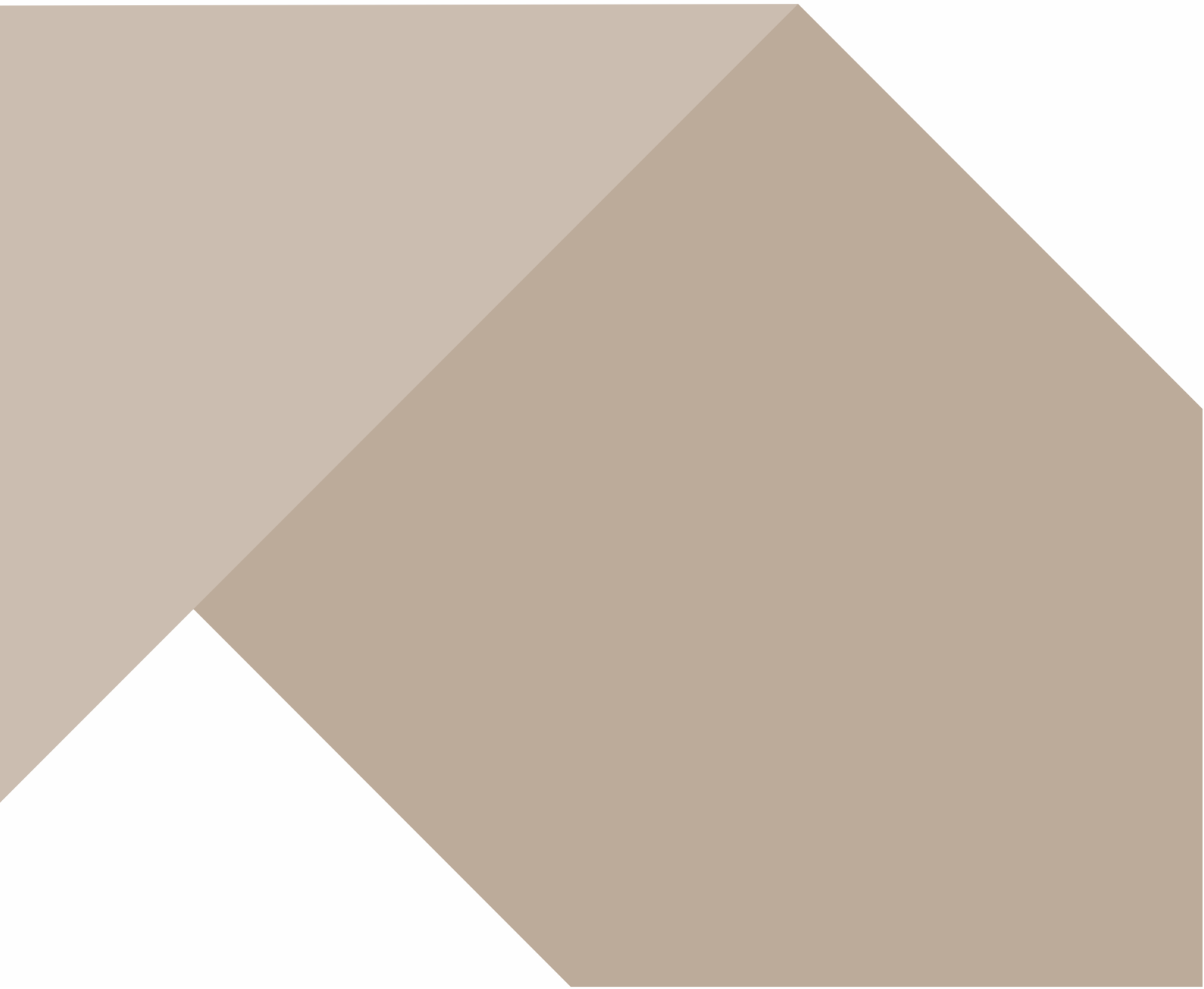


# One Group, Many Voices

*Group Equality, Diversity, Inclusion and Human Rights  
Action Plan - November 2022*



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## 1. Foreword by Wheatley Housing Group Chair, Jo Armstrong

Equality, Diversity and Inclusion (“EDI”) and Human Rights go to the heart of the common values shared by all members of the Wheatley Group (“the Group”).

We know that to achieve our ambition to deliver excellent services to our customers, be a great place to work for our people, and be trusted by our employees and communities this needs to be reflected in the way we work and through the decisions we make.

Our Group and partner Boards and Executive team are fully committed to EDI and recognise the importance of role-modelling this commitment through our decision making and governance.

In our Group 2021–2026 strategy, *Your Home, Your Community, Your Future*, one of our goals is that our customers and employees will think:

***‘I am proud to feel part of an ethical organisation that shares my values’***

We don’t just want equality at Wheatley. We want equity to ensure both our customers and employees are provided with equal opportunities that allow them to succeed.

We want all our customers and employees to be able to access our services in an equitable way. As both a housing and care provider and an employer, we wish to deepen our understanding of the barriers different individuals face so that we can tailor our services accordingly, meeting these varied needs.

As a Group, we recognise that we are in a unique position to help tackle inequalities and alleviate socio-economic hardship. In doing this, we also want to ensure that our policies, procedures and services do not unfairly disadvantage any person or group.

This action plan demonstrates our continued commitment to embrace and promote EDI and Human Rights. As we navigate ongoing complexities post-pandemic, it is more important than ever that we thread these values through everything we do.

We place our people and communities at the centre of our decisions and always strive to achieve better outcomes for them. Taking an EDI and Human Rights approach to this will only strengthen our position.



### Our Group values:

**Excellence**  
*to deliver quality in everything we do*

**Community**  
*to build more sustainable communities where customers have a real say in decisions affecting them*

**Ambition**  
*to do more for our customers and to provide more opportunities for our employees and stakeholders*

**Trust**  
*to be trusted by our employees, customers and partners*

## 2. Introduction

We recognise the value of diversity in our employees and communities and the benefits this can bring to the Group. Our focus goes beyond just meeting our legal obligations – we believe creating an equal, diverse and inclusive environment for our employees and customers is the right thing to do. For us, EDI means:

- **Equality** – people with different characteristics are treated fairly and have access to the same opportunities to fulfil their potential
- **Diversity** – respecting and valuing individual differences and unique characteristics
- **Inclusion** – making sure our employees and customers feel comfortable being themselves and that they feel valued, respected and heard

A key feature of our 2021–2026 Group Strategy, *Your Home, Your Community, Your Future*, is to deliver services to our customers and communities in an inclusive manner. We are also committed to ensuring that EDI is experienced by our employees.

We plan to achieve this in a range of ways, including:

- ensuring our policies and strategies reflect our commitment to EDI
- ensuring our employees and customers understand our approach to EDI
- fostering an inclusive culture
- collecting information about the needs and aspirations of our customers
- encouraging engagement from all demographics within our communities
- setting targets and objectives for EDI
- providing services that everyone can access
- operating fair recruitment and employment practices
- having systems to collect equalities information about customers
- promoting equality of opportunity with our partners and contractors.

This **Action Plan** details the practical steps we will take in implementing our Group Equality, Diversity, Inclusion and Human Rights Policy (“EDI and HR Policy”). This plan goes beyond detailing how we will meet legislative/regulatory requirements and sets out our plans under our **four equality outcomes** (see section 4).

### 3. Legislative and regulatory context

We must comply with certain legislation and regulations relating to equalities and human rights. Compliance with this legislation and regulation is embedded within our policies/strategies, services and culture.

Our EDI & HR Policy is the document through which we recognise the legislative foundation of the **Equality Act 2010** (“the Act”). The Act makes it unlawful to discriminate against someone based on a protected characteristic<sup>1</sup>.

In addition, we have regulatory obligations, for example the **Scottish Housing Regulator** requires us to collect data and ensure we are properly considering equalities and human rights issues in our decision making, in the design and review of internal and external policies, and in our day-to-day service delivery.

The Group is also committed to the **UN Sustainable Development Goals** which include promoting gender equality, reducing inequalities and developing peaceful and inclusive communities.



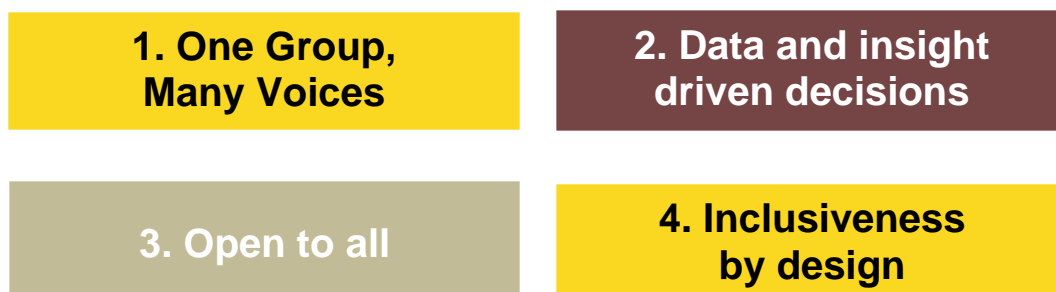
This Action Plan forms part of our overall approach to equalities and human rights, ensuring we are compliant with the above legislation and regulation.

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<sup>1</sup> These are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation

## 4. Equality Outcomes

We have identified **Four Equality Outcomes** to support us in putting our approach into practice and making it meaningful. These will allow us to evidence our compliance with legal and regulatory requirements as well as ensure our actions are impactful, demonstrate our commitment to EDI and human rights to our current/prospective customers and employees and the importance of this in our decision making.



### Outcome 1: One Group, Many Voices

In order to shape, evaluate and continuously refine our services, policies and approach to reflect the diversity of our communities, service users and staff we need to better understand the makeup of these groups. We do this through collecting and maintaining equalities data on each of the protected characteristics for our existing and new customers, people on waiting lists, employees, applicants and governing body members. Our focus goes beyond this required data however, to include socio-economic inequality analysis also.

We will use data to evolve, adapt and learn. Through refreshing and expanding our equalities monitoring and reporting we can better understand how our services are being used and measure the impact of our decisions. This allows us to refine our approach accordingly, making reasonable adjustments to address any areas of concern for example, to our training or communications.

### Outcome 2: Data and insight driven decisions

We will continue to improve how we embed equalities data and insight in our decision-making processes, including how we design and review our policies and services. The data we collect will strengthen our Equality Impact Assessments and make them increasingly reflective of our own customer and employee profiles. We will continue to diversify our engagement structures to open up opportunities to gather more targeted insight on how our services and policies could affect different groups or communities.

### Outcome 3: Open to all

We will send a clear message that we are an inclusive organisation and encourage applications and engagement from underrepresented groups. Our communications and processes in key areas, such as recruitment, will reflect this. We will also thread this through our internal leadership and development programmes to ensure diverse talent pipelines are sustainable. Through our services we will outline our commitment to the principles outlined in the Scottish Government, COSLA and Scottish Refugee Council's *New Scots Refugee Integration Strategy*.

### Outcome 4: Inclusiveness by design

We promote a culture where employees and customers feel a sense of belonging and trust their individual needs will be met and respected. This is emphasised and promoted through our *Different Together* approach, which focuses on wellbeing and inclusion. We work to embed EDI into all our policies, services, training and communications at the point of creation to ensure these principles are threaded through our organisation.

## 5. Commitments

To achieve our outcomes, we work closely with our workforce, Boards, trade unions and other stakeholders. We will continue to engage with our customers through our Customer Voices, including our Group Scrutiny Panel and tenant focus groups. We will also ensure the voice of the employee feeds into our EDI approach through our *Different Together* Community of Excellence ("CoE") and equality network groups. When required, we also engage external advice for example for training purposed or expert legal advice.

In developing this plan, we engaged with our trade union partners, sought external review by our Inclusion Advisor at Business in the Community and internally through our *Different Together* CoE. We also incorporated our tenant Scrutiny Panel's and Customer Voices focus groups' feedback in developing our approach to equality data collection, co-creating the guide and survey for this.

In delivering this Action Plan, we therefore make the following commitments:

- 1. Evidence** – using the equality data we collect as an accurate evidence base to inform our decision-making and service delivery, and measure progress
- 2. Policy, practice, people** – we will ensure that as an organisation, we are equipped with the necessary knowledge, skills, behaviours and attitudes to truly thread EDI through everything we do
- 3. Ownership** – we will continue to grow and learn, developing our understanding of equality intersectionality in our data gathering, analysis and decision making.

## 6. Where we are now

Although this Action Plan has been developed to further strengthen our organisational commitment to EDI, the Group already has a wide range of processes in place, including:

Area	How we demonstrate EDI currently
Data	<p>We collect equality data from our customers, employees and applicants. Sometimes this is for a specific, non-anonymous purpose e.g. for customers this ensures we allocate them to suitable housing (which may require adaptations) and communicate with them in their preferred method (for example, braille). For employees, we need to we make reasonable adjustments to working practices for example, to accommodate a disability.</p> <p>We use equality data to inform our Gender Pay Gap Report that we publish annually and assess our gender balance across our Group and subsidiary Boards. For further information on how we use this data currently see the Case Study 1 on page 11.</p> <p>From 2022, we collect data on each of the protected characteristics from our staff, applicants, current and prospective customers and Board members. Details on how we plan to use this data can be found in the Action Plan.</p>
Employment programmes	<p>Through Wheatley Works, our Wheatley Foundation and apprenticeships programmes we target opportunities at protected characteristic groups, where socio-economic diversity and inclusion is a significant area of focus. More detail at Case Study 2 on page 12.</p>
Employees training	<p>We have an e-learning EDI suite which includes EDI awareness training. Our training was independently reviewed by an external EDI expert and is a mandatory course for staff. We also have LGBTQ+ Awareness, Unconscious Bias and Hate Crime training. On our staff intranet, we have an EDI resource hub on our <i>Different Together</i> page. Our <i>Different Together</i> CoE members receive in-depth EDI training, and we ensure EDI training is threaded through our leadership and development programmes.</p>
Awareness Raising	<p>We run multiple campaigns each month on our internal intranet site, W.E. Connect, to raise awareness and increase understanding about different areas of equalities. We tie this in with celebration events such as Black History Month and National Pronouns Day.</p> <p>We also have Mental Health Awareness, Learning Disability Awareness, British Sign Language, and Challenging Sectarianism training.</p> <p>We publish employee stories and blogs regarding equalities, helping us to create a safe space where employees feel they are respected, valued and belonging. Our <i>Different Together</i> hub ties this all together.</p>



Accessibility	<p>We ensure accessibility of our communications reaches regulatory standards and are committed to making our websites accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This includes offering translations/interpretations services, braille, and publications in big text. Further information on our accessibility can be found here: <a href="https://www.wheatley-group.com/accessibility">Accessibility   Wheatley Group (wheatley-group.com)</a></p> <p>Customers can engage with us and we engage with customers through multiple avenues such as online, our 24/7 Customer First Centre, or in person at one of our local hubs or through a face-to-face meeting with their housing officer. This ensures that people can contact us in a way that suits them.</p> <p>We are also a disability confident employer and an equal opportunities employer.</p>
Policies	<p>Our internal employee policies have been reviewed by an external legal practice to ensure these are inclusive in content and language.</p> <p>We have a number of policies and procedures in place, at both a Group-wide and subsidiary level to support and protect protected characteristics in both employees and customers including Domestic Abuse Policy, Homelessness Framework, Flexible Working arrangements, Shared Parental Leave Policy etc. These policies are available on our websites.</p>
Hate Crime	<p>We developed our Group Hate Crime approach in 2019 and established a strategic partnership with Police Scotland's National Equality and Diversity Unit. We are also a member of Glasgow Strategic Hate Crime Working Group, Glasgow Hate Crime Training and Development subgroup and Multi-Agency Third Party Reporting Network. Additionally, we developed Hate Crime training in partnership with Police Scotland, with over 320 employees having received this to date. We relaunched our Hate Crime e-learning module during Hate Crime Awareness week in October 2022.</p>
Governance	<p>We have a comprehensive Equality Impact Assessment (EIA) approach including an EIA template and guidance, with assistance available via an external equalities expert. This was fully reviewed in 2021.</p> <p>We have identified which policies/strategies/services require an equality impact assessment and created an EIA e-learning module to assist employees in completing an EIA.</p> <p>EIAs are increasingly being carried out in the organisation, with an EIA being conducted on our Group 2021-2026 Strategy, our Group Homelessness Policy, Group Anti-Social Behaviour Policy and our consultation to move to a new operating model which included a more flexible working pattern and more employees working from home.</p> <p>All our Board and Executive Team reports have an equalities section included in which it must be made clear if an EIA has been determined as required and carried out, or if not required then this must be justified.</p>

Services	<p>Equalities is threaded through our aim to '<i>Make Homes and Lives Better</i>'. We provide warm, affordable housing that is tailored to our customer needs, and we offer many wraparound services which support those from protected characteristic groups, as well as foster good relations between groups.</p> <p>Customers can access these services through their housing officer, our Customer First Centre, through our Wheatley Foundation or through our websites/apps. We understand not all our customers will be digitally enabled/want to access our services online so to ensure no-one is left behind, we offer a blend of digital and face-to-face service whilst maintaining a strongly personalised approach.</p> <p>For example, we offer domestic abuse services, services for disabled tenants, services for retired tenants, and help customers get online.</p>
Engagement	<p>We have redesigned our Engagement Framework and developed <i>Stronger Voices</i>, <i>Stronger Communities</i> to encourage diversity and be more inclusive. This has included:</p> <p><u>Increasing digital engagement:</u></p> <p>We make efforts to identify and engage with a diverse group of customers to ensure we get a wide range of views for example, for online service usability studies conducted by our Digital Innovation team. The overall aim is to increase take-up of our digital services and better understand the barriers different customers might have when engaging with us online and how to help overcome these.</p> <p>We have multiple methods of engagement both online and in-person. This includes Walkabouts, focus groups and customer panels. For example, at the end of 2021 we held 43 rent focus groups with customers from across the Group to help us co-create the upcoming rent consultation process. Over 50% of these were online and we had positive feedback from BMG Research, who independently facilitated these, that the online groups had a more diverse profile. Online attendance reflected the convenience of this engagement method especially for younger customers/families who also had childcare/work commitments and those with mobility restrictions.</p> <p>We co-created our customer equalities data collection approach, survey and guidance in 2022 through engagement with our Group Scrutiny Panel and a number of online focus groups to ensure our customers felt trusted and comfortable in providing this information. Customers were able to respond to this via post return or online, and we reminded customers to complete the survey through social media, text or email (depending on customer communication preference). This encouraged a return rate of over 10,000 from our customers across the Group, sending a clear message on the importance of equalities to our communities.</p>

	<p><u>Stronger Voices Programme:</u></p> <p>In Autumn 2021, we established a new team structure to support our <i>Stronger Voices, Stronger Communities</i> Engagement Framework. Each RSL in the Group now has Stronger Voices Officers who support their local housing teams with customer engagement while working collectively to increase engagement in improving and co-creating our services.</p> <p>Through building up a database of Customer Voices, this allow us to have a large, diverse pool of customers we can engage with in co-designing our services, to ensure we are involving perspectives from different customer experience. For example, this includes testing our communications with disabled customers and customers whose first language is not English.</p> <p>Customers involved in our Customer Voices programme have provided some equalities data and consented us to securely retain this. In addition to age and gender, we ask about barriers or issues people might have engaging with our services. This includes mental and physical health, preferred language and pronouns so that we can better engage and ensure our services are compatible with different customer needs. Early analysis has shown that having this information helps ensure we design more accessible services.</p>
Work Practices	<p>Following the pandemic, we implemented a new operating model in which many of our employees now start their working day from home/work from home for the majority of the week. This has increased flexibility and has been beneficial for employees with childcare commitments for example.</p> <p>We also promote modern apprenticeship programmes and offer alternative avenues to employment through our Wheatley Work schemes. Employees/apprentices can achieve qualifications while working for us and we even offer bursaries. All this works towards limiting barriers to employment.</p>
Care	<p>Our care provider, Wheatley Care, offers a flexible service which is aligned to the changing needs of the population across our extensive care footprint.</p>
External validation	<p>We are members of Business in the Community (BITC) and Employers Network for Equality and Inclusion (enei) and have regular check ins. BITC reviewed this Action Plan, giving some suggestions and praise for the work achieved and planned, in particular around our evidence based approach. We completed our first enei TIDE (talent and inclusion diversity evaluation) self-assessment in Summer 2022 and overall scored well at the 'Realise' level. This led us to being recognised as TIDE Bronze Award level organisation with enei.</p> <p>We also meet regularly with our Trade Unions to engage on our EDI agenda.</p>

## 7. Equality data case studies

### Case study 1 – Diversifying our workforce – Age and gender

In 2019 we carried out a review of our employee demographic data, analysing gender split and age distribution. We identified that we could do more to **improve the gender balance** of applicants to Housing Officer and Environmental jobs.

We also identified that our workforce was getting older and that we needed to ensure we had clear pathways for new talent to come into the organisation, as existing employees neared retirement age. Key talent pathways identified were:

- Environmental Apprenticeships and Changing Lives Trainees for the environmental service
- Graduate and apprenticeship programmes for frontline housing roles

We carried out a review of recruitment materials, marketing and advertising, with updated visuals to underpin our commitment to a diverse workforce. We introduced a new digital application process to further support our recruitment and make it easy to apply for applicants from different groups.

The Group already had a small graduate programme in place; in 2019 this was relaunched under the 'Ignite' branding with an increased number of graduate positions available. Ignite graduate placements are open to both external new starts and internal applicants who are able to follow the same programme. This is to ensure we grow and develop our own internal talent as well as attracting high performing external applicants. Graduates were recruited via assessment centre recruitment methods with group and individual assessments, involving a diverse selection panel.

Since September 2019 we have recruited over **50** Ignite graduates, with the majority being from the under 25 age bracket, helping to rebalance our age profile. Similarly, the success of the apprenticeship programmes has ensured we continue to have younger workers joining the workforce.

We have seen a significant improvement in the gender balance of applicants to Housing Officer and Environmental jobs, which has translated into a greater gender balance in these job populations.



## Case study 2 – Diversifying our workforce and supporting our communities

The Wheatley Foundation, our charitable body, brings together all of the Group's Better Lives programmes and activities under one roof. The Foundation has provided support, training, and employment and apprenticeship opportunities, for example through our Wheatley Works and Changing Lives programmes, to help **tackle and improve socio-economic inequalities for our customers and communities**. The figures below illustrate this:

**517** apprentices since programme started, with 45% moving into promoted positions, including roles such as Housing Officer (30) and Customer Service Advisor (29)

Over **30,000** households supported over three years through the following:

- My Great Start
- Eat Well
- Home Comforts
- Emergency Response Fund

Over **17,000** books provided to children from 2019-2022 through The Imagination Library

- 53% of children from 20% most deprived areas in Scotland



**296** Changing Lives trainees since the programme started in 2016, with c33% moving into promoted full time roles so far

**177** customer bursaries awarded over three years



Since 2019 Wheatley Works has supported **1400+** people:

- **865** living in the 20% most deprived areas
- **63** people with a disability or health issue
- **62%** of opportunities taken up by customers

**10%** of places on our Modern Apprenticeship programme committed to young people with disabilities

- *15.8% of the 2021 intake*

We have developed an Action Plan to put our EDI and HR policy into practice and achieve our Equality Outcomes. Below is a summary of work planned for action in relation to each of the five outcomes.

Outcome 1: One Group, Many Voices		
<b>1.1 Collect data relating to each of the protected characteristics for existing tenants, new tenants and people on waiting lists<sup>2</sup>, employees and governing body members</b> <i>Aim: To collect equalities data as per SHR requirement to inform our decision-making and service design/delivery</i>		
Action	Owner	Timing
Collect equalities data from our current customers through an anonymous collection exercise every three years. The communications and approach to this will be co-created with customers	Governance	2022 complete  Next collection - 2025
Collect equalities data from prospective customers through MyHousing and from job applicants through JobTrain	MyHousing/ Workforce Planning	Ongoing
Collect equalities data from staff every three years through an anonymous survey (in which staff can consent to waive their anonymity) –develop comms/ approach with <i>Different Together</i> CoE, trade unions and external expert advise if required	People Services - HR	2022 complete
Our Governing Body members complete equalities monitoring form on appointment (consent given to process).	Governance	2022 complete  Ongoing in line with recruitment

<sup>2</sup> \*Our equalities monitoring form allows the respondent to answer questions on a voluntary basis and always contains the option 'I would prefer not to say'

## 1.2 Information security and protecting personal data

*Aim: Our equality data will be stored and accessed securely, and kept up to date*

Action	Owner	Timing
Extract data from MS Forms to PowerBI for reporting, monitoring and analysing; restricted access but data accessible if required to inform decision making/ service design. Information stored anonymously with no identifiable markers	IT/ Governance	From November 2022

## 1.3 Reporting and monitoring process

*Aim: We will report on and monitor our data collected to inform our decision making*

Action	Owner	Timing
Continue to develop our equalities monitoring reporting structures for the Group Executive Team and Boards, including agreeing what processes (e.g. recruitment and allocations) and services (e.g. Employability programmes) we monitor and how frequently we report	Governance	Ongoing
Review the data we collect through the Wheatley Foundation and consider expansion to inform our charitable programmes	Governance/ Foundation	From January 2023
Continue to monitor and report on the gender pay gap, taking action where necessary. Analyse and report on the distribution of all aspects of equalities data across different groups of roles in the organisation (e.g. housing officers /neighbourhood environmental teams /Senior employees)	People Services – Workforce planning	Monitor and analyse from Dec 2022, report by April 2023
Report equalities data of applicants and internal promotions to the Group Executive team quarterly including making recommendations for future actions	Services – Workforce planning	Ongoing
Produce a public annual equalities report, detailing the data collected, what this data informed, what actions have been put in place as a result and what benefits we have seen, or expect to see, as a result.	Governance	November 2023

## Outcome 2: Data and insight driven decisions

### 2.1 Equality mapping

*Aim: We will have a clear picture of the equality makeup of our employees and communities*

Action	Owner	Timing
Map employee diversity relative to the communities we serve to understand how they reflect each other.	People Services – Workforce Planning	From Census release
Expand the equalities data maintained for our Customer Voices to ensure we have diverse representation/ representation from certain groups when relevant (i.e. reviewing a service that has a specific impact)	Stronger Voices/ Digital Innovation	Develop from November 2022
Use equalities data to identify any EDI considerations (e.g. particular needs regarding language translation) in communities and, where appropriate, work with community to respond to these considerations	Stronger Voices	Post-collection

### 2.2 Diversification of our engagement structures

*Aim: We will engage and co-design services with a large, diverse group of customers in a way that suits their needs*

Action	Owner	Timing
Continue to engage Customer Voices - draw priorities, how customers want to engage with us and provide the support they need to do that i.e. improvement in IT skills, language skills	Stronger Voices	Ongoing
Use data to aid the Stronger Voices team and senior employees when reviewing our customer engagement approach	Stronger Voices	Post collection
Using equalities data, target our approach to specific groups in our diverse communities, ensure included in engagement about policies/strategies that are expected to have a particular impact on them	Stronger Voices	Post collection
Engage with customers in a way that suits their needs using varied engagement channels	Stronger Voices	Ongoing



Further build our online methods of engagement, allowing diverse profile of customers to be involved in the co-creation of services	Stronger Voices	Ongoing
<b>2.3 Data and insight driven decisions</b>  <i>Aim: All available data and insight is embedded in decision making process</i>		
<b>Action</b>	<b>Owner</b>	<b>Timing</b>
Age, ethnicity and disability diversity markers, along with skills, experience and gender, included in Board succession planning analysis, as well socio-economic diversity based on National Statistics Socio-economic Classification criteria	Governance	Commenced from August 2022
Results of customer data collected reported to RSL Boards	Governance	November 2022
Results of customer and employee data mapping considered by Group Executive	Governance	December 2022
Equalities data collected from customers and employees incorporated into future Equality Impact Assessments and future reports and decision making where relevant, such as strategy workshops	Governance	From 2023 – Using PowerBI
Further confirm inclusivity of our Procurement processes, using data to inform our Community Benefit approach	Procurement	From 2023 statement review
Benchmark Board diversity annually against sector data and report via RAAG Committee, with approach to diversity being extended to all partner Boards	Governance	Post September 2023 AGMs

### Outcome 3: Open to all

#### 3.1 Supportive services

*Aim – An initial priority will be to support Refugees in their resettlement in our communities by providing permanent accommodation and being committed to the principles of the New Scots strategy. Following analysis of our data collection we will enable us to us to shape supportive services that meet the needs of customers,*

Action	Owner	Timing
Support 'flip flats' for temporary accommodation including housing refugees	MyHousing	Ongoing
Monthly monitoring and tracking of refugees housed	Group Protection	Ongoing
Development of guidance and training for employees on Refugees and asylum seekers to enhance understanding (e.g. the journey of the Refugee)	Group Protection	Completed by December 2022
Participation in any Vulnerable Person Relocation Schemes (VPRS)	MyHousing	Ongoing
Ensure key documents (e.g. tenancy agreements, welcome packs) are available in a range of languages and demonstrate our EDI commitment to New Scots	MyHousing	Ongoing

#### 3.2 Recruitment – employees and Boards

*Aim- Our inclusive recruitment processes will encourage applications from underrepresented groups and support our EDI commitments to shape a diverse demographic of employees and Board members*

Action	Owner	Timing
Continue to ensure our job profile adverts communicate our commitment to EDI and are fully inclusive	People Services – Workforce Planning	Ongoing
Review where we advertise jobs, using feedback from our equality networks to ensure we reach under-represented group	People Services – Workforce Planning	Ongoing
Publish a "Statement of Commitment" as an employer, following other best practice EDI organisations, explicitly outlining the commitment of our Boards and Group Executive Team	People Services – Wellbeing and Inclusion	December 2022

Ensure recruitment panels represent a diverse range of protected characteristics where possible to include a diversity of perspectives and minimise potential bias. Recruitment panel members to be trained in unconscious bias and EDI awareness	People Services - Learning & Development	Ongoing
Hiring managers trained in our recruitment policy, aware and confident in carrying out recruitment in a way that aligns with legislation and our EDI objectives	People Services - Learning & Development	Ongoing
Ensure our assessments and interview questioning are inclusive - testing when designing these with employees with protected characteristics, ensuring these do not unfairly discriminate	People Services - Learning & Development	From October 2022
When relevant, advertise our intention to increase the presence of an under-represented group, to show that applicants from diverse backgrounds are encouraged	People Services – Workforce Planning	Ongoing
Target, encourage and support groups in our communities to attain jobs with us	People Services – Workforce Planning	From January 2023
Independent expert review of our recruitment processes	People Services – Workforce Planning	2023
<b>3.3 Induction</b>  <i>Aim- Quality inductions will allow our employees and Board members to feel comfortable and confident with EDI</i>		
<b>Action</b>	<b>Owner</b>	<b>Timing</b>
EDI threaded through induction process, showing importance and commitment to Wheatley Group and expectations of employees	People Services- Learning & Development	Ongoing
EDI & HR Policy and training as mandatory elements of induction	People Services- Learning & Development	Ongoing

Work with equality networks e.g. Disability and Neurodiversity group to review pre-boarding and onboarding process; interview adjustments made as necessary	People Services- Workforce Planning	Commenced October 2022
<b>3.4 A culture of inclusivity and a sense of belonging</b>  <i>Aim: EDI will be threaded through our employee services and championed by our people right through to our most senior level</i>		
Action	Owner	Timing
<i>Different Together</i> CoE meets regularly, led by the Group Director of People Services and feeding directly to the Group Chief Executive. To focus on EDI for staff, inform policy review as required.	People Services- Wellbeing and Inclusion	Launched August 2022
Promote initial employee equality networks as agreed by CoE (LGBTQ+, Carers, Disability and Neurodiversity) through spotlight on WE Connect, drop-ins. Each network sponsored by a member of the Executive Team	People Services- Wellbeing and Inclusion	Launched October 2022
Re-promote our reasonable adjustment passport following review, including with members of Disability and Neurodiversity group	People Services – Employee Relations	Launched October 2022
Promote and raise awareness of <i>Different Together</i> both on staff intranet and displays in hubs to reach site-based staff	People Services- Wellbeing and Inclusion	Commenced November 2022
Encourage under-represented staff groups to join CoE e.g. trades representatives, modern apprentices	People Services- Wellbeing and Inclusion	From November 2022
Expand and launch further 3 equality networks focusing on protected characteristics for example, race and multicultural, age, perimenopausal and menopausal.	People Services- Wellbeing and Inclusion	From November 2022
<i>Different Together</i> to feature in a CEO vlog and representation of members to attend Executive Team meeting– show importance of EDI at top level	People Services- Wellbeing and Inclusion/ Comms	From October 2022

Review equalities section on websites to ensure communicates inclusive culture of organisation for customers and employees/ prospective employees and wider stakeholders – including publishing materials	Governance	December 2022
Representation from protected characteristic groups/ guest speakers invited to CoE to give focus and raise awareness of particular needs – members to take back to business areas	People Services/ Governance	From 2023
Following full establishment of staff <i>Different Together</i> CoE, recruit and launch a branched-off group which focuses on EDI for customers	People Services/ Governance	From February 2023
<b>3.5 Review of Employee Benefits Package</b>  <i>Aim: We will offer a fully inclusive range of wellbeing benefits for our employees, suitable for different needs</i>		
<b>Action</b>	<b>Owner</b>	<b>Timing</b>
Continue annual review current employee benefits package to ensure it is suitable for different needs and benchmark against best practice EDI organisations for potential enhancement – feedback from <i>Different Together</i> CoE used to inform package	People Services- Wellbeing and Inclusion	Annually

## Outcome 4: Inclusiveness by design

### 4.1 Policies and services

**Aim-** EDI embedded into all our policies and services with ability to report on this

Action	Owner	Timing
The Wheatley Foundation will continue to provide support and opportunities for access to education, employment and volunteering for customers, including Refugee customers – data collected will inform these	Wheatley Foundation	Ongoing
If an EIA has deemed required, a summary will be included as an appendix to Board/ET report	Governance	Ongoing
Ongoing external review of all our HR policies to ensure these are inclusive in content and language - Signpost relevant policies to protected characteristic groups to access under our internal Wellbeing and Inclusion brand, <i>Different Together</i>	People Services- Employee Relations	November 2022
Review EIA template/guidance post data collection, including EIAs for specific purpose e.g. development and including in project proposal process	Governance	Quarter 1 2023
High-profile, organisational wide launch of our reviewed EDI & HR policy including; written and video materials for employees; live, interactive, online sessions, bespoke to staffing groups; link to interactive EDI e-learning; internal comms plan to raise awareness	Governance	From December 2022
Work with each business area to develop a statement of how EDI is achieved for them – progress against which will be reviewed annually and incorporated into annual equalities report	Governance	From 2023
Use allocations equality data to inform our new build programme so that the needs of our customers, including refugee communities, is incorporated into the planning	Development	From 2023
Add existence of EDI policy as a desirable (as well as signing up to Wheatley Pledge) when procuring to encourage and raise awareness with suppliers/ contractors of importance of this to us	Procurement	From 2023 Procurement strategy / Community Benefit review

## 4.2 Training and awareness raising

*Aim- Increase employee engagement with the EDI agenda and ensure all colleagues understand what it means to create and be part of an inclusive culture*

Action	Owner	Timing
<i>Different Together</i> members undertake in person EDI training facilitated by BITC	People Services- Wellbeing and Inclusion	November 2022
People managers from <i>Different Together</i> CoE to review managers training from EDI perspective	People Services- Wellbeing and Inclusion	From November 2022
EDI modules to be included in all Leadership and Management Development Programmes	People Services - Learning and Development	From December 2022
EIA masterclass for senior leadership to increase knowledge on the relationship between equalities data and EIAs, how it should be considered in planning stage and how to use data to inform our EIAs.	Governance	Quarter 2 2023
Refresh EDI training approach and have externally validated	People Services - Learning and Development	From 2023
When using interactive training, give employees the opportunity to reflect and share, promoting dialogue about diversity	People Services - Learning and Development	From 2023

## 4.3 Communications review

*Aim: We will communicate with our customers in a fully inclusive way*

Action	Owner	Timing
Continue to ensure our communications comply with accessibility standards- e.g. translations, audio formats, braille available etc.	Comms/ marketing	Ongoing

Use up-to-date, diverse imagery that reflects and represents the demographic of our employees and communities, including recruitment campaigns	Comms/ marketing	Ongoing
Consider EDI in our storyboarding, branding and photoshoots	Marketing	Ongoing
Ensure our websites are welcoming, representative of our communities	Comms/ marketing	Ongoing
Engage expert external bodies (such as Deaf Scotland) to independently review our customer communications	Comms	As required
Scope systems for simplification of preferred customer communications, incorporating language analysis from data collection	Governance	From 2023
<b>4.4 External benchmarking and accreditation</b>  <i>Aim- we will seek best practice from relevant sectors and peer organisations for inclusion in our action plan</i>		
<b>Action</b>	<b>Owner</b>	<b>Timing</b>
Review and update the equalities section on our websites, ensuring commitment to EDI is visible and highlighting recent progress with our EDI agenda as per best practice	Governance	December 2022
Following achievement of Bronze TIDE Mark accreditation with ENEI, progress in to become a Silver then Gold Standard Employer in EDI	People Services/ Governance/ Comms	May 2023

## 9. Monitoring and review

The Group Company Secretary will have overall responsibility in monitoring adherence with this Action Plan, with the Wheatley Solutions Board providing structured oversight.

The relevant leads from each team will meet quarterly to monitor and measure its progress, as well as ongoing external validation of our progress. Regular updates will be provided to the Executive Team and the Wheatley Solutions Board.

The Group Board will receive an annual progress report, the first of which will establish a baseline for the actions contained in this plan from which we can set targets. This Action Plan will be reviewed every two years.