

Equality, diversity and inclusion



An insight review of housing association staff in England

Foreword from Kate Henderson, Chief Executive at the National Housing Federation

Social housing is rooted in redressing inequalities, and as a sector we provide millions of homes for people across the country. We are a sector that serves so many diverse communities, including LGBTQ+ people, people of all ethnic backgrounds, disabled people, people of all genders and all ages. But it's clear that housing association staff, especially at the leadership level, do not represent wider society or the communities we serve.

To fully understand this, the National Housing Federation (NHF) in partnership with Housing Diversity Network (HDN) has produced this new insight report into equality, diversity and inclusion in the housing association workforce. We are publishing this report at the end of 2020, a year which has seen multiple crises affecting the physical, mental, economic and social health of people living across England, and throughout the world. The turbulence of this year is not felt equally, and we face an uncertain time ahead.

In order for us to make progress together, I believe that the insights set out in this new report must be more than a snapshot. Looking more closely at the status of our sector in this report presents an opportunity to address equality, diversity and inclusion – it allows us to set some sector ambitions and reach them, together.

In order to achieve that, we have been working closely with our [Equality, Diversity and Inclusion \(EDI\) in Housing member group](#) to take forward this important work. The group is made up of professionals from across the housing association sector, working with us to drive housing associations to progress on this vital issue. The group is committed to seeing a sector with leadership that is as diverse as the communities we serve, and which maximises the breadth of talent available to us.

We are going to keep working with this group to take our equality diversity and inclusion work forward, and have some exciting plans for next year that all of our members can get involved in.

We will build on the great work that is already out there, which we have tried to capture within this report. The expertise and voice that comes from collaborations such as BME National, BME London, HouseProud, Women in Social Housing, and the HDN will always be critical to this movement and we will continue to work closely with these groups.

Our intention is that this new report marks the beginning of our journey towards being an equal, diverse and inclusive sector. At the NHF we have already started to look at our own policies and practices, but we still have a long way to go. You can find out more about the action we are taking internally to be a more diverse and inclusive organisation in our strategy [Who We Are](#).

We are a sector which listens and learns, and which grows and develops. My hope is that this insight report, and the discussion it generates, will serve as an important step forward.

I encourage you to read the report and use it to have a conversation within your organisation about the findings – and for us all to think about what we can do to keep taking steps forward.

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1. Introduction

Social housing is a movement grounded in a commitment to tackle injustice and inequality. These are our roots and continue to be the values that motivate us today. But strong values are not enough to lead to fair outcomes and we know that our workforce is not as equal, diverse or inclusive as it should or could be.

Diversity within a workforce improves the performance and productivity of organisations.¹ Diverse leadership teams make better decisions and having different people with different perspectives and backgrounds around the table leads to better designed services. People trust leaders that reflect the diversity of the people they lead, the customers they serve and the communities in which they are rooted. Talent can be found all around us and attracting it from the widest pool possible creates competitive advantage – by not being as diverse as we could be we are missing out on talent.

The housing association sector wants to be the best it can be. We can't do this without employing a diverse workforce, having a diverse cohort of leaders, and ensuring housing associations are able to understand and tackle inequality. But we can't begin to change if we don't know where we stand.

To make sure we know where we're starting from, the National Housing Federation (NHF) commissioned Housing Diversity Network (HDN) to carry out an insight review into equality, diversity and inclusion amongst the workforce of housing associations in England. This report explores their findings as to the national picture of how equal, diverse and inclusive housing associations are and what the sector has been doing to bring about change.



1.1 About the research

HDN and the NHF gathered evidence and experiences around equality, diversity and inclusion in the housing association workforce. Insights are from a range of sources, from literature and data sources to more informal evidence, such as media pieces, organisational case studies and personal experiences. It focuses primarily on sources from the last 15 years (insights older than 15 years are legislative). Insights were loosely coded by protected characteristics in the Equality Act 2010.

The insights address the following questions, which we've structured this report around:

- What is current landscape of equality, diversity and inclusion in the housing association sector?
- What are people's experiences of equality, diversity and inclusion within the sector?
- What are the challenges that the sector faces with regard to equality, diversity and inclusion?
- Is there a need for change? If so, what?
- What can we learn from other whole-sector approaches?

Detail on the insights gathered is available at [Appendix A](#). [Appendix B](#) contains a more detailed explanation of language and terminology from the insight gathering stage of the research. A copy of the original research questions is contained in [Appendix C](#).

1.2 What is equality, diversity and inclusion?

Although equality, diversity and inclusion are often used interchangeably, they have different meanings, which is why we use the full term throughout this report.

- **Equality** is the absence of discrimination based on a person's protected characteristic. The Equality Act 2010 was designed to legally put an end to all types of victimisation and to advance equality of opportunity.
- **Diversity** is the recognition and value of differences between people. Diverse workplaces create cultures and practices that value the differences of their staff.
- **Inclusion** refers to an individual's experience within the workplace and in wider society.

It's important to recognise that while equality, diversity and inclusion are different, they need to be progressed together as one cannot exist without the other.



2. What is the current landscape of equality, diversity and inclusion in the housing association workforce?

2.1 Who lives in housing association homes?

When considering equality, diversity and inclusion amongst staff of housing associations, it is useful to reflect on the extent staff are representative of people living in social housing. The purpose of social housing is to provide homes for those who can't afford to access homes on the open market. As such, who lives in housing association homes reflects existing inequalities in society.

The English Housing Survey (EHS) gives basic data on diversity of residents in housing association homes, though this picture will differ by geography and association. It shows that:

- The majority of household reference persons (head of household who fills in the survey) in the housing association sector in 2018/19 are female – 59.3% compared to 40.9% for the population.²
 - Over a third of housing association households (37%) are lone females or single mothers with dependent children.²
- More than half of housing association households (53%) in 2018/19 had at least one household member who is disabled or has a long-term illness, compared to 34% for the population.²
- In England, 14.9% of households living in housing association homes in 2018/19 are headed by ethnic minorities compared to 11.9% across the population.² The national population was 14% Black, Asian, Minority Ethnic (BAME) at the time of the 2011 Census.³
 - The EHS shows significant differences across the regions. In 2015/16, 57% of housing association homes in London were headed by someone BAME, compared to 3% in the South West.⁴
- Around two thirds (69%) of social renters had a religion, according to EHS 2017/18 data – 60% were Christian and 6% Muslim.⁵
- Nationally, an estimated 2.3% of the English population identified as LGB in 2018.⁶ There is no national data on gender identity, although data will be available from the 2021 Census.
 - There is no specific data on LGBTQ+ within housing associations. The Human City Institute estimates from their research that around 4-6% of social housing head of households are LGBTQ+.⁷
- The EHS asks about perceptions of discrimination by council housing departments and housing associations. This shows that social renters were more likely than all households to think they would be treated worse than people of other races (12% compared to 10%).⁸
- Data on intersectionality at a population (or sector) level is almost non-existent.
- Aggregated data on the characteristics of individuals who live in housing association homes (as opposed to households) is also not publicly available.

7%

of **board members** from top 50 housing associations in 2019 were **BAME individuals**



14.9%

of housing association homes in England were **headed by a BAME person** in 2018/19

At the time of 2011 Census, the national population was

14%

BAME



41.1%

of **board members** from 61 housing associations were **women** in 2019



59.3%

of housing association homes in England were **headed by a woman** in 2018/19

2.2 Boards and executive level

There is no publicly available, centralised dataset on employment within the housing association sector. At the senior leadership level, most existing evidence is from relatively small surveys, often with a self-selecting sample, most notably those run by Inside Housing.⁹

BME representation

A recent study by Inside Housing found that BME representation at executive level is under 9.1% (29 out of 317).⁹ While this was an increase from their last survey in 2017 (which showed under 5%), because it is a self-selecting sample, organisations who perform better may choose to respond to the survey. In any case, any improvement is from a low starting point and is not representative of tenants, with 14.9% of housing association homes headed by a BAME individual in 2018/19.² The same survey found 6 of 61 organisations who responded were led by a BME Chief Executive.

Inside Housing found that boards were slightly more representative, (although still not quite representative of national figures), with 13.6% of board members identifying as BME, but 25 out of 61 housing associations who responded had no BME representation or no data.⁹ Analysis by Altair in 2019 of publicly available data suggests a much less representative picture; amongst the top 50 housing associations, 7% of board members and 5% of executives are BAME.¹⁰

Representation of women

Inside Housing found women in 2019 were under-represented at both board and executive level (41.1% and 39.7% respectively).⁹ Recruitment consultancy EMA recently randomly selected 80 housing associations and found that 37% of board members are women (similar to the Inside Housing estimate).¹¹ The English Housing Survey 2018/19 found 59.3% of housing association homes are headed by a female Chief Executive.²

EMA highlight that this is more representative than the FTSE 100, but they also found that female board members represent only 20% of audit committee chairs. They said this reflects the 20-25% female applications they receive for board positions. Lack of representation on boards may be related to the skillsets sought

by board recruiters, as social housing providers are increasingly looking for board applicants in treasury, audit, development and property: areas where men tend to be over-represented.¹² Another possibility is that gendered language in job adverts puts women off applying, maintaining existing inequality in traditionally male-dominated occupations.¹³ Anne Elliott, managing director of EMA, highlighted that many male applicants already have a board CV prepared and may have gone to a specialist agency to get support on this. She said that lack of flexibility around board meeting times can be a challenge for women who are more likely to be taking on care work. Women may have less time than men to apply or commit to additional roles due to additional caring responsibilities.¹⁴

LGBTQ+ and disability representation

Inside Housing also suggested that there is a substantial under-representation of both LGBT and disabled people within senior leadership.¹⁵

A recent survey by Inside Housing found 2.4% of board members identified as LGBTQ+ across 61 associations and 3.5% of executives (nationally, 2.3% of England identified as LGB in 2018⁶). For those who identify as disabled, the figures were 4.8% at board and 3.2% at executive level (compared to 53% of housing association households from EHS 2018/19²). However, it is difficult to know how much these groups are represented, as most organisations did not hold data on this.⁹



2.4%
of board members identified as **LGBT** in 2019 (Nationally, **2.3%** of England identified as LGB in 2018)



4.8%
of **board members** identified as **disabled** in 2019

53%
of **housing association households** had at least one member who is **disabled** or has a long-term illness in 2018/19



11%
of **Chartered Institute of Housing** members identified as **BAME** in 2015

5%
of **executives** in the top 50 housing associations were **BAME** in 2019

2.3 Lack of insight on other protected characteristics and job levels

There is very limited insight for other protected characteristics and on jobs at other levels. Characteristics relating to age, marriage/civil partnership, maternity/pregnancy or religion did not appear in most insights found during the review, and survey or administrative data (as opposed to insight sources) on intersectionality was almost entirely absent. Age had relatively few insights – all relating to younger employees or board members – despite this being the most common type of discrimination highlighted in a recent survey by Inside Housing.¹⁶

As with senior roles, there is almost no sector data showing staff diversity at a more junior level. What data there is suggests it is more ethnically diverse than at a senior level – 11% of Chartered Institute of Housing (CIH) members in 2015 were from BAME backgrounds,¹⁷ but this is still not representative of total population (14.9% of housing association homes headed by BAME individual according to EHS in 2018/19).

A recent survey on diversity data by the Greater Manchester Housing Providers in 2020 shows that, of 22 associations, the workforce (as opposed to the board or leadership team) was most closely matched to the customer base in terms of ethnic diversity. Nevertheless, they found that for the majority of respondents, the percentage of BAME people within the workforce was below that within the customer base.¹⁸

The insight review did not find many publicly available breakdowns of housing association workforce by protected characteristics, such as the Greater Manchester Housing Providers' recent survey, Tower Hamlets Homes have done¹⁹ and the NHF did in 2020.²⁰

A CIH article from 2015 suggests that disabled people are not visible as leaders in the sector, despite making up a substantial portion of housing association residents.²¹ However, CIH does not provide data for the sector specifically and only refer to national statistics suggesting disabled people are half as likely as non-disabled people to be an executive director and a third as likely to be a director or head of department.

Stonewall publishes annual data on LGBTQ+ inclusion in the workplace through its Workplace Equality Index. Three housing associations featured in its top 100 employers of 2020.²²

We need better data for all protected characteristics and at all job levels to understand diversity within the sector and how this affects promotion to senior leadership positions. An insight from Inside Housing suggests that one reason many chief executives are male may be that boards prefer to appoint from more male-dominated areas of social housing (such as property or finance) as opposed to more female-dominated (housing management).²³ If this is true across other characteristics, it emphasises the importance of building diversity at junior levels.

Most information relating to diversity tends to focus on the board and executive, meaning far fewer insights are available for management and senior management levels. We need to see a wider set of data at middle management level to make sure that our future leaders come from a diverse talent pool.

“

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2.4 Gender pay gap data

Recent legislation means larger employers (250 employees or more) have to publish their gender pay gap data. Inside Housing analysed the results from 47 housing associations and found that the median average pay difference between men and women for housing associations in 2018/19 was 8.1%.²⁴

This is substantially lower than the national gender pay difference average, which was 17.3% in 2019,²⁵ but any pay gap isn't good enough. Eight housing associations however exceeded this average. The difference ranged from one housing association with a median pay difference of almost 30% in favour of men, to one that had a median pay difference of almost 50% in favour of women.

Looking at the change from 2017/18 to 2018/19, Inside Housing found that:

- In just over half of organisations (22 of 43) the difference had increased in favour of men.
- 10 housing associations had narrowed the difference, but still paid men more than women.
- Three organisations went from paying men more to paying women more.
- Three housing associations continued to have no difference between men and women.
- Three continued to have a pay difference favouring women.
- Two housing associations eliminated the difference between men and women.

Organisations don't have to publish much more information than difference between male and female mean and median pay (or any bonus), and the proportion of each gender in pay quartiles, so it's difficult to look into why the gap exists. Reporting has also been suspended during the coronavirus outbreak.²⁶

Many organisations offer additional information voluntarily, such as Peabody, who published a short report on what they will do to address their gender pay differential.²⁷ Smaller organisations may voluntarily publish gender pay data, which is what the NHF decided to do from 2018.²⁸

Data on other protected characteristics is not required, such as pay information on ethnicity. Some organisations publish pay data of other groups: for instance, L&Q, Hyde and Optivo voluntarily publish ethnicity and (for L&Q) disability pay data, as well as reporting on what they are doing to advance equality and diversity.²⁹

2.5 Legal obligations



Legislation before the Equalities Act focused on rectifying discrimination after it had happened. The driver of the Equality Act 2010 and the Equality Duty 2011 was to positively promote equality, not just to prevent harassment, and to move the focus away from the individual and on to organisations.

Organisations subject to the Equality Duty must have 'due regard' for advancing equality. In practice, this means organisations should actively seek to remove or minimise the barriers faced by people related to their protected characteristics, attempt to meet the needs of those with protected characteristics where they might differ from those of others, and actively encourage people with protected characteristics to participate in relevant aspects of public life.

2.6 Sector commitment to equality, diversity and inclusion

There is a growing interest in and commitment to improving equality, diversity and inclusion within the housing association sector. As a sector, we provide an incredibly diverse range of services such as LGBTQ+ housing and housing for older people and disabled people. The sector includes specialist BAME housing associations as well as women's organisations and other specialist providers. A lot of sector leadership around highlighting and tackling inequality and discrimination come from these specialist associations and their networks, such as HDN, BME National, BME London and the Women's Housing Forum.

Our workforce should reflect the communities that we serve, and the attention paid to equality, diversity and inclusion has grown in recent years. The

Altair Review in 2017, commissioned by BME London, Optivo and L&Q with support from the Greater London Authority (GLA), launched a new conversation over the lack of BAME representation at senior levels of the housing sector.³⁰

Insights on diversity in the sector mostly originate from sector news sources. Inside Housing regularly publishes survey data and reports on diversity as part of its Inclusive Futures campaign.

In 2015, the CIH Presidential Commission focused on leadership and diversity, launching the "10 by 20" challenge. This included 10 challenges to improve leadership diversity by 2020.³¹

Many individual housing associations have publicly committed to promoting and improving equality and diversity amongst their staff. This includes published statements of commitment, strategies, and policies, as well as accompanying articles.

Examples of established networks and programmes promoting equality, diversity and inclusion in social housing

UNIFY – a collection of BAME groups working across the housing sector to share information, promote initiatives, host BAME network events and increase BAME senior management opportunities through cross-housing mentoring and coaching.³²

Leadership 2025 – an intensive nine-month leadership programme run by the consultancy Altair in partnership with Roffey Park and the support of the Mayor of London to support BAME senior professionals to become sector leaders in housing. As well as the programme, Leadership 2025 aims to challenge the perceptions of the sector and promote the benefits of diversity. As of 2019, 21 organisations had signed up to the Altair Review Five Point Plan to increase BAME representation in the sector. Altair considers this a relatively small number "given how important the sector suggests it values diversity".³³

Emerging Talent Programme – three housing associations have launched an emerging talent programme to reach under-represented groups in London. The programme is run by not-for-profit Future of London and the consultancy Altair, with the associations partnering with the house builder Hill Group and the Greater London Authority. It aims to improve branding, increase people's understanding of the various career paths in the sector, and offer a two-year training programme for those who take part.³⁴

CIH Futures – in recognition that CIH and the housing sector should reflect all members of society, this group of younger housing professionals works to help CIH attract and retain new members, raise the profile of housing as a career, and encourage employers to value professionals and invest in talented people.³⁵

Women in Social Housing (WISH) – started in 1998, WISH is a networking community for women working in social housing covering all the regions of England.³⁶

HouseProud – set up in 2014 as the network group for LGBTQ+ people working in social housing, it aims include sharing information and promoting best practice across the sector, supporting members and helping them mentor each other, raising awareness of LGBTQ+ issues across and industry and influencing policy and boards.³⁷

Our research shows a vast range of relevant publications. The Social Housing Equality Framework (SHEF) provides a framework mapping out how housing associations can improve.³⁸ A number of associations have specific equality and diversity policies, but these differ in level of detail, customer or employee focus and any commitment to reporting/monitoring progress.³⁹ HDN also publishes materials for training.⁴⁰ A number of good practice guides are available, predominantly issued by CIH.⁴¹ Greater Manchester Housing Providers have also published a review of what actions members are taking to create more equal, diverse and inclusive workplaces.¹⁸

However, several insights take a more critical line, drawing attention to the possibility that discussion within the sector is not always matched with actions or improved outcomes.⁴² The sector has been talking about the benefits diversity brings, and also the lack of progress, for some time.⁴³ There is a lot of talk, through reviews and inquiries, but actions and outcomes lag behind.⁴⁴

The insights gathered by HDN suggest that there are (and have been for some time) quite a range of different equality, diversity and inclusion initiatives being piloted. Some organisations, such as One Housing, have adopted the Rooney Rule, which ensures BAME diversity in shortlists of interview candidates.⁴⁵

Midland Heart launched a partnership with Women into Construction in 2018 after finding that gender imbalance was an issue in its property maintenance service, having received only five female applicants from over 190 applications. As well as looking at the targeting of recruitment campaigns, it is exploring new recruitment channels, such as work placements and the possibility of a sector-based work academy.⁴⁶

Metropolitan Thames Valley has partnered with race equality charity Olmec to create 'Black on Board'. The programme is designed to improve racial diversity on governing boards of all kinds of organisations. It is open to all staff and, from 2020, residents. Out of the first cohort of 20, 14 have been offered a board position.⁴⁷

Although these examples from housing associations show a positive direction of change, without the analysis of these initiatives we cannot know if they have been successful. The insights found during the review talk more about initiatives around gender and ethnicity, with less said on other protected characteristics.

Other organisations have run unconscious bias training, which is something that the NHF has run for a number of years. As will be discussed within [section 6](#), while unconscious bias training is useful to raise awareness, evidence on its effectiveness is mixed, with further research needed.⁴⁸

Within the sector, there can be no understanding of the effectiveness of such training without baseline data on diversity of staff from which to benchmark any change.

Many organisations set up key performance indicators (KPIs) for diversity, and perform analysis of their own recruitment and communications, such as Home Group and Gateway Housing Association.⁴⁹ There appears to be some initial success with using these measures, although they tend to relate only to senior leadership roles, which are easiest to monitor. Although it's important to monitor senior levels, it is relatively easy to diversify at those levels due to the small number of positions available. We need to see data on all levels of seniority within organisations to provide insight on diversity at lower levels and amongst future sector leaders.



3. Personal experiences from the sector

The most significant insight relating to employee experience is Inside Housing's 2018 survey on discrimination at work.⁵⁰ The survey had 225 respondents, who suggested that ageism, sexism and racism were common, as well as discrimination against other characteristics such as economic background.

The results should be treated cautiously as they are based on a self-selecting sample, meaning people who had experienced issues may be more likely to respond. Nevertheless, it is the only data we have on discrimination across the sector. The survey indicated that many employees had witnessed discrimination, against either themselves or others, and many thought their career had been affected by it. Key findings were:

- 43% had observed negative comments or behaviour relating to age.
- 40% had observed discrimination relating to gender.
- 29% had observed discrimination relating to ethnicity.
- 23% had observed discrimination relating to sexuality.



Observed discrimination by protected characteristic

Respondents also highlighted discrimination occurring based on economic background, disability, nationality, religion, pregnancy/maternity, gender identity, and other characteristics. Only 19% said they had not observed any negative comments or abusive behaviour.

Just under two-thirds reported discriminatory incidents from fellow colleagues, half named senior management and over a third named their own line manager.

The survey was repeated in 2020,⁵¹ with a lower response rate (91), finding:

- Over half (51%) had observed racist abuse or behaviour at work.
- 41% had observed sexual comments or abuse.
- 32% had experienced unwanted sexual advances.
- 54% of respondents said they felt their progress at work had been held back due to discrimination.
- The survey also found that derogatory comments about tenants were common.

Inside Housing ran a set of profiles of prominent BAME individuals in 2018, which includes some information about their career paths and experiences.⁵² A career path refers to the various positions an employee moves through as they progress within an organisation.

Gera Patel, Partner at Campbell Tickell, has written about her experience supporting recruitment for senior roles. She argues that direct discrimination is relatively rare (although not non-existent) within the sector, but there is a tendency to appoint people who “will fit in well” and make the panel feel comfortable. She says this creates a bias against those who are different and who challenge the status quo. She pointed to the courage necessary to appoint someone to a senior role who is very different to what you already have.⁵³

With the exception of Inside Housing's discrimination survey, the insights do not contain many examples of personal experience of inequality or discrimination. Articles, for example, normally talk about people experiencing discrimination generally and how that might be tackled rather than personal experiences of discrimination within the sector.

4. Equality, diversity and inclusion challenges faced by the sector

4.1 Lack of quantitative evidence and prioritisation of certain issues

One feature of the insights gathered is that there is no consistent, reliable quantitative information about staffing within the sector, or career pathways. As a result, it is almost impossible to make conclusive statements about the sector's track record, compare it with other sectors, or evaluate the success of any work, past or future.

Existing research, while beneficial, has relied on the use of surveys. These are likely to include non-response bias, which means that organisations with a strong track record and active focus on diversity are far more likely to respond to a survey. This can skew the data and overstate how much the sector overall is doing. Similarly, on surveys about experience of discrimination, those who have experienced it may be more likely to respond, potentially overplaying how frequent it is or the number of employees that have experienced or witnessed it.

The insights also suggest research is mainly focused on the most senior posts – board and executive level. While these are of course very important, they do represent a tiny minority of roles within the sector. Beneath the executive level, organisations generally have several layers of management, and there is no reliable information about the demographic breakdown of staff at these levels. This makes it difficult to identify at which point during the career path certain groups stop progressing.

Across the sector (including in more junior roles), there is also very little information about the types of roles different groups of people tend to work in. Within and outside of the sector, it is widely known that women are more likely to work in lower paid roles such as care and cleaning, often leading to larger pay gaps for organisations with care and support arms. However, there are also differences in the types of roles that employees from different ethnicities work in, which could have a potential impact on both pay and career progression.

Insight on career pathways for different groups would be enormously valuable in understanding the reasons why different groups do not tend to progress in their careers in the same way. Some associations are now starting to collect this information in a more consistent manner, but it will take several years before there is enough to work on and it relies on continued commitment to the project.⁵⁴

Other sectors that have made measurable improvements (see section 6) have generally done so on the back of major quantitative studies or detailed career pathways.

4.2 Structural bias, regulation and positive action

Given the lack of data and personal experience in the insights, it is hard to evidence why inequalities within the sector exist. The McGregor-Smith review of race within the workplace argued that processes, from recruitment to progression, benefit a certain group of people. This bias is referred to as unconscious, sometimes wrongly, when much is structural; but, whether conscious or unconscious, bias is discrimination.⁵⁵ Without further insight, including personal experience, we cannot know whether structural bias exists within our sector or what helps or hinders progress.

Some within the sector highlight the lack of progress and question whether regulation is the answer to improvement.⁵⁶ Before being dissolved, the Audit Commission's Housing Inspectorate held housing associations to formal standards on diversity through their Key Lines of Enquiry (KLOE).⁵⁷ This included ensuring fair and equal access to services by users and clear criteria on composition of boards, staff and contractors. Currently, the Regulator of Social Housing Consumer Standards requires providers to understand and respond to the diverse needs of tenants.⁵⁸ Altair recommended that the NHF Code of Governance review "consider how collection of data and formal reporting requirements could strengthen the sector's commitment to diversity and inclusion".⁵⁹

The new 2020 NHF Code of Governance places more emphasis than previous versions on equality, diversity and inclusion.

The Equality Act 2010 permits employers to take positive action to train or encourage underrepresented groups to apply for jobs, overcome a perceived disadvantage or meet specific needs based on a protected characteristic. Employers are reluctant to use positive action with recruitment, however, as the law is often difficult to interpret.⁶⁰

4.3 What is an appropriate benchmark?

There is also a challenge in appropriate benchmarking for board and executive diversity targets. Demographics differ by region, meaning that a benchmark for London, for example, might not be relevant anywhere else. Demographics of entry-level employees in the same organisation could be used, but this does not account for changing demographics over time. Senior staff may have begun their careers at a time where far fewer new employees were from certain backgrounds or had specific protected characteristics, so they may not be as unrepresentative of the country as they seem.

Additionally, tenants of social housing are more likely to be from certain groups. Altair has recommended that housing associations benchmark against the communities they serve.⁶¹ Some organisations, such as the NHF, base their target on national data, to ensure the workforce represents the general population.

4.4 Less talk, more action

This research shows that plenty of frameworks, statements and guidelines related to equality, diversity and inclusion are available. Notably, however, there is far less information about actual programmes and even less about any impact these actions have had. The schemes that are detailed tend to be actions or programmes run by individual or small groups of associations on a relatively small scale (e.g. predominantly for board or executive level) or time-limited projects. Measures of their success (or otherwise) are rarely published or analysed afterwards.

As a result, the insights give the impression that the approach to equality, diversity and inclusion within the sector is piecemeal and uncoordinated. This lack of a single voice or statement of action is potentially limiting for the sector's ability to make real progress.



5. Going beyond the moral case for equality, diversity and inclusion

The Black Lives Matter and #MeToo movements have refocused attention on racial and sexual discrimination. The coronavirus crisis has underlined the impact that inequality can have on health, and the role that housing plays in health.⁶²

- Research by Green Park on behalf of Operation Black Vote shows that in 2020 only 4.7% of the most powerful individuals in the country are BAME.⁶³
- Women Count 2020 found that there are more CEOs named Peter (six) in the FTSE 100 than there are female CEOs (five).⁶⁴
- In 2017, the average age of FTSE 100 board directors was 58.5 years and 25% had degrees from either Oxford, Cambridge or Harvard.⁶⁵

The insights did not show data on LGBTQ+ or disability for FTSE 100 companies. The lack of diversity at the top of the biggest UK companies calls into question the efficacy of equality legislation.

The findings from Inside Housing's survey on discrimination suggest that many people have experienced inequality or discrimination. What is more, they have heard discriminatory comments about residents. Nationally, Business in the Community suggests that as many as a quarter of BAME employees have witnessed or experienced racial harassment or bullying from managers in the last two years.⁶⁶

There is a strong moral imperative to tackle this unfairness to ensure that everyone can feel comfortable in their home and work environment. But as many commentators have highlighted, there are also substantial business benefits to doing so.

The business benefits that diversity brings:

- Research by the Department for Business, Energy and the Industrial Strategy for the McGregor-Smith review found that improved participation and progression of BAME individuals in employment is estimated to be worth £24bn a year to the UK economy, representing 1.3% of GDP.⁶⁷
- Research by Deloitte has found diverse and inclusive workplaces drive perception of high performance amongst employees, specifically around innovation, productivity and customer satisfaction.⁶⁸
- Women Count 2020 found executive committees of FTSE 350 companies with female membership of more than 33% have a net profit margin over 10 times greater than those companies with no women at this level.⁶⁴
- Research on behalf of the Chartered Governance Institute shows that the most admired, peer ranked companies have more diverse boards in terms of representation of women and functional background, with fewer from a finance background.⁶⁹

A report by McKinsey & Company examined more than 1,000 companies across 12 countries and found a statistically significant correlation between leadership team diversity and financial outperformance.⁷⁰ The report defined diversity as a greater proportion of women and ethnically/culturally diverse individuals.



McKinsey & Co suggest that this is because more diverse companies:

- Attract and retain top talent.
- Make better decisions, because more diverse groups tend to make more fact-based decisions and avoid “groupthink”.
- Focus more on their customers’ needs, through bringing their own experience of different customer groups in.
- Have better employee satisfaction.
- Have improved reputation and are more likely to avoid potentially destructive discrimination scandals.

For some industries, such as construction, the business case for employing more women is clear. Construction remains one of the most male-dominated industries, with only 15% of jobs held by women⁷¹, yet its workforce is ageing. The Farmer Review in 2016 said we could see a 20-25% decline in the workforce within a decade.⁷² Encouraging more women into construction will ensure there is a greater pool of applicants to replace them. Additionally, different use of public spaces by men and women have led some to suggest that built environment industries would benefit from more female employees and female-led design.⁷³

There is some evidence that female, BAME, disabled and LGBTQ+ tenants are less satisfied than other tenants, and that they are typically most dissatisfied with resident involvement.⁷⁴

As a sector, we would benefit from further research to look into levels of dissatisfaction, and whether differences are associated with diversity of front-line staff, service design, or even leadership.

If **BAME** individuals were able to achieve their full potential in work, it would be worth

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a year to the UK economy, representing **1.3% of GDP**

Executive committees of FTSE 350 companies with more than

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6. What can we learn from other whole-sector approaches?

When we look at other sectors and how they have changed their policies and practices to improve equality, diversity and inclusion, the police force is one of the prominent examples. Racism and discrimination came to wider public attention in 1999 following the racist murder of Stephen Lawrence and failures in the ensuing police investigation. The subsequent Macpherson Report accused the Metropolitan Police and other agencies, including housing and education, of institutional racism.⁷⁵ It stated that “if racism is to be eradicated there must be specific and co-ordinated action both within the agencies themselves and by society at large”. The report emphasised the importance of accepting the problem before addressing it, and recommended detailed performance indicators for the police, including levels of recruitment, retention and progression of Black and Asian officers.⁷⁶

Over 20 years after the report was published, progress is slow: at the end of March 2019, 93.1% of police officers were from the White ethnic group (compared to 86% in working age population). BAME officers have increased from 3.9% in 2007 to 6.9% in 2019,⁷⁷ which shows that while improvement has been made, underrepresentation is still an issue. However, the availability of data to measure change helps track progress or otherwise.

When it comes to whole system approaches, the McGregor-Smith Review into race in the workplace presents a six-step roadmap to success for taking action on racial equality:

1. Gather data.
2. Take accountability.
3. Raise awareness.
4. Examine recruitment.
5. Change processes.
6. Government support.⁷⁸

Business in the Community provides a scorecard which employers can use to measure progress on ethnic diversity, based on the roadmap to success from the McGregor-Smith Review in 2017.⁷⁹

One sector of interest is higher education. Following a series of high-profile incidents, universities looked at tackling sexual misconduct, hate crime and harassment of university students. A report by Universities UK looked at progress on changing the culture. They found significant, but variable, success in both bringing forward changes and embedding these across institutions, dependent on active senior leadership.⁸⁰ This case specifically highlighted the need for leadership in making lasting change organisationally. They highlighted particular challenges in sustainable funding for resources, training for students and staff in larger institutions, and maintaining a consistent sector approach.

Universities have the advantage that they are generally large institutions and are therefore more likely to have a consistent approach to recording and monitoring data. The fact that housing associations can vary quite drastically in size suggests that as a sector we may face more difficulty on this point.

Challenging educational bias is another way other sectors have approached equality, diversity and inclusion. Professional services firm Grant Thornton looked at the career paths of its current senior leadership and discovered that many of them would not have made it past its current academic entry requirements. After removing the requirements, it found that 20% of their intake would not have been able to apply to the programmes if the requirements had still been in place. It also moved away from assessments based on previous work experience or extra-curricular activities, invested in coaching calls for all candidates before and after first round interviews, and created online communities for peer-to-peer networking. Following a piece of in-depth analysis on 20,000 trainees, the

firm discovered that it had vastly improved their socioeconomic diversity, and that its employees' with lower academic results actually perform equally or better than their peers.⁸¹ The firm features in the top 10 of the Social Mobility Employer Index for every year since it launched in 2017.

Social Mobility Employer Index –the Social Mobility Foundation launched the index in 2017 to assess and monitor organisations' progress on social mobility. It encourages firms to share their initiatives and progress in becoming more inclusive employers. The index involves benchmarking and guiding organisations on their approach; all organisations who enter receive a feedback report highlighting areas where they perform well or can improve.⁸²

The Social Mobility Commission recently published an employers' toolkit for ensuring socio-economic diversity and inclusion.⁸³

Unconscious bias training has become more popular across sectors, and is recommended by the McGregor-Smith Review as a way of raising awareness amongst all employees. The Equality and Human Rights Commission (EHRC) investigated its effectiveness and found it did improve awareness of unconscious bias, and can be effective at reducing bias for some people. However, it is unclear how long this improvement lasts and there are potential negative effects for some people (who become more biased). The EHRC suggests that unconscious bias training alone cannot change organisational culture, but can be a useful "front door" to begin a wider programme of improvements.⁸⁴

As with many of the guidelines and steps advocated in sector commentary, the examples cited in this section often focus on only one aspect of equality and diversity, rather than an entire programme affecting multiple groups of people.



7. Conclusion

Social housing providers rightly pride themselves on addressing issues of inequality within society through providing housing and investing in communities. The Black Lives Matter and #MeToo movements have electrified the debate around discrimination, while the coronavirus crisis has highlighted the serious health impacts from inequality. It can feel we are living through dark times, but there is opportunity for positive change.

For too long, however, the sector has reviewed and discussed diversity, equality and inclusion without driving clear change. The insights gathered here show initiatives and actions have been piecemeal or time-limited, with little understanding of impacts. We have seen diversity, equality and inclusion as a project rather than an organisational value that should be embedded into company culture and policies. If we are to address the great challenges around inequality and discrimination, then greater sector leadership is required.

The NHF has already started to act internally, through changes to recruitment and training, releasing our equality, diversity and inclusion statement, publishing our action plan 'Who we are', and voluntarily publishing our gender pay gap data. But we know there is more we can do.

The insights in this review reveal the multiple challenges around understanding diversity, equality and inclusion in the sector, as well as the benefits in acting, but the starting point is data. We need to know where we are in order to know where we want to be and measure our progress.

The NHF and its member group will therefore be exploring ways to overcome barriers to providing a sector-wide picture of our workforce and how this compares to the demographics of the areas in which we operate. We will be calling on all members of the NHF to be open with their data.

We're also calling for the sector to show leadership around ensuring a diverse, inclusive and equal workforce. This must start with open, honest conversations within housing associations about the apparent lack of equality, diversity and inclusion throughout much of our sector. This insight review has shown some of what the sector is doing. There must be more that we can share with each other. Now is not the time for complacency or shying away from the problems in society mirrored by our sector. Now is the time for action.



8. Appendix A: Insights

8.1 Sources

This report is based on the insights gathered by the Housing Diversity Network for the NHF. HDN initially gathered insights in autumn 2019, with reporting in March 2020. The coronavirus outbreak delayed publication of the report, so NHF conducted an additional round of insight gathering in September 2020.

This report aims to address what we know already as well as what evidence is missing. This will lay the groundwork for the ongoing programme of work.

HDN gathered a total of 306 insights and coded these according to which sector they relate to, which primary protected characteristic(s) they relate to, and what type of information they include (e.g. survey, personal experience etc). The second insight-gathering phase added new insights and removed those that were no longer available due to the closure of 24Housing, leaving 281 insights. Tables 1 and 2 summarise the insights gathered.

The insights were also coded according to the research questions they relate to (see [Appendix C](#)). Note that as some questions did not bring forward much material, we have not addressed these questions in the report.

Table 1. Sector that insight primarily relates to

Sector	Count of insights
Housing	178
Public sector	35
Business	33
Charity sector	20
Construction	5
Police	2
Population	2
Health	1
Other	5
Grand total	281

Table 2. Primary protected characteristic that insight relates to

We have explained the language used in this report and throughout our work plan in [Appendix B: Language and terminology](#).

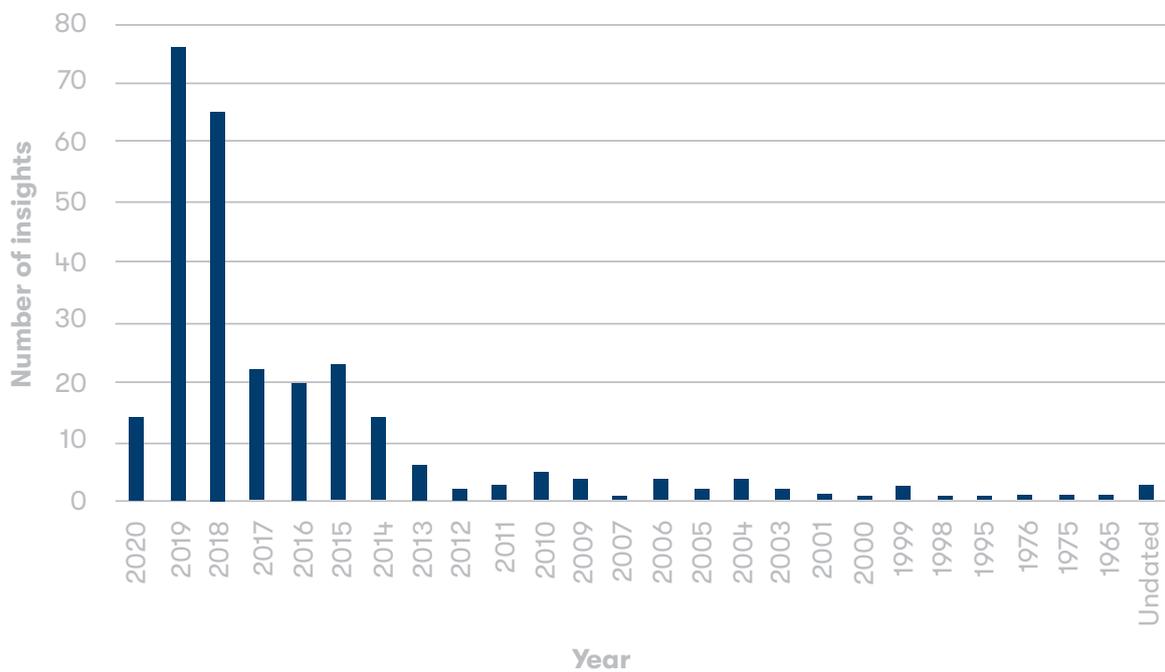
Primary protected characteristic	Count of insights
Multiple	145
Race	59
Gender	38
Sexual orientation	18
Disability	8
Age	6
Gender, race	5
Sexual orientation, gender	1
Disability, sexual orientation	1
Grand total	281

Certain protected characteristics draw much more attention in the sector than others. While many of the gathered insights are relevant to all protected characteristics, or relate to diversity more generally, ethnicity tends to dominate the insights. This is followed by gender, though transgender issues were not commonly referenced. Some protected characteristics have no or very few insights related to them at all, namely age, sexual orientation, religion, pregnancy/maternity and marriage/civil partnership status.

8.2 Insight gathered by publication date

We are focusing on sources gathered over the last 15 years, although a small number of important resources are included from prior to that. Most resources are from the last two years, which would be expected, as older insights may no longer be publicly available. Insights predating 2000 are relevant legislation affecting equality, diversity and inclusion.

Chart 1. Year of source



9. Appendix B: Language and terminology

9.1 What are protected characteristics?

Protected characteristics are an aspect of someone's identity that makes them who they are. Under the Equality Act 2010 there are nine defined protected characteristics. These are defined because the law says that everyone has the right to defence from various prejudices and discrimination.

The nine protected characteristics defined under the Equalities Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

To analyse the insights gathered, HDN has loosely coded them based on which protected characteristics each insight primarily relates to. We have defined each below.

Multiple is the term used when the source refers to individuals with multiple protected characteristics.

Age describes a generational or age bracket. Where people fall into the same age range, they share the "age" protected characteristic.

Disability is described in The Equality Act 2010 as a physical or mental impairment. It must be substantial or long-term (likely to last more than 12 months) and affect their ability to conduct day-to-day activities. Although the regulation provides a definition of disability, the issue is more complex than the act initially clarifies. In this report we have used the "social model" of language when referring to disabilities, which identifies systemic barriers and social exclusion that make life harder for disabled people.

'Race' is defined in the Equalities Act as group of people defined by their skin colour, nationality (including citizenship) ethnic or national origins. However in the intervening years the debate has moved on and now its acknowledged that 'race' is outmoded or inappropriate, and there is a growing movement away from it with a preference towards ethnicity. For the purpose of coding our sources in line with the Equalities Act protected characteristics we have used the term 'race' in our analysis. However, throughout this report we use the terms ethnic minorities or BAME, depending on how it is referred to in

the insight source. There is also a conversation about the terms BAME and BME (BAME stands for Black, Asian and Minority Ethnic and BME stands for Black and Minority Ethnic) as they aren't always associated with White ethnic minorities such as Gypsy, Roma and Traveller or Irish Heritage groups, which we know are among some of our most marginalised and disadvantaged communities. We use the term BAME to refer to people who come from Black, Asian and minority ethnic backgrounds. This includes white minorities and anyone who faces discrimination based on their ethnicity, culture, or nationality.

Gender refers to which gender a person identifies as. For the purpose of this analysis, we have used gender to describe the protected characteristics of sex and gender reassignment. It's important to remember when discussing transgender people that individuals aren't required to undergo surgery or treatment to change their gender. They'll still receive discrimination protection if they've reassigned their identity without any medical processes.

Religion and belief describes any religion, including a lack of religion and atheism. Belief refers to any religious or philosophical belief and includes a lack of belief.

Sexual orientation relates to who a person's sexual attraction is towards, whether that be their own sex, the opposite sex, both sexes or none of the above. Although we have used sexual orientation as a protected characteristic within the insight coding, throughout this report we use the acronym LGBTQ+ (Lesbian, Gay, Bisexual and Transgender, the Q can stand for "questioning" as in still exploring one's sexuality or "queer," or sometimes both) to describe the communities that some specific housing associations provide services for.

While we have categorised insights in accordance with the protected characteristics of the Equality Act 2010, this does not mean we believe the experiences of people within these categories are the same.

For each section of analysis, we use the terms that each source refers to, which is generally reflective of language used by housing associations to describe the communities they serve.

Appendix C: Copy of research questions from insight review invitation to tender

This insight review should help to answer the following research questions:

- What is current “state of play” with regard to diversity and equality in the sector? We take a broad view of what diversity and equality is, which could include anything from outright discrimination to recruitment practices to disparities in workforce make up. We are interested in structural inequality as well as experience of discrimination. We also want to understand people’s experiences of “fitting” within their organisations and cultures.
- What are the challenges that the sector faces with regard to equality and diversity?
 - o What are housing associations saying about it?
 - o Are there employee perspectives (anonymised)?
 - o Any sector-wide analysis?
- Are any employees talking about their experiences (positive or negative)?
- What are trade unions saying on diversity of the sector (or wider)?
- What are any business benefits of diversity?
- What language/terminology is the sector using to discuss diversity and equality?
- Is there a need for change? If so, what?
- What can we learn from other whole-sector approaches
- What do housing associations see as the Federation’s role in addressing these challenges? What are the main recommendations the sector makes? Are these sector-wide views or is much of the conversation dominated by individual organisations?

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