

# Our response to the Regulator of Social Housing's Consultation on Equality Objectives

## Consultation details

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**Title of consultation:** Equality Objectives

**Source of consultation:** Regulator of Social Housing

**Date:** 25 March 2020

## For more information please contact

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## About the Network

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The Housing Diversity Network (HDN) is a training, consultancy and research social enterprise, established in 2003, providing services to the civil society, state and private sectors throughout the UK; it has a concentrated presence in the North of England.

HDN believes that through its work covering all aspects of equality, diversity and inclusion that it has a crucial role to play in ensuring that housing organisations reflect the communities that they serve. This includes staffing establishments, seniority in decision-making and governance.

We welcome this opportunity to respond to the Regulator of Social Housing's (RSH) equality objectives review.

### Response

The Regulator is currently consulting on its proposed equality objectives which are set out as follows:

- Ensure that where equality and diversity concerns are raised through our enquiries process they are considered in line with our statutory objectives;
- The regulator will review its methods of communicating to ensure that it does so in an inclusive way;
- We will provide a supportive and inclusive working environment for all.

Our response to RSH's consultation is set out below; we have used the questions posed by RSH as headings.

#### 1: Do you agree the proposed objectives meet our obligations under the Equality Act?

HDN believes that housing organisations have an essential role in improving equality outcomes for their communities. This is not just achieved through meeting legal obligations but by working in a cohesive manner, embedding equality activity across a broad range of services and functions and aligning it with organisational, local authority and regional priorities.

This makes equality 'everybody's business' in the best organisations and is closely aligned to tackling inequalities in our communities, which go far beyond income and wealth.

In addition, the case for board diversity has never been stronger, and we believe that housing boards need to seek people from diverse backgrounds and with a range of life experiences.

Although boards and executives clearly believe in the benefits of diversity on their boards, current methods of sourcing and selecting candidates tend to reinforce the lack of diversity.

We believe that there is no requirement to change the current regulatory standards which are based on the following requirement in the tenant involvement and empowerment standard:

### 1.3 Understanding and responding to the diverse needs of tenants

#### 1.3.1 Registered providers shall:

- a. treat all tenants with fairness and respect
- b. demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

### 2.3 Understanding and responding to diverse needs

#### 2.3.1 Registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants

We do believe in line with our comments above that RSH do need to strengthen the Governance standard so that that the new requirements are outcome-focused and not prescriptive. The RSH also needs to focus on inequality as a way of meeting equality objectives.

We would suggest the following wording;

*The Regulator's regulatory standards are to ensure Registered Providers:*

- *improve diversity of thought in decision making (including taking action on board diversity)*
- *demonstrate how public equality duties are met*
- *address inequalities in their neighbourhood and communities*

## 2: Do you agree that we have identified appropriate activity to help achieve the overall objective?

HDN has expertise in equality, diversity and inclusion, and have been providing consultancy services for over 15 years to housing organisations using up-to-date knowledge with innovative and interactive approaches.

We would recommend that work on delivering its equality objectives is based on a strategic and evidence-based approach.

We know that society is becoming increasingly diverse. Organisations, especially those working within the housing sector need to make a conscious effort to ensure that they enable individuals and communities from different backgrounds to thrive together. It means creating the conditions for people to get used to each other, understand each other, appreciate shared values and to build their confidence in being together.

If RSH is to achieve its new equality objectives and meet its social purpose we believe that embracing diversity is critical. The economic and business changes of today, such as changing markets, mass customisation, outsourcing and cross functional team-working, together with changing demographics, mean that RSH has little choice but to have effective diversity policies to ensure they are recruiting and promoting people from the widest possible pool. Diversity is a key enabler of business strategy and lies at the heart of an organisation's choices about the future.

The business case that underpins this approach is clear. An organisation that retains and ensures that black, Asian and minority ethnic obtain positions of influence in the organisation will be a high performing organisation. Greater creativity and innovation in the key housing challenges of today can only be enhanced through this strategic approach. Having a workforce that reflects the communities that it serves is also a major benefit in the equality objectives.

We know that RSH believes that career progression should be based on merit. People from all backgrounds and walks of life should know that they will be able to progress in the organisation in line with their talents and commitment.

### 3: Have you got any other comments on our consultation?

We would recommend that RSH commit to carry out an ethnicity pay gap analysis to inform this work.

As you are aware one of the key HDN programmes is our staff mentoring scheme. This is an initiative aimed at under-represented talent and RSH participation would help to send a clear organisational message that RSH seeks to develop diverse talent pools. We also know from our own work that coaching and mentoring programmes can offer practical support to talented individuals who may otherwise lose out due to the inherent bias that operate within organisational cultures.