



Kent Housing Group- EDI Report 2022

Housing Diversity Network

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1. Executive summary

Between December 2021 and February 2022, 15 member organisations of Kent Housing Group contributed to Housing Diversity Networks equality diversity and inclusion survey, and 6 provided benchmarking data. The following is a summary of the key findings:

- The extent to which EDI policies and practices were adopted varied between the surveyed organisations. While almost all had adopted at least 50% of the listed policies and practices, just under half had adopted 75% or more.

- The majority of organisations have an EDI forum, group or champion (80%). The scope of these groups was mostly general EDI, however there are in some organisations separate groups which each deal with a specific protected characteristic.

- Only 53% of surveyed organisations are signed up to an EDI charter, framework or benchmarking scheme.

- A range of approaches to improving EDI are in place across the surveyed organisations. The most adopted approaches as listed in the survey are: the provision of EDI training, the monitoring of the Gender Equality Gap, involvement in events, campaigns and/or diversity celebrations, and routine monitoring of recruitment and retention in relation to protected characteristics.

- Only around 29% of respondents felt their organisations' Boards were representative of the communities served. This was slightly better for leadership teams (53%) and workforces (60%). Some organisations indicated that while there was representative balance for some characteristics (such as gender), other characteristics (such as ethnicity) were not as well reflected.

A small number of organisations said that they did not know whether the organisation was representative, likely owing to a lack of data and/or non-disclosure around certain characteristics.

- Many organisations are taking active steps to improve the diversity of Boards, leadership teams and workforces, using methods such as setting targets or monitoring KPIs around diverse recruitment, targeting diverse talent pools, and name blind recruitment. Those who stated they are not taking actions to improve upon diversity were likely to have answered positively to the previous question on whether their Board, leadership team and workforce are currently reflective of the communities they serve.

- Around 2/3 of organisations use customer profiling to at least a moderate degree to inform strategies, policies, and practices. When asked about specific challenges to gathering and utilising customer data to inform services, many organisations listed the reluctance of customers to disclose sensitive information as a key concern.

Recommendations

In light of the findings within this report, HDN are providing the following general recommendations around improving EDI to members of KHG:

Data

Organisations should take steps to improve the collection and utilisation of data on:

- Customers
- Workforces
- Boards

This should include-

- Collecting data more robustly on all protected characteristics (data on sexuality and transgender status appear to be key areas of focus in regard to being considered potentially sensitive information which is thus under collected/under shared)
- Communicating the benefits of sharing this data (i.e. around improving services, policies and procedures, removing potential barriers to accessibility), perhaps through targeted communications campaigns (particularly in the case of customers)
- Also assuring subjects of data collection that their data is protected under GDPR and will not be shared or used maliciously
- Though gender pay gaps are generally well reported and analysed by organisations as per legal requirements, HDN encourage also gathering the relevant data to conduct other pay gap analyses such as ethnicity and gender to determine any patterns or disparities which require action

Diversity and Representation

Improve representation of local communities and customer bases within organisations, particularly in higher levels such as executive leadership and at Board level, and set specific targets to monitor progress on this.

Actions to aid this could include-

- Using diverse recruitment outlets to widen the candidate pool

- Taking positive action in recruitment to improve the representation of specific underrepresented groups
- Targeting opportunities for learning and development at current staff from backgrounds which are generally underrepresented in higher levels of organisations – with the aim of equipping them with the skills and experience they would need to progress toward these roles

While some organisations who took part in this study had a good level of representation at some or all levels within the business, it is important still to be vigilant and ensure diversity and inclusion within the organisation is maintained.

Board diversity is a particular issue. HDN believes taking a longer-term strategic view of improving Board diversity – including succession planning and Board trainees programmes – are more likely to be sustainable ways of ensuring that Boards reflect the communities that you serve.

Local Collaboration

Organisations should aim to work and learn together around EDI:

- There are examples of best practice found within this study, and we would encourage KHG members to share and discuss good practices around EDI with one another regularly.
- Organisations would also do well to directly collaborate with one another around EDI, as this improves capacity particularly for smaller organisations who are perhaps unable to commit as much time or resources on their own
- Working at a regional level will also help in the wider inequality agenda. Reducing regional inequalities is a complex area and requires a long-term, multi-faceted approach to be successful – tying in with the overall approach to EDI proposed in this study.

There are opportunities therefore (for example through the government’s Levelling Up agenda) to address regional inequalities and provide opportunities for tenants and residents across the region. These could form part of a wider regional and collaborative approach to EDI adopted by housing organisations.

Frameworks and Member Organisations

To help improve EDI performance across organisations, considering memberships with organisations like Housing Diversity Network will:

- Give organisations access to expert advice, tools and resources around EDI
- Provide opportunities to collaborate with, support, learn and gain best practice from other members of the organisation (both regionally and across the country) who are leading in areas of EDI

Commitment to various EDI charters or frameworks would also provide a level of guidance in what organisations must do to maintain/improve EDI (for instance around specific areas such as race or sexuality), as well as giving organisations something to hold themselves accountable against.

2. Introduction and Methodology

This research was conducted to establish the baseline performance on equality, diversity and inclusion for members of Kent Housing Group. The write-up includes recommendations for organisations to improve their performance in this area and to deliver better outcomes for the communities they serve.

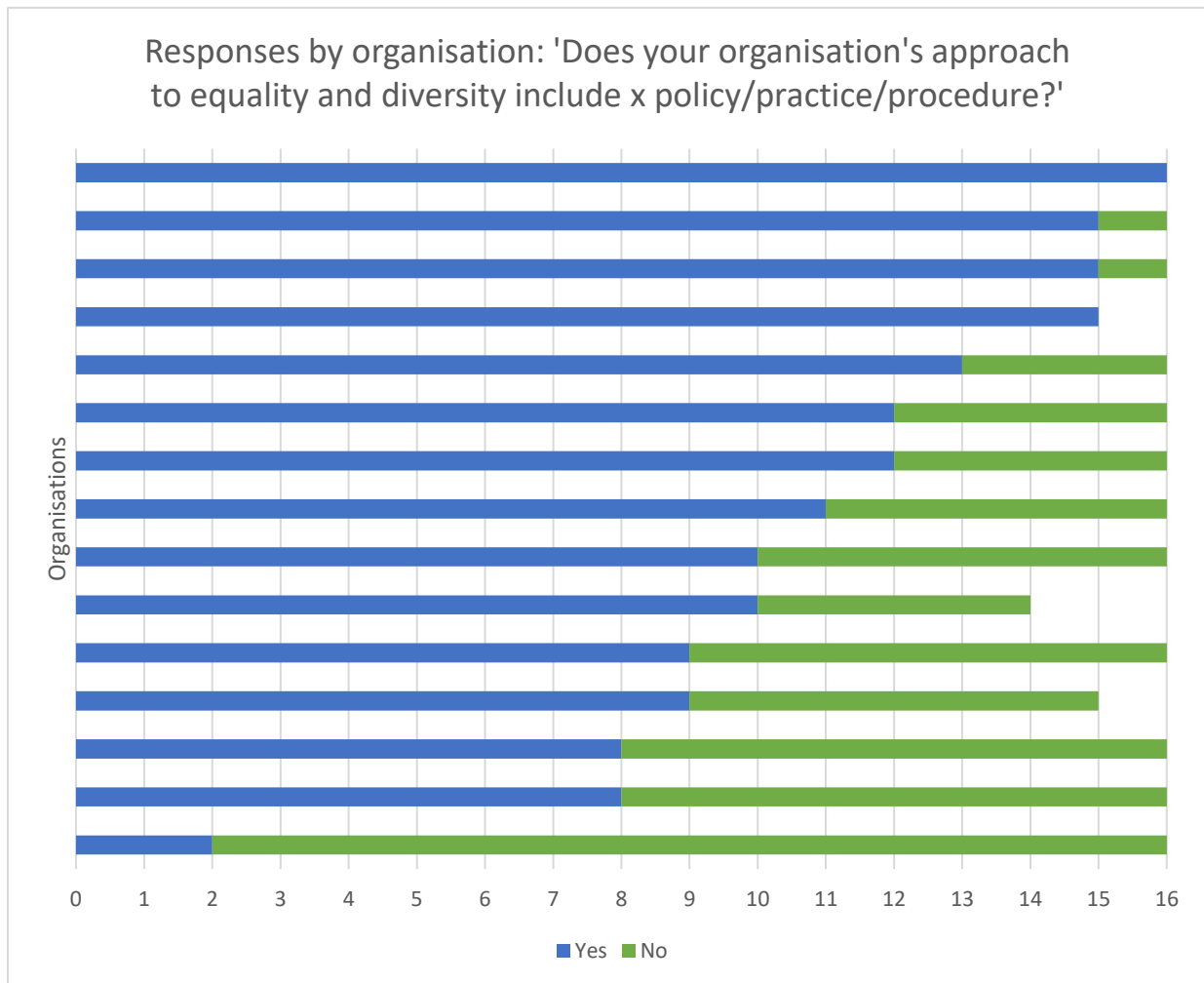
Housing Diversity Network looked to emulate previous regional reports on EDI practices conducted in 2020 by the Diversity, Inclusion, Community Cohesion and Equalities (DICE) partnership of social housing providers in Greater Manchester, and in 2021 by the Yorkshire and Humberside Chief Executives Forum. This study aims to highlight what organisations are doing to improve equality, diversity and inclusion (EDI) within their organisations and across the sector.

Methodology

The research was coordinated, carried out and written-up by HDN's Policy and Research Lead Josh Neary-Pegler. The research was carried out using an online Equalities, Diversity and Inclusion survey and sent out to organisations in February 2022. The survey was an adapted version of that developed by the Diversity, Inclusion, Community Cohesion and Equalities (DICE) partnership of social housing providers in Greater Manchester. Guidance in conducting this research was received from Sonja Wellings of Irwell Valley Housing Association. Demographic data on organisations was obtained using a proforma which again matched with that used by DICE in terms of scope.

3. Survey Findings

Variability



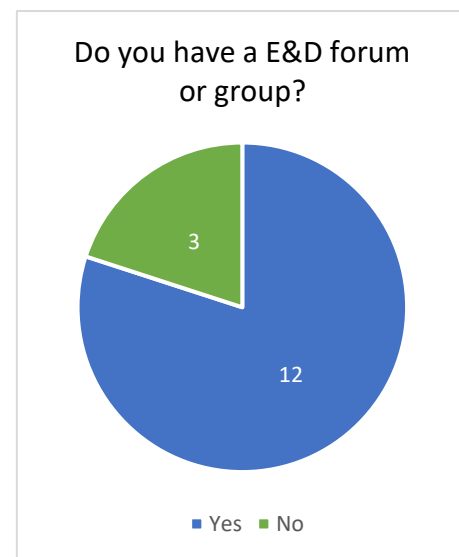
In terms of the variation between organisations relating to EDI policies and practices,

- 7 of the 15 organisations which took part in the study had adopted 75% (12) or more of the (16) policies or practices outlined in the survey, with 4 of these organisations these having adopted 15 or more (over 90%).
- All bar 1 organisation had adopted at least 50% (8) of the policies or practices contained in the questions
- It should be noted that rather than giving a negative answer, some organisations left a blank space where they felt a policy/practice was not something applicable to their organisation.

Approaches to equality and diversity

Equality, diversity and inclusion forums and groups

- The format of these groups/forums included general EDI Steering/Working groups, and/or Diversity Champion groups, and in some cases multiple specific groups within an organisation dedicated to specific protected characteristics (such as BAME, women's, LGBTQ+, multi-faith, disability, young persons and mental health support networks)
- Organisations without a dedicated EDI forum/group indicated that Equality, Diversity and Inclusion was instead overseen by an existing team within the organisation or by the Executive Management Team.



Equality and diversity charters, frameworks, and benchmarking

Examples provided in comments included:

Schemes, charters, accreditations, and awards

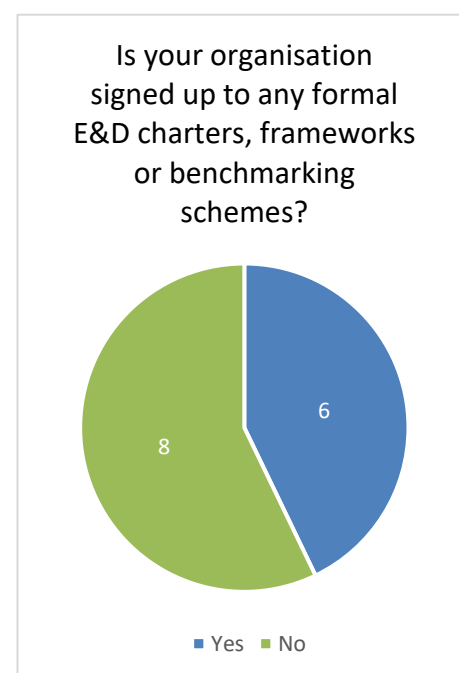
- Disability Confident Scheme
- Investors in People Accreditation
- Leadership 2025 (BME Leadership Development)

Membership organisations

- Housing Diversity Network
- Inclusive Employers
- Stonewall

Pledges and declarations

- Mindful Employer



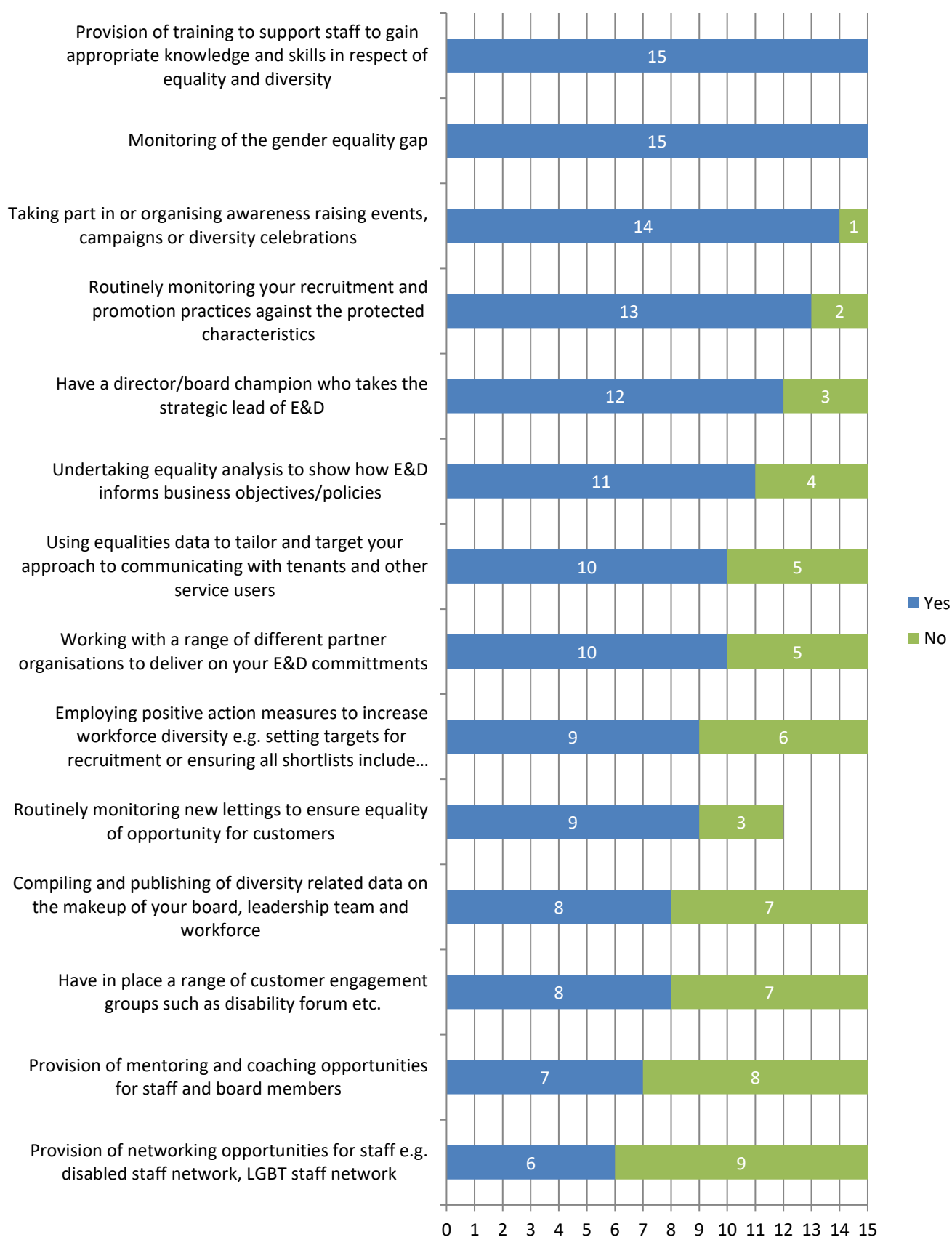
Other approaches to improving equality and diversity

The following graph illustrates the popularity of EDI approaches among organisations from most to least adopted.

The most adopted approaches include the provision of EDI training, the monitoring of the Gender Equality Gap (it should be noted that monitoring Gender Pay Gaps is of course a mandatory practice for many organisations), involvement in events, campaigns and/or diversity celebrations, and routine monitoring of recruitment and retention in relation to protected characteristics.

The least adopted practices were providing networking opportunities for staff based around protected characteristics, and providing mentoring/coaching opportunities for staff.

Please indicate whether your organisation's approach to equality and diversity includes any of the following:



15 Provide training to support staff to gain appropriate knowledge and skills in respect of equality and diversity	Responses indicated that provision of basic EDI training to all staff is mandatory and/or part of the induction process for many organisations, and in many cases is provided in the form of e-learning. Some organisations also offer more expansive or focussed EDI training (on subjects such as unconscious bias), and targeted training for executive/leadership teams and recruiting managers.
15 Monitor the gender equality gap	In addition to statutory obligations to deliver Gender Pay Gap reports, some organisations indicated that they also monitor and report relevant data in terms of the makeup of their workforce relating to gender and other protected characteristics.
14 Take part in or organising awareness raising events, campaigns or diversity celebrations	This ranged from a variety of religious festivals, Black History Month, White Ribbon events against domestic violence, Pride, internal staff workshops and webinars.
13 Routinely monitor recruitment and promotion practices against the protected characteristics	Some organisations indicated that they also annually review and update recruitment policies/practices to comply with any new legislation or in light of data collected on applicants. Disability Confident and support of Ban the Box were mentioned directly by respondents as adopted practices in recruitment.
12 Have a director/board champion who takes the strategic lead of E&D	This ranged from the responsibility of CEOs, People & Culture and Operations Directors, EDI Programme Managers, and Board champions. One organisation also indicated that they have a senior manager level champion for each protected characteristic, who each take the lead on conversations around issues with staff.
11 Undertake equality analysis to show how E&D informs business objectives/policies	Conducting Equality Impact Assessments (or differently named assessments with this same function) for policies and procedures was a common response to this question, as was the analysis of diversity data (such as diversity pay gaps) and using benchmarks to evaluate impact. Some organisations indicated that analysis of service data by EDI characteristics was only in its early stages, or in answering 'no' was planned action for the future.

<p>10 Use equalities data to tailor and target approaches to communicating with tenants and other service users</p>	<p>Methods of acquiring and utilising equalities data for this purpose include collecting tenant diversity data as part of tenancy-sign up and regularly thereafter and direct consultation with customers on preferred methods of communication.</p> <p>Approaches include ensuring communications are appropriately translated, accessible for the visually impaired (i.e. large print, braille, read-aloud documents), offered in British Sign Language, and accessible for individuals with mental health issues or learning disabilities.</p> <p>Again, some organisations indicated that they were in early stages of using equalities data or intended to improve on this front in the future.</p>
<p>10 Work with a range of different partner organisations to deliver on E&D commitments</p>	<p>The focus of collaborative partnerships ranges from women’s forums, senior’s forums, community cohesion, neighbourhood safety, mental health, and LGBTQ+ issues (including homelessness).</p> <p>Types of other organisations partnered with include local councils, housing organisations, health/education/emergency services, transgender support groups and other community groups and charities.</p>
<p>9 Employ positive action measures to increase workforce diversity</p>	<p>Actions included signing up to the Disability Confident scheme, using targeted avenues of recruitment, and using balanced recruitment panels.</p> <p>One organisation clarified that cultural change through business action to improve diversity is preferred to them over positive action.</p> <p>As indicated below, it stands to reason that some organisations may not be taking positive action as the workforce is already diverse or they find no issue in recruiting diversely.</p>
<p>9 Routinely monitor new lettings to ensure equality of opportunity for customers</p>	<p>Comments primarily concerned the collecting and monitoring data on new tenants (for instance Continuous Recording of Lettings and Sales in Social Housing in England data).</p> <p>Three respondents did not answer this question due to the fact they do not provide housing as a service.</p>
<p>8 Compile and publish diversity related data on the makeup of board, leadership team and workforce</p>	<p>Data is compiled and/or published by organisations in the form of for instance quarterly reports and in the reporting of gender or other diversity pay gaps. Some organisations indicated that this data was openly published online.</p>

8 Have in place a range of customer engagement groups	The form and function of these types of groups include disability forums, a women's group, a youth forum, seniors forums, a group for parents of Special Educational Needs children, scrutiny panels and general tenant forums/groups- one of which engages with the organisation in monthly Board meetings.
7 Provide mentoring and coaching opportunities for staff and board members	Organisations which provide mentoring/coaching do so as part of learning and development offers to staff- one organisation confirmed there is an opportunity to receive mentoring from internal and external persons. One organisation indicated while there is a process in place it does not see a wide uptake. One organisation indicated that this is something that they are looking at providing to staff in future.
6 Provide networking opportunities for staff	Networking opportunities include EDI Ambassador meetings, Menopause support groups, and an LGBTQ+ group. One organisation indicated that the networks they offer each have an Exec. Sponsor. One smaller organisation indicated that due to their low number of staff there was no demand for this sort of thing.

Additional approaches not covered in the above were provided in comments. These included things like:

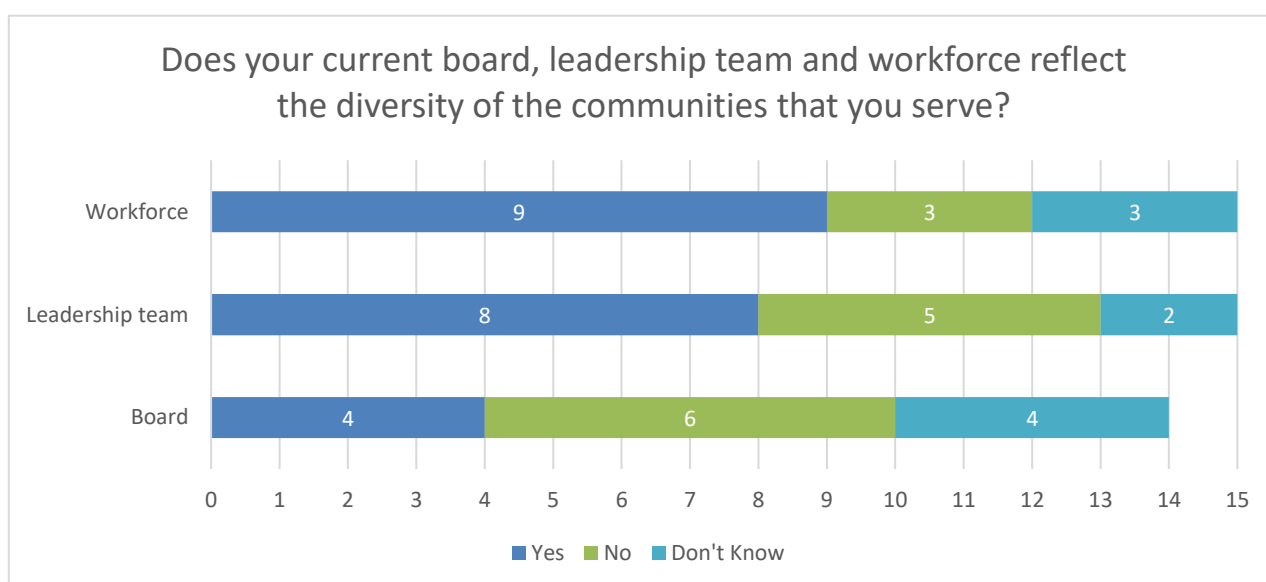
- An employee council which represents the views of staff within the business
- A listening group for BAME foster carers
- A corporate Equality & Diversity Document Framework which sets out compliance with the Public Sector Equality Duty
- Actions on Food Poverty
- Implementing policies, including EDI Policies and a Vulnerable Adults' Housing Policy
- Setting Procurement Equality Standards
- Providing Managing Disability in the Workplace Guidance for managers
- Name-blind recruitment practices
- Assessing mobility access for staff in head offices
- Providing staff development opportunities through a Maximising Potential programme
- Use of diversity champions
- An annual diversity conference

Diversity of boards, leadership teams and workforces

Reflecting communities served

In terms of reflecting the diversity of the communities which organisations serve:

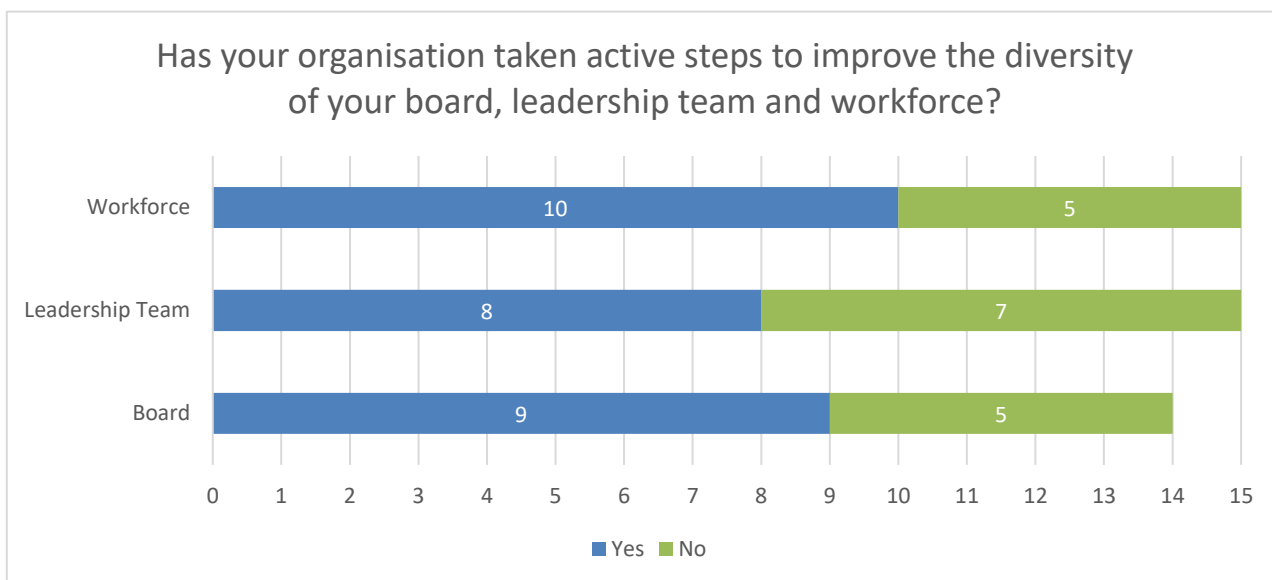
- Boards performed the worst overall in this respect, with only 4 of 14 responses affirming that their Board was representative of the community.
- Workforces on the whole were the most reflective, whereas leadership teams performed marginally worse.
- Some organisations indicated that issues with representativeness included struggles to recruit ethnically diverse Board members, and the traditional disproportionate employment of women in certain sectors.
- There was also a point raised that representation was good in for some characteristics (e.g. gender) but not others.
- One respondent indicated that while Board level employees were not particularly representative, they are supported by essentially junior members who are on the whole more reflective of the local community.



Steps taken to improve diversity of boards, leadership teams and workforces

The majority of organisations indicated that they were taking active steps to improve diversity in different parts of the business. Actions include:

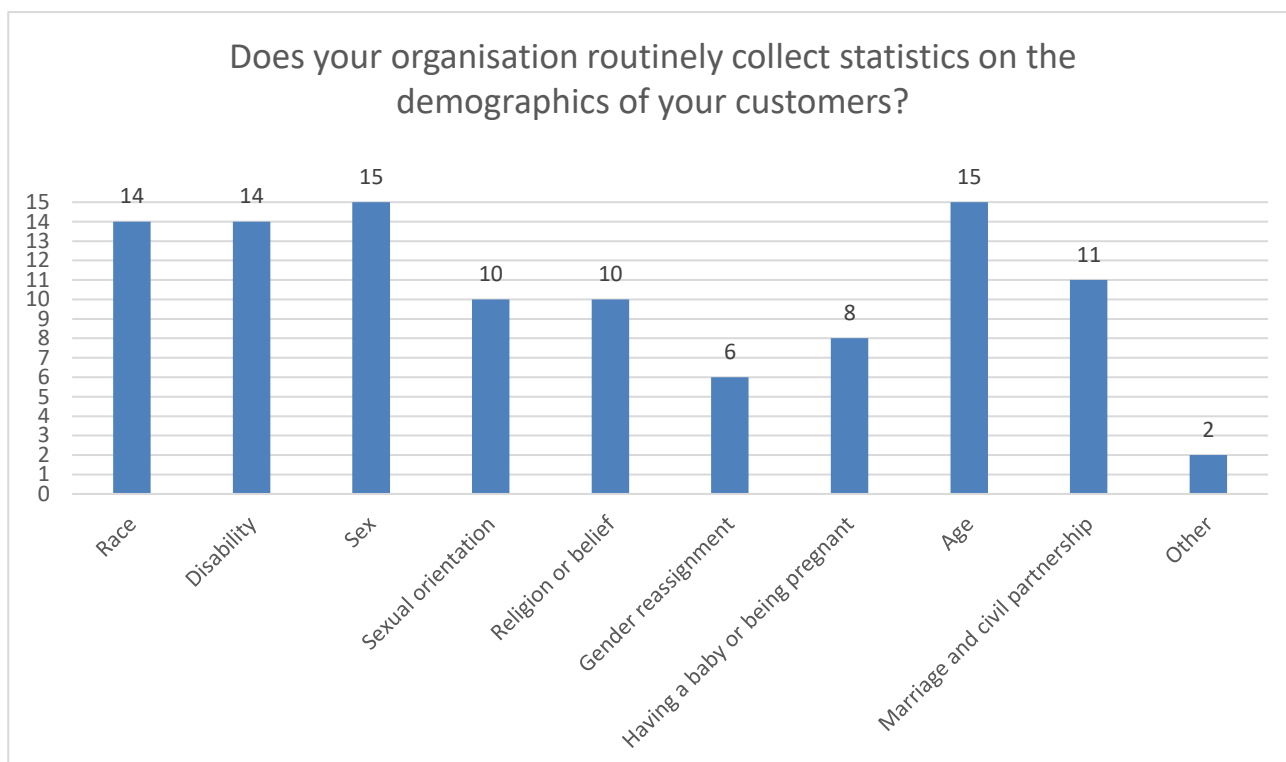
- Highlighting EDI in job advertisements and recruitment materials
- Setting and monitoring KPIs/targets in relation to diverse recruitment
- Targeting diverse talent pools through various platforms/websites
- Name-blind recruitment



Monitoring and insights

Customer demographics

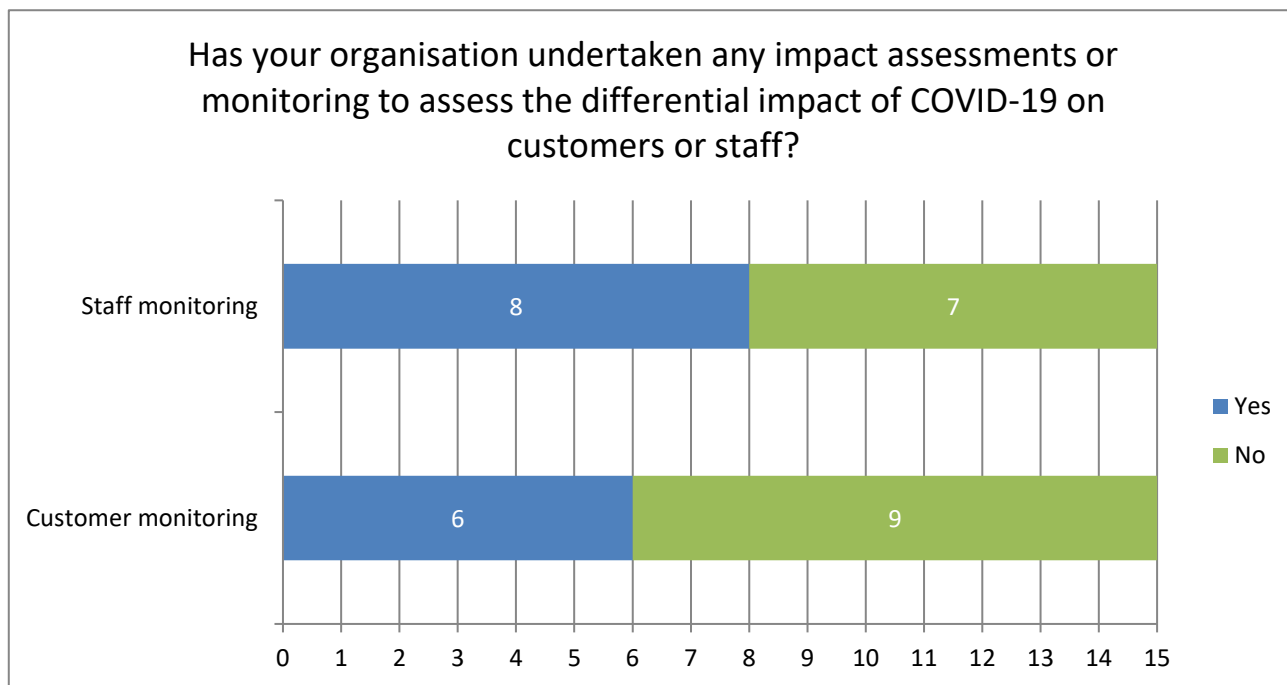
- Broadly, most surveyed organisations collect as standard customer data around 4 core protected characteristics (Race, Disability, Sex and Age).
- Collection of data as standard on the other protected characteristics (Sexual Orientation, Religion or Belief, Marital status, Pregnancy, and Gender Reassignment), some of which may perhaps be considered more sensitive, was however considerably less common. Data on Gender reassignment in particular is only collected by 6 of the 15 organisations surveyed.



*(Additional (Other) characteristics specifically collected were Gypsy/Traveller Heritage)

Impact of COVID-19

- Just over half of organisations had made efforts to monitor or ascertain the impact of the COVID-19 pandemic upon staff, and only 40% had done so in relation to customers.



Keeping customer data up to date

Methods used by surveyed organisations to ensure that customer data is accurate and current include:

- Carrying out various surveys with service users (in some cases capturing and monitoring diversity data alongside surveys with other focuses)
- Equality Impact Assessments
- Conducting tenancy audits
- Annual reviews of held data
- Monitoring Case Management System Data
- Self-service updating of personal details
- Routine checking of information when customers make contact

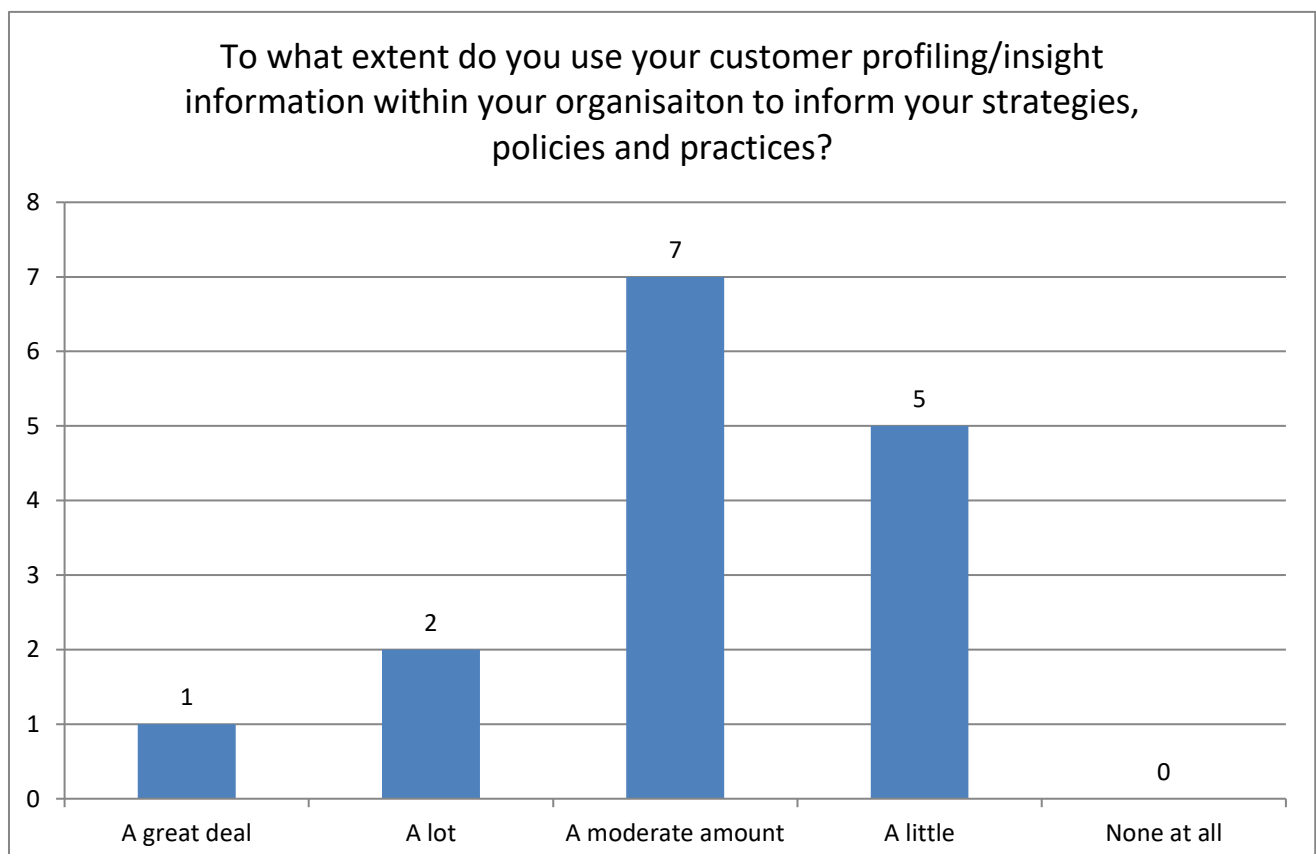
Challenges in data collection

Specific challenges encountered by organisations when collecting, storing and using such data include:

- Reluctance of customers to disclose sensitive information (this was by far the most common response to this question)
- Poor usability of customer portals where customers can update their own information
- Navigating GDPR compliance
- Keeping gathered data up to date
- Having enough time and resources to collect and use data

Using customer profiling and insight to inform strategies, policies and practices

- The majority of respondents indicated that they use customer profiling or insight to at least a moderate degree. Though 1/3 of respondents indicated that they only do this a little, none indicated that they did not do this at all.
- One organisation indicated that such customer data was obtained through various contexts- including during lettings, evictions, complaints and anti-social behaviour cases. Another organisation indicated that they use third party data analytics software, such as *Xantura* and *Policy in Practice*.



Suggested key areas of focus

Suggestions on areas which respondents felt should be a key area of focus for organisations included:

- Improving data collection practices
- Sharing best practice among organisations
- Raising awareness of how protected characteristics impact upon needs (referenced specifically for example were homeless women and those that do not have English as a first language)
- Collaboration between organisations on EDI activity or specific events
- Integrating principles of inclusion and diversity into organisations' management practices
- Ensuring there are diverse role models visible across all levels of organisations
- Developing benchmarking standards that all organisations could agree to implement
- Improving EDI Training across both leadership and wider workforce levels

4. EDI Benchmarking

Analysis of benchmarking data obtained is intended to give a general idea of how the Board, leadership team and workforce of organisations generally compare to the customer base of organisations, as well as the wider population (using the latest available data from the Office of National Statistics at the time this research was conducted).

Gaps in data

Of the 15 organisations which took part in the study, only 6 were able and/or willing to share data on the demographics of their customers, employees and Board. One of these datasets has been omitted due to the high level of missing data on board, leadership team, and customer base which made comparative analysis an impossibility. One dataset also had no information on the composition of the Board. While this small set of data isn't ideal, it is still worth analysing to gain insight into certain patterns we can still see present.

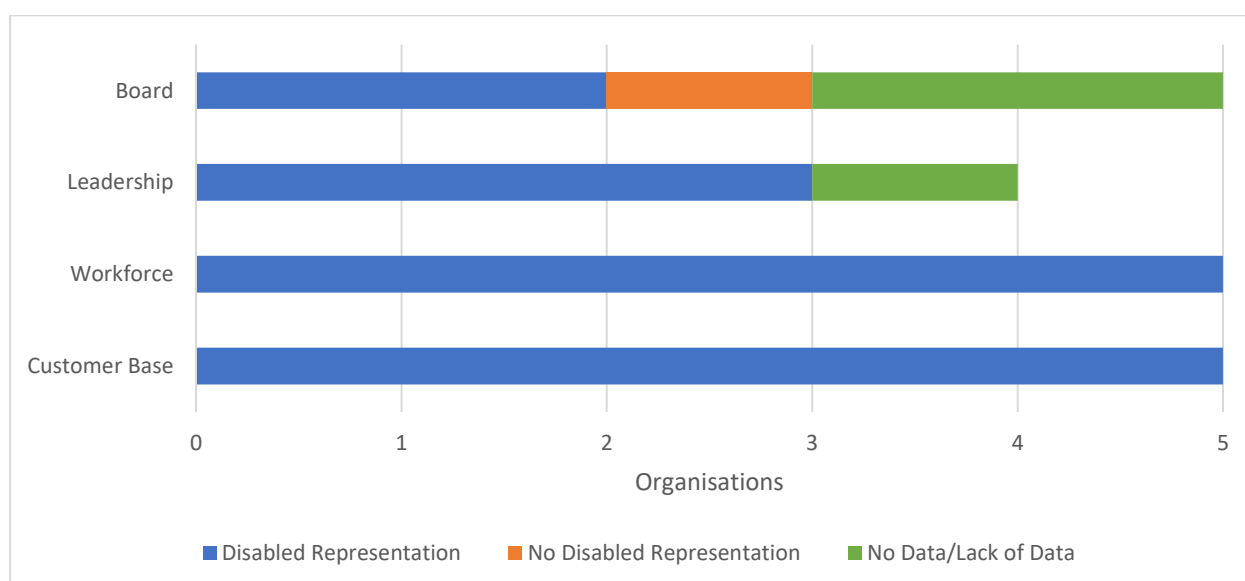
Age

The organisations which provided data on their Board's composition indicated that there was a dominance of older individuals, with each organisation indicating that at least 80% of each Board was over the age of 45.

This was not however the case with leadership teams, which were more varied in terms of majority age demographics from organisation to organisation- for instance with one organisation having a leadership team which is 70% age 45-64, and another being 58% 25-44.

Workforces were generally closer in terms of representation when compared to customer bases, bar the fact that some organisations had more customers over the age of 65- which is to be expected if organisations for instance provide services which cater to older demographics.

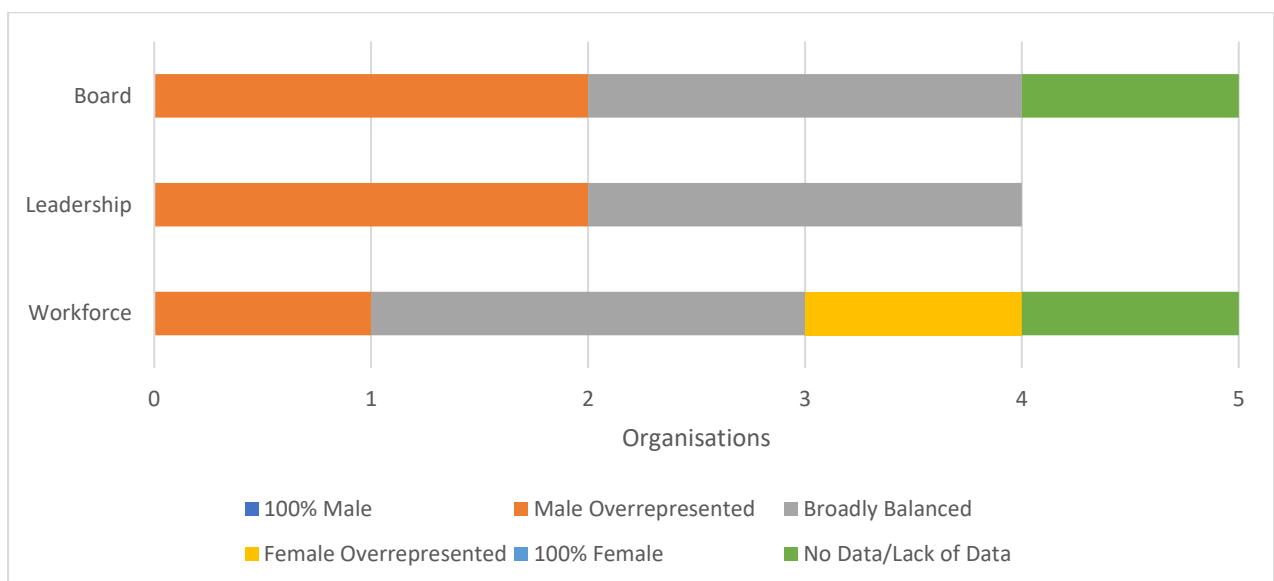
Disability



- In all organisations accounted for, there was at least some disabled representation within the general workforce, and 3 of the 4 organisations with senior leadership teams also had confirmed disabled representation within their leadership. Boards however fared worse in this respect with only 2 of the 5 organisations confirmed as having at least one disabled Board member, 1 with no disabled representation, and 2 with a lack of disclosure on disability.
- It should be noted that the latest data from the Office of National Statistics indicates that in the year ending June 2021 around 1 in 4 (24.9%) disabled people aged 16 to 64 years rented social housing, compared with only 7.9% of non-disabled people. This overrepresentation in the customer base makes representation within organisations an even more pressing issue.

Gender

Gender Balance relative to customers



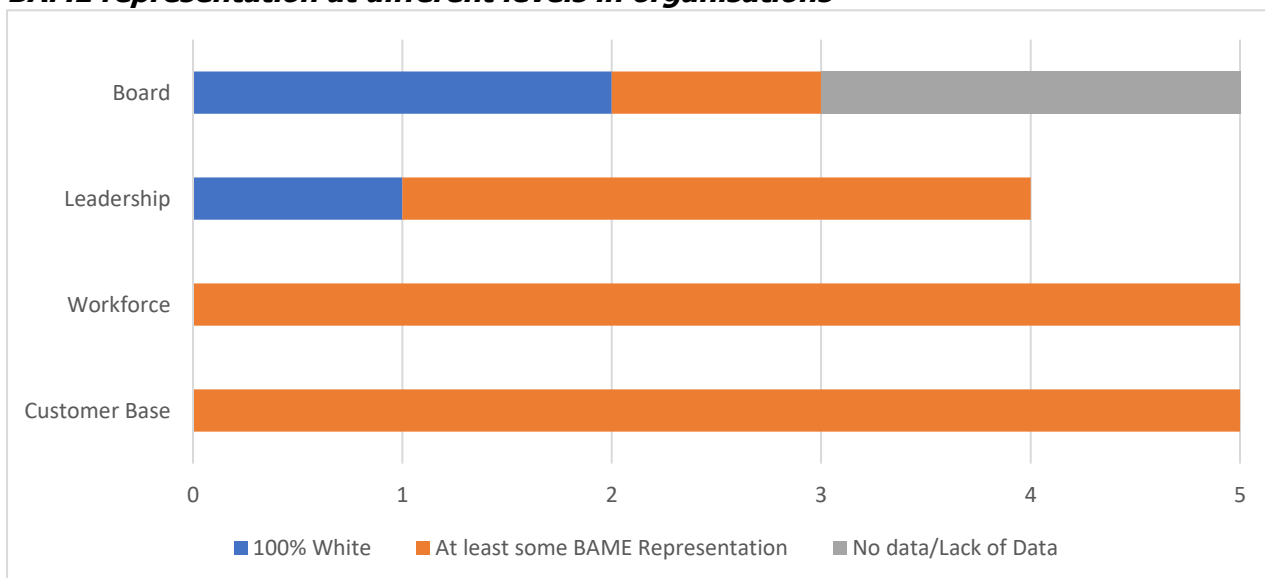
Gender Balance relative to population



- Compared to customer data, leadership teams and Boards appear to have more instances of being male overrepresented than workforces (one organisation in fact having an overrepresentation of female employees).
- When comparing statistics to the local population however we can see that in 4 of 5 organisations there is in fact an overrepresentation of female customers, which is reflected in by general similarity in workforces. This shifts the level of representation slightly for leadership teams, however 2 of the 5 organisation’s Boards are still male dominated by this metric.

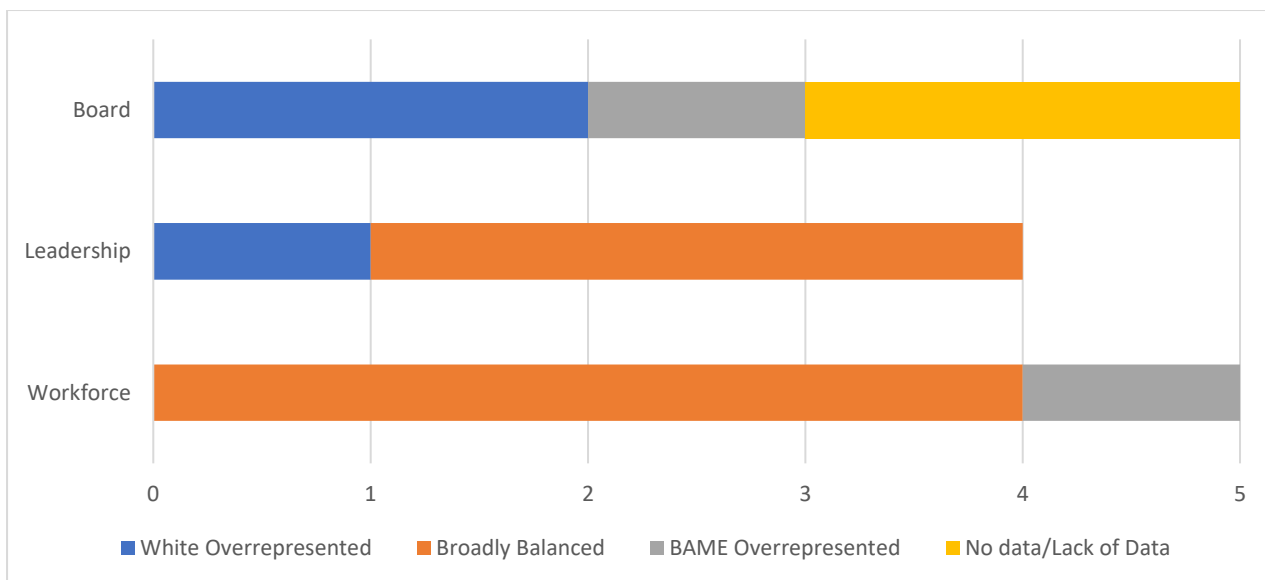
Ethnicity

BAME representation at different levels in organisations

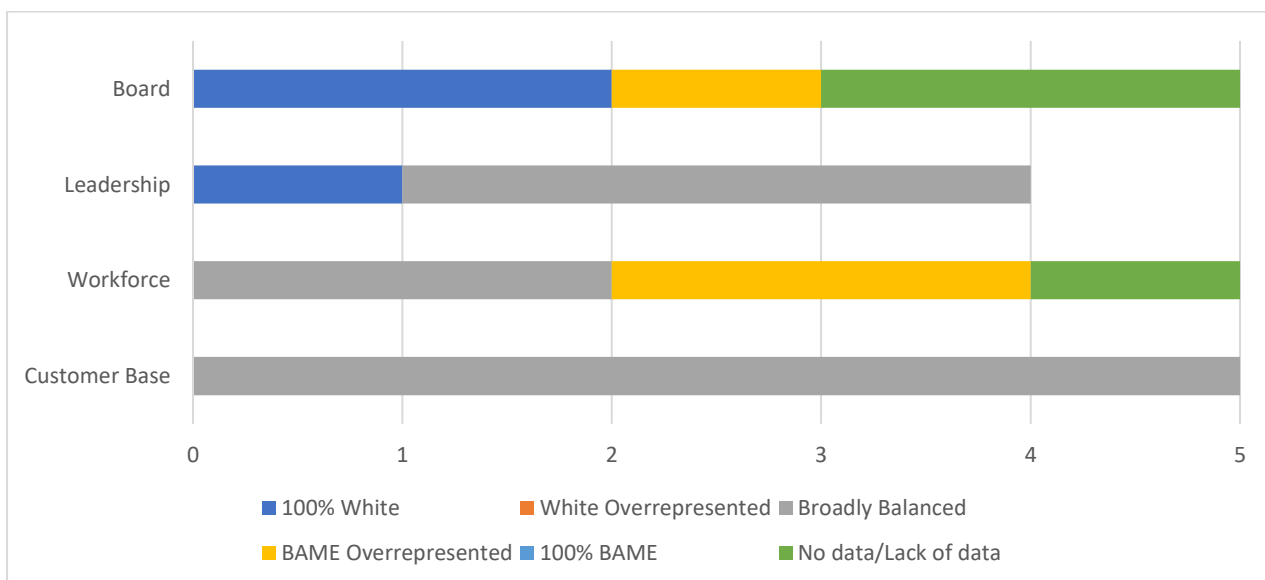


- At Board level the data again reflects a lack of disclosure around certain diversity characteristics within 2 organisations, and a lack of any ethnic diversity from 2 others, with only 1 board having at least one member from a black, Asian or minority ethnic background. This lack of diversity is also present in one organisations leadership team, whereas all organisations had at least some BAME representation in their workforces and customer bases.

Balance of ethnicity relative to customer base



Balance of ethnicity relative to local population



- When compared to their customer bases, the majority of organisations were broadly balanced in terms of general minority ethnic representation (representation of specific ethnic backgrounds would require further study with race as a focus). Likewise when comparing the representation of different aspects of each

organisation with the wider population, the customer base of each was broadly balanced, as was in most cases the leadership teams. In the case of workforce, 2 organisations were broadly balanced whereas 2 others were in fact slightly over representative in terms of BAME employees. One organisations workforce could not be assessed due to a reasonably high level of non-disclosure around ethnic background.

- Boards again were not as generally representative, with two organisations having 100% white compositions.

Sexual Orientation and Gender Identity

- Three organisations indicated that their Boards were either majority or entirely heterosexual, whereas the other two lacked enough or any data on this characteristic from the Board. Two Boards (including one of which lacked enough data to obtain a full picture) did however confirm that there was some representation of gay/lesbian individuals at Board level.
- Collection of data around sexuality is generally better at workforce level, however several of the organisations in this study also had significant gaps here (either in terms of missing data or a preference of non-disclosure). This level of non-disclosure or missing data was also generally even worse with regard to data on customer's sexuality. However from the data we do have, we can determine that there is LGB representation in at least 1 organisations leadership team, 4 organisations workforces, and 4 organisations customer base.
- Except for one organisation which had a reasonably high level of responses (including from customers at around 80%), all other organisations had either a high level of non-disclosure or missing data regarding whether individuals were transgender (with some not even collecting this information). This was the case across Boards, leadership teams, workforces and customers.

5. Conclusions

Though some organisations appear to be performing better than others around matters equality, diversity and inclusion, there is a clear understanding of and commitment to improving EDI from all of the members of KHG which took part in this study.

However, it is distinctly possible that organisations who were unable or chose not to take part in this study may well be further behind in their progress around EDI- non-participation in itself could potentially be indicative of a lack of time or resources committed to the EDI agenda within these organisations.

It is with this in mind that the recommendations found in the executive summary reiterate the good practices illustrated by organisations' survey responses, as well as providing guidance around weaker areas identified within the study.



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