

MHA's EDI Strategy - 2022 - 2025

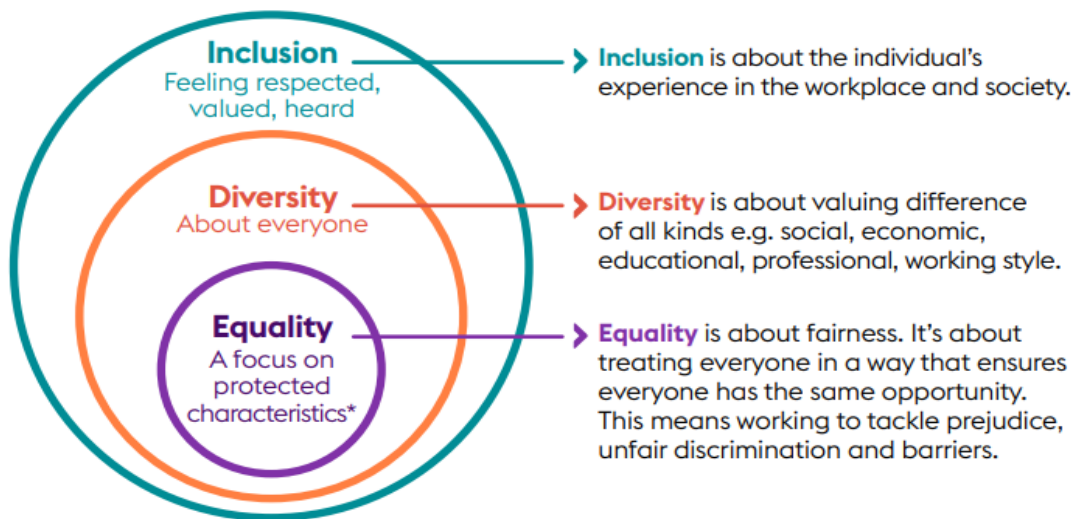
Introduction

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.

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.

(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.

(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.



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://www.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.

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.

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.

In relation to those using other preferred languages across the County, 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 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

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.

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.

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:

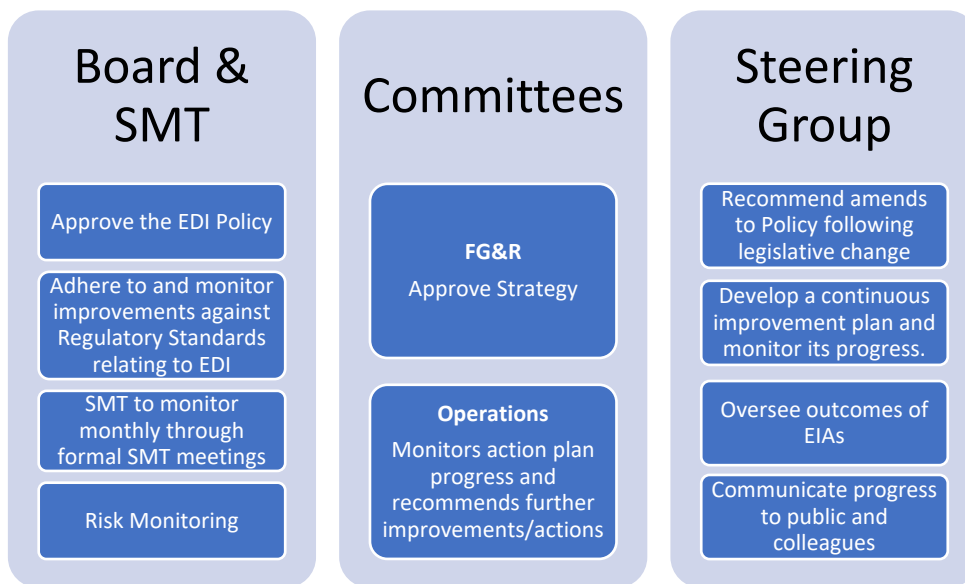
- MHA Group policies and strategies are reflective of the support we dedicate to those in minority groups and are compliant with our E&D Policy;
- Our recruitment and selection processes are equitable and transparent; and



- 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 Sustainability 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.