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**FCHA Equality, Diversity and Inclusion (EDI) Strategy**

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1. **INTRODUCTION**

First Choice Housing Association (FCHA) was established in 1988 as part of the All Wales strategy to enable people with a learning disability to live independently within the community, promoting the closure of large residential institutions. This focus served to bring people with a learning disability back from out of county and home to the communities with which they associated a feeling of belonging.

In recent years, FCHA’s Tenant group has diversified and we now provide specialist homes for people living with a physical disability, poor mental health, complex needs, ex-armed forces personnel or those with a family connection to the armed forces, and anyone who is considered vulnerable within society. FCHA properties are located across Wales, spanning 20 of the 22 Local Authority areas, as well as Shropshire and Telford in England.

With FCHA’s exciting growth ambitions for 2021-2024[[1]](#footnote-1), staff capacity will be continually reviewed to complement these plans and ensure that we preserve the skills and expertise needed to deliver specialist homes for people with a range of disabilities or support needs. FCHA has seen an increase in recruitment, including employees who work remotely across Wales to increase efficiency and reduce our carbon footprint.

FCHA’s mission is to improve quality of life through the provision of quality, bespoke homes that enables Tenants to achieve independence, fulfil their potential and optimise enjoyment of life, and allows staff and family to be part of that journey. Our core values are: to uphold integrity and continue to do the right thing for the right reason; to provide equal opportunity for all; to strive for excellence in everything we do; and maintain our passion for doing the best for FCHA Tenants.

**1.1 What is covered by the strategy?**

This document sets out FCHA’s strategic aims and objectives on equality, diversity and inclusion. In order to implement, monitor and review our aims and objectives, the strategy works harmoniously with our Equality, Diversity and Inclusion Action Plan (please see 3.0 Appendices) in embracing an outcomes focused approach. The strategy and action plan is based on the SMART method, ensuring that the actions are Specific, Measurable, Achievable, Relevant and Time-bound.

As with the Equality Act 2010, which consolidated a range of different legislation into one single Act to protect people from discrimination, harassment and/or victimisation[[2]](#footnote-2), this strategy is inclusive of all the nine protected characteristics:

* Age
* Disability
* Gender reassignment
* Marriage and civil partnership
* Pregnancy and maternity
* Race
* Religion or belief
* Sex
* Sexual orientation

Further reference points for the protected characteristics listed above include The Well-being of Future Generations (Wales) Act 2015, The Human Rights Act 1998, the CHC Code of Governance and various Welsh Government regulations and legislation.

FCHA is committed to doing more with regards to equality, diversity and inclusion beyond just meeting statutory obligations, but this legal framework is of course crucial. We are bound by the Equality Act 2010 to promote equality of opportunity, eliminate unlawful discrimination and encourage positive relations between the protected characteristics or strands of diversity. Being a pan-Wales organisation, particular consideration of the Welsh Language and socio-economic duties will be given.

As an organisation, we are clear that the term *equality* is not synonymous with *sameness*. We recognise that to achieve *equality of opportunity*, not all people can and should be treated the same. Effective equality, diversity and inclusion practices will acknowledge the importance of reasonable adjustments and an appreciation that, in society, we do not all have the same chances of succeeding.

**1.2 Development of the strategy**

We are progressing towards our Quality in Equality and Diversity (QED) Award with Tai Pawb, who strive to advance equality and social justice in the housing sector in Wales. We have been committed to the QED Award process as it “is a quality mark for the Welsh housing sector and provides a comprehensive, Wales-specific framework for reviewing and improving the equality and diversity impact of [our] organisation”[[3]](#footnote-3). Tai Pawb’s assessment of FCHA’s equality and diversity performance consisted of:

* An analysis of findings from staff, Board and stakeholder surveys;
* A desktop audit;
* A three-day virtual / on-site assessment visit from Tai Pawb, which included focus groups and one-to-one interviews.

All the information that Tai Pawb has gathered from FCHA and our stakeholders has not only been instrumental in assessing our current equality, diversity and inclusion practices, but also in working collaboratively to address gaps. To this end, the QED Award has supported us in identifying, fulfilling and reporting on our SMART actions, which now form our Equality, Diversity and Inclusion Action Plan.

The benefits of the QED Award, as identified by Tai Pawb, have enabled us to develop a better informed strategy with:

* A clear understanding of where FCHA is now;
* A clear understanding of what ‘good’ looks like;
* A framework to embed equality and diversity into our organisation;
* Improved experiences of diverse Tenants, customers and staff;
* A clear framework and plan for continuous improvement;
* A means for showing that FCHA is committed to improving equality and diversity in the workplace;
* Evidence that FCHA complies with regulatory requirements[[4]](#footnote-4).

Key discussion points during the formation of this strategy were also taken to the Staff Forum, whereby forum representatives were consulted on equality, diversity and inclusion topics. This consultation with a representative group of FCHA employees further guides FCHA’s equality, diversity and inclusion work in a way which is relevant and meaningful to the staffing group. These EDI discussion points will be revisited in sections 2.1 and 2.2 and are intrinsically linked with our Equality, Diversity and Inclusion Action Plan.

**1.3 FCHA’s commitment to equality, diversity and inclusion**

The QED Award process thus far has identified not only areas of improvement and learning points, but also highlighted the things that we at FCHA have invested in regarding equality, diversity and inclusion.

FCHA has upheld a strong commitment to working inclusively and promoting diversity with regards to Tenants and staff members but did not have an EDI strategy. We are dedicated to treating people fairly and enabling access to equal opportunities, as already set out in the FCHA Equality and Diversity Policy and other relevant policies (i.e. in connection with the various strands of diversity)[[5]](#footnote-5). For the Association, this is most pertinent in respect of housing, services, recruitment and employment.

FCHA has long had in place appropriate channels for addressing any concerns around discrimination, harassment and victimisation. The Association has standalone policies for harassment and bullying, whistle blowing, and reporting hate crime. Our separate complaints policy and procedure is also available in Welsh and in easy read format. The promotion of improved understanding and awareness goes beyond the circulation of well-established policies and procedures, and includes staff training opportunities. At the time of writing, compulsory equality and diversity e-learning has recently been rolled out, with all employees passing the training with a score in excess of 80%. We appreciate that awareness raising does not stop here and we have worked with staff to identify best ways to continue this learning, as detailed in section 2.1.

At FCHA, we are proud of the emphasis we place upon working inclusively with Tenants. The first principle underpinning all that we do at FCHA is: *hearing the Tenants’ voice*. As set out in FCHA’s Tenant Participation Strategy, this may be via more formal communications known as ‘Consultative Engagement’, and also informal ‘Gateway Engagement’ events[[6]](#footnote-6). The Association always takes into consideration the diversity of FCHA’s Tenant group when planning and organising these, ensuring that our calendar of Tenant Participation events includes an assortment of activity in various locations, accommodating for different interests, needs, and the geographical spread of FCHA properties. Prior to the COVID-19 pandemic, FCHA’s Customer Service Advisors would record Tenant attendance at events on our database. With the easing of COVID restrictions, this practice has now been reinstated in order that we can analyse the data in light of any patterns in attendance and non-attendance.

The Association is equally invested in being inclusive of staff diversity and needs. Our Head Office was selected for accessibility reasons and further had a lift installed to support any employees or visitors with mobility issues. As with Tenant events, we ensure that there is something for everyone in FCHA’s annual programme of activities and events for staff. Being a pan-Wales organisation, we are a proud promoter of the Welsh language, with some colleagues being fluent speakers and many others taking the opportunity to learn. Additionally, much of our communications are released in Welsh and English, and always consider accessibility.

The Association fosters a positive workplace culture whereby staff respect each other, feel valued, and benefit from a range of employee benefits in both their personal and professional lives. Further reflecting FCHA’s commitment to embedding a positive culture (for employees and Tenants), the Association introduced a new role to the staffing team in 2021: the Health and Wellbeing Coordinator. All of this and more has contributed to an overall staff satisfaction level of 100%, which we strive to maintain by listening to FCHA employees and responding appropriately. This has been embedded more recently through the formation of the Staff Forum, whereby a group of employees from across the organisation represent the whole staffing group. The representatives meet regularly to discuss pertinent matters to the Association and come up with new ways to combat challenges and embed positive changes. Feedback and suggestions from the Staff Forum feed directly into FCHA’s Executive Meetings where they are carefully considered and turned into tangible outputs for staff.

**2.0 FCHA EQUALITY, DIVERSITY AND INCLUSION (EDI) STRATEGY**

As detailed previously,this strategy and the associated action plan is informed by engagement with staff, Board and Tenants through our Quality in Equality and Diversity (QED) journey, and also through the analysis of diversity data and comprehensive desktop reviews. Stemming from our work with Tai Pawb, discussion points were also raised at the Staff Forum in order for the Reps to have their say on some important areas of EDI.

The following information links to the SMART actions (Specific, Measurable, Achievable, Relevant and Time-bound) included in our Equality, Diversity and Inclusion Action Plan. It highlights what we intend to achieve in terms of both staff and Tenants, why it is meaningful, how we seek to produce outputs, and the process for monitoring and reviewing these.

**2.1 Our approach to staff equality, diversity and inclusion**

Components of our Equality, Diversity and Inclusion Action Plan (see appendices) were discussed with FCHA employees at our Staff Forum in order to identify how best to proceed with certain areas of work.

 **EDI** **training and awareness raising**

 Looking forward, staff felt that an alternative approach to training may be beneficial in relation to equality, diversity and inclusion matters. The consensus was that this body of learning would be better suited to face-to- face training as the discussions held in person makes it more meaningful and memorable. Asking questions is easier done when in a room together, as opposed to online where it can be difficult to feel comfortable as part of the group and effectively pick up on social queues. Some shared that it felt increasingly important to create a ‘safe space’ to ask questions without the fear associated with getting things wrong, particularly if staff members have not experienced diversity in their personal lives.

The suggestion was made to incorporate training on different protected characteristics in line with the EDI calendar, so that staff can learn about different areas of diversity at a time where it is being celebrated and discussed more widely. It was felt that this would increase knowledge and understanding as FCHA employees would be learning about particular strands of diversity perhaps one at a time, rather than being overloaded with information in one session. The representatives felt that, by learning in this way, it would also allow the Association to publicise the awareness raising sessions via social media channels, demonstrating a willingness to learn, and our commitment to becoming a more inclusive organisation with EDI as a priority.

Further on the effectiveness of training, it was proposed that awareness raising may be more robust and meaningful if done interactively with the support of outside agencies. For example, learning about different cultures and faiths through food, music or sport, and by bringing in speakers and charities with lived experience in various areas of diversity. Embedding EDI as more of a ‘golden thread’ in this respect was considered by the forum representatives to be beneficial in many areas of the organisation’s practices, such as workplace culture and wellbeing, and resulting in increased applicants from diverse backgrounds during recruitment.

**Staff Diversity and Recruitment Practices**

Staff were sensitive to the lack of diversity amongst FCHA’s employees in relation to more visible strands of diversity such as ethnic background. The forum representatives were acutely aware that FCHA is underrepresented ethnically in relation to the staffing group and that this is owing to a lack of diversity in applicants during the recruitment process. We will seek positive action in recruitment practices and consider how best to effectively portray a sense of belonging for job seekers from diverse backgrounds.

The Association is partnering with Race Council Cymru in advertising job vacancies. Alongside this, we are reviewing how FCHA is represented and will work with Tai Pawb to reach a wider audience. We will also:

* + Emphasize flexibility in working hours to appeal to working parents and those with care responsibilities;
	+ Release video adverts for jobs to be more inclusive of particular disabilities;
	+ Engage with Human Resources departments and Employability Officers at other Housing Associations to gauge if we are missing any best practice;
	+ Invest in the person more when recruiting, such as employing someone with potential and providing them with training opportunities in order to thrive at FCHA;
	+ More actively recruit via Universities, as they are hubs for diversity and provide opportunities for those wanting to further their new skills and knowledge, or open up the job market for mature students wanting to get back into the workplace/change their career.

 **Tenant Diversity Monitoring Data**

FCHA have updated their diversity monitoring forms to ensure that the questions and answer options are in line with the 2021 Census. Robust diversity data plays a crucial part in creating strong foundations for effective EDI practices. When consulting with staff, there was uncertainty around why data is collected and whether this data is regularly reviewed. Staff knew that the data was particularly important for the Housing Management Team, but were unsure about the specifics of its usage. This made it difficult for the forum representatives to reflect on the effectiveness of data and its purpose. We will endeavor to raise staff awareness on the use of equality data, both for regulatory purposes and to ensure we are tailoring services to meet the diversity of Tenants.

**Attitudes towards Equality, Diversity and Inclusion (EDI)**

Staff agreed that there is merit in FCHA’s willingness and desire to learn and felt reassured that we are having conversations around equality, diversity and inclusion. The forum representatives felt that, whilst the staffing group could be forthcoming about areas for improvement and are happy to offer suggestions, progression may be better achieved by partnering with external organisations and agencies who may have more experience and expertise in this field. Embracing a solutions-focused approach through partnership working may be the first step to ensure that FCHA produces effective and meaningful equality, diversity and inclusion outcomes. By engaging with consultants with the relevant skills, it may offer different insight and valuable advice in relation to all the equality, diversity and inclusion discussion points raised at the Staff Forum.

Staff expressed that FCHA’s workplace culture is a positive one whereby colleagues feel valued and have the opportunity to contribute and that the Association empowers and enables staff to thrive. FCHA places great emphasis on employee wellbeing and ensuring people feel supported. These sentiments have also been reflected across the Association via staff satisfaction surveys.

**2.2 Tenant equality, diversity and inclusion**

 Staff felt that it is important to recognise what we do particularly well at FCHA. As a specialist housing provider for people with disabilities, consensus was that the Association is effective in acting inclusively in relation to this strand of diversity and always makes decisions with the best interest of Tenants at heart.

**Tenant Feedback**

FCHA releases an annual Tenant survey and we are proud of the positive feedback we receive. In response to the 2022 survey and most relevant to the topic of equality, diversity and inclusion, Tenants have told us that:

*“The adaptations were made to make my sons life better. He loves it here and is more independent which makes my life easier.”*

*“I enjoy attending FCHA meetings as I get the opportunity to meet new people outside of the area I live in.”*

*“First Choice provides every tenant everything that* [is] *needed to help and* [be] *more independent.”*

*“I'm really happy.”*

In terms of Tenants satisfaction levels across the Association at the time of writing, the following are significant in relation to equality, diversity and inclusion:

* 99% of respondents said they feel happy in their home
* 99.5% of respondents said they feel safe in their home
* 99% of respondents said their home helps them to be independent
* 97.5% of respondents said they feel like they belong in their community
* 99% of respondents said they feel happy with their neighbourhood as a place to live
* 96.5% of respondents said they have enough ways to communicate with FCHA
* 99.5% of respondents said they are happy with the overall services provided by FCHA
* 99.5% of respondents said that FCHA is a good landlord
* 99% of respondents said they trust FCHA
* 97% of respondents said FCHA provides enough opportunities for Tenants to get involved

 **The role of Local Authority and Support Provider partners**

Staff reflected on the lack of diversity amongst FCHA Tenants, particularly in relation to ethnicity, religion and belief. The Association itself cannot directly influence decision making around who does and does not become an FCHA Tenant, as Local Authority partners have full nomination rights. It is difficult for FCHA to answer questions around representation across its Tenant group without engaging more closely with Local Authority partners on this topic to ensure that the process is not in any way exclusionary.

Staff expressed an interest to know how diversity is considered by FCHA’s Support Provider partners. For example, are Tenants matched (where possible) with support staff who may have similar lived experiences or share certain protected characteristics? Factoring in this potential compatibility with regards to support would be a beneficial way of fostering positive relationships and encouraging a sense of belonging at FCHA properties.

Whilst our influence in these areas is limited, FCHA will ensure that all Service Level Agreements with Local Authority and Support Provider partners include EDI agreements/arrangements.

 **Hate Crime**

 FCHA has well-established processes for reporting and responding to hate crime incidents. Despite this, support staff or Tenants themselves do sometimes fall short of notifying us as their Registered Social Landlord (RSL). Engagement with Support Provider partners directly has revealed that, for some, incidents of hate are endured by staff but not acted upon. Sadly, to some it can be viewed as a ‘normal part’ of their job to shield supported Tenants from negative attitudes, even when this becomes more serious. In discussing this with FCHA staff, the sentiment was that we need to understand *why* some Support Providers may not come to us.

Staff have considered more proactive approaches to reduce the likelihood of hate crime occurring in the first instance, such as creating a video to share with the neighbours of FCHA properties, ideally at the early stages of the development process. The premise would be for people who may have felt nervousness and uncertainty around an FCHA property being built near their home, and may have had negative feelings towards the development, to share their insight and, importantly, the reality that they came to know and the shift in their attitude. This idea has also received support from some Local Authority and Support Provider partners as more of a prevention approach. The hope is that such footage will help to reduce the ‘Not In My Back Yard’ (NIMBY) issue which sadly does sometimes occur in a supported living setting.

**Celebrating Tenant Diversity**

Staff felt that the quarterly newsletter was a positive way of supporting Tenant diversity by publicising stories in peoples’ own words, such as the ‘coming out’ story that one Tenant shared in relation to their experiences as a transgender person. This was a ‘star story’ in one of our newsletters and staff felt that, if people feel comfortable to share, this outward support is certainly positive. We will translate this ethos over to our digital platforms, such as FCHA social media pages, as an authentic way for us to further celebrate diversity and promote inclusivity (of course being sensitive to any anonymity requirements).

**2.3 Monitoring and review**

FCHA recognises that successfully responding to and improving equality, diversity and inclusion practices relies heavily on regular monitoring and review of the EDI strategy, action plan and budget by:

* Use of the ‘Decision Time’ software, allowing visual representation of progress against key strategic milestones in the implementation plans;
* Continued engagement and consultation with staff to ensure that the focus is ‘best fit’ for them as FCHA employees and also Tenants;
* Meetings and feedback to measure whether key outcomes are being achieved and what more can be done;
* Continued engagement with Tenants around inclusivity and satisfaction with FCHA as their Registered Social Landlord (RSL);
* Continued commitment and scrutiny from FCHA’s Board of Management;
* Reporting against a number of equality, diversity and inclusion criteria.

FCHA will ensure that, where relevant, equality, diversity and inclusion news and results will continue to be fed-back to Tenants, Support Providers, Local Authority partners, FCHA staff and Board members.

Our EDI strategy and action plan is a live document which will be reviewed and updated regularly to ensure that it continues to be significant and valuable.

**3.0 APPENDICES**

**3.1 Equality, Diversity and Inclusion Action Plan**

[**EDI Action Plan 2022.xlsx**](file:///%5C%5C10.10.10.20%5Cdriveg%5COrganisational%5CQED%5CEvidence%20folder%5CEDI%20Action%20Plan%202022.xlsx)

1. Please refer to FCHA’s Strategy 2021-2024 for more insight. [↑](#footnote-ref-1)
2. For more information on the different types of discrimination and how it should be reported, please refer to FHCA’s Equality, Diversity and Inclusion policy [↑](#footnote-ref-2)
3. For more information, please visit <https://www.taipawb.org/consultancy/qed/> [↑](#footnote-ref-3)
4. <https://www.taipawb.org/consultancy/qed/> [↑](#footnote-ref-4)
5. See separate FCHA Equality and Diversity Policy [↑](#footnote-ref-5)
6. For more information, please refer to FCHA’s Tenant Participation Strategy [↑](#footnote-ref-6)