



Equality, Diversity and Inclusion Strategy 2023-2026

Founded in 1974, North Wales Housing has been providing homes and delivering services for nearly 50 years. We are a successful housing association with over 2,700 homes and we are totally committed to our communities across North Wales. We employ up to 190 people across a diverse selection of roles.

This Equality, Diversity and Inclusion (EDI) Strategy sets out how North Wales Housing will be a leading housing association, recognised as a fair and inclusive landlord and employer.

Our Mission is:

“Transforming lives by providing great homes and delivering high quality services and support.”

Our Vision is:

“... to make a difference to people's lives, by providing homes to be proud of and creating communities in which they can thrive.”

These can only be achieved where our services are delivered with EDI principles at their core. Our [Corporate Plan 2021-2024](#) contains five values: Open, Trust, Responsive, Fairness and Learning. Linking with EDI principles, our value of Fairness states that **“we’re open to all but closed to prejudice. We will actively promote equality and respect diversity”**. The strategy also links to the six aims of our People Strategy 2021-2024.

In the period May to August 2022, [Tai Pawb](#) undertook an assessment of North Wales Housing’s equality, diversity and inclusion performance against Tai Pawb’s Quality, Equality and Diversity (QED) Award standard, which consisted of an analysis of findings from colleagues, Board and stakeholder surveys, a desktop audit, and a three-day virtual qualitative assessment from Tai Pawb, which included focus groups and one to one conversations. The findings were subsequently mapped against the QED Award framework and recommendations given.



1. Introduction
2. Why have an Equality, Diversity and Inclusion Strategy?
3. Our Equality, Diversity and Inclusion Aims
4. Legislative context

Why have an Equality, Diversity and Inclusion Strategy?

We recognise that the needs of our residents are varied, individual and different and so in order to meet those needs, we must consider the ways in which our work impacts on our residents, and ways for them to feed back to us through various means that are easy to use and accessible. We will also monitor satisfaction and service delivery across our services by diversity categories.

In order to do this, we also need a workforce that understands the areas in which we operate but are themselves diverse, so that as an organisation we have colleagues who can provide us with a variety of viewpoints and a wider range of experience.

Colleagues and residents will have the opportunity to comment on the EDI Action Plan and their views will help us with developing and implementing those actions.

Our Equality, Diversity and Inclusion Aims

We offer a range of services to our residents, and invest in our current housing stock and develop plans to meet the population needs of the future.

For that to be effective, we need to have meaningful engagement and dialogue with residents in order to have the best understanding of their EDI needs, and how best to deliver our services and we need to have that same meaningful engagement and dialogue with our workforce, in order to ensure that we are the best employer we can be and value our colleagues as individuals.

Our five organisational EDI aims are as follows:

- 1: We have a clear strategic approach to achieving equality in everything we do.**
- 2. Our services are delivered fairly, do not discriminate, and meet people's needs.**
- 3. Residents and colleagues are aware of, can access and have positive experiences of services delivered.**
- 4. As a result of inclusive and meaningful involvement, our organisation is fairer and more responsive.**
- 5. Our organisation is an inclusive workplace with a culture which values, promotes and embraces EDI.**

Aim 1: We have a clear strategic approach to achieving equality in everything we do.

This strategy, our EDI policy and the action plan meet the requirement of [Welsh Government Regulatory Framework for housing associations registered in Wales](#).

Governance

The delivery of EDI across our services is not the responsibility of one individual or one team but by all of us at North Wales Housing. It is the Board and Leadership/Senior Management Team however, who have overall responsibility for its implementation, compliance with relevant legislation and responsibility for ensuring that this strategy is reflected in all aspects of our work. We aim to ensure that the Board is representative of the community we serve.

The [Community Housing Cymru's Code of Governance](#) is designed to help housing associations to develop good governance structures and to support continuous improvement. This strategy directly relates to Principle 6 of the Code:

"Equality, diversity and inclusion - The board has a clear, agreed and effective approach to supporting equality, diversity and inclusion throughout the organisation and in its own practice. This approach supports good governance and the delivery of the organisation's purposes."

Legislation

As a social housing provider, we have certain responsibilities under the Equality Act 2010 to promote equality of opportunity. The Equality Act 2010 makes discrimination unlawful in relation to nine protected characteristics. These are:

- | | |
|--------------------------|------------------------------------|
| • Age | • Gender reassignment |
| • Disability | • Marriage (civil/same sex) |
| • Gender | • Sexual orientation |
| • Religion/belief | • Pregnancy/maternity |
| • Race | |

A full list of our legal EDI obligations can be found in our EDI policy.

Equality Impact Assessments

We will undertake thorough Equality Impact Assessments (EIAs) on all our new and updated policies, procedures and strategies and include them in our decision-making process, and will include a summary of this work as part of our monitoring and annual reporting process, especially to the Board.

Aim 1: We have a clear strategic approach to achieving equality in everything we do.

Monitoring Progress

We will monitor and regularly review our strategy and action plan, employment practices, procedures and services to ensure fairness for all, and make any changes as necessary, for example if there are any significant changes to legislation, policy or practice.

We will include detailed data collection across our services to assist with this (for residents and colleagues), analysed by protected characteristics and with supporting evidence in the form of our Equality Impact Assessments.

Progress will be monitored via regular reports to the Board, in particular the annual reports, and will detail our progress against each of the aims in the strategy and the QED process. The report format will reflect this so that our residents and colleagues can easily compare progress against our stated commitments.

Risks

We aim to meet and exceed our legal responsibilities in order to minimise any adverse impact on our residents, workforce or communities and any impact to our reputation. We recognise that there are risks associated with non-compliance, which can affect on our reputation, and which can have considerable financial implications and could affect business continuity.

These risks can include of non-compliance not being recorded; opportunities to identify association-wide actions and learning being missed; lack of meaningful engagement to progress the delivery of our EDI aims; failure to adhere to the EDI standards set out in the Regulatory Framework for Housing Associations, and other regulatory and legislative requirements.

Procurement and our Supply Chain

North Wales Housing is committed to EDI in respect of achieving best value in all our procurement activities. We will make sure that our values are reflected by all external suppliers working on behalf of North Wales Housing and that they uphold the principles of this strategy in all their dealings with our customers.

Aim 2: Our services are delivered fairly, do not discriminate, and meet people's needs.

Registered providers are required to treat all residents with fairness and respect including protected characteristics and those with additional support needs.

Monitoring our Residents

We ensure that the data we hold on our residents includes details of their protected characteristics in order to ensure that our service delivery and communications with them meet their individual requirements. We will clearly explain our reasons for collecting such data but will also include a "prefer not to say" option for each category.

Data Protection

The use of personal information will be treated with appropriate levels of confidentiality and will be fair and lawful. We ensure that personal information is accurate; not kept for longer than is necessary; is secure; is adequate, relevant and not excessive. Information will be processed in accordance with the data protection rights of the individual.

Repairs and Maintenance

We will ensure that our repairs and maintenance services to residents are carried out without discrimination, whether they are carried out by our colleagues or by contractors. Resident satisfaction surveys are sent out following repair and maintenance work and any complaints are followed up and monitored – these will be recorded by diversity categories in order to identify issues related to an individual's circumstances.

Repair work reported by our residents is assessed by colleagues according to the priority categories set out in the [Repairs Service Standards](#). This also sets out our code of conduct for colleagues and contractors who carry out repairs work in our residents' homes, which includes the requirements to show respect and courtesy, and to take into account any individual requirements.



Aim 3: Residents and colleagues are aware of, can access and have positive experiences

Service Provision

Our contact methods and information sources will be fully accessible and available to all our residents, paying particular attention to those who may be digitally excluded.

Consultation

Ongoing collaboration through our internal EDI group and tenant scrutiny will contribute to the monitoring and reporting process, ensuring that the needs and views of colleagues and residents are sought and included in our service development and delivery.

Hate crime, harassment, anti-social behaviour and domestic abuse

We are committed to dealing promptly and effectively with all aspects of hate related crime, harassment, anti-social behaviour and domestic abuse, as these impact on residents and communities as well as colleagues. Specific policies for residents have been developed to ensure that achieve this.

Our colleagues will be fully trained on an on-going basis to make sure that they are sufficiently knowledgeable to deal with such situations. Our approach is victim-centred and absolute priority is given to investigating any such report.



Aim 4: As a result of inclusive and meaningful involvement, our organisation is fairer and more responsive.

Resident Care

We will provide homes for our residents that meet those needs, and will identify those needs by collecting comprehensive resident data to inform our service development.

Residents' Inclusion

We will encourage our residents to engage with us in every possible way, whether that is through formal surveys or general feedback, complaints or tenants' groups.

Colleagues' Inclusion

We will encourage our colleagues to highlight issues they feel may be hindering positive service delivery, either to our residents or internally in terms of processes.

Promoting the Strategy

We will make sure that this strategy is made available on our website and publicised widely;

- It will be available in Welsh and English, and in other formats on request;
 - All colleagues, board members, applicants for jobs and contractors and consultants working for North Wales Housing will be advised of the strategy in order to support colleagues to meet our regulatory and legislative requirements;
 - Residents will be advised of the strategy through key resident communications and the website;
 - The strategy will be included in the employee toolkit on the intranet and discussed with all new starters during their on boarding process;
- Contractors, bidders and suppliers will be advised of the strategy through the tendering and contract review processes and will be expected to uphold the standards of this strategy in everything they do.

Aim 5 Our organisation is an inclusive workplace with a culture which values, promotes and embraces EDI.

Our Workforce

We offer an inclusive culture and encourage diversity in the workplace in order to attract and retain talented people and reduce turnover. Diverse teams and a sense of belonging bring different ideas, innovation and creativity to the workplace and helps us to better understand the needs of our residents and communities.

We ensure that any barriers to recruitment and progression are removed, whether they are physical or procedural/process related, and monitor our workforce and workplace in order to focus on tackling any identified issues.

We encourage our workforce to discuss any issues with their manager, so that appropriate support and reasonable adjustments can be assessed in order to overcome or minimise difficulties in carrying out their role. We will make every effort when colleagues become disabled to work with them so that they remain in employment.

Colleagues on maternity, paternity or shared parental leave will be kept informed of any job opportunities, promotion prospects or other changes in terms and conditions in the work force.

We have specific HR policies for colleagues on how to raise issues of harassment, bullying and whistle blowing. Colleagues may raise the issue directly with their line manager, a member of the HR team or any other manager.

Learning and Development

We encourage learning and development for all colleagues through regular personal development reviews, relevant training and work experience, so that career progression and promotion is open to all.

All colleagues and board members complete EDI training and are given appropriate training on good practice, appropriate to their role. We will encourage colleagues to raise new EDI training requirements, for example if they encounter a resident with needs with which they are unfamiliar or feel that they need further training in order to fully help that resident.



INVESTORS IN PEOPLE
We invest in people Gold
Rydym yn buddsoddi mewn pobl Aur



Legislative Context

The Public Sector Equality Duty requires Housing Associations delivering public services to give 'due regard' to the need:

- To eliminate discrimination, harassment and victimisation
- To advance equality of opportunity
- To foster good relations (tackling prejudice and promoting understanding)

North Wales Housing is not a public body but is required to comply with the duty in the provision, allocation and management of social housing that would otherwise be undertaken by local authorities. We must therefore comply with the Equality Act 2010 and the associated regulatory framework for Equalities in Wales, which also includes a number of specific employment requirements around recruitment and dignity at work issues and all other HR functions.

The [Well-being of Future Generations \(Wales\) Act 2015](#) requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. Three of the seven aims in the Act are directly linked to the Equalities agenda:

- A More Equal Wales** - "A society that enables people to fulfil their potential no matter what their background or circumstances"
- A Wales of Cohesive Communities** - "Attractive, viable, safe and well-connected communities"
- A Wales of Vibrant Culture and Thriving Welsh Language** - "A society that promotes and protects culture, heritage and the Welsh language"

As Welsh Government is itself bound by this legislation, it follows that Housing legislation and regulations in Wales are framed in this context.

The **Building Regulations 2010 - Part M** covers a wide range of building related matters in relation to access requirements under the Disability duties – the Welsh Government's guidance can be found online [here](#).

The **Welsh Language (Wales) Measure 2011** modernised the previous legal framework regarding the use of the Welsh language in the delivery of public services and introduced a series of Welsh Language Standards. While the Welsh language is not a protected characteristic under the Equality Act 2010, our approach will ensure we will not neglect the importance of the Welsh language for people who use our services, live in our homes, are members of our Board of Management, or who are employed by us.

Our Welsh Language Scheme and annual report can be found [here](#)

The **Socio-Economic Duty** came into force in Wales on 31 March 2021, meaning that some public bodies now have to think about how their strategic decisions, such as setting objectives and developing services, can improve inequality of outcome for people who suffer socio-economic disadvantage. There are clear links between many of the protected characteristics and inequalities of outcome due to socio-economic disadvantage as one can compound the other. It is essential to consider these interlinked factors when making decisions and delivering services.

Other Relevant Legislation, Regulations and Guidance

- [Beautiful Homes and Spaces](#) (formerly DQR) which includes Lifetime homes;
- The Welsh Housing Quality Standard and forthcoming WHQS 2023 (specifically elements: 6e, 6d - [Welsh Housing Quality Standard: draft gov.wales](#));
- The new [Local housing market assessment \(LHMA\) guidance](#) - although this is for Local Authorities, Registered Social Landlords should commit to working in partnership with Local Authorities to meet the housing needs of specific groups, including disabled people, ethnic minorities and others;
- Welsh Government's [Anti Racist Wales Action Plan](#) (Section 7 Homes and Places)
- Welsh Government's [LGBTQ action plan](#);
- Welsh Government's [Nation of Sanctuary plan](#),
- Welsh Government's [Action on Disability: the right to independent living framework and action plan](#)