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TO DIVERSITY

# Housing Diversity Network Midlands EDI Baseline Report

**2022**



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# Executive Summary

**Between February and April 2022, 36 organisations across the Midlands region contributed to a study carried out by Housing Diversity Network's (HDN) on equality diversity and inclusion (EDI) policy and practice in the region. The following is a summary of the key findings alongside recommendations for further action:**

- Around 81% of surveyed organisations had adopted at least over half of the 17 policies, practices or procedures listed within the survey, and around 39% (14) had adopted three quarters or more - indicating a generally positive commitment to Equality Diversity and Inclusion.
- The majority (83%) of organisations had an EDI forum, group or champion - ranging from general staff groups, to customer EDI groups, to Board champions. A key focus of such groups is the development and delivery of EDI strategies or action plans.
- Only 56% of organisations however indicated that they had committed to a formal EDI charter, framework or scheme. This could perhaps suggest a reliance on internal momentum and accountability around action on EDI.

- A range of approaches to improving EDI are in place across the surveyed organisations. The most common approaches to improving EDI (adopted by over 85% of organisations) were:

- **Taking part in or organising awareness raising events, campaigns or diversity celebrations**
- **Providing training to support staff to gain appropriate knowledge and skills in respect of equality and diversity**
- **Monitoring of the gender equality gap**

- The least adopted approaches (adopted by less than 40% of organisations) were:

- **Having in place a range of customer engagement groups around EDI/protected characteristics**
- **Collecting data on staff with caring responsibilities and offering them necessary support**

This indicates that engagement of diverse customers around EDI issues (particularly those relating to services) is a generally underdeveloped area. Work around providing support to staff with caring responsibilities is also an underexplored area within the sector.

- Responses indicated that across organisations, workforces are generally more representative of the diversity within served communities than Boards or Leadership teams:

- **64% of organisations indicated that they had a Workforce reflective of the local community**
- **Only 28% of organisations indicated that their Leadership Team was representative**
- **40% of organisations indicated that they had a representative Board**

Some organisations also indicated that they lack the sufficient data to assess this, and several organisations also indicated that their Workforce/Leadership Team/Board was representative in terms of certain characteristics, but not others.

- Most organisations surveyed have taken or are planning to take active steps to improve diversity at all levels within the organisation- particularly at Board level with 29 organisations indicating that this is an area of action.

- Collecting adequate customer diversity data appears to be an area of concern for many organisations. There is a general indication that further work around communicating the benefits of sharing this data to customers is needed to build trust and alleviate reluctance to share potentially sensitive information.
- Among suggested areas of focus to aid in the general improvement of organisations EDI performance, region/sector wide sharing of best practices was frequently cited, alongside more specific areas for improvement such as data collection and analytics, recruitment and retention, and the diversity of senior staff and Boards.



# Recommendations

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



# Recommendations

## Data

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

- **Customers**
- **Workforces**
- **Boards**

This should include-

- 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 disability to determine any patterns or disparities which require action (several responses within the survey indicated that organisations are beginning to monitor ethnicity pay gaps more widely).



## Recommendations

# Diversity and Representation

Many organisations need to improve their level of representation of local communities/customer bases, particularly in higher levels such as executive leadership and at Board. Specific targets should be set 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 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

Even where organisations have 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 across the region. 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.

# 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
- Provide opportunities to gain EDI accreditations- such as HDN's Diversity Network Accreditation (DNA)

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.

# Recommendations

## A Regional Approach

We believe that a collaborative approach across the region will help to celebrate and share good practice, as well as encourage shared learning. Regional working with the principles of challenge, educate and support across the housing sector could be a valuable method of service improvement.

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.

There is already an established HDN forum which gives organisations an opportunity to meet and discuss EDI issues on a quarterly basis, and this seems the obvious place to take this work forward.

# Introduction

This research was conducted to establish the baseline performance on equality, diversity and inclusion (EDI) for organisations in the housing sector across the midlands. 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.



# Methodology

The research was coordinated jointly by HDN and the NHF, and was 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.

36 organisations across the midlands completed the survey, some of which exclusively operate locally within the region, and others which operate with a wider scope across other areas of the country. Respondent organisations were primarily housing associations, however two local authorities also took part in the study.

Demographic data on workforces, executive leadership teams and Boards was also obtained from 21 of these organisations- either with their permission from the National Housing Federation's 2021 Data Tool, or directly from organisations who had not contributed to this tool.

# Findings: Approaches to Equality and Diversity

## Variability

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

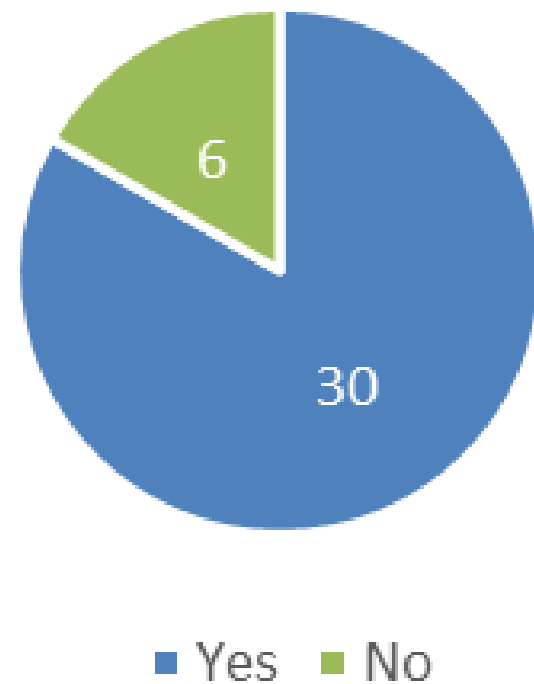
- Around 81% (29) of organisations have adopted at least over half of the 17 policies, practices or procedures listed within the survey
- Around 39% (14) have adopted three quarters or more
- 5 organisations performed exceptionally well, with 1 having adopted all 17 listed policies, 2 having adopted all 16 options listed in the survey at the time it was completed, and 2 confirming that they have adopted all except 1
- Only two of the 36 organisations had adopted less than 1/3 of the listed policies, practices and procedures



# Findings: Approaches to Equality and Diversity

## EDI Forums And Groups

**Do you have a E&D forum/group?**



**The majority (83%) of organisations have an EDI forum, group or champion.**

The form and function of these groups varied between organisations. Examples include:

- EDI Sounding/Steering Groups. These varied in composition from staff volunteers across various departments to chief executive and other senior leader involvement
- A specific EDI Delivery Board
- An instance of twin EDI groups, one of which focuses on leadership/colleagues, the other upon service delivery
- EDI Champions/Champion Group (with dedicated champions for specific themes/characteristics)
- An EDI Subgroup of a customer forum, which supports the EDI lead of the organisation
- A Board champion/director in EDI

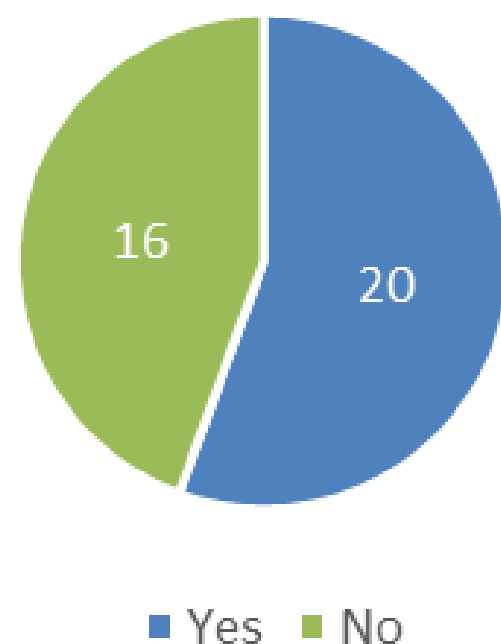
Aims of groups identified were generally relating to the delivery of EDI strategies/action plans. In some cases, organisations indicated that they had multiple groups, each with a specific focus upon distinct protected characteristics.

Most of those who answered no referred to the responsibilities around EDI belonging to a pre-existing group or groups (for instance the senior leadership team, people/culture team, HR and customers services departments). Others indicated that the establishment of an EDI group/forum was something planned for the near future.

# Findings: Approaches to Equality and Diversity

## EDI Charters, Frameworks and Benchmarking

Is your organisation signed up to any formal E&D charters, frameworks or benchmarking schemes?



Only 56% of organisations indicated that they had committed to a formal EDI charter, framework or scheme. Of those who did answer positively, examples provided were:

### *Schemes, charters, accreditations, and awards-*

National Centre for Diversity's Investor in Diversity Award / Social Housing Equality Framework / Business in the Community Race Charter / Race Equality Code 2020 / Disability Confident / CIH Equality Scheme / Stonewall UK Equality Index / Investing in Ethnicity Maturity Matrix / Menopause Friendly Scheme / Dementia Friends Scheme / Race at Work Charter / Equality Framework for Local Government / HDN's Diversity Network Accreditation / Employers Network for Equality & Inclusion's Talent Inclusion and Diversity Evaluation (TIDE) Benchmark / Tech She Can Charter / Mindful employer accreditation

### *Membership Organisations-*

Housing Diversity Network  
Housing Quality Network

### *Pledges and declarations-*

Houseproud Pledge / Employers Domestic Abuse Covenant / Women in Trades Pledge / Harry's Pledge (working carers)

Many of the organisations which answered positively to this question were members/signatories of multiple frameworks, charters or schemes etc. Several organisations indicated that further work into researching/joining schemes or seeking awards was being considered for the future. One organisation indicated that they did not feel they needed any charters because 'EDI' is intrinsic to the kind of housing provider that they are. It is however important to be mindful of inclusivity across all protected characteristics.



# Findings: Approaches to Equality and Diversity

## Other approaches to Improving EDI

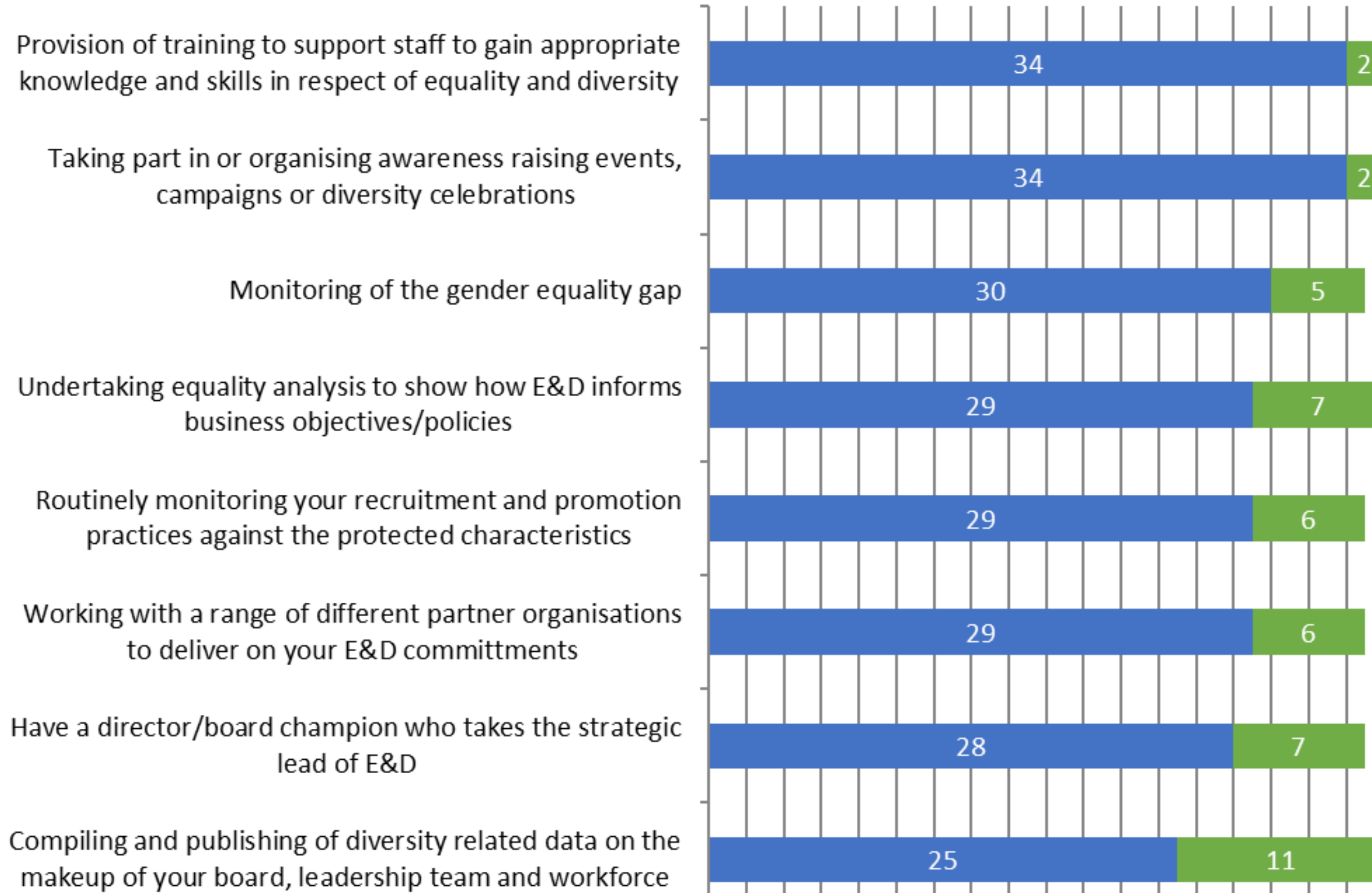
The following graph illustrates the popularity of EDI approaches among organisations from most to least adopted.

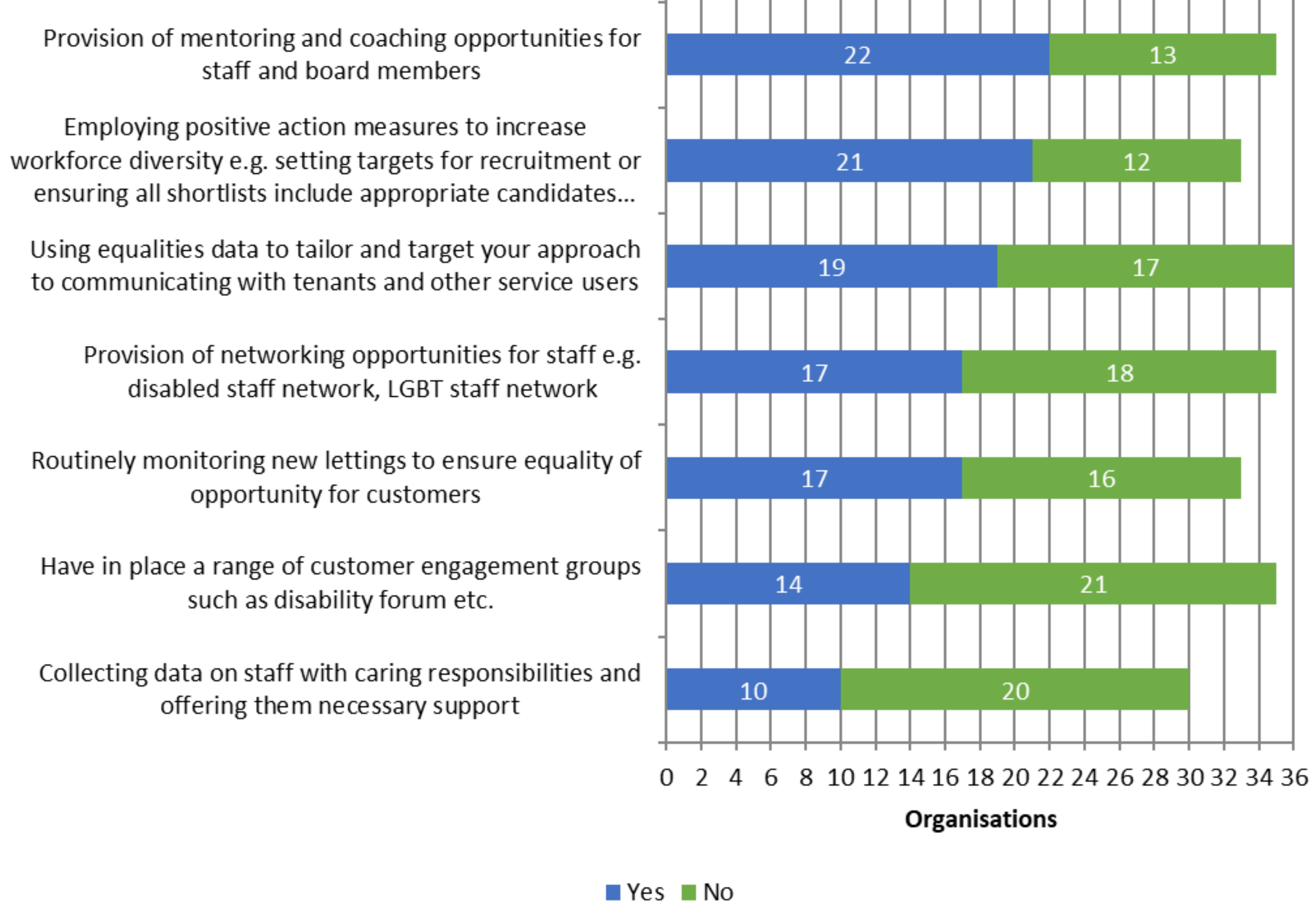
The most adopted approaches (adopted by over 85% of organisations) were: Taking part in or organising awareness raising events, campaigns or diversity celebrations; Providing training to support staff to gain appropriate knowledge and skills in respect of equality and diversity; and Monitoring of the gender equality gap.

The least adopted measures (taken up by less than 40% of organisations) were: Having in place a range of customer engagement groups around EDI/protected characteristics; and Collecting data on staff with caring responsibilities and offering them necessary support.

It should be noted that the question around collecting data on staff with caring responsibilities was added shortly after the opening of the survey, so not all participants were given the opportunity to answer this. Other gaps in the data are due to some user errors in submission (i.e. unfilled questions), or due to intentional omission in cases where the respondent felt that they could not answer the question or that the question was not applicable to their organisation.

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





# Findings: Approaches to Equality and Diversity

**34** **Provide training to support staff to gain appropriate knowledge and skills in respect of equality and diversity**

Most respondents indicated that EDI training was mandatory for all employees, usually included in induction, and in cases is renewed between every 1 to 3 years. Some organisations indicated that separate or additional training is offered to certain employees- for instance managers or front-line staff. A few respondents indicated that additional modules covering more specific topics relating to EDI (such as unconscious bias, autism awareness, allies training, neurodiversity, hate crime, British Sign Language, Trans awareness) were also available for staff to complete voluntarily. Most respondents indicated that EDI training is primarily online, rather than in person.

**34** **Take part in or organise awareness raising events, campaigns or diversity celebrations**

Many organisations reference the celebration of national or international events such as International Women's Day, Black History Month, Carers Week, Mental Health Awareness, Pride, LGBT History Month, Disability History Month, National Inclusion Week, Autism Awareness, Holocaust Memorial Day, International Day of Persons with a Disability, and Race Equality Week, as well as cultural or religious holidays such as the Lunar New Year, Ramadan, and Eid. Other approaches additionally included internal and external (on social media for instance) awareness campaigns around these events or on key issues relating to protected groups- some for instance involving the sharing of personal experiences from staff. Several indicated that EDI awareness/celebration is planned into an annual calendar- ensuring adequate planning and attention is given to each topic.

**30** **Monitor the gender equality gap**

Monitoring and reporting of the Gender Pay Gap was cited by most respondents as the primary method of understanding gender equality gaps and devising actions to remedy disparities. It should be noted that while it is likely a statutory duty for most organisations which took part in this study to report the GPG, several indicated that they also voluntarily report on the ethnicity equality gap through Ethnicity Pay Gap reporting.

# Findings: Approaches to Equality and Diversity

29

**Undertake equality analysis to show how E&D informs business objectives/policies**

The use of Equality Impact Assessments to inform policies and practices was most frequently referenced in responses. Other more general analysis includes reports on EDI strategy/action plan/KPI progress delivered to executive teams/Boards monthly/quarterly/annually etc. either as a sole focus or part of wider business updates.

29

**Routinely monitor recruitment and promotion practices against the protected characteristics**

Most organisations which responded positively to this question state that diversity information is collected during recruitment and is analysed and reported upon thereafter. Fewer organisations however indicated how or if this monitoring is also applied in cases of promotion of existing employees. Several respondents indicated this was an area they wished to invest more development in.

29

**Work with a range of different partner organisations to deliver on E&D commitments**

Cited organisations include housing membership organisations such as the National Housing Federation and Chartered Institute of Housing, housing associations, local councils, the Department of Work and Pensions, organisations with a general focus on EDI such as HDN, the National Centre for Diversity, Deep Insight, EQuIP (Warwickshire), Green Park, SPM Group and Employers Network for Equality & Inclusion, and organisations focussing upon or specialising in specific protected characteristics such as BME National, Women in Social Housing, Business Disability Forum, Stonewall, Race Equality Matters, Carers UK, Positive about Disabled People and Ambitious About Autism.

# Findings: Approaches to Equality and Diversity

<b>28</b> <b>Have a director/board champion who takes the strategic lead of E&amp;D</b>	Responses indicated that as well as acting as strategic leads there is also in some cases Board/executive representation on organisations' Champion initiatives, or within EDI Forums/steering groups.
<b>25</b> <b>Compile and publish diversity related data on the makeup of the board, leadership team and workforce</b>	Some organisations indicated that work toward collecting and/or publishing such data is in early stages or is planned for the future. Several also indicated that this data is collected and analysed, but only published internally.
<b>22</b> <b>Provide mentoring and coaching opportunities for staff and board members</b>	Organisations indicated that in-house coaching and mentoring programmes are in place- including in a few cases reverse mentoring. One organisation indicated that it offers staff placement on the HDN Mentoring programme.

# Findings: Approaches to Equality and Diversity

<b>21</b>	<b>Employ positive action measures to increase workforce diversity</b>	Cited methods include name blind recruitment, targeted promotion of vacancies, tailoring job advertisements for accessibility and to highlight inclusivity, the Disability Confident Employer scheme, developing diversity targets based on local demographics, application of the Rooney Rule, diverse leadership programmes, offering pre-application and interview techniques training, and the use of diverse interview panels.
<b>19</b>	<b>Use equalities data to tailor and target their approach to communicating with tenants and other service users</b>	Respondents frequently referenced the removal of barriers through the provision of communications in large print, brail, BSL, read aloud or translated formats. One organisation also referenced the importance of being visually representative of the community in communication materials. A few organisations cited a lack of quality customer data being a key barrier to tailoring customer communications.
<b>17</b>	<b>Provide of networking opportunities for staff</b>	Specific EDI networking groups which were provided as examples include: carers groups, menopause groups, BAME networks, LGBTQ+ networks, Disability networks, Gender Equality networks, Race Equality networks, parent networks, allies networks, and general EDI networks.

# Findings: Approaches to Equality and Diversity

**17** **Routinely monitor new lettings to ensure equality of opportunity for customers**

Comments indicated that in the cases where this monitoring occurs, diversity data is collected from new tenants during the lettings process. While some indicated analysis and reporting of this data was regular, some indicated that it was not yet routine.

**14** **Have in place a range of customer engagement groups**

While many organisations have customer engagement groups, the majority of these groups are not based around protected characteristics.

Organisations which have successfully set up customer groups for those with specific backgrounds indicated that groups exist for customers are who are: LGBTQ+, Racially diverse, and Disabled (one organisation even having four separate groups focussing upon different disabilities- Neurodiversity, Mobility impairment, Hearing impairment and visual impairment).

**10** **Collect data on staff with caring responsibilities and offer them necessary support**

Some organisations indicated that while they do not collect this data they strive to support colleagues with for instance flexible working options. Others indicated that this was a planned area of focus going forward.

Some of those who do collect this data and offer support indicated that they were signatories of the Harry's Pledge campaign.



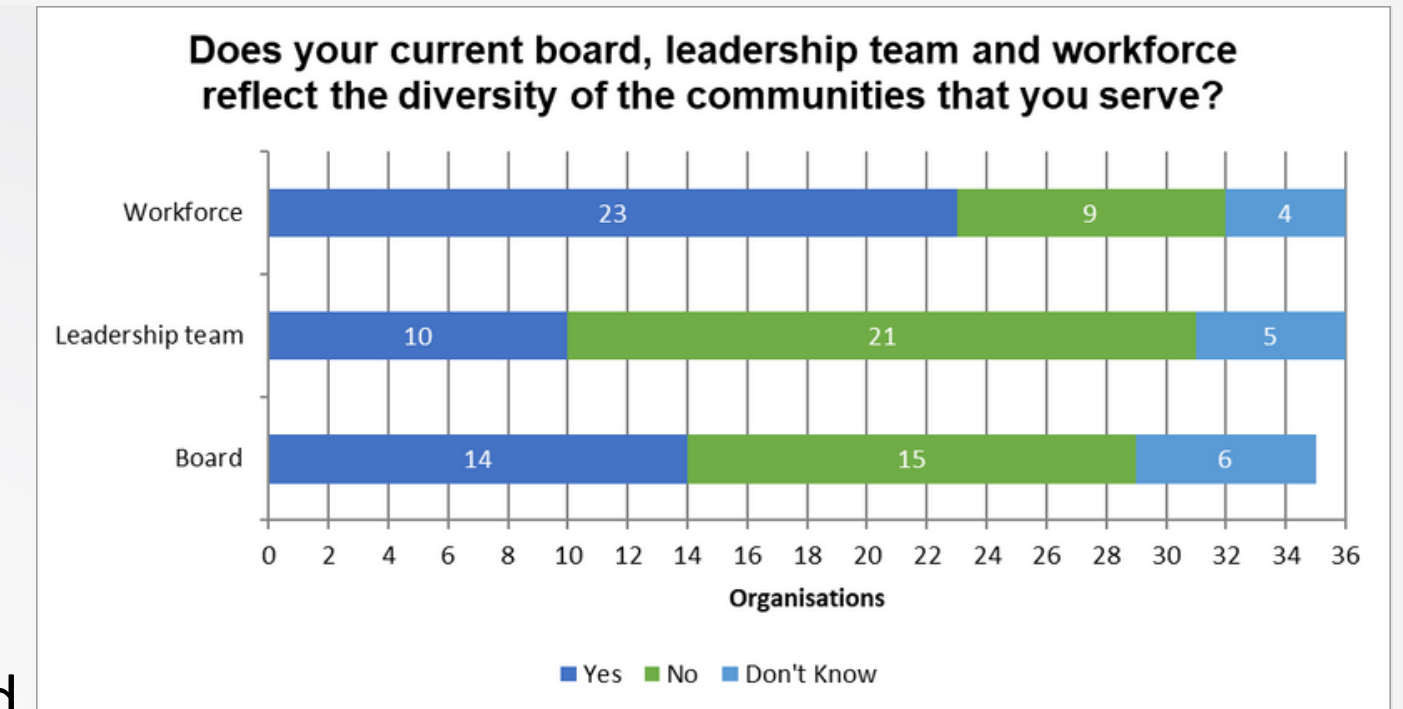
## Additional approaches not covered in the above were provided in comments. These included things like:

- Implementing EDI policies/strategies/action plans
- EDI Ambassador programmes
- Annual data-driven EDI reports on performance around objectives
- Engaging customer groups on matters of EDI
- Offering EDI training to engaged tenants
- Discussing matters of EDI at general staff forums
- Initiatives celebrating the diverse backgrounds of the workforce
- Implementing/developing other EDI related policies (such as Menopause, Transitioning at Work)
- Mental health and wellbeing policy/resources/service development
- Employee EDI surveys
- Regularly monitored EDI data dashboards
- Lunchtime learning programmes with internal/external speakers
- EDI strategy sessions

# Findings: Diversity of Boards, Leadership Teams and Workforces

## Reflecting Communities Served (Self Assessed)

- Unsurprisingly the workforce is generally the most reflective segment of organisations, with around 64% of organisations indicating that their workforce is representative of the communities they serve.
- Boards and leadership teams were markedly less representative, with only 40% of responding organisations indicating their organisations had a reflective Board and 28% that they had a reflective senior leadership team.
- Several responses indicated that while there was good representation of certain characteristics within their organisation, there was an underrepresentation of others. These specifics varied somewhat between organisations where information was provided (some for instance indicated that they were generally reflective in terms of gender and ethnicity but not sexuality and disability, whereas others indicated an unrepresentative lack of gender and/or ethnic diversity).
- One organisation pointed out that even where representation was at an ostensibly good level, this was not consistent at all levels of the organisation (i.e. across pay quartiles).
- Another organisation also pointed out that owing to their wide area of operations, reflectiveness of local communities was not something easily quantified.



Comments indicated that of those organisations which selected 'Don't Know' as an option to these questions, some were unable to answer conclusively due to a lack of data, either generally or relating to specific characteristics.

Where exactly data was lacking also appears to vary between organisations- for instance on the characteristics of the Board, Leadership Team, Workforce, customer base, or local population- or indeed some combination of the above.

# Findings: Diversity of Boards, Leadership Teams and Workforces

## Steps Taken to Improve Diversity

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

- Advertising vacancies to a wide audience, using specific diverse recruitment channels
- Targeted campaigns in Board and leadership recruitment
- Language neutrality assessments of job advertisements
  - Implementing the "Rooney Rule"
  - Offering development/training/mentoring opportunities
- Highlighting organisational stances on EDI, encouraging applications from underrepresented groups in job postings
  - The "10 by 20" CIH Leadership Challenge
  - A Future Leaders programme
  - Utilising diverse recruitment panels

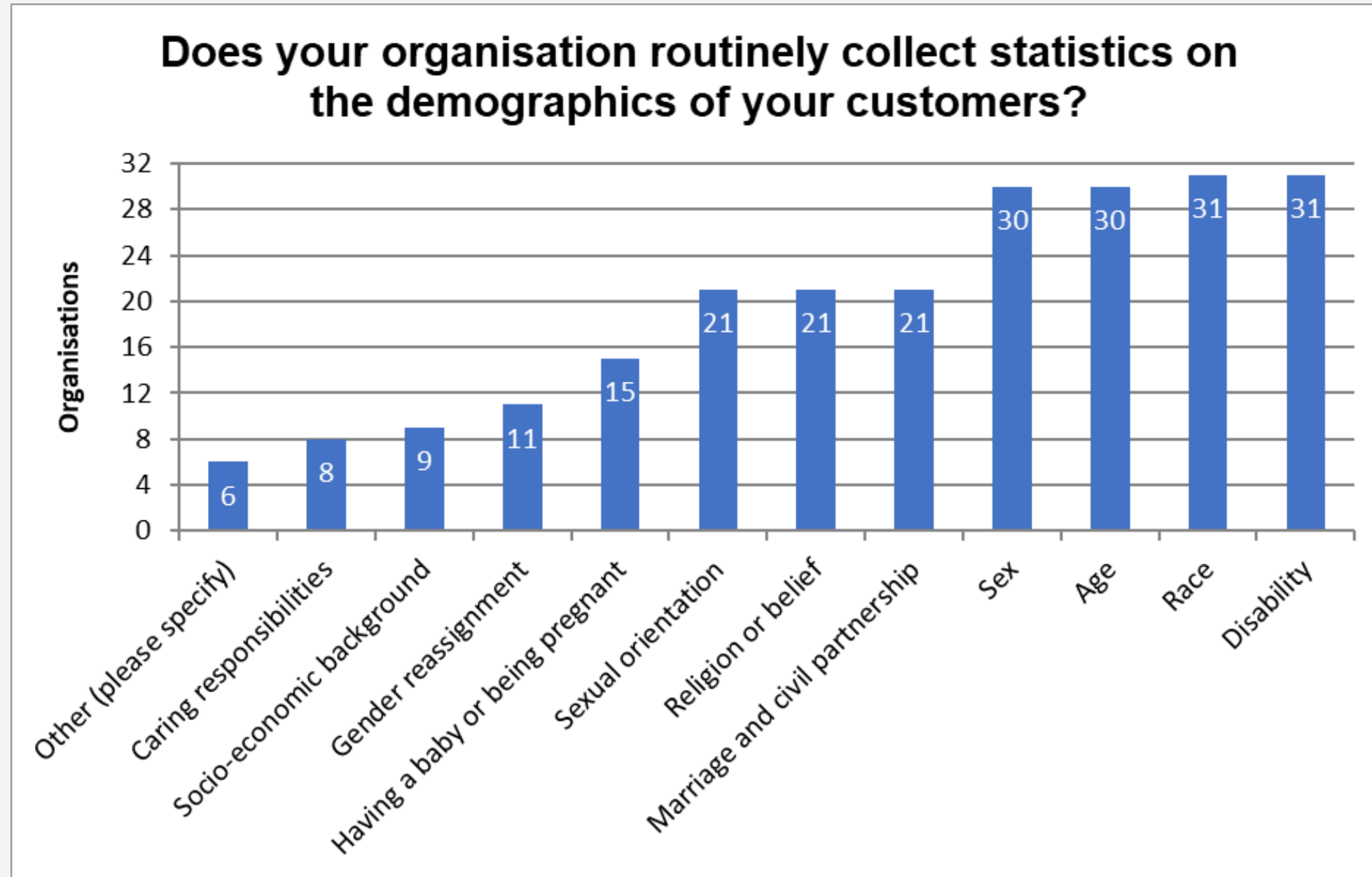


Of the organisations which answered 'No' to taking action toward improving diversity in any of these areas, many indicated that work around active steps was forthcoming. Some also highlighted that a key issue to proactive diversification of the Board and leadership team was a lack of opportunity to do so due to low turnover.

One organisation indicated that they did not feel the need to take action, as they felt that their organisation was highly representative of the communities which they serve. Again, there is a danger of not considering intersectionality in cases such as this.

# Findings: Monitoring and Insights

## Customer Demographics

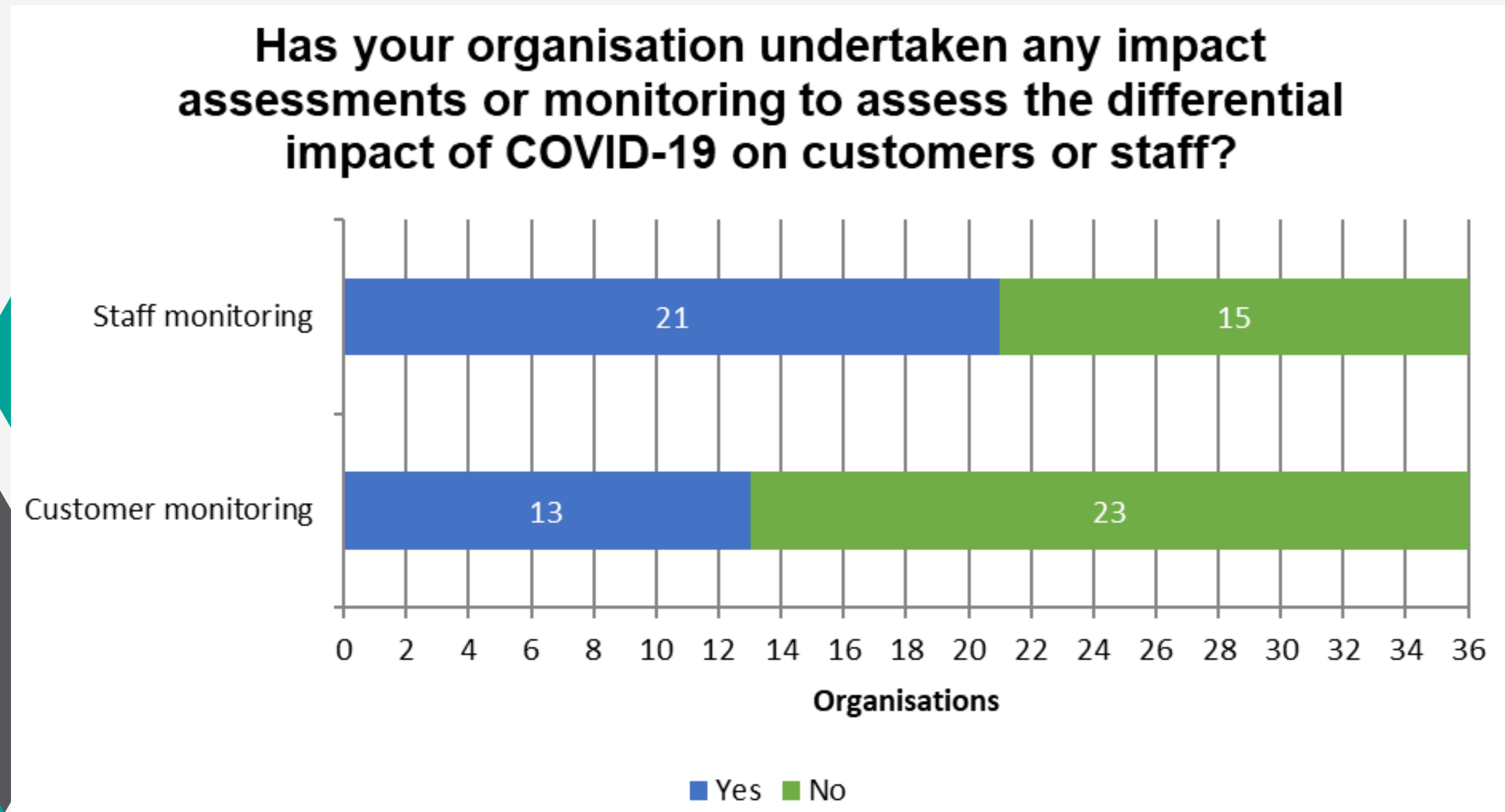


(Additional (Other) characteristics specifically collected included nationality and dementia care responsibilities.

- The Sex, Age, Race and Disability status of customers was most widely collected among the surveyed organisations.
- The least collected demographic data (obtained by less than half of organisations) in descending order was data on: Having a baby or being pregnant, Gender reassignment, Socio-economic background and Caring responsibilities.

# Findings: Monitoring and Insights

## Impact of COVID-19



- Only 58% of organisations had taken steps to assess the impact of COVID-19 upon staff, and even fewer (36%) had assessed the impact of COVID upon their customer base.

# Findings: Monitoring and Insights

## Keeping customer data up to date

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

- **Tenancy audits**
- Customer censuses
- A campaign to encourage customers to update personal details via self-service (such as through an app or online portal)
- **Customer surveys**
- Having staff update customer information when they make contact
- Annual tenant visits

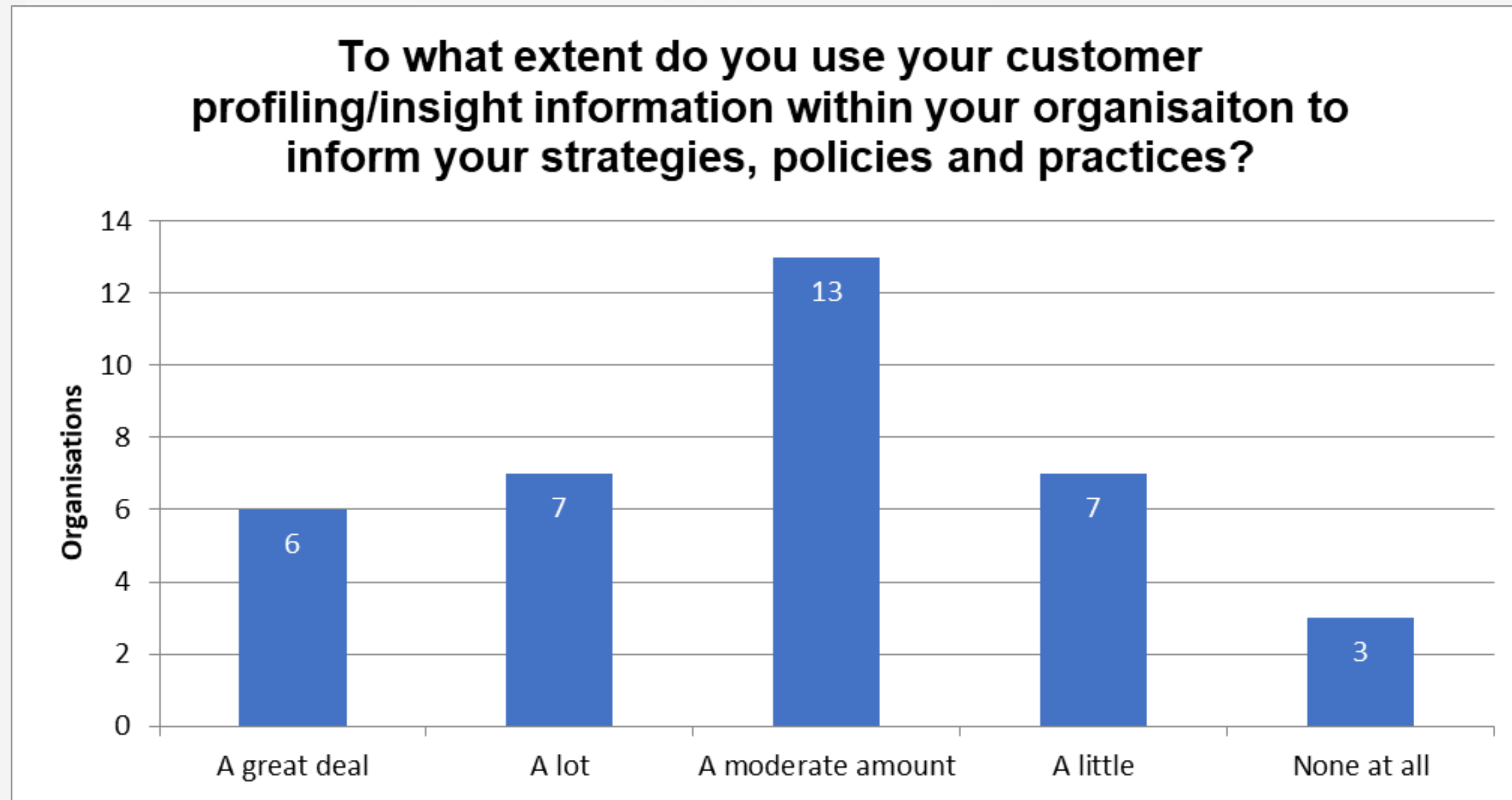
Specific challenges respondents have encountered when collecting data from tenants are:

- **A lack of customer understanding around the benefits of sharing diversity information**
- A lack of time and/or resources
- Building trust between customers and the organisation
- Identifying the best communication channel for existing tenants to obtain this data
- **A reluctance to share potentially sensitive information**
- A lack of active reporting from customers around changes in circumstances
- GDPR and the fact that data would go unused
- Using different data systems across an organisation, creating inconsistency
- COVID disrupting interactions/trust building with customers

\*any common responses have been **highlighted**

## Findings: Monitoring and Insights

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



- Around 72% of the responding organisations indicated that customer profiling was utilised to inform strategies, policies and practices to at least a moderate degree.
- The distribution of answers however indicates that there is still room for general improvement in terms of placing greater focus upon the use of customer insight.

# Findings: Participant Suggestions

## Potential Key Areas of Focus

Respondents were invited to share what they felt should be a key area of focus for organisations going forward. Suggestions included:

- **Sharing best practice**
- Publishing performance information
- Holding forum discussions between organisations around EDI
- Improving data collection and usage (from customers and employees at all levels)
- Improving Equality Impact Assessments
- Collaboration between organisations and the sharing of resources
- Recruitment and retention strategies
- Diversification of senior roles (i.e. through creating routes for underrepresented groups)
- Dealing with issues of EDI across characteristics (intersectionality)

\*any common responses have been **highlighted**



# EDI Benchmarking

The following section of the report breaks down the demographic makeup of participating organisations across three categories- Boards, Executive Leadership Teams, and Workforces- in terms of age, gender, disability, ethnic group, religion, and sexuality. Data on other important characteristics, such as transgender status, was unfortunately less complete and as such has not been included in this report. Data on customer bases was unfortunately also less readily available and as such has not been included for comparison at this time.

- It is important to note that the relatively small size of many Boards and Leadership Teams, as well as the workforces of smaller organisations, means that some of the displayed percentages are impacted upon to a much greater degree by the demographic background of single individuals.
- In terms of gaps in data, these tend to occur more frequently at higher levels of seniority- either due to non-disclosure or non-collection, and frequently across organisations in terms of characteristics that are potentially considered more sensitive, such as sexuality and religion.
- As we have come to expect, the data indicates that in many cases Board's and Leadership teams generally skew older, are more male dominated, and less ethnically diverse when compared to workforces, and that disabled representation is generally low across organisations.

# EDI Benchmarking

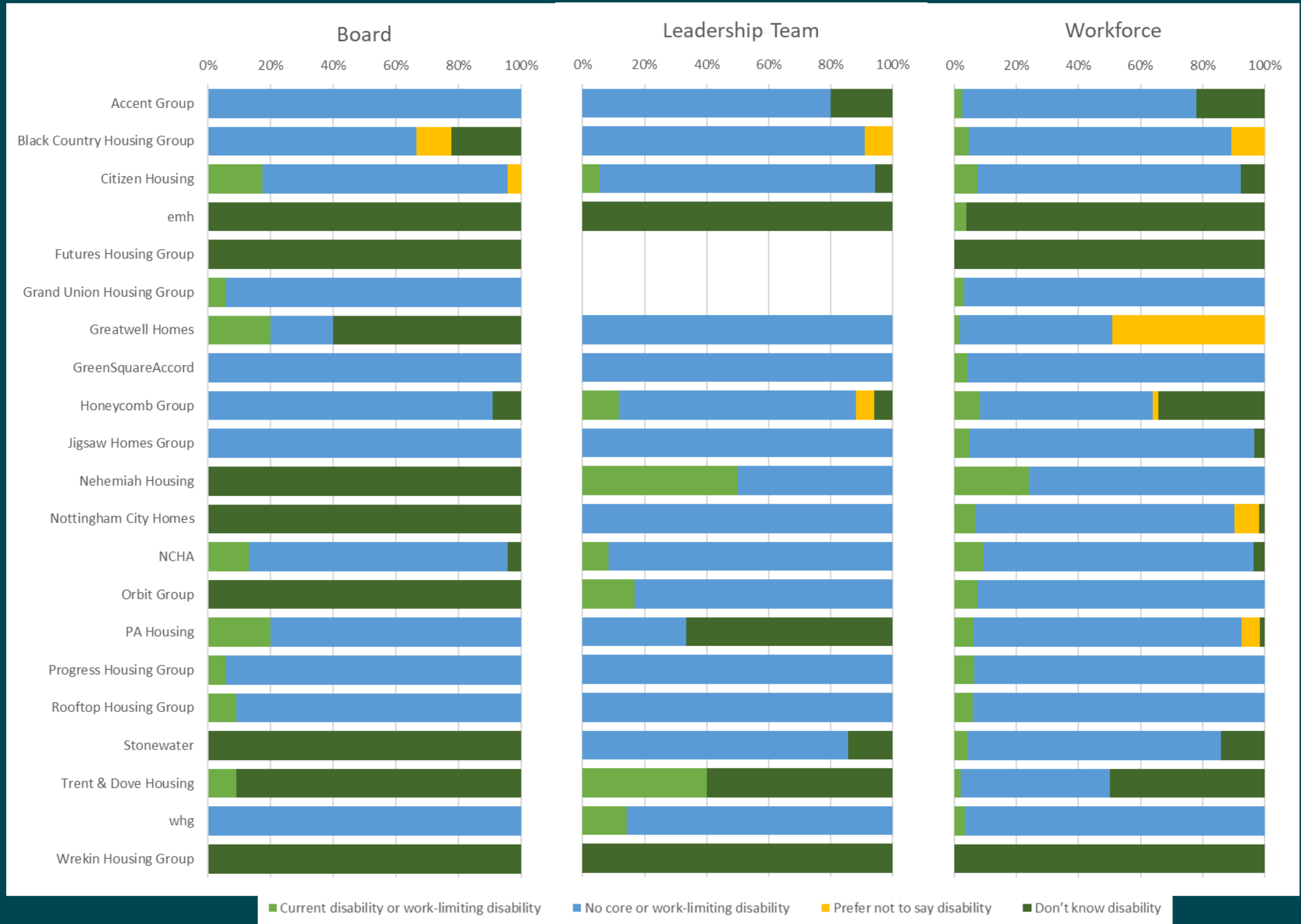
## Age



## Gender



## Disability



## Ethnicity



## Religion



## Sexual Orientation



# Conclusions

The findings of this study indicate that there are indeed organisations across the region which have a great deal of commitment to equality, diversity and inclusion, as illustrated by some of the good practices detailed within the report. There are however still specific areas which need to develop further, and work around EDI should as always be characterised by an aim of continuous improvement.

It is also important to remember that organisations participating in studies such as this are likely to already have a guaranteed degree of commitment to EDI. Organisations which have not taken part - for reasons including a lack of time, resources, or interest- may on the other hand be further behind in terms of progress. It is therefore important for organisations which are excelling in areas of EDI, or are taking steps to improve their performance, to also champion EDI- both in the region and the housing sector more widely.

It is with this in mind we believe that a collaborative approach is integral to improving EDI across the sector, and is particularly important when addressing complex regional challenges. As respondents to this survey identified, this can best be achieved through for instance the continued sharing of best practices and shared learning. Further detail around this, alongside our other recommendations for improving EDI in the region, can be found within the executive summary.





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