



Equality, Diversity & Inclusion Strategy

This document sets out the Equality, Diversity and Inclusion Strategy of Community Housing Cymru. It explains why equality, diversity and inclusion are important to us, the basic principles we will follow and how we intend to achieve a Wales where good housing is a basic right for all.



We have developed this strategy with the support of **Professor Uzo Iwobi OBE**, Founder of Race Council Cymru.





Table of contents

<u>1. Introduction</u>	4
<u>2. Working principles</u>	4
<u>3. Equality, diversity and inclusion definition & statement</u>	4
<u>4. Equality, Diversity and Inclusion Strategy</u>	6
4.1. Equality legislation	6
4.2. Aim of the Equality, Diversity and Inclusion Strategy	7
4.3. Community Housing Cymru leadership: Board and Senior Management	8
<u>5. Specific actions and commitments</u>	8
5.1. Intersectionality	8
5.2. Pledges	9
5.3. Protected characteristics	9
a.) Gender	10
b.) LGBTIQ+	11
c.) Disabled people	11
d.) Race and ethnicity	12
e.) Religion and belief	13
f.) Age	14
g.) Socio-economic factors	14
h.) Welsh language	15
5.4. Adverse Childhood Experiences (ACEs)	15
5.5. Discrimination, Harassment and Victimisation	15
5.6. Training	16
<u>6. Service delivery</u>	16
6.1. A note on digital inclusion	16
6.2. Advocacy activity	16
6.3. Training, advice and support to our members	17
6.4. Communications	17
6.5. Events and conferences	17
6.6. Equality Impact Assessments	18
<u>7. Procurement</u>	18
<u>8. Performance standards: Delivery of the strategy</u>	18
8.1. Responsibility for equality of opportunity within the organisation	18
8.2. Diversity Group	19
8.3. Day to day operation of the Equality, Diversity and Inclusion Strategy	20
<u>Appendix 1 - Equality legislation</u>	22
<u>Annex 2 - Definitions of discrimination, harassment and victimisation</u>	29
<u>Annex 3 – Social Model of Disability</u>	31



1. Introduction

We are the membership body for more than 70 not-for-profit housing associations and community mutuals and are the leading voice for the social housing sector in Wales.

Our ambition is for a Wales where good housing is a basic right for all. However, good housing means something different to everyone. There is no blanket approach to good housing, with different communities having different needs. In particular, the COVID-19 pandemic has reinforced the broad spectrum of inequality that exists in our society that needs to be addressed.

As a representative body, our mission is to enable Welsh housing associations to be brilliant, but to do this, we need to be brilliant ourselves.

This strategy sets out our ambitions and how we will work to deliver equality in social housing through the way we work and the services we provide to others.

2. Working principles

Working to equality ethics outlined below, we will operate within the following principles:

- **Transparency:** We are open and accessible in all that we do.
- **Accountability:** We deliver on our commitments and are responsible to our members and each other.
- **Adaptability:** We are flexible and responsive to change.
- **Inclusivity:** We value and embrace the diverse nature of our membership and our staff.
- **Innovation:** We actively identify new ways to deliver the best service we can.





3. Equality, diversity and inclusion definition & statement

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment and to goods and services, the basis of which is supported and protected by legislation.

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and nonvisible differences, and by respecting this everyone can feel valued for their contributions. This is beneficial not only for the individual but for the organisation as a whole.

Valuing diversity can be described as valuing the qualities that different people bring to their jobs, to the resolution of problems and the development of business opportunities - rather than judging people's ideas by the extent to which they conform to our existing values or personal preference.

Managing diversity can be described as recognising the potential that 'difference' can bring to an organisation and having the management skill to allow different perspectives and views to improve the quality of our decisions.

We are committed to promoting equality, diversity and a culture that values difference and recognises the benefit that people from different backgrounds and with different experiences can bring to a workplace.

Inclusion is a sense of belonging. Inclusive cultures make people feel respected and valued for who they are as an individual or group. People feel a level of supportive energy and commitment from others so that they can do their best at work. We strive to become an inclusive organisation, where diversity is valued, respected, built upon, and enhances the way we function; and that as an organisation, we reach out and recruit and retain a workforce that reflects the diverse communities for whom Wales is home.

The principles set out in our Equality, Diversity and Inclusion Strategy underpin our organisational values and will provide the framework for subsequent action plans for our staff, and for those we support in the social housing landscape.



4. Equality, Diversity and Inclusion Strategy

4.1. Equality legislation

We will implement this Equality, Diversity and Inclusion Strategy under the Equality Act 2010, which affects employees (including agency staff and outside contractors), members of the public and partners, and includes services delivered in partnership or by others on behalf of our organisation.

The requirements of the Equality Act 2010 protects the rights of individuals and promotes equality of opportunity for all, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

In addition, the Equality Act sets out public authority duties. While these duties do not apply to us at Community Housing Cymru, complying with them voluntarily is seen as good practice. These public authority duties require that, in exercising their functions, an organisation must have due regard to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

These public sector duties for Wales are fully set out in the Equality Act 2010 (Statutory Duties) Regulations 2011 as issued by the Welsh Government.

In addition to the Equality Act 2010, we will also follow the following relevant legislation (explanations can be found in Appendix 1):

- Human Rights Act 1998
- International Covenant on Economic, Social and Cultural Rights
- The Socio-economic Duty
- Convention on the Rights of Persons with Disabilities
- The Well-being of Future Generations (Wales) Act 2015
- UN Convention on the Rights of a Child
- UN Principles for Older Persons
- Gender Recognition Act 2004
- Marriage (Same Sex Couples) Act 2013
- UN and European Conventions on Human rights



4.2. Aim of the Equality, Diversity and Inclusion Strategy

To create a diverse workplace where people are able to be their whole selves at Community Housing Cymru and that those we provide services for and on behalf of feel fully represented.

As an employer, we will:

- Ensure everyone feels a sense of belonging, with equal access to promotion opportunities, career development and equal pay.
- Foster a co-operative working environment which is free from bullying, harassment or victimisation and which promotes good relations among staff to create the conditions for the full development of their potential.
- Represent the diversity of Wales through our workforce and recruitment process by developing policies which ensure that no job applicant or employee is unfairly discriminated against on the basis of any protected characteristic or their socio-economic background.
- Provide support and encouragement to all staff to enable them to give their best, but with special consideration for members of staff with particular needs such as those with domestic responsibilities, disabled people, religious responsibilities or health issues (both physical and mental) or public duties.

As a contributor to public policy development and debate, we will work closely with housing associations to listen to and understand a range of voices and issues to enable us to incorporate lived experience into policy making and development in a safe way.

As an events and training provider, we will remove any physical, structural or communication barriers ensuring that we are accessible to all and by all. We will also set ambitious targets when securing speakers and trainers to avoid tokenistic approaches.

As a membership body, we will aim to set an example to our housing association members, leading by example.

4.3. Community Housing Cymru leadership: Board and Senior Management

Key outcomes:

- We have effective and fair recruitment systems for appointing board members.
- The board broadly reflects the different communities the organisation serves, including new and emerging communities.
- The senior management of the organisation are aware of their equality responsibilities and know what is expected of them.
- Staff are clear where the senior management stand on questions of equality and lead by example.
- It can be demonstrated that senior management are meeting their equality responsibilities, and are actively advancing the organisation's Equality, Diversity and Inclusion Strategy.



- Progress reports on the strategy are presented to senior management in sufficient detail and with sufficient frequency for them to monitor progress against the strategy and set new directions when needed.
- All board reports will have an equality and diversity impact section, describing the impact of the report on the strategy.
- It can be clearly demonstrated that we have taken proactive steps to promoting equality, diversity and inclusion through our service provision.



5. Specific actions and commitments

5.1. Intersectionality

[The Welsh Government](#) defines intersectionality as:

“Our overlapping identities and the ways in which they connect to systems and structures of oppression and privilege. Intersectionality provides an analytical framework, which considers the cumulative effect of multiple identities. It helps us to understand how people with different identities may experience services such as health and social care, education and employment differently.”

We recognise the importance of intersectionality when addressing inequalities and will work with partners to take an intersectional approach to all the following actions and commitments across all characteristics.

5.2. Pledges

We recognise that in order to achieve the desired outcomes of this strategy, that we cannot do this alone. A formal strategic alliance with equality organisations is needed for us to deliver our objectives. As a starting point, we have signed up to Tai Pawb’s [Deeds Not Words pledge](#) and Race Council Cymru’s [Zero Racism Wales pledge](#).

Deeds Not Words pledge

To commit to the following pledges in the next 5 years:

1. Mitigate the impact of Covid-19 on Black, Asian and other Minority Ethnic staff and communities.
2. Improve the ethnic diversity of the board and staff at all levels.
3. Communicate and engage.
4. Develop an inclusive culture.

Zero-Racism Wales pledge

We commit to promoting a zero tolerance to racism throughout the organisation. This means that:

- We will take a stand against racism and promote a more inclusive and equal society for all.
- We will not tolerate racial prejudice, discrimination, harassment, victimisation, abuse, or violence against any individual.
- We will stand in solidarity, come together, and say no to racism, in all its forms.
- We will promote good race relations between people from diverse ethnic backgrounds in our organisation.
- We will promote equal and fair opportunities for people from diverse ethnic backgrounds to attain promotion.
- We will eliminate unlawful race discrimination, harassment, victimisation and abuse.



5.3. Protected characteristics

In order to achieve the aim of the strategy and outcomes of the above pledges, we need to recognise how people may experience inequality due to the following personal characteristics:

a.) Gender

[The World Health Organization](#) defines gender as the characteristics of women, men, girls and boys that are socially constructed. Gender interacts with but is different from sex, which refers to the different biological and physiological characteristics of females, males and intersex persons, such as chromosomes, hormones and reproductive organs.

Gender and sex are related to but different from gender identity. Gender identity refers to a person's deeply felt, internal and individual experience of gender, which may or may not correspond to the person's physiology or the sex assigned at birth.

We will:

- continue to work to ensure fair representation of all genders identified by members of staff, visitors and those who we support through our services to our member organisations within the social housing sector.
- recognise that transgender people can face barriers and challenges in terms of participation when attempting to access employment and as part of an existing workforce. We believe that transgender women are women, transgender men are men and non-binary identities are valid. We will also give due regard to the physical barriers that transgender people may experience when accessing our facilities. For example, toilet facilities.
- ensure fair representation of all genders in all parts of the organisation, and at all levels.
- ensure our policies and procedures address gender issues and where appropriate take positive action. Our priorities in respect of gender equality will be identified in our Equality Objectives and our Equality Action Plan.
- ensure that we do not apply any direct or indirect discrimination to our staff and those who we work for and with on the basis of gender, gender identity or marriage/civil partnership.
- ensure that Community Housing Cymru has a transparent and non-discriminatory pay system that tackles unequal pay between genders.

b.) LGBTIQ+

LGBTIQ+ stands for lesbian, gay, bisexual, transgender, intersex, queer (or sometimes questioning), and others. The "plus" represents other sexual identities including pansexual and Two-Spirit. The first four letters of the acronym have been used since the 1990s, but in recent years there has been an increased awareness of the need to be inclusive of other sexual orientations and gender identities to offer better representation.

The acronym is used to represent a diverse range of sexualities and gender-identities. This refers to anyone who is transgender and/or of diverse sexual orientation.



- We are committed to creating a safe working environment for all our staff and to those who we work for and with, giving due regard to their sexual orientation and gender identity.
- We will challenge negative views, and provide training where necessary so that there is a better understanding of these issues amongst our staff and managers.
- We will ensure our policies and procedures address issues around sexual orientation and gender identity and, where appropriate, take positive action.

c.) Disabled people

A person is disabled under the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities.

'Substantial' is more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' means 12 months or more, e.g. a breathing condition that develops as a result of a lung infection. People with progressive conditions can also be classified as disabled. E.g. HIV or cancer.

Even if someone does not call themselves "disabled" in everyday life, the Act may still protect them, nor does it specify that a diagnosis is required in order to be covered. The Equality Act does not define impairment. We perceive this to include mental illnesses, based on the varying effects it has on individuals to do things that a lot of people do in everyday life.

As an organisation, we will adopt the social model of disability as a fundamental principle, recognising that people are not disabled by their impairments, but the way in which they are discriminated against by society. A more detailed explanation of the model can be found in Annex 2 of this document.

We will:

- operate within the principles of the social model of disability and increase organisational awareness of this model.
- work to ensure our practices do not restrict what we do or the contribution disabled people can make to our work.
- make regular assessments of the accessibility of our site, actively seeking opportunities to improve access to any premises we intend to use.
- challenge the myths that disability only affects people with visible impairments.
- build on the use of technology to ensure accessibility needs are met through our digital platforms, particularly any training, events or conferences.
- develop and implement a mental health strategy, working alongside an external consultant to support people's mental health needs, particularly in response to the impacts of the pandemic.



d.) Race and ethnicity

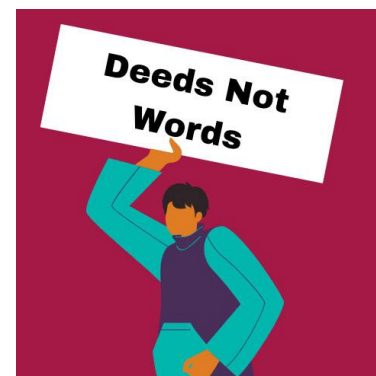
Race is a fluid concept used to group people according to various factors including, ancestral background and social identity. Race is also used to group people that share a set of visible characteristics, such as skin colour and facial features.

Though these visible traits are influenced by genes, the vast majority of genetic variation exists within racial groups and not between them. For this reason, the overwhelming body of scientific opinion, including that of the [Human Genome Project](#), maintains that race is considered as a social construct and not a biological one.

The terms “ethnicity” and “ethnic” avoid the biological connotations of “race” and “racial.” Ethnicity refers to the shared social, cultural, and historical experiences, stemming from common national or regional backgrounds, that make subgroups of a population different from one another.

Wales is an ethnically diverse country. However, this diversity is not yet reflected in our workforce. To help make us truly representative of the people of Wales, we will embed an anti-racist culture within Community Housing Cymru and aspire to set an example for others to follow. To do this, we will:

- commit to [Tai Pawb's 'Deeds Not Words' pledge](#),
- ensure our policies and procedures address race issues and, where appropriate, take positive action.
- identify our priorities in respect of race and deliver a subsequent Race Equality Action Plan.
- increase awareness within the organisation in regards to race issues through training and other initiatives.



e.) Religion and belief

Religion refers to people with a range of faiths (e.g. Islam, Christianity etc.) Religion also means smaller religions or sects like Rastafarianism, Scientology or Paganism. You can also be discriminated against because you belong to a specific denomination or sect within a religion - for example, Sunnis or Shi'as within Islam.

Belief means both religious and non-religious beliefs. A religious belief can exist within a religion, but may not be shared by everybody within that religion. For example, in Christianity, the belief that you are born with sin.

A philosophical belief is a non-religious belief and includes things like humanism, secularism and atheism.

- We are committed to creating a safe working environment for all our staff, visitors and those organisations we support, giving due regard to all religions or beliefs.
- We want to be a place where all staff and visitors who adhere to different religions or beliefs feel it is safe and comfortable to be open about their religion or belief.
- We will challenge negative views and practices and provide training so that there is a better understanding of the issues amongst our staff.



- Whilst a political belief is not a philosophical belief falling under the Equality Act, differences in political opinions can be a strength to an organisation by widening the pool of perceptions and lived experiences of others and can avoid working in silos. We will respect all political beliefs, so long as they do not contradict the values of protected characteristics, nor inflict physical and mental harm to others.

f.) Age

Under the Equality Act individuals are protected from discrimination on the basis of their age and/or because they are part of an age group - this can be specific (e.g. people in their mid-30s) or broader (e.g. people under 50). In addition, some terms can indicate age groups without reference to specific ages e.g. young people, elderly, pensioner, etc.

We will:

- continue to employ and serve people of all age groups and will ensure our policies and practices do not adversely affect staff, visitors or those who use our services because of their age.
- give particular consideration to the rights of older persons, given some of our members' role in care settings.
- ensure that we do not unfairly discriminate in the employment of staff or the provision of services on grounds of age.
- adhere to the UN Principles for Older Persons (see Appendix 1).

g.) Socio-economic factors

Social and economic factors include things such as income, education, employment, assets, where someone lives, and digital exclusion or marginalisation and can significantly affect how well and how long we live. These factors affect our ability to make healthy choices, afford medical care and housing, manage stress, and more.

We understand that many socio-economic factors hold a powerful grip over many people's lives in Wales, contributing to an unequal society. This includes class, which refers to divisions in society based on economic and social status. People in the same social class typically share a similar level of wealth, educational achievement, type of job and income. We are therefore committed to a no discrimination policy in regards to people from all socio-economic backgrounds and will seek to follow the Socio-economic Duty as outlined in Appendix 1.

h.) Welsh language

We will adhere to the principle of the Welsh Language Act 1993, that the Welsh and English languages should be treated on the basis of equality and to respect the need to provide appropriate services based on linguistic choice. Our commitments are set out in our [Welsh Language Scheme](#) and include commitments on communications, correspondence and internal operations.



5.4. Adverse Childhood Experiences (ACEs)

Adverse Childhood Experiences (ACEs) are traumatic experiences occurring during childhood that cause children to repeatedly suffer. The experiences can directly harm a child (e.g. abuse) or can indirectly affect a child through the environments they live in (e.g. growing up in a house with domestic violence.) The resulting trauma can continue to affect people as adults, long after it has happened. It often causes them to repeat the same abusive and traumatic experiences, causing a circle of repetition.

Preventing and mitigating the impact of Adverse Childhood Experiences is essential to future generations' health and well-being and is a priority area for the [Future Generations Commissioner for Wales](#).

We will be an ACE-aware and trauma-informed organisation, particularly when incorporating lived experience into our policy influencing work. We recognise the need for a joined up system focused on early intervention and prevention and will work to ensure our members are supported through an equal/reciprocal relationship with public services to provide the building blocks of resilience for different communities..

5.5. Discrimination, Harassment and Victimisation

We will actively encourage individual members of staff, board members, staff members from housing associations, conference or event speakers and delegates at our conferences, training and events to report any incident which resulted in them feeling they had been unfairly disadvantaged, discriminated against unlawfully or subjected to harassment. The incident should be reported to their appropriate line manager if they are employed by CHC in the first instance, or alternatively directly to the Chief Executive and/or People and Business Director. In the same way, members of staff who witness an act of discrimination or harassment against a fellow employee and/or visitor should report this. Further details can be found in the Dignity at Work policy.

Any employee found to have acted in a discriminatory way in relation to colleagues, or visitors to the organisation, will be dealt with in accordance with the organisation's disciplinary procedure. Guidance on what constitutes discrimination, harassment or victimisation can be found in Annex 1.

5.6. Training

We will provide in-depth training for our entire staff, managers and board members on all equality and diversity issues. This will include training on the legislation covering equality and consideration of how equality impacts on all aspects of our organisation, not just employment issues. The training will also place an emphasis on the responsibility we all have to create and maintain an inclusive environment for all staff and visitors.



6. Service delivery

6.1. A note on digital inclusion

Digital inclusion involves working to address issues of opportunity, access, knowledge and skill in relation to using technology, and in particular, the internet.

Not all groups of people are homogeneous in being digitally excluded. For example, an 18 year old who has been brought up in an age where digital technology grew rapidly may be assumed to have access to and experience in the use of digital tools. However, socio-economic factors may cause this person to be less digitally included compared to another 18 year old with different socio-economic factors in play (and an example of why intersectionality is important). In addition to this, some older people may be totally excluded by lack of skill and / or access, particularly in rural areas leading to high levels of isolation.

As an organisation, we will seek to ensure that digital inclusion is taken into account across all areas of our service delivery and that we are able to communicate effectively with each person we work with or seek to work with, providing appropriate support to meet the needs of different people.

6.2. Advocacy activity

We will work alongside our members, stakeholders and decision makers to influence the operating environment for housing associations in Wales.

Social housing policies are an inescapable part of mitigating inequality. We will set clear equality objectives within our influencing strategies that ensure we promote equality, diversity and inclusion through this work.

We will ensure that we consider the relevance and impact of equality, diversity and inclusion on the policy topics covered by our Strategic Delivery Groups (SDGs), particularly when reviewing SDGs to align with new corporate plan priorities. This will enable us to work with our members to improve how we incorporate lived experience into policy, resulting in fairer outcomes for tenants.

6.3. Training, advice and support to our members

As an organisation, we have built a strong reputation for supporting our members on a range of issues. Wales is a diverse nation and this diversity should be reflected in all areas of our members' work. We will promote housing as a career of choice for all people from all parts of our society. This is key in supporting our members to achieve true excellence in governance and strategic decision making.

As educating others about equality and diversity is not Community Housing Cymru's area of expertise, we will guide our members to the most appropriate organisations who offer relevant training to housing associations.

In terms of our own in-house training services, we will evaluate how to best widen the pool of diversity to those that deliver training.



6.4. 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 activity includes a diverse range of voices, at the same time being sensitive to the lived experiences of the people we aim to represent.

We will develop a house style which will ensure that language used in any communications is inclusive. We will make sure any videos and images produced are accessible using the [W3C](#) and [A11y](#) industry guidelines and include a diversity of participants.

6.5. Events and conferences

Our physical events and conferences will consider the accessibility requirements of people with visible and nonvisible disabilities, while any virtual event should consider translation, aural or visual needs of delegates.

We will develop a code of conduct for attending and involved in the delivery of our events that ensures that harassment and discrimination will not be tolerated and what actions will be taken.

We will set ambitious goals for ensuring a diverse range of speakers at our events and conferences. We will also decline to speak at external events and conferences if the panel does not represent the diversity of those it seeks to represent.

6.6. Equality Impact Assessments

The Equality Impact Assessment is an equalities risk assessment which records the benefits and risks for different people by protected characteristics. It presents evidence of research and consultation and engagement with stakeholders. We will develop an approach to Equality Impact Assessments, drawing on good practice. In order to do this, we will conduct Equality Impact Assessments in relation to major, organisation-wide strategies and initiatives in the first instance, before implementing a wider approach as appropriate.



7. Procurement

We will strive to ensure that the purchase of goods, services and facilities is undertaken in line with our equality and diversity commitments. We want to engage with a diverse range of suppliers and ensure that businesses from diverse communities have an equal opportunity of competing for our contracts.

We will endeavour wherever practicable to purchase from agencies or companies who share our values on equality of opportunity and diversity. Our commitments to boosting the social value of our procurement procedures are outlined in our Equality Action Plan.

8. Performance standards: Delivery of the strategy

8.1. Responsibility for equality of opportunity within the organisation

The Chief Executive has overall responsibility for equality of opportunity within the organisation. This role will be supported by a designated board member who has equality as an assigned role.

Under the leadership of the Chief Executive, we will create a Diversity Group to steer through equality-driven changes and developments. The Diversity Group will seek input from those with lived experience and other relevant expertise as appropriate where this is not present within the group.

8.2. Diversity Group

The remit of the Diversity Group is to:

- review relevant current and pending legislation to ensure that we comply with our equality obligations.
- review all aspects of our activities to ensure that we do not discriminate in our employment practices or our delivery of services.
- revisit all training materials that are delivered to members, checking for equality based legal compliance, best practice and any unintended consequences.
- ensure that a guidance/methodology document is developed regarding the delivery of Equality Impact Assessments.
- ensure Equality Impact Assessments are carried out early in the process and acted upon.
- map the main equality organisations that will be crucial when seeking equality information. These organisations can also be engaged with regarding the Equality Impact Assessments.
- ensure a mechanism is in place to monitor and report on equality and diversity activities.
- develop this Equality, Diversity and Inclusion Strategy, ensuring that it is supported by policies and procedures. This will be formally approved by the Senior Management Group and Board.



- aspire to be seen as the equality and diversity leader amongst our member organisations.
- to seek external support where appropriate in order to ensure that we have access to the most appropriate advice in relation to equality, diversity and inclusion issues.

8.3. Day to day operation of the Equality, Diversity and Inclusion Strategy

- Working alongside the Chief Executive, line managers are responsible for overseeing the Equality, Diversity and Inclusion Strategy across the whole organisation, especially within their respective teams; ensuring staff understand the strategy and their roles within it; and for providing reports and monitoring information.
- In relation to this, managers should ensure that team and individual work programmes promote equality, diversity and inclusion and keep this under review.
- Every member of staff has an individual responsibility to ensure this Strategy is actively implemented. This should be reflected in the development of individual work programmes which take account of the needs of all potential users of services. It should also be reflected in individuals' performance and conduct.
- All board reports will have an Equality and Diversity category, highlighting the impact of the report on the strategy.
- The Strategy will be circulated to all employees, member organisations, candidates applying for positions with Community Housing Cymru and all contractors. The Strategy will be made available on the Community Housing Cymru website.



9. Accountability: How we will be held accountable for our progress against delivery of our Equality, Diversity and Inclusion Strategy

It is absolutely essential that we ensure that progress is underway to implement our Equality, Diversity and Inclusion Strategy. To do that, we need to have the right approach to track progress and to shift our approach when needed.

To do this, we will:

- identify, agree and monitor a focused set of metrics with our Diversity Group, board and other partners to reflect the changes we are making and shifts to the way we do things.
- implement clear governance and accountability for this strategy at all levels of the organisation from board downwards.
- publish an annual external update on progress made on this strategy.

We want to make sure that everyone at Community Housing Cymru knows what their role is in implementing our Equality, Diversity and Inclusion strategy and that we inform our members, partners and the wider public of our progress.

To do this, we will:

- communicate the strategy and its initiatives to staff, our members and other audiences (where relevant).
- make every team accountable for implementing changes for their staff and other audiences.
- report annually to the Community Housing Cymru Board on how indicators are shifting for different protected characteristics and different audiences.
- review and discuss progress against the strategy annually with our Board.
- publish an annual update on our website and social media channels on our progress against the aims of our strategy.



Appendix 1 - Equality legislation

Human Rights Act 1998

Human rights and equality are inextricably linked. Equality is treated as a fundamental human right, from the principle of equal respect for the inherent dignity of people.

Article 14 of the European Convention of Human Rights prohibits discrimination 'on any grounds such as sex, race, colour, language, religion, political or other opinions, national or social origin, association with a national minority, property, birth or other status'.

The words 'other status' has been held to cover, amongst other characteristics: sexual orientation, illegitimacy, marital status, trade union membership, gender identity, disability, carers and imprisonment.

Article 14 can only be used when attached to a complaint relating to another article of the Convention such as Article 6: right to a fair trial, or Article 8: right to private or family life, home and correspondence.

In some instances, the Human Rights Act 1998 gives greater rights to people than other equalities legislation because it judges treatment against a fixed standard and does not rely on a comparison between the treatment of one group of people and another.

International Covenant on Economic, Social and Cultural Rights

The International Covenant on Economic, Social and Cultural Rights (ICESCR) is a multilateral human rights treaty adopted by the United Nations General in 1966, and ratified by the UK in 1976.

ICESCR rights are crucial to enable people to live with dignity. This treaty covers important areas of public policy, such as the rights to:

- Work in just and favourable conditions
- Social protection
- An adequate standard of living
- The highest attainable standards of physical and mental health
- Education
- Enjoyment of the benefits of cultural freedom and scientific progress.

The Covenant is monitored by the UN Committee on Economic, Social and Cultural Rights. The Welsh Government updates the United Nations on progress towards implementing and observing international human rights standards by including a distinctive Welsh contribution in the formal UK reports to the UN Committee on Economic, Social and Cultural Rights.

Socio-economic duty

The Socio-economic duty came into force in Wales on the 31 March 2021. The duty places a legal responsibility on public bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.



Although we are not required to comply with the duty, we believe that we have a responsibility to also have due regard to socio-economic disadvantages as a determinant of unequal outcomes. Examples of socio-economic disadvantage are:

- Area deprivation
- Low/no wealth
- Socio-economic background
- Low/no income
- Material deprivation

Examples of unequal outcomes are:

- Education: The capability to be knowledgeable.
- Health: The capability to be healthy, physically and mentally.
- Work: The capability to work in just and favourable conditions.
- Justice & personal security: The capability to avoid premature mortality.
- Living standards: The capability to enjoy a comfortable standard of living.
- Participation: The capability to participate in decision making and in communities, accessing services.

Convention on the Rights of Persons with Disabilities

The Convention on the Rights of Persons with Disabilities is an international human rights treaty of the United Nations. It intends to protect the rights and dignity of disabled people. Parties to the Convention are required to promote, protect and ensure the full enjoyment of human rights by disabled people and to ensure that disabled people enjoy full equality under the law.

The Convention serves as a major catalyst in the global disability rights movement, enabling a shift from viewing disabled people as objects of charity, medical treatment and social protection, towards viewing them as full and equal members of society, with human rights. Thus, the convention supports the social model of disability.

The convention includes:

- Recognising and enforcing the right of people with visible and nonvisible disabilities to live independently, be included in the community and choose where they live and who they live with.
- Ensuring that social security policies protect the income of disabled people and their families, allowing for the extra costs that come with visible and nonvisible disabilities.
- Removing barriers to ensure that people with visible and nonvisible disabilities can access decent work and equal pay.
- Taking action to combat any negative or discriminatory stereotypes or prejudice against people with visible and nonvisible disabilities in public and the media.



- Ensuring people with visible and nonvisible disabilities have equal rights to justice by providing appropriate legal advice and support.
- Involving disabled people and disabled people's organisations in planning and implementing all laws and policies affecting disabled people.
- Incorporating CRPD into domestic law to ensure that people can take legal action if their rights have been breached.

Welsh Government is presently considering the incorporation of the CRPD into Welsh law as it did with the UN.

The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act came into force in Wales in 2016. The Act requires public bodies to think more about the long-term, to work better with people, communities and each other, to look to prevent problems and to take a joined-up approach.

These principles are supported by seven goals which provide a clear framework underpinning everything the public sector does both now and in the future. The seven goals are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The Act requires organisations to think fundamentally about what is needed to achieve the goals and how the principles of the Act have been actively applied to maximise the contribution which can be made.

The Equality Objectives identified to deliver our equality and diversity commitments have been developed to meet the requirements of the Equality Act 2010 set within a framework of the Well-being of Future Generations (Wales) Act 2015.

Although we are not required to comply with the Act, we subscribe to its values and seek to promote the well-being goals and demonstrate the ways of working in everything that we do. These are:

- **Long-term:** The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
- **Integration:** Considering how our well-being objectives may impact upon each of the well-being goals, on our objectives, or on the objectives of other organisations.



- **Involvement:** The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.
- **Collaboration:** Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.
- **Prevention:** How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

UN Convention on the Rights of the Child

The United Nations Convention on the Rights of the Child (UNCRC) is a human rights treaty which sets out to protect the civil, political, economic, social, health and cultural rights of children under the age of 18. It was ratified by the UN General Assembly in 1989.

In 1991 the United Kingdom formally agreed to ensure that every child in the UK has all the rights listed in the convention. The Welsh Government adopted the Convention as the basis for policy making for children and young people in Wales in 2004.

The basic premise of the Convention is that children (below the age of 18) are born with fundamental freedoms and the inherent rights of all human beings but with specific additional needs because of their vulnerability. The UNCRC is sometimes spoken of as the most complete of the international human rights instruments as it includes civil, political, economic, social, and cultural rights as well as incorporating aspects of humanitarian law.

The Convention sets those rights out in a total of 43 articles which can be split into 4 categories:

- Survival
- Protection
- Participation
- Development

All of the rights are of equal importance and all are underpinned by 4 general principles:

- All of the rights must be available to all children without discrimination (Article 2)
- The best interests of the child must be a primary consideration in all actions concerning children (Article 3)
- That every child has the right to life, survival, and development (Article 6).
- That the child's view must be considered and taken into account in all matters affecting them (Article 12).

In January 2011, the 'Rights of Children and Young Persons (Wales) Measure' 2011 was passed by the National Assembly for Wales. It placed a duty on all Welsh Ministers to have due regard to the substantive rights and obligations within the UNCRC and its optional protocols. This duty was extended in 2014. Since then all Secretaries and Ministers need to have due regard to the UNCRC when exercising any of their Ministerial functions.



UN Principles for Older Persons

The United Nations Principles for Older Persons were adopted by the UN General Assembly on 16th December 1991. Governments were encouraged to incorporate them into their national programmes whenever possible. The Older People's Commissioner for Wales is legally obliged to have regard to these Principles. They are Principles which should be considered by all organisations and regarded as a framework for their treatment of older people.

There are [18 principles](#), which can be grouped under five themes: **Independence, Participation, Care, Self-fulfilment** and **Dignity**.

The Principles acknowledge:

1. the tremendous diversity in the situations of older persons, not only between countries but within countries and between individuals;
2. that individuals are reaching an advanced age in greater numbers and in better health than ever before;
3. that scientific research disproves many stereotypes about inevitable and irreversible decline with age;
4. that in a world characterized by an increasing number and proportion of older persons, opportunities must be provided for willing and capable older persons to participate in and contribute to the ongoing activities of society;
5. that the strain on family life in both developed and developing countries requires support for those providing care to frail older persons.

Gender Recognition Act 2004

The Gender Recognition Act 2004 (GRA) sets out a process that allows individuals over the age of 18 to receive legal recognition of their acquired gender. Successful applicants are issued with a Gender Recognition Certificate (GRC). As an organisation, we recognise all self-determined genders (including non-binary), regardless of legal status.

Marriage (Same Sex Couples) Act 2013

The Act:

- enables same sex couples to marry in civil ceremonies;
- ensures those religious organisations which wish to do so can opt in to marry same sex couples according to their rites;
- protects religious organisations and their representatives from successful legal challenge if they do not wish to marry same sex couples;
- enables civil partners to convert their partnership to a marriage, if they wish; and
- enables individuals to change their legal gender without having to end their marriage.

UN and European Conventions on Human rights



The European Convention on Human Rights (ECHR) protects the human rights of people in countries that belong to the Council of Europe. The UK's membership is unaffected from leaving the EU.

The Convention secures:

- the right to life (Article 2)
- freedom from torture (Article 3)
- freedom from slavery (Article 4)
- the right to liberty (Article 5)
- the right to a fair trial (Article 6)
- the right not to be punished for something that wasn't against the law at the time (Article 7)
- the right to respect for family and private life (Article 8)
- freedom of thought, conscience and religion (Article 9)
- freedom of expression (Article 10)
- freedom of assembly (Article 11)
- the right to marry and start a family (Article 12)
- the right not to be discriminated against in respect of these rights (Article 14)
- the right to protection of property (Protocol 1, Article 1)
- the right to education (Protocol 1, Article 2)
- the right to participate in free elections (Protocol 1, Article 3)
- the abolition of the death penalty (Protocol 13)



Annex 2 - Definitions of discrimination, harassment and victimisation

Discrimination

There are four kinds of illegal discrimination defined in the Equality Act 2010; they apply to service delivery and employment:

- Direct discrimination
- Combined direct discrimination
- Indirect discrimination
- Discrimination arising from disability

Direct discrimination – where a person treats another less favourably because of a protected characteristic. For example, not giving somebody a job or refusing to deliver a service to somebody because of their gender.

Combined direct discrimination - where a person is treated less favourably because of a combination of protected characteristics (e.g. gender and age).

The definition of direct discrimination has been extended to reflect case law. It now includes discrimination because of association with a person against whom it would be unlawful to discriminate (e.g. discrimination against a parent of a disabled person).

Direct discrimination is also extended to cover discrimination based on the perception of protected characteristics (e.g. discrimination against a person who is believed to be a Muslim, even if they're not).

Indirect discrimination – when a policy or practice is apparently neutral but the effect places a group of people at a significant disadvantage (e.g. an inflexible uniform policy which won't accommodate people's needs based on religion or disability).

Discrimination arising from disability – where a person is treated less favourably because of something related to their impairment (e.g. a disabled pupil disciplined for not obeying a rule they didn't know about because they didn't understand the sign).

Harassment - unwanted behaviour that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

We have a responsibility to protect people in the work environment from harassment. We may be found at fault if a person reports harassment and didn't take reasonable steps to prevent further harassment. This remains true even if a person is harassed by different people for different reasons at different times.

Harassment now includes harassment based on association i.e., a friend of a disabled person, or perception (e.g. mistakenly believed to be a Muslim).

Harassment applies to all protected characteristics except for pregnancy and maternity (where any unfavourable treatment may be considered discrimination) and marriage and civil partnership.



Victimisation

The Equality Act protects people from victimisation on the grounds of any of the protected characteristics. Victimisation is when a person subjects another person to detriment because they have done, or believed that they will do, a 'protected act'. A 'protected act' includes bringing proceedings under the Equality Act 2010, giving information or evidence, or making an allegation in relation to the Act, as long as they have done so in good faith - that is, done honestly.



Annex 3 – Social Model of Disability

Traditionally society has viewed disability as simply a medical issue, but since the 1970s our understanding has changed. In 1972, a group of disabled people were trying to leave a Cheshire home to live independently and were told that physical rehabilitation was the only means to independent living. These disabled people rejected this, identifying that it was society that had created barriers to limiting their autonomy, and so that first and foremost, society had to change. The social model was born.

The model was further developed creating new definitions which challenged traditional thinking. Disability is the disadvantage or restriction of activity caused by a society which takes little or no account of people who have physical or mental impairments, and thus excludes them from mainstream activities.

The social model identifies systemic barriers, negative attitudes, the physical environment and exclusion by society as the main barriers that disable people who have impairments. Physical or mental impairments do not have to lead to disability. Disability exists when society fails to take account of the requirements of all of its people and their individual differences. Therefore, disability - like racism or sexism - is discrimination and social oppression.