

One Group, Many Voices

**Equity, Diversity and Inclusion and Human
Rights Action Plan**

wheatley-group.com

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Interactive key



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1. Foreword by Wheatley Housing Group Chair, Jo Armstrong

In November 2022, we agreed our first Group Equality, Diversity and Inclusion (“EDI”) and Human Rights Action Plan, **One Group Many Voices**.

In the year that followed, we made strong progress over a relatively short period of time including:

- **Expanding** the collection, reporting and monitoring of equality data to inform our decision-making;
- **Launching** our Different Together approach and 6 staff networks;
- **Publishing** our first [Statement of Commitment](#) and first [Annual Equalities Report](#).

Our Group 2021-2026 strategy *Your Home, Your Community, Your Future* sets out our desire to increasingly: tailor services to suit the needs of our customers; diversify our engagement through Customer Voices; and consider how our workforce will more closely reflect our communities. In 2023, we reviewed our strategy and strengthened our commitment to EDI by stating our focus on *‘ensuring EDI is reflected in our organisation and in everything we do... We are committed to creating an inclusive culture where diversity in all its forms is welcomed and celebrated. We will continue to build a diverse workforce that reflects our customer base through our Different Together initiatives.’*

EDI therefore continues to go to the heart of the common values shared by all members of the Wheatley Group (“the Group”).

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. We want all our customers and employees to be able to access our services in a fair way and we want to ensure that our policies, procedures and services do not unfairly disadvantage any person or group.

In recognising the significant progress made in delivering the first iteration of **One Group Many Voices**, we have reviewed our Action Plan with a focus on embedding and sustaining the structures we have put in place, being particularly mindful of access and equity.

This second iteration of our EDI Action Plan demonstrates our continued commitment to embrace, promote and sustain our EDI and Human Rights approach.. You can read last year’s **Action Plan** [here](#).

We will publish this Action Plan on our website and provide this report on request at no cost, in large print, in Braille, translated, or on another non-written format.

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 Action Plan details the practical steps we will take in continuing to embed our Group Equality, Diversity, Inclusion and Human Rights Policy (“EDI and HR Policy”).

Our focus goes beyond just meeting our legal obligations – we believe creating an equitable, diverse and inclusive environment for our employees and customers is the right thing to do. You can read more about our approach on our websites here: [Equality, diversity and inclusion | Wheatley Group \(wheatley-group.com\)](#)



In progressing from last year, and recognising that our communities are becoming more diverse with an expanding range of languages spoken by our customers, we understand that our service model must reflect this diversity; and continue to reflect this going forward. As such, we have updated what ‘EDI’ means to us. We previously referred to ‘equality’ which may be defined as treating everyone equally. However, we aim to provide equal opportunities so therefore we now refer to this as ‘equity’. This focus on ‘equity’ rather than ‘equality’ also follows best practice from the wider diversity and inclusion sector. As such, for us, ‘EDI’ now means:

- **Equity** – 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, both in our organisation and our communities
- **Inclusion** – making sure our employees and customers feel comfortable being themselves and that they feel valued, respected and heard

Over the last year, we have strengthened our EDI approach. For example we significantly expanded equality data collection and monitoring to inform our decision-making and service delivery, such as through Equality Impact Assessments (“EIAs”) and customer engagement. We have now collected the following data from the following groups:

- **Customers** – anonymous survey which generated over 10,300 customers;
- **Prospective customers** – via our housing application platforms;
- **Customer Voices** – our customer engagement programme;
- **Employees** – staff survey, with a high return rate of 60%;
- **Job applicants** – JobTrain and Foundation employability programmes; and
- **Board members** – upon appointment.

We launched our Different Together EDI and Wellbeing approach. This included:

- Developing a staff resource hub and staff Community of Excellence group, chaired by our People Services Director
- Launching six staff network groups, each sponsored by an Executive
- Refreshing recruitment adverts, job profiles and recruitment training involving staff network groups
- Enhancing our EDI training and online suite of learning, including the launch of accessibility e-learning on MyAcademy as well as in-person EDI training delivered by [Business in the Community](#) (BITC) to over 250 managers
- Celebrating and highlighting wellbeing and inclusion events, including menopause workshops, Cognitive Behavioural Therapy

2. Introduction (continued)

workshops, National Pronouns Day, men's mental health and Pride

- Launching menopause guidance and enhancing our paid carers leave following feedback from our network groups

We published our first Annual Equalities Report, detailing the significant progress made over the last year in delivering **One Group, Many Voices** including all the data we had collected and what this informed. You can access a one-page summary about this [here](#) and read the full report [here](#).

We received awards and recognition for our work from enei (Employer's Network for Equality and Inclusion), including:

- Our 2023 TIDE result in which we scored 72%. This means that, overall, we are working at the 'Embed' level and are a Silver level employer; this is an improvement from 2022 in which we scored 56% and have increased one level from 'Realise' and Bronze level employer.
- In relation to the strategy and planning element of the assessment we achieved the **highest level of 'Sustain'**. As a benchmark, the median score for all participants was 58% and within our sector, we ranked 2nd highest.
- At the Annual Inclusivity Awards held in November 2023, we were the winners of the

Driving Social Mobility and Social Inclusion in the Workplace category. You can read more about the awards here: [The enei Annual Inclusivity Awards Winners 2023 - Employers Network for Equality & Inclusion](#)

In recognising this progress and considering enei's recommendations for improvement, our Action Plan for 2024/25 focuses on embedding and sustaining our work to date. The Action Plan is built on the following pillars:

- **Different Together with you** – customer and community focus;
- **Different Together in our Group** – staff and internal culture focus; and
- **Evolving our data** – whole journey approach and embedding it into decision-making

This Action Plan has been developed with feedback from our Different Together Community of Excellence, our Trade Unions, our Boards and externally by BITC.

We have a strong focus on continuous improvement and ensuring this is reflected in our organisational culture – we will continue to strengthen this through this next iteration of our EDI actions.

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 characteristic¹.

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 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.



Human Rights approach

As part of its Programme for Government, the Scottish Government is planning to introduce a Human Rights Bill for Scotland. The purpose of the Bill will be to incorporate into Scots law internal economic, social and cultural rights and rights relating to women, people with disabilities and people who experience racism, as well as recognise the right to a healthy environment (within the limits of its devolved competence). A number of these are rights that derive from existing international treaties or standards, that do not yet form a part of our domestic legal framework (i.e. Scots Law). The proposed Bill would therefore make these rights enforceable in Scots Law for the first time and create duties on those delivering public functions to deliver these rights. A number of our activities are already grounded in human rights - for example, through our letting system, our tenancy agreements and our policies and procedures. Through EIAs we consider how our policies/services are delivered without discrimination.



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

4. Key outcomes

Building on our last EDI Action Plan, we have identified **three key outcomes** to support us in putting our approach into practice and making it meaningful. These will allow us to:

- continue to evidence our compliance with legal and regulatory requirements;
- help ensure our actions are impactful;
- demonstrate our commitment to EDI and human rights to our current/prospective customers and employees; and
- evidence the importance of our commitment to EDI in our decision-making.

1. Different Together with you

2. Different Together in our Group

3. Evolving our data

Outcome 1: Different Together with you

This outcome focuses on **customer and community** actions; a key area of focus will be on how we enhance our approaches that support equality of access to our services. A particular focus will be on how we support access to services for customers whose first language is not English or who have disabilities, in particular blindness and deafness. We will measure the success of this in different ways such as through:

- **our language and translation data** – external validation of our approach and an increase in requests would indicate a service that is accessible to customers;
- **data from our customers** – we will aim to better understand if customers feel our services offer fair and equal opportunity to access;
- and **Hate Crime monitoring** – an increase in reporting may be a positive outcome, showing customers and staff have a raised awareness and feel confident in effectively utilising our policy process.

In 2022, we launched the Different Together Community of Excellence (“CoE”) and six staff network groups. The priority here was to enhance our internal EDI culture, awareness, training, and recruitment. Now we have strengthened these



foundations within our employee base, we will launch a network group focused on frontline EDI actions for our customers and communities.

This group will help to review, identify and action areas of improvement in terms of enhancing operational accessibility and inclusivity considerations for customers, consulting with our trade union partners on any impact upon staff delivery methods. This network group will be able to support and inform such work ensuring the successful delivery of customer-focused actions, for example refining our language services. The network group will be supported by business leads and work in collaboration with other parts of the Wheatley Group to achieve this.

Our Action Plan takes an inclusive approach and is not solely focused on one characteristic. Our work will be beneficial in improving access more widely. The work of our Group Protection team is important here, particularly in launching our Group Hate Crime policy with customers and staff to signal a zero-tolerance approach against harassment.

Although not a protected characteristic, in Scotland socio-economic disadvantage is a recognised characteristic and area of inequality; social mobility is therefore a key focus in helping to alleviate this and providing employment and training opportunities for our customers.

4. Key outcomes (continued)

In relation to access to the sector more widely, in 2023 Shelter published recommendations for improvement following research into ethnic minority access to social housing; this has informed this plan particularly at section 1.4.

Our allocation data shows that housing applicants are more likely to be from an ethnically diverse background in comparison to our existing customers; we also play a key role in terms of housing refugees and New Scots.

Representatives from the Group attended a Shelter workshop to discuss the report and its findings – we are now members of the subsequently launched Race and Housing Network. This is comprised of housing professionals from across the sector, who will work in partnership to take forward the report recommendations on how to improve access to social housing for ethnically diverse individuals and families and facilitate a forum for discussion and sharing best practice. We hosted the first meeting at the end of November 2023.



Outcome 2: Different Together in our Group

This outcome focuses on **staff and internal culture**; our Different Together approach will be further embedded with our people and through our workplace environment. Different Together was launched in summer 2022 as the Group's EDI and Wellbeing brand; a new identity for celebrating individual differences and recognising the strength from bringing these together.

In the Different Together intranet hub, staff can find support, training and information to help make sure everyone in our organisation is represented and has equal access to the resources and services they need; through Different Together initiatives and awareness raising, colleagues have the opportunity to influence and shape priorities to suit individual needs. The aim here is to create a fully inclusive environment where everyone can feel safe, represented and free to be themselves at work. We will measure success of this through our staff EDI survey, post-training feedback and through Employee Relations process data.

We aim to support and strengthen the internal structures we have put in place in the last year in terms of making Wheatley a great place to work where we attract and retain a diverse group of talented people, reflecting the communities that we serve, and support them throughout their career journey with us.

Our People Services team will continue to work with the Different Together CoE and our six staff network groups so as not to lose momentum internally. Actions here include rolling out our EDI face-to-face training in partnership with Diversity Scotland and working to improve our enei TIDE score.

Outcome 3: Evolving our data

This outcome focuses on **data**; we will take a whole journey approach and embed EDI data into decision-making. We will measure this through our continued and expanded EDI data analysis to spot trends and gaps to improve service delivery and design. We will use Equality Impact Assessments (EIAs) to better understand the impact of our policies and approaches on different groups. In doing this, overall we aim to improve customer satisfaction as we use data to drive changes in our services that make them increasingly tailored.

Our previous EDI Action Plan allowed us to achieve a significant expansion of our equality data collection, reporting and analysis. This must continue and strengthen, supporting us to take an increasingly intersectional approach.



4. Key outcomes (continued)

Enei's recommendations in this area were to try and improve participation levels and publish information and benchmarking. We are already planning to do this through the Annual Equality Data Report and census comparison once available; we will also consider other data to benchmark against such as Office of National Statistic data and the National Housing Federation surveys.

Taking a 'whole journey' approach will allow us to better identify any barriers. For example, not only tracking EDI staff data in terms of applicants and successful candidates, but also in terms of promotions, turnover and attrition. For our customers and in particular housing applicants, this will include regular analysis of those then housed and comparing this with community-level data, helping to predict housing needs and helping to inform new build design.

A strong theme within our data collection will be to link into the wider development within the Group of vulnerability data. Understanding customer vulnerability is an important element in ensuring that we have the necessary data to develop and provide tailored, equitable, inclusive and personalised services. As the wider Group approach and strategy on vulnerability develops we

will strengthen this Plan to reflect this and include more specific actions.

We will also look at including tenancy sustainment data, and disaggregating homeless, transfer and waiting list applicant data. Combined, this will help us build a stronger picture from which we can identify trends and help to remove any barriers.

Our Action Plan last year primarily focused on the social landlords in the Group. Adopting an EDI approach is also important for our partners, Lowther Homes and Wheatley Care. This plan therefore more clearly sets this out, such as introducing EDI data analysis for our mid-market rent and care customers by firstly establishing what information we already have available and thereafter expanding this to align with Group EDI data collection more widely. MyHousing was recently launched for Lowther Homes so will be utilised in the same way used for housing applicant equality data collection.

A summary of work planned for action concerning each of the three outcomes is detailed in the following section. Progress against these actions will be monitored quarterly by our Wheatley Solutions Board.

5. The Actions

Outcome 1: Different Together with you		
<i>Evolve Different Together approach with an increased customer and community focus to give equal opportunity and improve access to our services</i>		
1.1 Different Together approach for customer and communities		
Action	Owner	Timing
Launch Different Together customer focussed network group, including staff with lived-experience and from customer-facing roles from e.g. housing, Lowther, repairs, CFC, Stronger Voices, Foundation and Care.	Director of Governance	From Q1 24/25
Customer focussed network group to review, identify and action areas of improvement in terms of customer accessibility and inclusivity considerations. This will include specific consideration of vulnerabilities.	Network group lead	Ongoing once launched
Enhance EDI information in digital welcome packs through ALISS.org e.g. signposting to local community groups and places for support, reflecting MyHousing data that shows high numbers of applicants with mental health conditions.	Letting and Homeless Lead	From reviewed pack launch
Undertake EIA for Group 5-year development programme to assess the equality impact of our new build plans.	Director of Development	Q4 23/24
Scope further improvements for information captured in the Annual Tenant Visit including specific consideration as to whether vulnerability information could be captured.	Business Improvement and Policy Lead	Q1 24/25
Develop and launch a ‘people-centred’ guide – e.g. EDI considerations for frontline interactions.	Business Improvement and Policy Lead	Q2 24/25
Improve Foundation application and EDI data analysis approach through review e.g. through neurodiverse lens, and scope use of MS Forms.	Director of Foundation	From Q4 23/24
Aim to increase Bursary representation of applicants compared to awarded from 2023 results e.g. proactively supporting customers with process especially considering language barriers, working with third sector to advertise applications.	Director of Foundation	From Q1 24/25

5. The Actions (continued)

1.2 Effective Hate Crime and ASB approach		
Action	Owner	Timing
Raise awareness of Group Hate Crime policy with staff and customers through internal/external launch campaign and varied communication channels, supporting alternative communications requirements e.g. translation.	All - Wheatley 360 Lead	Q4 23/24 - Q1 24/25
Identify and map staff role profiles for which Hate Crime training will be mandatory and monitor completion rates.		Q2 24/25
Monitor and analyse Hate Crime reporting for trends e.g. types of Hate Crime being reported.		From Q1 24/25
Implement and monitor actions identified within the Group Anti Social Behaviour (ASB) Framework and Group Hate Crime policy EIAs.		Q4 23/24 - Q1 24/25
As part of the launch and implementation of Group ASB Framework and subsidiary policies, consider improving data analytics in terms of identifying particular groups that may be experiencing more ASB to support driving improvements.		Q2 24/25
1.3 Advancing our New Scots approach		
Action	Owner	Timing
Develop a Group New Scots Action Plan to respond to the 3rd iteration of the Scottish Government New Scots Refugee Integration Strategy.	All - Wheatley 360 Lead	From Q2 24/25 when strategy and delivery plan are launched
Design an internal communications campaign to promote the 'journey of the refugee' e-learning module with staff, enhancing understanding and awareness.		Q1 24/25
Embed our New Scots Welcome Pack to all New Scots customers signing up for a tenancy with our organisation.		Q1 24/25

5. The Actions (continued)

1.4 Improving access to social housing and other services		
Action	Owner	Timing
Participation in Shelter's Race and Housing Network to help drive improvements for access within the sector; to include representatives from key teams.	Director of Governance	Ongoing from Nov 2023
Work to enhance reassessing housing need i.e. addressing under-occupancy if bedrooms are no longer required.	Letting and Homeless Lead	Scope from Q1 24/25
Focus on long-term housing that meets the needs of marginalised groups, not only temporary accommodation options.	Letting and Homeless Lead/ Director of Development	Ongoing
Provide drop-in surgeries in hubs, where pre-appointments at home are not suitable, to improve access to a range of services e.g. support for applying for a home.	Housing Leads	Underway/ ongoing
Implement actions and monitor progress with actions from Homelessness policy EIA review.	Letting and Homeless Lead	From Q4 23/24
<p>EDI is considered within our Digital Maturity roadmap for customers and digital service design. This includes:</p> <ul style="list-style-type: none"> improving EDI inclusion in projects and customer journey mapping through developing and implementing a Customer Persona Library, based on EDI data and accessibility characteristics; Digital Services (including web self service and online repairs) designed to be as accessible as possible and using best practice (SAtSD), taking consideration of non-English language needs; working to ensure our content is compatible with assistive technologies. 	Digital Innovation Lead	Q1 - 4 2/4/25

5. The Actions (continued)

1.5 Enhancing our Stronger Voices approach through Different Together		
Action	Owner	Timing
EDI threaded through our engagement approach, e.g. using our equality data, Different Together calendar, internal events.	All - Business Improvement and Policy Lead	Ongoing
Implement EIA actions from the Engagement Framework review.		From Q4 23/24
EDI approach considered through Neighbourhood Planning.		From Q1 24/25
Involve minoritised groups/those with lived experience in the development of policies and service design.		Ongoing
Use our Customer Voice EDI data to have targeted check-ins of how our policies impact marginalised groups.		From Q3 24/25
Tying in with our Digital Maturity roadmap, use our Customer Voice data to identify and target with the aim to improve the participation of underrepresented groups e.g. younger customers, linking in with local groups.		Annual review and ongoing
1.6 EDI friendly communications, adaptable to language need		
Action	Owner	Timing
Refresh translation/ interpretation services through procurement exercise, including: <ul style="list-style-type: none"> • taking account of our current language data and staff feedback • Introduction in CFC of noting the reason for customer request to access translation, to identify trends for services. 	Director of CFC	Q4 23/24 and ongoing
Improve access to our translation and interpretation services by: <ul style="list-style-type: none"> • Developing guidance for staff; • Developing translated pack for customers to include key information about accessing services to be issued upon sign-up or where language need is identified. 	Director of Governance	From Q4 23/24
Review and enhance our mandate process to support accessibility, following recommendation from Repairs Thematic review.	Director of CFC	From Q4 23/24

5. The Actions (continued)

Action	Owner	Timing
Following the external website accessibility audit undertaken in December 2023, implement recommendations to further enhance our website's accessibility and scope improvements for the use of PDFs.	Director of Comms	From Q4 23/24
Enhance the accessibility of forms by reviewing the use of editable PDFs and adopting a uniform approach to slicken user experience. This review of documents and process will involve various business leads to ensure a consistent approach is used, including scoping the use of MS Forms, helping to improve the accessibility and inclusivity of forms e.g. title options including Miss, Mrs, Mr and Mx (non-binary option).	Director of Comms	From Q4 23/24 and as review required
Evolve use of language data analysis, work to better direct customers who require a translation by introducing a translation statement in top languages e.g. for newsletters; publishing a digital poster; and periodical posts on our social media reminding customers how to request a translation.	Director of Comms	From Q4 23/24
Explore and recommend improvements that could be made to our Web Self Service (WSS) to enhance compliance with Web Content Accessibility Guidelines (WCAG) – improvements to be actioned by WSS Lead.	Digital Innovation Lead	From Q1 2024/25
Engage with external bodies to undertake a series of accessibility and language reviews to ensure we are achieving all we can to support those whose first language is not English or who require alternative communication methods. This may include: <ul style="list-style-type: none"> external review of key service areas such as repairs; MyHousing and website review from the perspective of a non-English speaker. 	Director of Governance	From Q1 24/25
Review ASTRA to more effectively capture EDI dimensions such as language through engagement with service delivery leads.	Director of I.T and Digital Services	From Q1 24/25

5. The Actions (continued)

Action	Owner	Timing
<p>Explore the use auto-translation e.g. within Outlook taking consideration of:</p> <ul style="list-style-type: none"> customer preferences regarding translation e.g. if prefer to translate on their own device; the accuracy of using modern translation services; solutions interpreters/language services have to auto-translation <p>If implementing auto translation, develop clear guidance to raise awareness of this and when appropriate to use.</p>	Director of Governance	From Q1 24/25
<p>Promote EDI content externally, including through social media, informed by Different Together calendar e.g. celebration days to signal to customers our inclusive culture.</p>	Director of Comms	Q1 24/25 and ongoing
<p>Improve the digital accessibility of content used internally by:</p> <ul style="list-style-type: none"> Using Microsoft 365 tools, rolling out 'creating accessibility content' training for Leadership and staff involved in creating content e.g. presentations Developing and publishing templates for staff, drawing on Microsoft 'Accessibility fundamentals' Training Promoting MyAcademy training 'Accessibility - Making Your Computer Easier' to Use (Video Guides and Support Material on Microsoft Accessibility Features) Raising awareness through internal communications around Global Accessibility Awareness Day (16 May 2024). 	Director of Comms	Q1 24/25
<p>Consider how to track the impact of MyVoice e.g. for those whose first language is not English.</p>	Director of CFC	Q2 24/25

5. The Actions (continued)

Outcome 2: Different Together in our Group		
<i>Different Together approach is embedded with our people and through our culture</i>		
2.1 Support and strengthen structures in place		
Action	Owner	Timing
Continue to support our Different Together CoE and network groups in delivering their actions.	Wellbeing & Inclusion Lead	Ongoing
Keep membership of CoE under review to ensure retains diversity in lived experience and roles.	Wellbeing & Inclusion Lead	Ongoing
Roll our EDI training for Board members.	Governance	From Q1 – Q3 24/25
CoE and Network Groups hold a series of engagement roadshows and events, aligned to new developments and/or training delivery.	Wellbeing & Inclusion Lead	Q1 – 4 24/25
Work collaboratively with Unison to promote their ‘Year of the LGBT+ Worker’ in inclusion messaging to colleagues and support of LGBT+ network group agenda.	Wellbeing & Inclusion Lead	From Q1 24/25
Encourage the use of external learning resources and opportunities to CoE and networks groups.	Wellbeing & Inclusion Lead	Q1 – 4 24/25
Deliver EDI face-to-face training across the Group accredited by Diversity Scotland following the pilot with Different Together CoE.	L&D Lead	Q4 23/24 – Q2 24/25
Ahead of TIDE submission, aim to improve Procurement score by engaging with enei.	Director of Procurement	Q1 24/25 - submission
Continue to improve our enei TIDE benchmark overall progress working towards Gold.	Wellbeing & Inclusion Lead	Q2 24/25 - results
Continue to include EDI requirements in Procurement policy, and report supplier commitment to EDI through Contract Management System.	Director of Procurement	Annual - Policy review

5. The Actions (continued)

2.2 Attract and retain a diverse group of talented people		
Action	Owner	Timing
Undertake an annual review of current employee benefits package to ensure it is suitable for different needs and benchmark against best practice EDI organisations for potential enhancement – feedback from Different Together CoE used to inform the package.	Wellbeing & Inclusion Lead	Ongoing
Continue to provide coaching and training for difficult conversations as required e.g. reasonable adjustments.	People Services Director	Ongoing
Enhance Care external imagery – photoshoots taking consideration of EDI and reflective of the people we work for.	Director of Comms	From Q4 23/24
Introduce EDI reflections into MyAppraisal for leaders relevant to their business area.	L&D Lead	Q1 2024/25
Explore development opportunities for our staff groups within underrepresented areas of diversity; this may be for example, Care.	L&D Lead	Q4 2024/25

5. The Actions (continued)

Outcome 3: Evolving our data

Take a whole journey approach, further embedding equality data into decision-making

3.1 Sustain and develop structures set

Action	Owner	Timing
Continue to collect, monitor, report and use equality data to inform decisions e.g. in EIAs and through looking to develop structures established where possible – for customers, MyHousing, Customer Voices, Foundation, JobTrain, Wheatley Works, staff and Board members.	Director of Governance	Ongoing
Update Boards and ET regularly e.g. in the annual People Services EDI update.	Directors of Governance/ People Services	Ongoing
Continue to comply with Housing for Varying Needs, including following its review, and comply with Scottish Accessible Homes Standard once introduced.	Director of Development	Ongoing
Publish progress publicly through the next Annual Group Equalities Report.	Director of Governance	Develop from Q1 24/25
Implement EDI Staff Survey for 2024 with improvements following the initial year; to include a question around the impact of EDI approach to help measure success/impact on culture.	People Services Director	Develop from Q1 24/25
Age, ethnicity and disability diversity markers, along with skills, experience and gender, included in Board succession planning analysis, as well as socio-economic diversity based on National Statistics Socio-economic Classification criteria.	Director of Governance	Autumn 2024
Benchmark Board diversity annually against sector data and report via the RAAG Committee.	Director of Governance	Autumn 2024
Collect equality data from our current customers through an anonymous collection exercise every three years. The communications and approach to this will be co-created with consideration of customers with vulnerabilities and additional support needs.	Director of Governance	Autumn 2025

5. The Actions (continued)

3.2 Evolve our EDI data, taking a whole journey approach		
Action	Owner	Timing
Full 2022 Census comparison of all customer/staff data with community level data.	Directors of Governance/ People Services	Once available
Introduce EDI data analysis for MMR customers through MyHousing to use in Lowther decision-making.	Director of Lowther	Develop from Q1 24/25
Introduce EDI data analysis for People We Work for in Care.	Managing Director of Care	Develop from Q1 24/25
Consider EDI information and data across delivery of Group Data Strategy e.g. customer needs, accessibility, vulnerabilities, mandates and alignment with process and system changes.	Director of I.T. and Digital Services	From Q1 24/25
Outcome 3: Evolving our data		
<i>Take a whole journey approach, further embedding equality data into decision-making</i>		
3.1 Sustain and develop structures set		
Action	Owner	Timing
Continue to collect, monitor, report and use equality data to inform decisions e.g. in EIAs and through looking to develop structures established where possible – for customers, MyHousing, Customer Voices, Foundation, JobTrain, Wheatley Works, staff and Board members.	Director of Governance	Ongoing
Update Boards and ET regularly e.g. in the annual People Services EDI update.	Directors of Governance/ People Services	Ongoing
Continue to comply with Housing for Varying Needs, including following its review, and comply with Scottish Accessible Homes Standard once introduced.	Director of Development	Ongoing
Publish progress publicly through the next Annual Group Equalities Report.	Director of Governance	Develop from Q1 24/25

5. The Actions (continued)

Action	Owner	Timing
Implement EDI Staff Survey for 2024 with improvements following the initial year; to include a question around the impact of EDI approach to help measure success/impact on culture.	People Services Director	Develop from Q1 24/25
Age, ethnicity and disability diversity markers, along with skills, experience and gender, included in Board succession planning analysis, as well as socio-economic diversity based on National Statistics Socio-economic Classification criteria.	Director of Governance	Autumn 2024
Benchmark Board diversity annually against sector data and report via the RAAG Committee.	Director of Governance	Autumn 2024
Collect equality data from our current customers through an anonymous collection exercise every three years. The communications and approach to this will be co-created with consideration of customers with vulnerabilities and additional support needs.	Director of Governance	Autumn 2025
3.2 Evolve our EDI data, taking a whole journey approach		
Action	Owner	Timing
Full 2022 Census comparison of all customer/staff data with community level data.	Directors of Governance/ People Services	Once available
Introduce EDI data analysis for MMR customers through MyHousing to use in Lowther decision-making.	Director of Lowther	Develop from Q1 24/25
Introduce EDI data analysis for People We Work for in Care.	Managing Director of Care	Develop from Q1 24/25
Consider EDI information and data across delivery of Group Data Strategy e.g. customer needs, accessibility, vulnerabilities, mandates and alignment with process and system changes.	Director of I.T. and Digital Services	From Q1 24/25
Strengthen the use of application data for new build projects e.g. pre-build consultation and planning, physical characteristics of housing and predicting needs, account of cultural awareness and accessibility.	Director of Development	From Q1 24/25 and ongoing
Evolve MyHousing data, e.g. continual analysis against applications then housed, filter for homeless/waiting list/transfer.	Letting and Homeless Lead	From 23/24 Q4

5. The Actions (continued)

Action	Owner	Timing
Scope inclusion of comparison of MyHousing data with tenancy sustainment data.	Performance and Strategy Lead	From Q1 24/25
Full 2022 Census comparison of all customer/staff data with community level data.	Directors of Governance/ People Services	Once available
Develop employee data analysis through an EDI lens in Employee Relations processes, including for employees who leave the organisation.	People Services Director	Q2 24/25
Develop and Publish Gender Equality Employee Policy.	People Services Director	Q2 2024/25
Look to improve our complaint analysis from an EDI perspective.	Business Improvement and Policy Lead	From Q4 24/25
Scope CFC capability of enhanced EDI data analysis e.g. through Storm, drawing information available from ASTRA and engaging with trade union partners if any impact on CFC staff.	Director of CFC	From Q4 24/25

6. Monitoring and review

The Group Company Secretary will have overall responsibility in monitoring with the delivery of 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. This Action Plan will be reviewed every two years.



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