



## **EDI Strategy 2025 - 2028**

## Introduction

MHA has gained significant traction since revising its approach to EDI, some three years ago. This strong foundation allows us to advance to the next phase, supporting our commitment to building community resilience, healthier environments, and delivering affordable, safe homes and high-quality services. These benefits should be accessible to all service users fairly and equally. The aim of this strategy is to ensure MHA is doing everything possible so that colleagues and service users from under-represented groups, and those experiencing social deprivation receive the same quality services and support, feel safe in their homes and live free from discrimination.

We are committed to implementing several large-scale maintenance programmes to meet evolving standards and regulations over the next 3 years. However, the challenging legislative environment aims to deliver fairness but also creates unintended barriers when supporting diverse needs. For instance, the new WHQS23 standards and revised Building Safety Act require safety measures, reduced carbon emissions, and improved fuel efficiency across all homes. While these actions are positive, the disruption caused by retrofit works and numerous pre-assessment visits vary, due to the differences in household makeup, structure, and property age. This can significantly impact those with disabilities or poor mental health, for example. Additionally, tailoring and prioritising work programmes for the most vulnerable is challenging when resources are stretched to meet government-led deadlines, risking loss of funding.

Our current support framework is designed around Monmouthshire's demographic, so as we expand services into neighbouring authorities, we recognise the importance of appropriately resourcing, training and tailoring support to meet the diverse needs and unique challenges of these communities too. For instance, the Local Authority Census Data 2021 (detailed in table below) highlights the diverse ethnic composition across the different counties. Population density is significantly higher outside of Monmouthshire, and Newport's 14.5% non-white residents (23,142) contribute to the city's vibrant cultural and religious diversity, but lifestyles will dictate distinct housing needs and will face different barriers, requiring varying levels of support.

	Monmouthshire	Newport	Torfaen
Size	849km <sup>2</sup>	190km <sup>2</sup>	126km <sup>2</sup>
Identity (Ethnic Group)	96.9% white	85.5% white	97.1% white
	1.3% Asian	7.5% Asian	1.3% Asian
	1% Mixed	2.8% Mixed	1.1% Mixed
	0.4% Black	2.3% Black	0.2% Black
	0.4% Other	1.7% Other	0.3% Other
Population	93,000	159,600	92,300

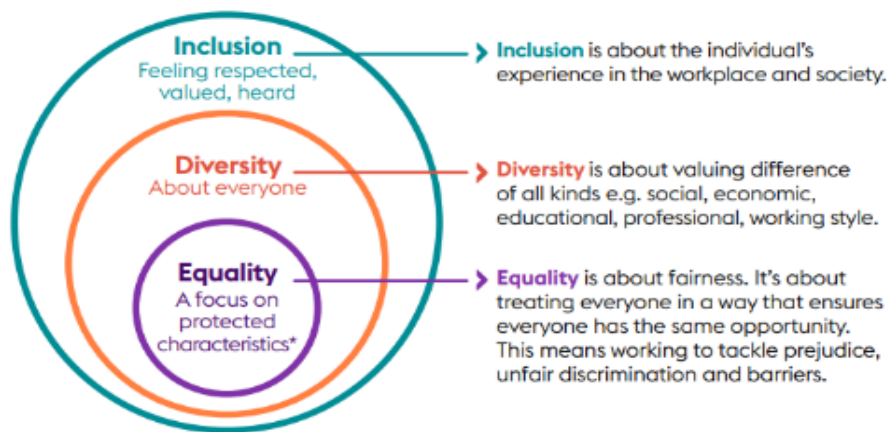
These are some of the challenges we face in delivering and prioritising equitable, fair and tailored services. To overcome obstacles, we must be creative, proactive, innovative and apply appropriate 'tools' to enhance tailored support for those who need it most. At the same time applying a 'single approach' when rolling out this new strategy, so we are not singling out or emphasising members of under-represented groups, which can inadvertently exacerbate feelings of exclusion or discomfort.

## Achievements 2022-2025

As mentioned above, significant headway has been made since the review in 2022, measured against previously set EDI objectives below:

<u>Communities' Objective:</u> "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".	<u>Colleagues' Objectives:</u> "We aim to embrace neurodiversity, maximising talents of those who think differently and support an inclusive culture where all staff can achieve their potential and deliver quality services with a clear understanding of the issues faced by those with protected characteristics".
<p>Examples of key achievements....</p> <ul style="list-style-type: none"> <li>• Revised section on website, improving accessibility and signposting of additional support</li> <li>• Maintain a central directory of specialised support agencies, to ensure frontline staff have access to expert assistance, when needed.</li> <li>• Stonewall LGBTQ+ Housing 'Pioneer' Accreditation</li> <li>• Procured Language Line to help overcome communication barriers.</li> <li>• Advanced the Deeds Not Words Pledge and actions to tackle racism.</li> <li>• Introduced a new section in the Tenants Annual Review report, showcasing support around equality, diversity and inclusion agenda</li> <li>• New alerts introduced on housing management system linked to specific needs</li> <li>• Carried out additional analysis to explore the correlation between satisfaction levels among minority groups.</li> <li>• DAHA (Domestic Abuse Housing Alliance) 'Gold' Accreditation</li> <li>• Increased number of assessors available to carry out Equality Impact Assessments.</li> <li>• Re-balanced the gender representation on the Group and subsidiary Boards.</li> <li>• Targeted training (unconscious bias, domestic abuse, hate crime, dementia)</li> <li>• Revision of our recruitment brand imagery and language</li> <li>• Improved capturing of equality data collected for colleagues</li> </ul>	

## Re-affirming what EDI means 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

## New Approach

The EDI strategy 2025/28 will support delivery of MHA's corporate objectives, aligned with relevant local authority strategies and the

### **MHA's PEOPLE:**

Mitigating inequality and supporting people to fulfil their potential, we will encourage healthy living and protect our cultural heritage.

### **Wellbeing of Future Generations Goals:**

More Equal - To see a society that enables people to fulfil their potential no matter what their background or circumstances.  
Vibrant culture and thriving Welsh Language – A society that promotes and protects culture, heritage and the Welsh Language.  
Cohesive communities - attractive, viable, safe and well-connected communities.  
Healthier – a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood

### **We can influence this through building resilient communities by:**

- creating access to education and employment opportunities and fair work, and providing benefit advice and support,
- addressing health and financial inequality and tackling domestic abuse,
- improve connectivity - addressing language barriers, applying appropriate communication methods and maintain insight data to improve access to services and targeted support.
- Through the Tenant Involvement & Engagement policy give people equal opportunities to participate in decision making and enabling equal outcomes.
- improving access and use of Welsh language.
- Creating a culture of positive attitudes and 'kindness' toward others
- Review and enhance work practices which better support minority groups.

Members of the EDI Steering Group have undertaken a series of consultations with key stakeholders, predominantly: tenants, colleagues and representatives of the Community Voice Group. As a result, we now have a clear understanding of what is important to them and where our efforts should be directed. Suggestions are prioritised in accordance with perceived urgency.

In addition, 'Disability' represents the largest minority customer group so we will prioritise this area as the central theme for the first year of the strategy. Therefore, we aim to explore specific challenges and a wide range of initiatives, implementing effective solutions that enhance accessibility and support for all registered and non-registered disabled members of our community.

#### **Local Authority Goals:**

**Monmouthshire CC** - 'A fair place to live' – improving life chances for people regardless of income or background' and 'better access to services and support needed to live a healthy life'

**Newport CC** – [Strategic Equalities Plan 2024/28](#)

**Torfaen CBC** – [Strategic Equalities Plan 2024/28](#)

## **Objective setting**

Reflecting on insights and stakeholder consultation, our new EDI objectives for 2025/2028 meet the needs of both the communities in which we serve and the support we afford our colleagues. They are aligned with both national strategies and

support the delivery of our own business goals:-

### Communities

- Improve the way we work to make life easier for those with disabilities
- Create a culture which tackles racism, prejudice, domestic abuse and hate crime within our communities
- Ensure fair and equal access to services, removing barriers preventing minority groups from participating in decision making.

### Colleagues

- Cultivate inclusive workplaces by challenging recruitment and work practices affecting people within minority groups
- Champion the Welsh Language within our communities
- Review data governance and management practices so that EDI is mainstreamed into everything we do.

The **EDI Action Plan** for Year 1 is designed to be fluid and responsive, and has a primary focus on disability, review of processes and other such priorities. Overseen by the Operations Committee, the EDI Steering Group will implement and monitor recommendations, and undertake a 'Review and Reflections' exercise in May 2026. At which point they will revisit outcome of consultations and apply learning to inform the development of Year 2 (2026/2027).

## **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. This strategy aligns with our VFM Strategy's ethos of creating social value, inclusive to all.

## **Risk**

Risks associated with getting it wrong could be:

- Low level of satisfaction (mistrust/morale), higher turnover of properties and staff
- Reputational damage – 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 & other legal consequences – failure to adhere to EDI standards could contribute towards a regulatory downgrade and other penalties.

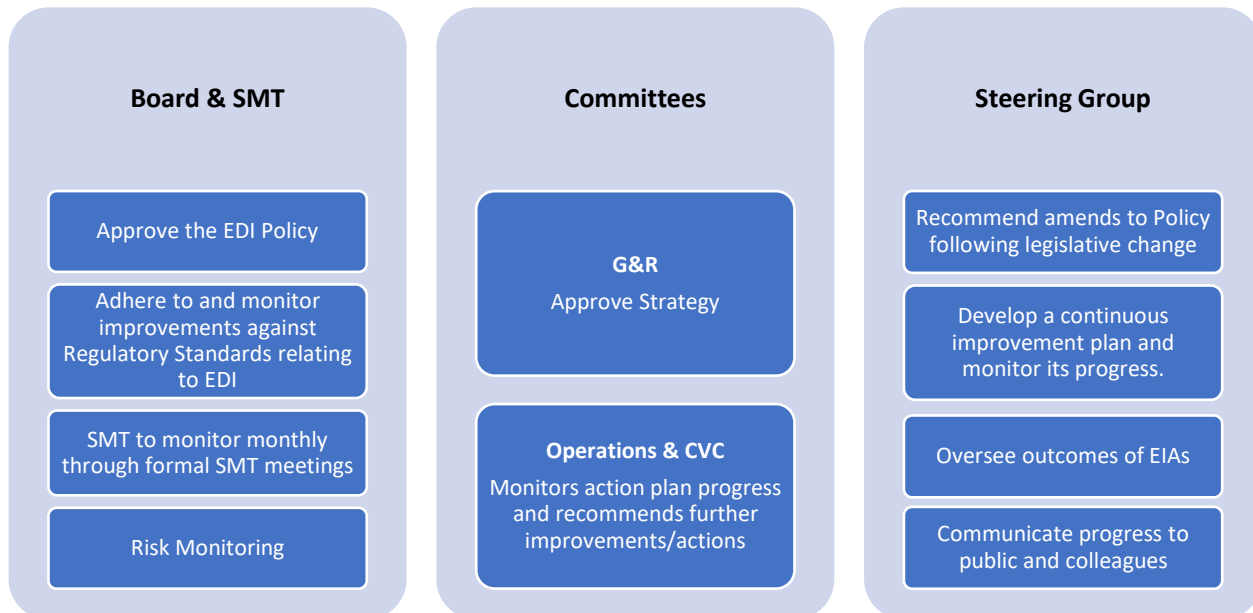
## **Leadership, Governance & Accountability**

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 MHA's EDI Policy (section 3 – Roles and Responsibilities) for more information. The EDI Steering Group will be supported by two sub-groups (Colleagues and Communities) to assist in the delivery of actions. All internal groups are represented by a cross-section of staff across the business, and we will explore further opportunities to widen representation over the coming weeks. Strategically, see below for high level reporting and responsibility structure:



## Links to other strategies

- ✓ Communications Strategy
- ✓ People & Culture Strategy (under development)
- ✓ Tenant Involvement & Engagement Policy & Strategy
- ✓ VFM Strategy
- ✓ Digital Strategy

## Communications

We will deliver clear, consistent messaging and provide regular updates through various channels to build trust and accountability. Inclusive communication methods will be used to reach all stakeholders, and feedback mechanisms established to encourage dialogue. Training and awareness campaigns will educate employees on EDI, while celebrating successes and involving leadership demonstrating our commitment. We also promote access to alternative formats and language on all corporate literature/media.

### 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.

EIA assessments confirm 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. The most common disability mentioned is mobility impairment.

- (c) 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. 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.
- (d) **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.
- (e) **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.
- (f) **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.

Generally, we are committed to creating a safe environment for those we work with and for, and will challenge negative views, hate crime and increase an understanding of the challenges face by these communities through training etc. *For information, LGBTQ+ 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" for more information).*

- (g) **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.

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.

- (h) **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.

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.

- (i) **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.

- (j) **Pregnancy & Maternity** - The protected characteristic of pregnancy/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/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.

- (k) **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 will be legislatively responsible for demonstrating a commitment to the Welsh Language Standards, released November 2025. This ensures that the Welsh and English languages are treated based on equality with complete respect for linguistic choice.

#### **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 regards to people from these backgrounds.