



Title	Equality, Diversity and Inclusion Strategy 2019-2023
Scope	This policy applies to all businesses within emh group
Authors	Head of Quality & Standards
Date Approved Approved By	9 th September 2019 - emh homes Board 10 th September 2019 - emh care & support Board 13 th September 2019 - emh group Board 2 nd September 2019 - Midlands Rural Housing Board
Review Date	April 2023
Key Values	Diversity: This strategy sets out our approach to equality, diversity and inclusion. Diversity is one of our core values and we seek to embed it throughout all that we do. The diverse workforce and client groups we have contributes to the culture of the organisation and our achievements.
Business Plan Key Strategic Goals	<p>People and Organisational Development:</p> <ul style="list-style-type: none"> ➤ Initiate an Organisational Development programme to develop an organisational culture that celebrates diversity, empowers staff, embraces change, and manages and values talent. ➤ Review our rewards and recognition frameworks to ensure we attract and retain staff. ➤ Refine and continue to roll out our Learning and Development Strategy, including our leadership development and coaching for performance programmes. ➤ Further develop our approach to talent management and succession planning. ➤ Expand the emh Academy, making full use of the Apprenticeship Levy, offering a range of options for people wishing to pursue work based qualifications, traineeships and apprenticeships. ➤ Actively promote the health and wellbeing of our colleagues. ➤ Refresh the skills and diversity of the Board to align to the current operating environment. <p>Housing and Neighbourhood Services:</p> <ul style="list-style-type: none"> ➤ Establish high performing and highly effective estate services and community development services.

	<ul style="list-style-type: none">➤ Increase resident engagement and feedback opportunities, bringing the views and comments made by our customers together into meaningful learning that influences service development.➤ Develop a strategy for the future of the older persons' housing stock, neighbourhood and support services, including more collaborative working between emh homes and emh care and support to provide holistic support solutions.➤ Ensure the highest standards of safe working practices, ensuring our homes and communities are safe places to live and work.➤ Increase the use of customer information to target and improve services in order to achieve top quartile satisfaction levels.➤ Increase efficiency outputs by providing more digitally accessible customer services. <p>Care and Support:</p> <ul style="list-style-type: none">➤ In line with our values and core client group, we will actively promote employment opportunities for people with disabilities. <p>Growth and Business Development:</p> <ul style="list-style-type: none">➤ We will actively seek out opportunities for expansion through acquisition and partnering, including merger opportunities that align with our values and requirements. <p>Business and Financial Resilience:</p> <ul style="list-style-type: none">➤ In line with our values and core client group, we will actively promote employment opportunities for people with disabilities.
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FOREWORD

We want our approach to equality, diversity and inclusion to be contained within the DNA of our business, embedded in all that we do. The correlation between this Strategy and our business plan objectives demonstrates our commitment to this with 60% of these overarching objectives having links to this Strategy.

We have a diverse team at emh, with strong ethics and values that align with the values of the business – one of these is ‘Diversity’ – respecting people for who they are. We are incredibly proud to work alongside these colleagues, who every day look for opportunities to create equality and fairness across the housing and care sectors, working with our customers, supporting them to achieve all they want to.

We as Board Diversity Champion and Group Chief Executive have a strong personal commitment to equality and diversity and we are committed to championing this strategy, supporting our people to meet it and exceed it. We know we need to focus strongly on engagement and increasing the ways in which we can truly improve opportunities for people, but we also know that emh has the will, ability and above all the strongest moral compass to achieve it.

We would encourage all that read this Strategy, to join us; come and have a conversation with us about how you can support it and be part of the delivery of it and really make a difference to the lives of the people, communities and stakeholders we serve.

Patricia McCabe

Board Diversity Champion

Chan Kataria

Group Chief Executive

1. INTRODUCTION

emh is committed to achieving equality of opportunity in all aspects of our work and to ensuring that equality, diversity and inclusion (EDI) are mainstreamed throughout our organisation. Our Vision is to be the best social housing and care business in the Country, leading the market as an employer and service provider. Our Mission is to provide housing and care to improve opportunities for people. We believe that we cannot achieve either of these objective without a commitment to our core values of Integrity, **Diversity**, Openness, Accountability, Clarity and Excellence.

The people who provide our services, those who use them and the wider communities with which we engage, all have diverse backgrounds, characteristics, experiences and needs. Prejudice, discrimination, stigmatisation and harassment remain part of everyday life in society for many people. We are committed to doing all we can as an organisation to eliminate such experiences from our workplaces and services, and to contribute to a fairer, more equitable society that respects and recognises diversity of every kind.

For this reason, we do more than simply comply with equality and diversity legislation: we identify, champion and embed best practice.

Our **equality, diversity and inclusion vision** is:

‘to champion change, breaking down barriers that hold people back and creating opportunities for people to succeed’

We are focused on creating a culture and environment that allows every individual to flourish and that respects their contributions.

We believe in accountability for both actions and for inactions. We also believe that transparency and openness are critical components in achieving an effective EDI strategy.

Strong leadership is vital and our board and senior management are committed to championing equality, diversity and inclusion initiatives throughout our organisation.

We have in place policies and procedures which cover all legally Protected Characteristics (see appendix 1).

emh has established this EDI strategy to help us achieve positive outcomes for existing and future employees and customers, our partners and the wider community. We will take positive action to address the needs of under-represented groups who face barriers in accessing information, homes, services and employment opportunities. We will do this in partnership and consultation with wider community groups, voluntary and public organisations.

2. KEY COMMITMENTS

We have outlined below our key commitments. These are closely aligned to our business plan to ensure that EDI is embedded across our business activities. Each of these commitments is translated into SMART targets and actions within an accompanying action plan (appendix 2), progress against which shall be monitored by our emh group board.

For the first year of this strategy, our focus is on continuing what we have already started and importantly scoping and researching what data, information and metrics we need to ensure that we deliver on our commitments. This is not to say that we will stand still. We already

have significant policies, processes, actions and achievements in this area – these are outlined in section 3 of this Strategy. We intend to continue and build on these, and where we can quickly achieve additional value, we will do this.

2.1 Business and Financial Resilience Commitments

- ✓ Be a sector leading voice for championing and tackling EDI issues
- ✓ Develop close partnerships that have aligned values relating to EDI
- ✓ Ensure we have robust data collection and reporting around EDI to help inform business decisions and tackle discrimination, bias and stigmatisation
- ✓ Use our data to develop a programme of positive action to encourage under-represented groups to become more involved and help us to improve
- ✓ Develop a suite of metrics and indicators that provide meaningful insight into the provision, targeting and use of our services, highlighting areas where positive action needs to be taken to address imbalance

2.2 People Commitments (employees)

- ✓ Support a culture that enables all staff to achieve their full potential
- ✓ Increase engagement levels amongst staff
- ✓ Sustain a workplace where the dignity and rights of all are respected and protected, and the needs of staff are met
- ✓ Ensure we use non-discriminatory language in all communications; and to communicate with staff in their preferred format wherever possible
- ✓ Equip staff with knowledge and skills needed to comply with the EDI strategy and the law
- ✓ Identify and eradicate unlawful and unfair discrimination and harassment
- ✓ Maintain fair and transparent recruitment, promotion and reward processes

2.3 Housing and Neighbourhoods Commitments to Customers and Communities

- ✓ Ensure fair and equal access to homes and services
- ✓ Embed a culture of respect for all
- ✓ Ensure staff and engaged customers are aware of and trained in diversity and equality issues
- ✓ Address any concerns over EDI issues promptly, fairly and transparently
- ✓ Ensure we engage and consult with wider communities, including minority groups; and develop positive action projects to work with under-represented communities
- ✓ Ensure we use non-discriminatory language in all communications; and to communicate with customers in their preferred format wherever possible
- ✓ Ensure our services reflect the diverse needs of the communities we serve
- ✓ Demonstrate leadership on EDI issues

2.4 Care and Support Commitments to Service Users, their Families and Partner Agencies

- ✓ Ensure communication and information needs are fully met
- ✓ Meet dignity and respect regulatory requirements
- ✓ Research what additional services or provision is needed for vulnerable individuals and assess how we can help to meet that unmet need
- ✓ Tackle stigmatisation within our communities through awareness campaigns and educating wider society
- ✓ Ensure our services are culturally sensitive particularly in relation to gender mix, meal requirements and personal care
- ✓ Provide care and support staff that more closely reflect the individuals we serve

- ✓ Ensure routes to access our services are uncomplicated, easy to navigate and have person centred options

2.5 Growth and Business Development Commitments

- ✓ Developing a programme for new homes that caters for a wide range of needs, demographics, accessibility, digital requirements; culturally sensitive design requirements and community location/geography
- ✓ Ensuring that our sales and home ownership products are inclusive and accessible by all and that we are using data to understand where this is not the case
- ✓ When procuring our development contractors, ensuring they have a diverse workforce and policies in place to support our wider EDI agenda
- ✓ Ensure any merger or acquisition opportunities consider the impact on diversity for our business and have aligned values
- ✓ As we expand our geographical spread, ensure that we understand the demographics of the areas we are reaching and what impact that has on our staffing and customer profile

3. OUR CURRENT POSITION AND FUTURE PLANS

Alongside the commitments we have made above, we are already pro-actively working towards positive EDI outcomes. It is our intention to continue to deliver these whilst we embed our new approach through this strategy. Below we outline what we already do, and also what we know we need to work on.

3.1 Data and Information

We collect and use a wide range of data and information relating to the demographic make up of our customers and staff, this includes gender, age, disability, religion, and sexual orientation. During year one of this strategy, we want to focus on improving the completeness of the data as for some areas, non-disclosure is prevalent – this is particularly noticeable for disability and sexual orientation. We also need to increase our data collection to include for example gender reassignment status.

Satisfaction and complaints data helps us to understand where we are in meeting needs and where we need to focus effort to bring about improvements. We are good at using these data sets independently of each other, but we do need to develop a methodology to bring them together to provide more joined up results and therefore actions. One of these data sets, our Survey of Tenants and Residents (STAR) has a range of statistically reliable data that is capable of giving insight into different client groups – we need to analyse this at the granular level to fully understand the levels of satisfaction across all our customers not just the tenure groups of general needs, older persons and home owners. The same can be said for other customer relevant data sets and our employee data too. If we can use this information to its full potential, we will be able to target and improve services, leading to improved satisfaction and performance. It will also enable us to target positive action to address potential barriers to equality for our customers and colleagues.

3.2 Diverse Board, Leadership and Staff

We aim to have a workforce that is representative of our communities and an organisational culture that values diversity and encourages high levels of employee engagement. We take positive steps to try to redress any imbalance. This aim is supported through our Boards and leadership. We have a business plan targets for having boards and workforce that match the demographics of the communities we serve.

Our 'women on boards' initiative was established in 2018 to give potential female board members guidance on making their application stand out, on maximising their impact at interview, including observed board meetings, and meeting a leading female Chair role model. We have reviewed our board recruitment practices - actions include extending recruitment lead-in times; developing a candidate pipeline; adding softer skills to person specifications; using more accessible language; adding positive imagery of women; and promoting development opportunities to help candidates build expertise and fulfil their potential. In 2018 we invited 20,000 tenants to a demystifying governance workshop, which resulted in a successful skills based appointment to the group board.

We want to continue with these actions, but also to expand them to attract other under-representative group onto Boards and into our organisation, particularly young people.

We want to ensure we attract talented people from a diverse range of backgrounds into careers within the housing and care sectors. Our emh group Academy has been successful in attracting and recruiting apprentices from a range of backgrounds. Significant highlights for the Academy have been the increase in the number of younger people across the organisation; and the number of females successfully securing apprenticeships in traditionally male dominated professions such as building trades. Promotional materials and activities have contributed to this success. We are strongly committed to continuing this good work. We value the achievements of the Academy in helping us to 'grow our own' pool of talent.

We are committed to regularly reviewing our gender, age and ethnicity pay gap data to gain greater understanding of any gaps that exist, and where appropriate we will take action to reduce this over time. Actions include a leadership development programme through which all of emh Group's leadership team are to be trained coaches by 2023. As at Summer 2019, 51 employees have been trained, 59% of whom are women; 31 women are receiving coaching (85% of our total).

Through our Investors in People journey we have achieved Gold for emh group and silver for emh care and support. The value of this framework in improving our working practices and engagement of colleagues is high and we intend to build on this through introducing a range of pulse surveys and diversity focus/champions groups. It is our aim to give colleagues a real voice through these groups, and we will be guided by staff in establishing these groups to reflect their needs and priorities relating to equality and diversity.

3.3 Policies, Learning and Development

Our robust framework of policies to support our approach to EDI is wide reaching and includes anti-harassment and discrimination; whistleblowing; safeguarding and codes of conduct for staff, Board members and engaged tenants.

We have a rolling programme of mandatory training for all staff, Board members and engaged tenants and this explores not just legal requirements, but unconscious bias and inclusivity. We do want to review our learning offer during the course of this strategy to ensure it is tailored to the role profiles and needs of staff, Board members and engaged tenants. We are already exploring the provision of LGBTQ+ training, recognising that this is an area where we need and want to do more. Our aim is that our training will be relatable, interactive, educational and thought challenging to help people to recognise and address any conscious and unconscious bias.

We recognise that inclusive policies and learning provision, increases assurance and confidence that our staff are well informed and that we actively promote EDI positive practices. We know that this helps increase staff satisfaction and wellbeing leading to

colleagues being able to bring their whole selves to work, reach their full potential and have fulfilling work lives.

We also recognise that staff and customers need to feel able to report concerns without fear of reprisals. We already take a zero tolerance approach to this but our aim is to make the process more transparent and easy. The diversity focus groups we are establishing (see Championing and Celebrating Diversity below) will play a key role in helping to shape the process and in helping us to understand what any fears may be. We also want to engage more with partner agencies who may be better placed to offer support to any victims of discrimination and guidance to us in how we can improve. This includes:

- ✓ our employee assistance line partners
- ✓ hate crime centres
- ✓ Police
- ✓ Local Authorities
- ✓ Housing Diversity Network
- ✓ PlaceShapers
- ✓ Tenant Participation Advisory Service (Tpas) and East Midlands Tenant Participation Forum (Emtpf)
- ✓ Business in the Community

Learning from others, continually reviewing and evaluating our own performance will support our strategic aims.

We embrace equality, diversity and inclusion because it is the right thing to do, but we recognise that we must meet the legal and regulatory requirements of the Equality Act 2010, Regulator for Social Housing regulatory standards, Care Quality Commission standards and the NHS accessible information standard for our care business. We set out to meet these requirements, but also to go beyond them.

3.4 Accessing Services and Information

Our mission is to improve opportunities for people and as such we support a wide range of vulnerable people through offering a wide range of services. These include:

- ✓ Allocation of our homes and choice-based lettings
- ✓ Tenancy and estate management, including harassment and anti-social behaviour services
- ✓ Income collection and financial inclusion services
- ✓ Aids and adaptations
- ✓ Care provision
- ✓ Intensive housing management support
- ✓ Repairs
- ✓ Day services for our service users with learning disabilities

We provide high quality, person centred support. We strive to ensure that customer services and information about them are accessible.

We provide easy to read documents that are appropriate for the target audience. We have introduced a tenant proof reading group to help provide feedback on the accessibility and ease of reading our customer facing documents. Removing barriers to communication empowers people which in turn removes inequality of access to services.

We have a multi-channel approach to communication and we have committed to increasing digital channels where appropriate but not by default. We do recognise though that digital platforms help to ease access to information and services and are more efficient. These methods often suit our younger customers too.

Translation and interpretation services are expensive, and so rather than offer this as the solution to all our customers information needs, we discuss alternative methods with them to ensure the communication is appropriate yet cost effective. We partner with Language Line for most of our needs and this is both a telephone and written service. We also have staff translators and interpreters who support our day to day needs at point of request.

3.5 Championing and Celebrating Diversity

This strategy will be championed and monitored by a strategic steering group made up of colleagues from across the business. Part of their role is to engage with staff to achieve the aims we set. We are therefore committed to establishing focus groups to really fully engage with and understand the diverse needs of our colleagues.

In arriving at this strategy, we undertook some independent research through our Business in the Community network. We surveyed staff, receiving a 21.6% response rate, and found that 77.5% of staff perceived emh to be either inclusive or very inclusive. For us, this is a starting point and we intend to improve on this position during the course of this strategy.

Part of achieving this is to make sure we establish greater engagement opportunities, but also that we fully celebrate diversity. We are helping to raise awareness of diversity issues through our work with:

- ✓ 24 Housing and the sponsorship of the 24 Housing Diversity Award
- ✓ Representation on the judging panel for the Women in Housing Awards
- ✓ Sponsorship of the East Midlands Chamber of Commerce community engagement award
- ✓ Group Chief Executive, Chan Kataria, is one of seven ambassadors for the Inside Housing Inclusive Futures Campaign

We can do more and intend to actively seek out opportunities to increase our contribution; celebrate and champion diversity and inclusion across not just the housing and care sectors, but wider business.

4. OUR APPROACH TO DELIVER OUR OBJECTIVES

This is a four-year strategy and we have identified above many objectives we want to achieve. We have therefore developed our action plan to reflect more detail around those objectives. In brief the plan sets out the following:

Year one – Research Phase (Planning)

- review of data available, gaps analysis and establishment of plans to fill those gaps
- cross sector/business review of good practice in data collection and monitoring
- development of focus groups
- review of the terms of reference of the strategy steering group
- development of key metrics to be monitored and reported to boards
- development of a refreshed annual report to Board
- development of an EDI event and awareness raising programme

Year Two – Implementation of Data Knowledge (Doing)

- data gathering for new metrics
- formulate targets against the data sets where required
- review of key EDI related policies including recruitment and selection, harassment, employee interventions such as discipline and grievance. The shaping in year one of the metrics we want to collect in relation to these will provide be useful in identifying how these policies need to be shaped going forward
- review of the EDI training/learning and development provision
- development of positive action activities

Year Three – Review (Checking)

- measurement of journey begins – what has changed as a result of our research and implementation?
- Gaps analysis/review and identification of what else we need to do
- Review of best practice across sectors – identification of what else we can learn and implement.

Year Four – Reporting and Demonstrating Positive Outcomes (Acting)

- lessons learned including where we didn't achieve what we set out to and why
- feedback from staff, customers and partners about impact for them
- review of measures/metrics – are they giving us what we need?
- commence review of the strategy

July 2019.

Appendix One

Protected Characteristics

The Equality Act covers the same groups that were protected by existing equality legislation – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity. These are now called ‘protected characteristics’. The Act extends some protections to characteristics that were not previously covered, and also strengthens particular aspects of equality law.

Age (no change)

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if you can justify it (for example if you can demonstrate that it is a proportionate means of meeting a legitimate aim). Age is the only protected characteristic that allows employers to justify direct discrimination.

Disability (new definition and changes)

The Act has made it easier for a person to show that they are disabled and protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

As before, the Act puts a duty on the employer to make reasonable adjustments for staff to help them overcome disadvantage resulting from an impairment (for example, by providing assistive technologies to help visually impaired staff use computers effectively).

The Act includes a new protection from discrimination arising from disability. This states that it is discrimination to treat a disabled person unfavourably because of something connected with their disability (for example, a tendency to make spelling mistakes arising from dyslexia). This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably be expected to know, that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim.

Additionally, indirect discrimination now covers disabled people. This means that a job applicant or employee could claim that a particular rule or requirement you have in place disadvantages people with the same disability. Unless you could justify this, it would be unlawful. The Act also includes a new provision which makes it unlawful, except in certain circumstances, for employers to ask about a candidate’s health before offering them work.

Gender reassignment (new definition)

The Act provides protection for transsexual people. A transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. The Act no longer requires a person to be under medical supervision to be protected – so a woman who decides to live as a man but does not undergo any medical procedures would be covered.

It is discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent because they were ill or injured

This is being taken into account as part of the review of Sickness Absence, and will be integrated within the updated policy.

Marriage and civil partnership (no change)

The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected.

Pregnancy and maternity (no change)

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled. During this period, pregnancy and maternity discrimination cannot be treated as sex discrimination. You must not take into account an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

Breastfeeding is now explicitly protected, and needs to be brought to the attention of the providers of e.g. our catering services, or any on-campus retail outlets.

Race (no change)

For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins.

Religion or belief (no change)

In the Equality Act, religion includes any religion. It also includes no religion, in other words employees or jobseekers are protected if they do not follow a certain religion or have no religion at all. Additionally, a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or no belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief. Discrimination because of religion or belief can occur even where both the discriminator and recipient are of the same religion or belief.

This characteristic includes having a religion or belief and not having one. It does not include political beliefs, scientific beliefs, or supporting football teams. However, there has been a tribunal case where a belief in man-made climate change met the threshold of the belief being 'cogent, serious and worthy of respect in a democratic society.' We have to be mindful of this threshold when determining if a person's belief falls under the protection of the Equality Act. It is important to note that minority religions are treated with the same consideration and respect as more prominent religions.

Sex (no change)

Both men and women are protected under the Act.

Sexual orientation (no change)

The Act protects bisexual, gay, heterosexual and lesbian people.