent satisfaction survey, we understand that bisexual tenants had an above average response rate (42.9%) and Bisexual, Lesbian and Gay respondents all gave 100% satisfaction scores. This is a positive outcome, albeit the overall response rate was 38%.

Generally, we are committed to creating a safe environment for those we work with and for, and will challenge negative views and increase an understanding of the challenges face by these communities through training etc.

In relation to (c) and (e) above it is important that:

- We recognise barriers faced by members of this community (incl. physical barriers for transgender individuals), particularly around accessing employment and as part of an existing workforce.
- Aligned with our values, we will ensure fair representation of all characteristics across the business, remove direct or indirect discrimination to our staff and those who we work for and with and reflect an inclusive culture.
- Our policies and procedures will address issues and encourage positive action to remove barriers.

For information, LGBTIQ+ stands for lesbian, gay, bisexual, transgender, intersex, queer (or sometimes questioning), and others. The "Plus" represents other sexual identities incl. pansexual and two-spirit (refer to [Protected characteristics | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com) for more information).

(f) Race & Ethnicity

The Equality Act says that you must not be discriminated against because of your race. The term 'race' is a fluid concept used to group people according to factors, incl. ancestral background, social identity and/or a shared set of visible characteristics, such as skin colour and facial features. In contrast 'ethnicity' refers to shared social, cultural and historical experiences.

88% of our tenants and 95.5% of colleagues are grouped as UK White. Of the remaining 12%, nearly 10% do not identify race or ethnicity, so only 2.3% have stated they are from a non-UK White ethnicity. Although our tenant nationality data is not as comprehensive, and the sample sizes are small, a recent EIA assessment² confirmed that Polish and Romanian tenants are much more likely to have increased communication with MHA (rent and tenancy support need, for example).

As we are not representative of many of our smaller minority communities, increased awareness is required around the challenges of addressing the needs of minority groups and mitigating race-related issues to avoid isolation.

(g) Religion or Belief

The Equality Act says that you must not be discriminated against because you are or not, part of a particular religion / hold a particular philosophical belief. Religion refers to people with a range of faiths, or smaller religions and sects (such as scientology or paganism for example). The term 'belief' refers to both religious, non-religious and philosophical views which are not necessarily shared by someone of the same religion.

39% of our tenants do not have a religion or belief, 40% of our tenants stated they were Christian, which includes 1% who specified they were Catholic, 0.7% of our tenants have selected one of the other five major religions, with 1.2% selected Other. A recent EIA assessment² identified minimal variations in regard to accessing our services.

We recognise the diverse range of religions within our workforce and communities and are committed to creating an inclusive and supportive culture. We will challenge negative views and practices by providing training and a better understanding of the issues amongst our customers.

(h) Marriage & Civil Partnership

The Act says you must not be discriminated against in employment because you are married or in a civil partnership. The question of a person's status relating to marriage or civil partnership has no effect on the way their needs are addressed. This applies equally to tenants and to members of staff/Board members.

(i) Pregnancy & Maternity

The protected characteristic of pregnancy and maternity is not defined as such by the Equality Act 2010. However, s.18 of the Act provides that the forms of unfavourable treatment listed below constitute pregnancy and maternity discrimination, and it is therefore clear that these aspects of pregnancy and maternity are covered. Section 18 covers unfavourable treatment of an employee, during the "protected period" of their pregnancy, because of:

- their pregnancy; or
- illness suffered by them as a result of pregnancy;

Or treating an individual unfairly if:

- they are on compulsory maternity leave; or
- they are exercising or seeking to exercise, or have exercised or sought to exercise, the right to ordinary or additional maternity leave.

(j) Welsh and Other Languages

MHA understands that in Wales, equality with respect to the use of the Welsh Language is effectively treated as an additional branch of the Equality Act.

MHA Group adhere to the principles of the Welsh Language Act (as referred to in the E&D Policy) and has its own Welsh Language Scheme, translation service and action plan. This ensures that the Welsh and English languages are treated on the basis of equality with complete respect for linguistic choice. In terms of addressing our customer base and diverse needs, MHA Group have 249 employees, out of which only a few are classed as fluent in Welsh. We have 7 Welsh speaking tenants recorded.

We have no data relating to the use of other preferred languages by any of our tenants. However, if such circumstances were to present, we would ensure that family members or a person with a command of both English and the relevant language are engaged in any discussions relating to a person's tenancy.

Other Issues

Socio-Economic Factors

This term refers to income, education, employment, assets, where someone lives, and digital exclusion or marginalisation, which can significantly affect how well and how long we live. It also affects our ability to make healthy choices, afford medical care and housing, manage stress and more. Again, MHA have access to a plethora of data to tailor support needs. All of the above factors contribute to an unequal society and we are committed to a 'no discrimination' policy in regards to people from these backgrounds.

Our Tenants & Communities

In summary, and reflecting our commitments to those falling under the protected characteristics (and other issues mentioned above), our objectives are to:

- Have a better understanding of the additional challenges our customers and families are facing and, aligned with MHA's vision, to make our society a better place for everyone. (See current profile of tenants – Appendix 1) by:
 - Ensuring fair and equal access to services for all by aligning our policies, procedures and practices
 - Engaging and consulting with wider communities and develop positive action projects to work with under-represented communities and groups

Where are we now...

Topic	Action / Status
Relating to the Protected Characteristics and Other Issues	
Consideration of age-related issues	From our recent Tenant Satisfaction Survey (TSS) ¹ results we have identified that 72% of our customers, across the age profile and minority groupings are satisfied that MHA listens to their views and acts upon them. We are currently conducting Neighbourhood Planning initiatives and an Older Persons Review.
Disability related issues	However, the same survey identified that those with a disability are slightly more dissatisfied (specifically visual impairment and those with long term illness).
Accessibility of services	We have conducted a Customer Accessibility assessment through the Customer First Programme (see 'actions arising' within Action Plan).
Advice relating to Welfare Benefits	We have staff who give overall advice to disabled tenants relating to their applications for welfare benefits. With more advanced cases, we refer such tenants to the Disability Advice Project who are experts in the completion of forms, appeals etc.
Tackling racism	We have pledged our support to the 'Deeds Not Words' initiative, tackling racism within our communities. Two years into a five-year plan

¹ Tenant Satisfaction Survey Jan 2022 response rate and if we are comparing this with ONS data to ensure representative of our customer base

	we have already met 10 of the standards, 6 partially and 2 are yet to start. Progress is reported on through the Annual Review Report (available on our website)
Low income families	<p>We have started several Community initiatives (detailed within MHA's 2021/22 Annual Review – located on the website) aimed at identifying the support needs of low-income families. This included consideration of fuel and food poverty, and problems associated with lone parenting.</p> <p>We offer apprenticeship posts and a Workskills Wise programme to local residents, to improve employment opportunities and prospects.</p>
Tenancy foundations	Our Void 'Gold' Standard reduces socio-economic inequality by providing high quality housing, with full decoration & flooring, to help sustain tenancies and offer the best possible start to new tenants who may be struggling to afford to furnish their homes.
Domestic abuse, hate crime etc	50 cases of domestic abuse were reported to MHA last year. In addition we noted 27 cases of harassment, 6 hate-related and 29 reports of intimidation. Officers made 65 support and counselling referrals and work closely with, and signpost to, specialist partners across the county.
Relating to the working practices of MHA relating to Equality Issues	
Overview of performance to date	<p>When asked if our customers trusted MHA, of those who engaged in the Tenant's Satisfaction Survey, an average of 82% agreed. Satisfaction improved within the minority groups (88%). Tenants with a minority characteristic also had slightly greater levels of satisfaction</p> <ul style="list-style-type: none"> • regarding the services we provide, • how safe their neighbourhood is and that • we listen to their views and act upon them. <p>However, getting hold of the right person was rated lower than the average, with 5 respondents saying it was difficult, compared to 74 respondents in total.</p>
Equality Impact Assessments	These measure the potential impact that a policy, function or service may have on different groups. Since 2020 the Group has undertaken 7 EIAs where changes to services have been required (see action plan)
Working with the community	We have been Involved in a number of local partnership initiatives working with the Police, the local authority and other support agencies across Monmouthshire (e.g. Homeless Prevention Panel, Safer Monmouthshire, Mind, Good Things Foundation, Stonewall, Digital Communities Wales, Citizens Advice Bureau, Energy Redress etc.) We also run a number of inclusive initiatives (i.e. Crafty Women)
Supporting minority groups	We demonstrate our support for individuals identified within minority groups through our communications (i.e. supporting National Awareness campaigns such as Pride Month, significant religious events etc.)
Monitoring our Equality work	MHA commissioned an independent Equality Health Check with Tai Pawb to identify gaps in our offer (see action plan).

Management	Aligned Board and Committee reporting structures to improve monitoring against our EDI offering (see monitoring section below).
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Areas for improvement Summary (see action plan attached)

- The tenant satisfaction survey is currently being used to improve areas of low satisfaction, including those within the protected characteristics
- Consider how stock condition/repairs impact on different groups
- Increase our stakeholder support network
- Apply good practice and advice provided by support stakeholders such as RNIB
- Production of a Plain Language protocol
- Improving communication with those visually impaired/long term illness in respect of feeding back what we are doing with consultation
- Deliver awareness campaign around hate crime to encourage reporting/zero tolerance to any form of discrimination
- Use our profiling data to deliver targeted support to those in disadvantaged groups
- Identify a Venue checklist/framework (Equality Act 2010 compliant)
- Undertake a Tenant Voice audit
- Carry out up-to-date accessibility audits for our premises

Our Colleagues

Our objective is to:

- Value neurodiversity of colleagues so we can embrace and maximise the talents of people who think differently
- Support a culture that enables all staff to feel included to achieve their full potential and sustain a workplace where the dignity and rights of all are respected and protected
- Improve our service offering by heightening awareness of the issues facing those with protected characteristics and equip staff with the knowledge and skills needed to comply with our commitments.

Where are we now...

Topic	Action / Status
Relating to the Protected Characteristics and Other Issues	
Disability related issues	We are committed to the Confident Disability Employer scheme. From our equality monitoring data, we know 8% of the workforce has a form of disability. Where necessary we have adjusted colleagues work patterns and provided equipment and furniture to support their specific needs i.e. standing desks, 'man down' lone working device, IT equipment
Access to employment	Networkx Recruitment System – provides 'blind' recruitment to reduce unconscious bias.
Domestic abuse, hate crime etc	MHA Group has a dedicated Workplace Domestic Abuse Policy
Staff training	We deliver Equality & Diversity and Unconscious Bias training to all colleagues and Board Members. Also, Mental Health & Wellbeing, dementia champions and domestic violence training to relevant staff,

Supporting minority groups	New Recruitment Brand using inclusive imagery and has flexibility to target under-represented groups. Recognise that 7% of our staff have either indicated they are not heterosexual or preferred not to say. This equates to around 16 individuals.
Monitoring our Equality work	To assist us on our journey of improvement MHA recently established an EDI Steering Group, made up of a cross section of staff across the business, The remit of this group is to collectively drive a holistic approach to support equality and diversity. We carry out pay benchmarking of our salaries every two years to ensure our salaries are fair and competitive. A job evaluation methodology is used to establish pay levels of posts internally to ensure equal pay. Our Gender Pay Gap is monitored annually. As we are below 250 employees within the Association, this is not reported on the government website. RNIB accreditation etc.
Management	Are conducting an EDI Staff Survey, results of which will feed into this strategy New Ways of Working and other policies in place to support hybrid working and work/life balance.

Areas for improvement Summary (see action plan attached)

- Increase number of trained EIA colleagues
- Increased awareness to colleagues of EDI related progress through quarterly reporting via social platforms
- Provide up to date Hate Crime training for relevant frontline colleagues
- Review Recruitment & Selection Policy and procedures to reflect recommendations made within the Equality Health Check.
- Review and document process for tenant profiling
- Review our workforce data collection to align the terminology with that collected for tenants, where possible
- Review of Procurement Policy and produce a quick guide for contractors establishing our expectations as representatives of MHA Group - resource support - [A-quick-guide-to-equality-and-procurement-for-housing.pdf \(taipawb.org\)](#)
- Continue positive action to encourage under-represented groups into roles and departments to create a more diverse workforce

Value for Money

It is important to MHA that we get things right first time and reduce inefficiencies, ensure customers receive services that meet their individual needs, help to increase levels of satisfaction and promote an inclusive culture where colleagues and customers feel valued and engaged, therein also reducing the cost of turnover (see *corporate objectives set for this year*).

Risk

Risks associated with getting it wrong could be:

- Low level of satisfaction and higher turnover of properties and staff
- Reputational risk – difficult to attract new customers, disadvantaged when tendering new contracts and availing of funding opportunities (ESG links)

- Recruitment & Retention – that we are not seen as competitive, the employer of choice, a fair and inclusive employer – all of which restricts our talent pool.
- Regulation – failure to adhere to EDI standards could contribute towards a regulatory downgrade.

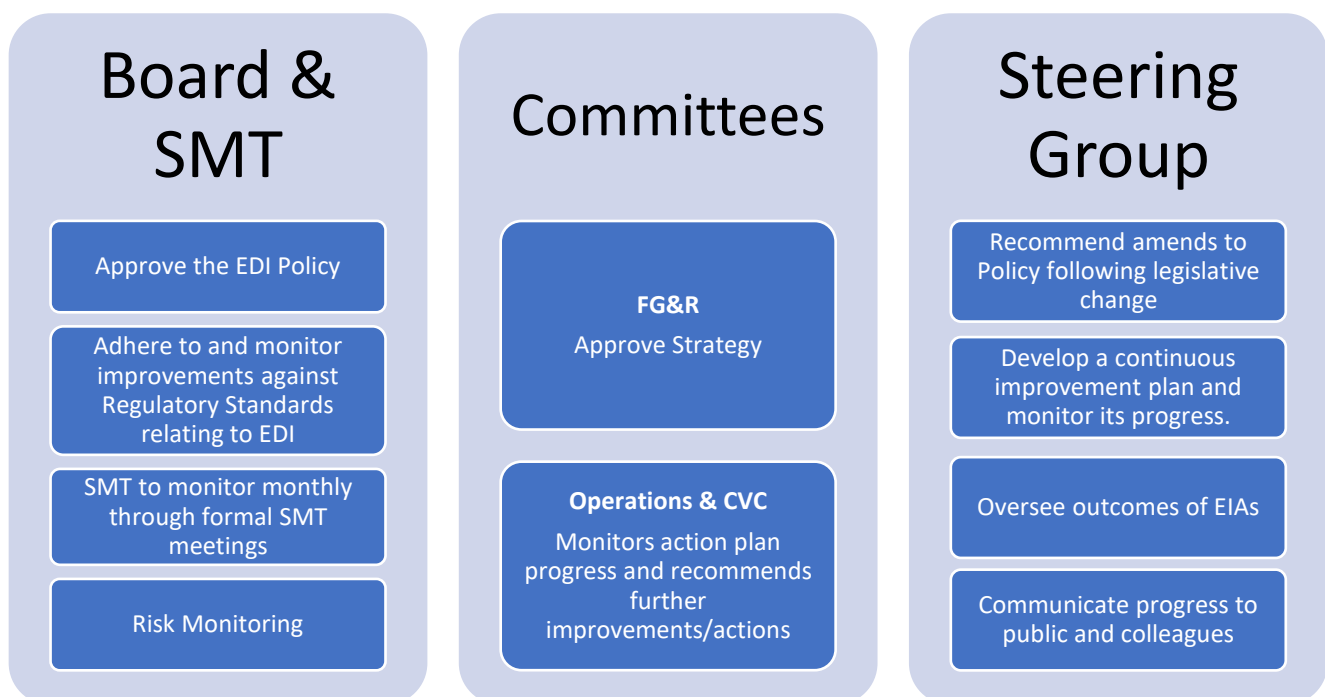
Leadership, Governance & Accountability

In accordance with the EDI Policy, the Board have ultimate responsibility to provide leadership and resources, facilitating achievement of our equality objectives. Members are also responsible for ensuring that:

- MHA Group policies and strategies are reflective of the support we dedicate to those in minority groups and are compliant with our E&D Policy;
- Our recruitment and selection processes are equitable and transparent; and
- Appropriate measures and reporting structures are in place to monitor progress against EDI objectives and comply with regulatory standards.

Reporting & Monitoring Structures

Please refer to the revised EDI Policy (section 3 – Roles and Responsibilities) identifying operational golden thread. Strategically, see below for high level reporting and responsibility structure:



Links to other strategies

- ✓ Annual Impact Assessment 2021/22
- ✓ HR Strategy 2021 - 2026
- ✓ Engagement Strategy
- ✓ VFM Policy and Statement

Communications

We will ensure that our communications output is diverse and reflects the communities it represents. We will make sure wherever possible that any media includes a diverse range of voices, at the same time being sensitive to the lived experiences of the people we aim to represent. We also promote access to alternative formats and language on all corporate literature/media.