

Equality Plan

2023 – 2026



Introduction

Sian Morgan, Chief Executive

At Stori, Equality, Diversity and Inclusion is integral to our Business Values and the way we act each day. Treating people equally, valuing their diversity and making sure they feel included is a vital part of our DNA.

Our Equality Plan states our commitment to promote equality, diversity and inclusion for the clients we support and our employees. The overall vision of the strategy is to create a diverse and inclusive environment where clients, and employees have a sense of belonging, where they feel their voice is heard, their opinion matters, and their input and contribution is valued.

Scope

Our Equality Plan sets out our approach to Equality, Diversity and Inclusion, and outlines the commitments we are making over the next three years. It is a 'living' document that can be adapted in line with the changing needs of our clients, colleagues and partners, as well as the external environment.

We have a separate Equality Policy which sets out our public commitment of how we plan to meet the duties placed upon us by the Equality Act 2010 it can be found on our website [Home | Stori \(storicymru.org.uk\)](http://Home | Stori (storicymru.org.uk))

Promoting equality is more than just a statement of how we will meet our regulatory and other requirements, it's fundamental to the way we work. Valuing peoples' differences and promoting equality are central to our core values and helps us to understand our staff, tenants and clients better, as well as positively contributing to better overall governance of our organisation.

We are committed to promoting equality and to providing an inclusive and supportive environment for our clients and tenants, staff, Board of Management, and those people who work closely with us.

Our commitment to creating a sense of belonging and inclusion is a key aspect of our ethos that will in turn support the overall achievement of this plan.

This equality plan has been informed and developed by involving and engaging with our staff and the people we provide services to, to support all of us to work in ways that promote equality. We will continue to engage with staff and clients to inform our ongoing action plan.

The proposed actions in this plan will allow us to reach full compliance with the EDI principles and requirements of Community Housing Cymru's Code of Governance and the Welsh Government Regulatory Framework for Housing Associations registered in Wales.

This plan will also enable us to contribute to the Welsh Government's:

Well-being of Future Generations (Wales) Act 2015 goals, in particular:

- *A More Equal Wales*
- *A Wales of more Cohesive Communities*

Anti-Racist Wales Action Plan (Section 7 Homes and Places) goals:

- *To significantly increase representation of ethnic minority people in senior*

leadership and at all levels to create a workforce within the homes sector to reflect the diversity of the population in which they operate.

- *To ensure that standards provision and services around the provision of homes advance race equality, embed anti-racism, equality and human rights, and meet the diverse needs of ethnic minority people.*

Additionally this plan sets out our commitment with regard to Welsh Government's LGBTQ+ action plan, and will inform the Association's strategic decision-making when setting objectives and developing services, to include improving the inequality of outcome for people who suffer socio-economic disadvantage.

This plan sets out:

- our equality objectives
- how we will identify and collect relevant equality information
- how we will communicate relevant equality information
- how we will promote knowledge and understanding of equality and diversity to our Board, staff and clients

Our current Welsh Language Scheme and the forthcoming Welsh Language Standards for social housing providers set out how we will treat Welsh and English languages on an equal basis. 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 Objectives

1. Create an inclusive culture by ensuring everyone feels respected, listened to and that they are able to be their true selves at work.
2. Enhancing our tenant and client voice by involving them in shaping our services to ensure they are inclusive of everyone's needs.
3. Increase our reputation as an inclusive employer and attract a more diverse range of talent by identifying and addressing barriers to recruitment and progression.
4. Ensure robust equality impact assessment and assurance procedures are in place for policy development, project planning and changes to services.
5. Encourage and monitor the implementation of equality, diversity and inclusion practices and policy across the Association and support staff to meet regulatory and legislative requirements
6. Prepare, present and publish reports detailing progress against objectives to meet the requirements of equality legislation and which demonstrate the Association's commitment to operating in line with our values to achieve fairness and equity for all.
7. Develop and provide a range of equality, diversity and inclusion training and awareness raising for staff.

8. Develop, promote and implement a range of equality, diversity and inclusion initiatives to support staff and clients.

We have grouped our objectives under 3 themes:

- Training and Awareness Raising
- Impact Assessment and Policy Development
- Promotion and Initiatives

Each theme aim has desired or expected outcomes and specific actions to contribute to their achievement, including evidence to give assurance to Board, clients and the wider community that we are a culturally competent organisation.

It's vital we meet our equality objectives as set out in this plan to maintain the confidence of all the communities we serve, our staff and our Board.

Monitoring and Review

This EDI Plan will be reviewed and monitored quarterly by the staff EDI group who will report to Senior Management and Board quarterly on actions taken, progress made and setting out recommendations, timescale and responsibilities for continued improvement.

Progress achieved and actions taken or planned will be evidenced through a separate Action Plan to this Plan and is not included here.

| OPERATIONAL RISKS IDENTIFIED | | | | | |
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| Description | Links To Strategic Risks | Likelihood | Impact | RAG Rating | Mitigating Actions |
| Incidents of non-compliance with our policies are not recorded and investigated and opportunities to identify Association-wide actions and learning are missed. | 7, 10,13,15 | Possible | Serious <ul style="list-style-type: none"> Negative impact upon individual's health and well-being. Reputational damage to the Association | 6 | Escalate identified risks via reports and recommend actions to mitigate any non-compliance. Use staff / client feedback mechanisms to identify and resolve incidents at the earliest opportunity. Record risks on formal risk registers until resolved. |
| Lack of engagement by Board and SMT to progress the delivery of the Association's equality objectives | 6, 10 | Possible | Serious <ul style="list-style-type: none"> Staff remain unaware of EDI planned objectives Inclusive culture not fostered, levels of staff satisfaction are low, recruitment and retention of staff suffer | 6 | Continue to promote EDI objectives and embed them into directorate operational plans. Continue to offer specialist EDI training and encourage participation by all staff |
| Failure to adhere to the EDI standards set out in the Regulatory Framework for Housing Associations, and other regulatory and legislative requirements | 6 , 9, | Possible | Major <ul style="list-style-type: none"> Could contribute towards to a regulatory downgrade Could lead to services that do not meet the needs of our diverse client groups, resulting in low levels of satisfaction and high turnover in our properties | 12 | Monitor and review EDI regulatory requirements at Board and Senior Management at least quarterly and action plan accordingly Monitor, review and action plan the objectives of the EDI Plan at least quarterly and escalate risks via reports and recommend actions to mitigate risks. |

| THEME 1 - Training and Awareness Raising | | | |
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| Aim | Actions Needed | Outcomes Measured By | Lead(s) |
| Undertake a Training Needs Analysis for Diversity and Inclusion every 3 years | <ul style="list-style-type: none"> - Review training provided over the past 3 years (to include all types of training and awareness raising, formal and informal, internal and external, 1-1 training sessions, etc) - Develop mechanism to monitor training provision more effectively (to include details on costs, staff attendance, etc) - Ensure opportunities to obtain feedback from attendees and analyse data to assess effectiveness of training courses, value for money and to inform future training needs - Monitor expenditure on external training and develop budget proposals for training in 2022-2025 | <ul style="list-style-type: none"> - Staff and Board have access to relevant training opportunities to allow them to develop a better understanding and awareness of EDI related matters which are relevant to clients, Board and staff - Training records - Analysis of Training feedback forms - Examples of how learning has been applied in the workplace - Examples of how Board has received EDI training and awareness raising - Carefully planned cost effective training courses | Strategic – Director of People Services Operational – HR Manager, Training Officer |
| Develop, promote and provide EDI training and awareness raising to staff | <ul style="list-style-type: none"> - Source available external training resources in line with strategic guidance. - Membership of Tai Pawb enabling access to menu of (often free) resources - Develop internal training sessions which set out clear learning outcomes - Explore options for utilising HR records system to capture and analyse training data - Promote available training opportunities to staff to increase uptake – global emails, targeted training within teams, etc. - Develop EDI training and resources section on new Knowledge Hub site for staff | <ul style="list-style-type: none"> - Staff have access to relevant training opportunities to allow them to develop a better understanding and awareness of EDI related matters which are relevant to both clients and staff - Training records - Participant feedback on learning outcomes - Examples of how learning has been applied in the workplace - Evidence of promotion e.g. Global Emails - Staff Portal includes Inclusion Calendar, variety of resources – e.g. links to Black History, LGBTQ+ months etc, - input by staff across the business | Strategic – Director of People Services Operational – HR Manager, Training Officer |
| Maximise completion of mandatory EDI training | <ul style="list-style-type: none"> - Work with managers to review and update mandatory training for new starters and during Corporate Induction - Review completion rates of e-learning modules and work with managers to promote compliance | <ul style="list-style-type: none"> - All staff have a basic understanding of the needs of those with a protected characteristic - Training records - Feedback from Corporate Induction | Strategic – Director of People Services Operational – HR Manager, Training Officer |

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| | <ul style="list-style-type: none"> - Explore options for e-learning EDI modules as mandatory training - Embed anti - racist training into training programme | | |
| Use personal stories to increase awareness and understanding of the barriers and challenges experienced by those with a protected characteristic, carers and vulnerable groups | <ul style="list-style-type: none"> - Create a standard template for case studies - Liaise with clients and tenants to improve feedback channels for them - Identify EDI trends within concerns and complaints raised by staff and clients - Identify suitable personal stories for development - Deliver LGBTQ+ Awareness raising training for staff at all levels, to be provided by people with lived experience. - Provide ongoing anti-racism and cultural competence training to staff and Board, to be conducted by people with lived experiences. - Celebrate the diversity of staff and clients and raise awareness of different faiths by producing an Inclusion Calendar annually. - Deliver Disability (and limiting health conditions, mental health) Awareness training sessions run by people with lived experience. This training would be aimed at enabling staff at all levels to understand the barriers disabled people face and how they can contribute to creating an inclusive working environment for disabled colleagues and clients. - Deliver training to all staff on hate crime awareness, hate crime policy and procedure and their roles and responsibilities | <ul style="list-style-type: none"> - Staff have a greater understanding of the potential barriers and challenges faced by individuals and can apply this knowledge to remove barriers and challenges in the workplace - Staff are aware of unconscious bias and actively work to eliminate all forms of discrimination - Review of comments and feedback - Feedback channels | <p>Strategic – Director of People Services, Director of Business Development, Directors of Operations</p> <p>Operational – Training Officer, HR Manager, Partnerships Manager, Operations Managers, Housing Manager, Governance & Assurance Manager</p> |

| THEME 2 – IMPACT ASSESSMENT and POLICY DEVELOPMENT | | | |
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| Aim | Actions Needed | Outcomes Measured By | Lead(s) |
| Ensure robust equality impact assessment and assurance procedures in place from planning | <ul style="list-style-type: none"> - Review EIA process and develop procedural guidelines. - Ensure accurate record keeping and data collation on EIA undertaken across the Association | <ul style="list-style-type: none"> - Managers have increased confidence in undertaking EIA and know where to access further advice and support | <p>Strategic – Director of People Services</p> <p>Operational – Governance & Assurance Manager</p> |

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| <p>stages to final approval from Board or CEO</p> | <ul style="list-style-type: none"> - Increase training opportunities and awareness raising of EIA - Liaise with Operations teams to improve consultation and engagement with client/tenant groups and individuals with protected characteristics - Continue to seek expert advice from external organisations to inform EIA (e.g. Tai Pawb) | <ul style="list-style-type: none"> - Board Members are assured that sufficient EIA has been undertaken before approval - Policy and procedural guidelines - Records of EIA undertaken - Record of training and advice provided to staff - Evidence of consultation and engagement undertaken | |
| <p>Tackling Hate Crime</p> | <ul style="list-style-type: none"> - Develop and publish a Hate Crime Policy - Encourage and enable tenant/client engagement and participation in developing, implementing, monitoring and reviewing the policy and performance - Ensure staff understand their roles and responsibilities | <ul style="list-style-type: none"> - Up to date Hate Crime Policy in place - Recording and reporting of Hate Crime incidents and actions taken reported to Board - Training records of staff - Complaints reports to Board | <p>Strategic – Directors of Operations, Director of People Services Operational – HR Manager, Housing Manager, Operations Managers, Governance & Assurance Manager</p> |
| <p>Data collection and analysis to:</p> <ul style="list-style-type: none"> • tailor and develop services • identify under representation or gaps in provision • identify patterns or trends • provide assurance and inform strategic decision-making | <ul style="list-style-type: none"> • Review population data and other relevant data as it becomes available to ensure that the most current data is used to inform EIA (e.g. Census Data, Local Wellbeing Plans) • Improve our collection and reporting of protected characteristics data from our clients and tenants at critical points of contact to include: <ul style="list-style-type: none"> - Letting a home - Engagement with support, learning or similar - Anti-Social Behaviour reports - Hate crime reports - Income collection concerns (i.e. rent arrears) - Tenancy terminations • Analysing complaints by protected characteristics to support with identifying any patterns with complaints. • Improve our collection and reporting of protected characteristics data from Staff and Board at critical points of contact to include: | <ul style="list-style-type: none"> • Quarterly client & tenant EDI reporting to Board of <ul style="list-style-type: none"> - Protected Characteristics - Tenancy terminations and lettings - Complaints regarding repairs, housing condition; service delivery, staff (and contractor) behaviours; ASB and where relevant rent arrears • 6 monthly staff EDI reporting to E & R Committee of <ul style="list-style-type: none"> - Protected Characteristics - Grievances and, complaints of bullying & harassment, staff behaviours • Annual (and ongoing) reporting of client / tenant EDI data for engagement with services • Annual Board EDI return to Welsh Govt | <p>Strategic – Directors of Operations, Director of People Services Operational – HR Manager, Housing Manager, Governance & Assurance Manager</p> |

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| | <ul style="list-style-type: none"> - Board – annual EDI survey as part of Regulatory requirements - Staff – at Onboarding and at annual check • Analysing grievances and, harassment and bullying complaints by protected characteristics to support identifying patterns • Improve our collection and reporting of EDI data of tenants and clients involved in participation and working groups to address under-representation | | |
| Review EDI policy in line with policy renewal dates | <ul style="list-style-type: none"> - Review Equality policy and amend as necessary - Consult with staff on EDI policy before approval at Board - Use a variety of methods to promote policy to all staff, clients and other stakeholders - Develop summary version for staff and clients e.g. easy read version / procedural guidelines / EDI policy poster - Review processes for reporting discrimination as part of policy review programme. | <ul style="list-style-type: none"> - The organisation promotes EDI and actively seeks to eliminate discrimination - Incidents relating to EDI are resolved at the earliest opportunity with a clear learning outcome to avoid repeat incidents. - Process for reporting discrimination is reviewed and improved and is culturally considered as having appropriate strength. Staff feel empowered to report cases - Evidence of consultation and engagement - Policy documentation - Number of concerns and queries relating to EDI breaches - Data from Complaints Log - Number of staff grievances relating to EDI | Strategic – Director of People Services Operational – Governance & Assurance Manager |
| Review accessibility of information | <ul style="list-style-type: none"> - Develop and promote guidelines on creating accessible documents, webpages and mobile apps - Liaise with Marketing and ICT teams to review accessibility of websites and mobile apps - Continue to promote and advise staff on creating accessible documents and why this is important | <ul style="list-style-type: none"> - Information on Websites and Mobile Apps are accessible to all - Guidelines - Evidence of accessibility website functions - Review of available apps | Strategic – Director of Business Development Operational – Governance & Assurance Manager, ICT Manager, Partnerships Manager |

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| Review the implementation of the EDI Plan 2023-2026 | <ul style="list-style-type: none"> - Produce and publish EDI Annual Monitoring Report - Identify areas for improvement and actions needed to realise the EDI Objectives in full | <ul style="list-style-type: none"> - The EDI Annual Report demonstrates how the organisation promotes EDI and actively seeks to eliminate discrimination - EDI Annual Report - Actions Plans and interim progress reports - Reports which outline any potential risks and mitigating actions | Strategic – Director of People Services Operational – Governance & Assurance Manager |
| To attract a diverse workforce and Board | <ul style="list-style-type: none"> - Utilise variety of opportunities and agencies to advertise vacancies widely to encourage individuals with Protected Characteristics to apply - Review and refresh website to advertise vacancies utilising personal stories, lived experiences etc. | <ul style="list-style-type: none"> - Applicants' data - Staff and Board are representative of the communities we serve | Strategic – CEO, Director of People Services, Director of Business Development Operational –HR Manager, Marketing Officer |
| Monitor access of interpretation and translation services | <ul style="list-style-type: none"> - Develop guidelines to help staff determine the need to access interpretation and translation services to support individual client needs - Review available methods for accessing online interpretation and translation services and develop how this is reported. - Monitor and investigate incidents which report problems in accessing interpretation and translation services and identify appropriate solutions to increase usage of available services | <ul style="list-style-type: none"> - Clients can understand and communicate effectively with the Association - Staff can access interpretation and translation services in a timely manner - Policy documentation - Record of interpretation services accessed - Interpretation services are communicated widely to all clients and their take up is encouraged - Client feedback and incident reporting - Staff training resources and guidelines | Strategic –Directors of Operations Operational – Governance & Assurance Manager, Operations Managers |

| THEME 3 – PROMOTION and INITIATIVES | | | |
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| Aim | Actions Needed | Outcomes Measured By | Lead(s) |
| Promote EDI in the Association | <ul style="list-style-type: none"> - Produce a regular EDI bulletin and promote via Global Email, Staff Portal / new Knowledge Hub - Provide overview of EDI at Corporate Induction and on new Knowledge Hub on Staff Portal - Refresh and promote digital version of EDI Calendar of Events | <ul style="list-style-type: none"> - Staff have an increased awareness of EDI and know how to access support and advice - Concerns and queries data - Corporate Induction resources - Evidence of promotional events - Feedback from staff | Strategic – Director of People Services Operational – Training Officer, HR Manager, Governance & Assurance Manager |

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| | <ul style="list-style-type: none"> - Promote and participate in Equality weeks/months e.g. Transgender Awareness Week, Black History Month etc | | |
| LGBTQ+ | <ul style="list-style-type: none"> - Explore options for participating in LGBTQ+ events - Continue to work with Tai Pawb and other relevant organisations to seek specialist advice on how to support LGBTQ+ staff and clients - Explore options for Stonewall Employer Index submission, other quality standards - Liaise with relevant Business Development and Operational teams to review available services for LGBTQ+ persons - Continue to review gender inclusive language within policies | <ul style="list-style-type: none"> - LGBTQ+ Staff and clients feel included and supported by the Association - Staff have an increased awareness and understanding of the challenges and barriers faced by LGBTQ+ individuals - Staff attendance and participation at events - Training records - Stonewall Employer Index rating, and/or other quality standards/awards - Staff and client feedback - Examples of EIA which include improvements and mitigating actions for LGBTQ+ individuals - Evidence of gender inclusive language within policies | <p>Strategic – Director of People Services Operational –Governance & Assurance Manager</p> |
| Sex and Gender Reassignment | <ul style="list-style-type: none"> - Conduct an audit of gender neutral and gender specific facilities across the Association and develop policy guidelines and signage for gender inclusive and gender specific facilities as required - Review the Dress Code Policy to ensure that staff are not discriminated against based on their gender identity - Provide transgender awareness training to all staff by people with lived experience | <ul style="list-style-type: none"> - The Association does not discriminate against persons in relation to their sex or gender identity - Concerns and queries data - Policy documentation - Staff feedback - Training records | <p>Strategic – Director of People Services Operational –HR Manager, Governance & Assurance Manager</p> |
| Religion & Culture | <ul style="list-style-type: none"> - Liaise with Tai Pawb and other relevant organisations to raise awareness of cultural differences which may affect service delivery - Promote religious events in the Inclusion Calendar to raise awareness and promote inclusivity amongst staff | <ul style="list-style-type: none"> - The Association is inclusive of all religions and celebrates cultural differences - Concerns and queries data - Inclusion Calendar - Staff Portal news items | <p>Strategic – Director of People Services Operational –Governance & Assurance Manager</p> |
| Ethnic Minorities | <ul style="list-style-type: none"> - Consult and engage with Minority Ethnic communities at local events | <ul style="list-style-type: none"> - The Association actively seeks to eliminate race discrimination - Minority Ethnic staff feel supported in the workplace | <p>Strategic – Director of People Services Operational – HR Manager, Governance & Assurance Manager</p> |

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| | <ul style="list-style-type: none"> - Continue to work with Tai Pawb and other relevant organisations to seek specialist advice on how to support staff and clients - Liaise with staff EDI group to support staff within the workplace - Explore options to adopt Tai Pawb Deeds Not Words | <ul style="list-style-type: none"> - Minutes and Meeting Actions - Contribution to policy development and relevant consultations - Engagement activity - Feedback from staff and clients | |
| Disability and Limiting Health Conditions | <ul style="list-style-type: none"> - Explore options for participating in relevant events - Continue to work with Tai Pawb and other relevant organisations to seek specialist advice on how to support staff and clients with disabilities - Liaise with staff and with the staff EDI group to support staff with disabilities within the workplace, including hidden disabilities - Maintain Disability Confident Employer standard | <ul style="list-style-type: none"> - Staff with disabilities or limiting health conditions inc mental health conditions, hidden disabilities feel included and supported by the Association - Staff have an increased awareness and understanding of the challenges and barriers faced by individuals with disabilities and health conditions. - Staff attendance and participation at events - Staff Surveys - Examples of reasonable adjustments made within the workplace for individuals - Training records - Staff and client feedback - Examples of EIA which include improvements and mitigating actions for individuals with disabilities or limiting health conditions - Disability Confident Employer standard | Strategic – Director of People Services Operational –Governance & Assurance Manager |
| To provide support to staff who are impacted by menopause | <ul style="list-style-type: none"> - Source and promote available training from external providers e.g. access Tai Pawb menopause network 2 x yearly - Establish quarterly support group (Menopause Café) and link in with Wellbeing staff group - Ensure that training and support is available for all staff, including men and transgender staff - Identify sources of information and advice to support staff who are impacted by the menopause | <ul style="list-style-type: none"> - Staff are aware of the impact of menopause - Staff who are experiencing menopause feel supported - Staff Surveys - Training attendance records - Information and resources on Staff Portal / new Knowledge Hub | Strategic – Director of People Services, Operational –Health & Safety, Wellbeing and Engagement Advisor |

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| <p>To increase attendance at tenant and client events and focus, working or participation groups</p> | <ul style="list-style-type: none"> - Analysis of current attendees by Protected Characteristic and identifying where there is under-representation, and then targeting under-represented groups via marketing, comms, door knocking, incentives, etc. | <ul style="list-style-type: none"> - Attendance/representation at client/tenant events and groups - Attendance/representation in working and participation groups | <p>Strategic- Directors of Operations Operational –Housing Manager, Operations Managers</p> |
| <p>To review and refresh the EDI Staff Group</p> | <ul style="list-style-type: none"> - TOR refreshed - Promotion of group - Membership and attendance - Reporting process - Explore further staff support groups / networks potential (e.g. Menopause, LGBTQ+ etc) | <ul style="list-style-type: none"> - Staff feel supported in the workplace - Minutes and Meeting Actions - Staff Testimonials - Contribution to policy development and relevant consultations - Resources and information on Staff Portal / new Knowledge Hub | <p>Strategic – Director of People Services Operational –Governance & Assurance Manager</p> |