



Homes
England

Date: 20 May 2021

Our Ref: RFI3430

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Making homes happen

██████████
By Email Only

Windsor House
Homes England – 6th Floor
50 Victoria Street
London
SW1H 0TL

Dear ██████████

RE: Request for Information – RFI3430

Thank you for your recent email, which was processed under the Freedom of Information Act 2000 (FOIA). You requested the following information:

1. *The amount spent on initiatives for staff about ethnic diversity pr year from January 2015 until January 2021.*
2. *What specific diversity initiatives are being used to increase ethnic diversity in the workforce.*

Response

We can confirm that we do hold some of the requested information. We will address each of your points in turn.

1. ***The amount spent on initiatives for staff about ethnic diversity pr year from January 2015 until January 2021.***

Information from January 2015 – March 2019

We are able to confirm that Homes England does not hold the information detailed in your request.

In order to conclude that the information is not held, we have searched with our Diversity & Inclusion team who would have the requested information if held.

The FOIA does not oblige a public authority to create information to answer a request if the requested information is not held. The duty under section 1(1) is only to provide the recorded information held.

The full text of section 1 in the legislation can be found here:

<https://www.legislation.gov.uk/ukpga/2000/36/section/1>

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Information from April 2019 – January 2021

Please see below the amount spent and details of the initiatives for each of the financial years 2019/2020 and 2020/2021.

2019/20	£8,150	BAME into leadership conference (multiple tickets)
2019/20	£166	BAME network career development event catering
2019/20	£1,107	D&I Leaders Race at Work Summit (multiple tickets)
2020/21	£2,900	Investing in Ethnicity membership
2020/21	£150	Housing inequalities: Race and Ethnicity perspectives training
2020/21	£1,750	2x Let's talk about Race training sessions for all
2020/21	£225	Mental Health First Aid training to ensure BAME representation
2020/21	£2,500	Speaker for Wider Leadership Network on race and ethnicity
2020/21	£3,000	BAME into Leadership conference (multiple tickets)
Total	£19,948	

2. What specific diversity initiatives are being used to increase ethnic diversity in the workforce.

Some of the information requested is publicly available elsewhere and therefore exempt from disclosure under Section 21 FOIA. The full text of the legislation can be found on the following link:
<https://www.legislation.gov.uk/ukpga/2000/36/section/21>.

As part of our duty to provide advice and assistance under Section 16 FOIA where the information held is publicly available we have provided links below.

Homes England's Equality, Diversity and Inclusion report is publicly available on the following link: [Equality, Diversity and Inclusion Report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612422/equality-diversity-and-inclusion-report-2020-21.pdf). This report sets out how we plan to achieve our objectives, and how we will measure success.

Please find attached Annex A. Annex A is a strategic document outlining some of the challenges faced both in the organisation and through the housing need of people from different ethnicities. This document was produced by Homes England's BAME Network. The network is made up of Homes England staff and has been established since 2018. The network has a senior sponsor who is an Executive Director and they provide strategic advice and leadership support to the network. The network made several recommendations in the strategic document, all of which were approved by a corporate decision making board.

The strategic document also contained a publicly available document from the All-Party Parliamentary Group on Governance and Inclusive Leadership (GAIL) which is available on the following link:
[appg_matrix_2019_conference.pdf \(investinginethnicity.com\)](https://www.government.uk/government/uploads/system/uploads/attachment_data/file/612422/appg_matrix_2019_conference.pdf).



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Section 40 – Personal information

We have redacted information contained within Annex A on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

To disclose personal data such as ethnicity and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Section 40 is an absolute exemption which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exemption is engaged.

The full text in the legislation can be found on the following link;

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

Advice and Assistance

As part of our duty to provide advice and assistance under Section 16 of the FOIA we are also able to provide the following general evidence of our commitment to promote ethnic diversity in the workplace:

In July 2020 Homes England launched its new diversity and inclusion objectives which we will focus on over the next four years. Each objective will be looked at from the point of view of different protected characteristics, including Ethnicity. Our objectives cover the following areas:

Objective 1 – Create a more inclusive colleague experience

Improve the experience that our colleagues and candidates have with us by ensuring the employee cycle, from recruitment and onboarding to our HR policies and ongoing workplace practices, are inclusive.

Objective 2 - Work together to create acceptance and build an inclusive culture

Work together to share individual experiences and raise awareness and acceptance. Demonstrate inclusive behaviours and lead by example, embracing the work of employee network groups, allies and individual role models.

Objective 3 - Leadership commitment and action

Create a culture where the principles of equality, diversity and inclusion are visible and actively championed at a senior level and where our leaders are educated, empowered and confident in role modelling inclusive behaviours.

Objective 4 - Work with our partners and suppliers to help create a more inclusive industry

Lead by example by setting expectations on those who want to work with us and enable the sharing of best practice with our partners.

Objective 5 - Deliver homes for the communities we serve

Promote and actively contribute to the delivery of housing that meets the needs of people with protected characteristics.

Each objective has an Executive Director sponsor and we now have a Board sponsor for diversity and inclusion.



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Some activities undertaken to date, specifically on ethnicity include:

- Race awareness e-learning is part of our mandatory training and is part of our induction process
- Providing opportunities for colleagues to attend BAME into Leadership Conferences from 2018-2021;
- Setting up 'Let's Talk About Race' learning sessions which were attended by c200 people
- Ensuring that our Mental Health First Aiders have ethnically diverse representation
- Becoming a member of Investing in Ethnicity and committing to enter the Maturity Matrix in 2021
- Hosting a learning session on ethnicity to our wider leadership network, with a guest speaker talking about the importance of ethnicity inclusion and why diversity matters (followed by a line manager toolkit, attached).
- We are in the process of arranging a wellbeing and resilience session with an external speaker, specifically for colleagues from ethnic minority to provide additional support.
- We are shortly going to be launching a reciprocal mentoring programme which will be rolled out to the BAME Network first.
- We have an ethnicity Wellbeing champion as part of our core Wellbeing Group.

In 2020 we also became a corporate member of Investing in Ethnicity, and we will be taking part in the Investing in Ethnicity Maturity Matrix this year. We know that we still have work to do in this area and the Matrix should help us to understand where we need to focus our efforts going forward in this area.

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request an internal review. You can request an internal review by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: infogov@homesengland.gov.uk

The Information Governance Team
Homes England – 6th Floor
Windsor House
50 Victoria Street
London
SW1H 0TL

Your request for review must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response. Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for review will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link <https://ico.org.uk/>



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Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team

For Homes England

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Homes
England

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CHANGE FOR REAL: Inclusion is Everyone's Responsibility

BAME Network Strategic Delivery Plan [Final Draft v2.0]

Date: September 2020

Version	Date	Owner	Comments
1.0	August 2020	BAME Network Executive Team	Initial Draft Feedback received from People Group
2.0	25 September 2020	BAME Network Executive Team	Final Draft Incorporating feedback received from People Group

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Introduction

Homes England strives to be at the forefront of championing diversity and inclusion. **Diversity** is a value that forms part of the **Homes England Way**: the DNA of who we are, what we do and how we do it. Race equality is a critical part of those values and we must take a holistic approach to achieve ambitious, accountable and transformational change.

Ethnicity is an important strand of the broader Diversity and Inclusion ('D&I') tapestry. Ethnicity is truly intersectional as it is present across all other protected characteristics. It is important and necessary to agree a plan of action that will nurture an equitable, respectful and diverse environment for our ethnic minorities to flourish. As a leader in the housing industry, Homes England is falling short in developing and progressing talented black, Asian and ethnic minority ('BAME') staff into senior management positions. The Agency can and should be an exemplar of equality, equity and diversity in action, an employer that provides fair and equal access to progression for all staff and sets a standard for others to follow. We are a public service. We serve the public and we need to be reflective of the communities and people we serve.

This [paper] sets out a series of recommendations which, if implemented, will create and maintain the **immutable foundations** of a **Diverse** environment envisaged by the Homes England Way and that aligns with each of our 5 Equality, Diversity and Inclusion objectives. An environment that:

- is reflective of a culture which is unapologetically **ambitious** in the example it sets to public and private sector organisations.
- welcomes ethnic minority talent and integrates them to create highly skilled teams with a wide variety of experiences and backgrounds.
- lives the values of the Homes England Way and treats everyone with respect, encouraging authentic diversity of thought in the development and implementation of **creative** and **commercial** ways to fulfil our mission.
- actively seeks out and promotes the inclusive development, **learning** and career progression of BAME talent, by providing the appropriate support, resources and opportunities.
- demonstrates, promotes and enforces a zero tolerance of behaviours and practices that negatively impacts ethnic minorities and people with other protected characteristics.
- **Collaborates** and builds mutually beneficial partnerships with the housing and development industry to champion and deliver sustainable, resilient, inclusive and high-quality places for one and all.

This [paper] is a live document that will evolve as we grow bolder in our plan to make that environment a reality and will incorporate our learnings along the journey. **This is not a request for preferential treatment, it is request for equality.**

Industry context

The 2017 UK Government report Race in the workplace: The McGregor- Smith review highlighted that “in the UK today, there is a structural, historic bias that favours certain individuals, organisations and individuals tend to hire in their own image, whether consciously or not”. This is also true in the housing and development industry. The report revealed that the majority of management positions in the housing and development sector are held by people from a white background. These findings are also echoed in Building magazine’s April 2019 diversity survey, which noted that just **4% of workers in the UK development and housing industry are from the BAME community and 76% of BAME staff felt their chances of being promoted or finding a job was lower because of their ethnicity.** Baroness McGregor- Smith stated that BAME people face significant challenges through their career. They are faced with a lack of role models, more likely to perceive the workplace as hostile, less likely to apply for and be offered promotions and more likely to be judged harshly.

The Local Government Leadership 2018 report, which maps the gender and ethnocultural diversity of Board and Executive leaders in Local Authority organisations, reported of the 343 local authorities in England, there are only **10 BAME CEOs across all Unitary Authorities, County Councils, Metropolitan Boroughs and London Boroughs, with 6 BAME CEOs at District Councils.** The report further notes that **BAME executives hold 3.7% of senior management roles across local government despite a UK working age BAME population of 13%.** It is important to note, however, that communities that have a significant BAME population exist. **Most noticeably, London which has a population that is 60% white and 40% BAME, only two (6.25%) of London’s 32 Boroughs have BAME CEOs and 10.5% BAME representation at senior management level.** Cities such as Leicester, Luton and Reading also have substantial BAME population. Birmingham, the largest metropolitan city in Europe, is set to have a majority BAME population within the next 4 years. Despite this, the proportion of senior BAME staff within the housing sector as an industry continues to be proportionally very low.

Insider Housing in 2018 highlighted that although there appears to be diversity in the housing sector at an apprentice level, **BAME staff careers tend to stall at middle management level.** This is largely attributed to unconscious bias and lack of mentoring resulting in a high number of ethnic minority groups leaving the industry. This is of concern as housing deals with more complex needs of specific communities, particularly in inner city areas, is not representative of those communities and often resulting in poor decision making. For instance, analysis carried out by the Resolution Foundation on data from the ONS indicate that **housing needs are not being met for people from ethnic minority backgrounds** with the proportion of ethnic minority home ownership being below that of white members of society and the housing cost to income ratio being much higher in black households than any other. It is argued in the report that better informed policy making was needed to surface such issues. A lack of diversity in thinking can be seen to be a factor in tackling such inequity (further details can be found in their report “Structurally Unsound” at Appendix 4 below)

The Building Magazine survey 2019 found a severe lack of trust in leaders to identify the need for, and affect, greater diversity within organisations. **Change however, is the most effective when it occurs at all levels from top down to bottom up and those with influence need to be aware of their leverage to shape this change.**

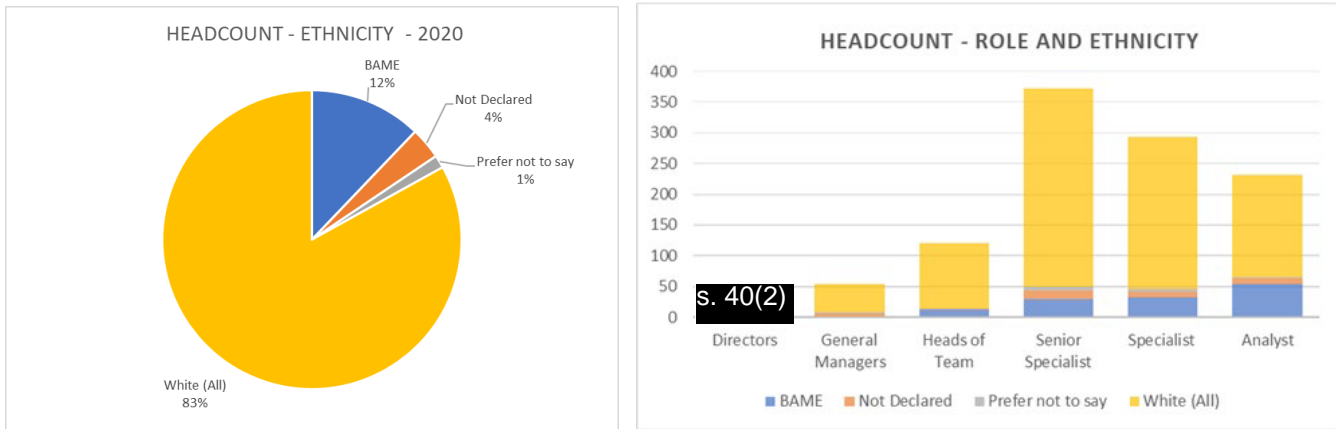
Homes England context

As at June 2020, **c.12% of Homes England’s 1,080 employees identify as being from a black, Asian and minority ethnic background.** Whilst the proportion of ethnic minorities employed at Homes England has increased alongside our staffing levels over the years, they are consistently employed below the Senior Specialist grade (see charts below and appendix 1). 66.4% of BAME employees below Senior Specialist grade, with just 9% at Head of Team and 1.5% General Manager grades. **s. 40(2)**

██████████ We were unable to undertake analysis of BAME staff by region in order to compare with regional census

BAME population due to General Data Protection Act, however, we deem this analysis key to understanding whether Homes England represents the communities that we serve at appropriate levels.

Headcount break down by ethnicity and role:



Further break down noted in appendix 1.

Directorate breakdown

Directorate	BAME	Total Headcount
Corporate Resources:	38	266 (14.3%)
Executive Office:	<10 *	47
Investments:	64	375 (17.1%)
Land & Development:	24	280 (8.6%)
MPP:	<10 *	127
Service Design & Transformation:	<10 *	15
Total Headcount	138	1111

*Exact Number Unavailable due to Data Protection Regulations

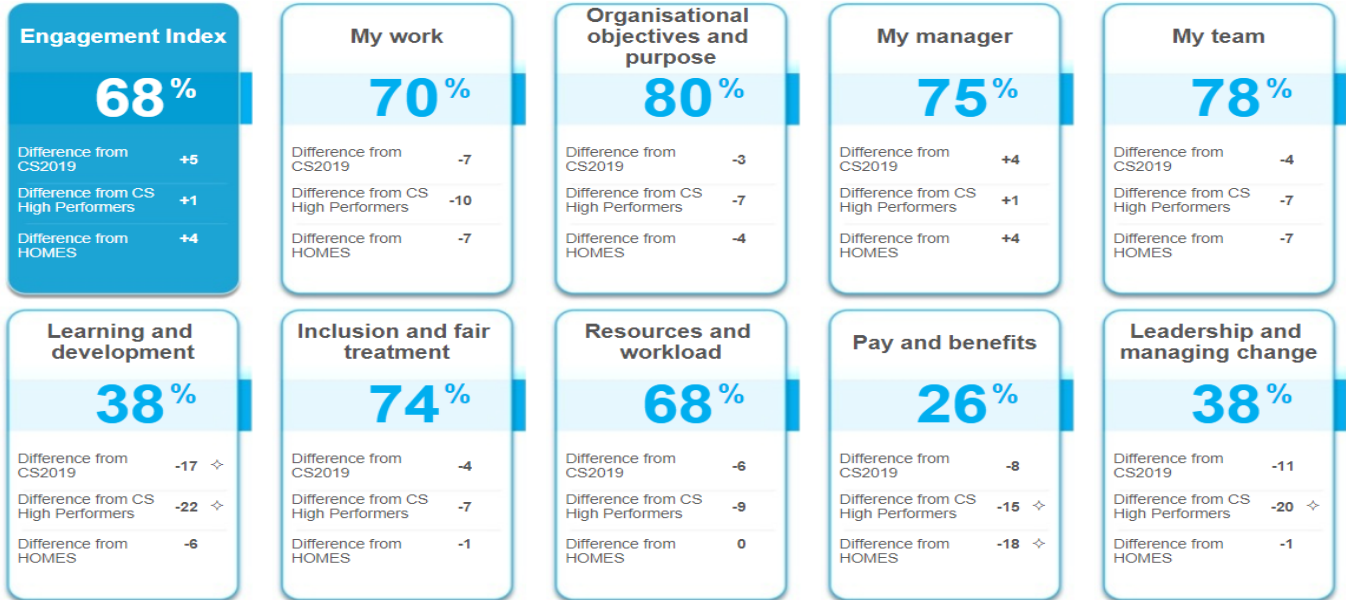
Homes England **Human Resources does not currently have systems in place in order to provide data required to analyse the progression of BAME staff** in the Agency, which includes the number of internal applications submitted by BAME employees, and how many are awarded roles. Data will need to be available to enable us to better understand the extent of this issue and formulate bespoke solutions for improvement and monitoring.

We await confirmation of whether Homes England has the requisite data to analyse the level of retention over the last few years which, again would be required to understand the extent of the issue.

Data from the Homes England Peoples survey highlights that in **7 out of the 10 areas reviewed, BAME respondents showed a more negative score compared to that of their non BAME colleagues**, with Pay and Benefits showing the greatest difference.



◇ Statistically significant difference from comparison



Furthermore, the result shows a statistically significant variance from the norm of Homes England staff when it comes to questions of discrimination, bullying and harassment, with **BAME colleagues scores indicating a higher incident of occurrence.**

E01. Have you been discriminated against at work, in the past 12 months?^A

	Percentage	Difference from CS2019	Difference from HOMES
Yes	21%	+10	+13 ◇
No	68%	-13 ◇	-18 ◇
Prefer not to say	11%	+2	+5

Your survey included a question about whether the discrimination occurred in your organisation. These results have been suppressed in this report to protect respondents anonymity, but do feed into the overall Civil Service results.

E03. Have you been bullied or harassed at work, in the past 12 months?^A

	Percentage	Difference from CS2019	Difference from HOMES
Yes	20%	+8	+11 ◇
No	67%	-15 ◇	-18 ◇
Prefer not to say	13%	+6	+7 ◇

Your survey included a question about whether the bullying and/or harassment occurred in your organisation. These results have been suppressed in this report to protect respondents anonymity, but do feed into the overall Civil Service results.

Homes England Lived Experience

Since the BAME network was established over 3 years ago, there is anecdotal evidence to suggest that **BAME employees feel that opportunities for progression are not open to them. Our members feel 'uncomfortable' discussing their own career development with managers** who did not seem engaged with nor interested in their career development plan, while it was felt there was a **more positive approach to their white peers.**

The Network is aware of various BAME members feeling that progression opportunities were not communicated to them. In addition, our members have fed back on the process of applying for internal applications and the **lack of engagement and support received from the hiring manager** both during the application process and in respect of lack of feedback thereafter. There is a general sense that we have a **recruiting process in Homes England that**

allows teams to hire in their own image or with a candidate already in mind, whether this is because the candidate lives in the same area, previously worked with or are just a better 'fit' with the hiring manager or head of team. There is a sense, especially in certain Directorates, that these opportunities **are not truly open for all**.

There have also been **various instances of reported and unreported bullying and/or harassment from our BAME membership** which, over the years, has **caused people to leave the organisation, to be forced out or to continue to suffer under that treatment with severe impact on wellbeing and mental health**. The network has been informed of various instances of **Personal Improvement Plans being used as means to intimidate new and existing BAME employees** into staying silent about the bullying and harassment they have been subjected to or as a means to force them to stay in the roles they wish to progress out of. The case for change is robust and now is the time to make Change For Real at Homes England.

BAME Network Consultation Feedback:

s. 40(2)



Risk Implications

- **Loss of potential talent** - the diverse talent needed to drive the organisation forward may be reluctant to engage with the Agency if they believe the organisations approach to diversity and inclusion would make it harder for them to fulfil their potential. Existing employees may also become disillusioned with their prospects and leave. Resulting in reputational damage and lost opportunities.

Stakeholders expectations not met - failure to demonstrate a solid commitment with tangible outputs relating to diversity and inclusion results in a loss of faith in the organisations ability to represent the diversity of views and aspiration of the communities it engages with or expectations of sponsoring government department and other partners. Resulting in damage to the organisations reputation for diversity and inclusion and mission/values failure.

- **EDI Regulation and best practice non-compliance** - failure to comply with aspirations or regulatory expectations relating the composition of an organisations structures, in relation to the diversity within each grade, board representation for BAME staff and other relevant best practice/new EDI regulations, results in damage to the organisation reputation as leader of the sector and regulatory or best practice non-compliance. The Public Sector Equality Duty requires Homes England to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Business Case

- **Delivering our Mission** – collaborate and build mutually beneficial partnerships with the development industry to champion and deliver sustainable, resilient, inclusive and high-quality places for **one and all**.
- **Attract and retain the best people** - studies have shown that promoting diversity can increase employee motivation and staff retention. In a more diverse and inclusive workforce, the number of employees who intend to stay with their firm increases by 20% and 50% more employees express a commitment to their teams. In a survey of 200 European Companies, 62% of companies said that diversity programmes helped to attract and retain highly talented people. It is especially important for Homes England to attract the most diverse talent to better understand the housing needs of all the communities we serve, inclusive of BAME communities.
- **Increased productivity and motivation** - equal opportunity policies and practices have been linked to increased productivity. Companies which have diversity training are more likely to report higher productivity and better business performance. 58% of SMEs reported improvement in productivity as a result of flexible working practices.
- **Improved financial performance** - companies with the highest levels of racial diversity report 15 times more productivity on average than those with the lowest levels of racial diversity. Organisations in the top quartile for executive board diversity achieve a ROI 53% higher, on average, than those in the bottom quartile. Profit margins at the most diverse companies were 14% higher on average, than those of the least diverse companies.
- **Diversity of thought** - having diverse workforce brings a diversity of ideas, innovation and thinking.
- **Greater pool talent** – by the year 2030 c 15% of the professional workforce in the UK will be from a BAME background.

Recommendations

Strategic objectives – a starting point

This is a **LIVE** document that envisages future growth. The following are initial Strategic Objectives which specifically targets Homes England's urgent need to address endemic issues of **under-representation, progression and attainment** of black, Asian and ethnic minority workforce. Homes England is/are to address the key objectives in the manner outlined in operational objectives subsection below, to form the foundation on which future action will be built:

1. To tackle **underrepresentation** of BAME colleagues in Senior Leadership.
2. Nurture and support the talent through career **progression** of BAME colleagues and address any ethnicity pay gap.
3. Create an **inclusive culture** through our ways of working both internally for our BAME colleagues, and the wider BAME communities that we serve.
4. Address **unconscious bias, discrimination, inequality** or exclusion in the workplace.
5. To deliver our mission by collaborating and building mutually beneficial partnerships with the development industry to champion and deliver sustainable, resilient, inclusive and high-quality places for **one and all**.

Operational objectives – Investing in Ethnicity Maturity Matrix

Achieving the above Strategic objectives requires ambitious and transformational change at all levels of the organisation. To provide a structure and clear route to effecting the change that will lead to the fulfilment of those Strategic Objectives, this paper recommends Homes England implement and seek to attain accreditation by Investing in Ethnicity – Maturity Matrix ('matrix').

The Maturity Matrix was launched in the House of Commons on 8th January 2018 in collaboration with the All Party Parliamentary Group for Governance and Inclusive Leadership and is a step by step tool to measure success and identify areas of improvement.

The Maturity Matrix has been developed based on input from over 150 organisations and is already being used by a number of business and organisations, including professional partner to Homes England CBRE Limited. It is aligned to many recent report recommendations including McGregor-Smith, CMI's Delivering Diversity and CPID's addressing career progression. The Matrix will simplify the process of enabling Homes England to work towards positive improvements and narrowing inequalities surrounding race in the workplace.

The matrix provides clear and concise actions that Homes England should undertake, which focus on 4 key areas: Board and Senior Allies, Policy & Data, BAME employee life-cycle and Culture & Inclusion. While Homes England has already undertaken several actions recommended by the Maturity Matrix, there are a number of recommended actions in which we fall behind.

This [paper], therefore, ultimately recommends that Homes England applies for the Investing in Ethnicity Advanced Employer accreditation by June 2021. In actioning this matrix, we will achieve our Strategic Objectives. This matrix and the actions involved have been reviewed by s. 40(2) who is supportive of our recommendation on the basis that Homes England has already undertaken some of the actions required to meet the standard of Advanced Employer. The actions which Homes England will need to undertake already form part of various actions plans contemplated by the Diversity and Inclusion Report 2020 but ensure that those plans also fully address ethnicity at the Agency.

Below are a sample of actions to be undertaken by an “Advanced” employer under the recommended matrix that align with each of the Strategic Objectives.

To tackle underrepresentation of BAME colleagues in Senior Leadership

- **Reverse mentoring** - senior leaders and executive board members engage with individuals from different ethnic backgrounds in more junior roles to provide guidance and advice on career progression and be mentored in Ethnicity and Race matters as reciprocal relationship. This will support better understand the progression barriers faced and the positive impact of diversity can have.
- **Annual reporting** - ensure that your HR systems are capturing data on ethnicity, which is then used to analyse BAME representation at all levels within annual reports and to align to [this strategy]. The Agency is currently lacking in this capability and should be improved as a matter of urgency. The executive team should reference what steps they are taking to improve BAME representation and progression within their annual report.
- **Annual senior training** - ensure that executive and senior teams have mandatory BAME inclusion training as a stand-alone programme that is beyond currently available unconscious bias training.
- **KPIs** - The KPIs included should be measurable objectives that align to wider inclusion objectives and be assessed annually. KPIs should be tied to the data for each department to ensure that BAME employees are given the same access to career progression and programmes, and that recruitment of appointments are chosen fairly from a diverse talent pool.
- **3rd party recruitment** - actively ensure a diverse long and short list from head hunters and recruitment agencies for all senior recruitment positions. When recruiting through third parties, reject lists that are neither reflective nor representative of the ethnic origin of the local working age population.
- **Diverse interview panels** - ensure BAME representation on recruitment panels for all roles (especially senior roles) by having an interview panel register from which interviewers are chosen and ensure inclusion related questions are posed during the interviews.
- **Recruitment advertising and summer programmes** - actively promote early career and current job opportunities to BAME communities and a broader range of educational institutions e.g. through job fairs, demographic-specific advertising to nurture an interest in housing from an early age and to broaden the pool of talent available for selection. This may include outreach into educational establishments encouraging those from disadvantaged backgrounds.

Nurture and support the talent through career progression of BAME colleagues and address any ethnicity pay gap.

- **Development programmes** - identify top BAME talent at middle and senior levels and place them on career or talent programmes developed for those who want to progress in the Agency.
- **Recruitment** - ensure succession planning is fair and monitor BAME and other groups inclusion in career progression plans to enhance and maximise talent pipeline.
- **BAME role models** - build a pool of talented BAME role models at senior levels. Visibility of role models is key factor in impacting the extent to which BAME staff feel Homes England leadership is developing BAME talent.
- **Clear route of progression** - produce detailed and transparent guidelines with information on how Homes England’s career progression works, including pay, promotions and rewards. This should be available to all staff including new entrants.
- **BAME Mentoring scheme**: develop and implement mentoring scheme where BAME staff are matched with mentor to acquire/ gain soft and technical skills for career progression, and in reciprocal be mentored in Ethnicity and Race matters

Create an inclusive culture through our ways of working both internally for our BAME colleagues, and the wider BAME communities that we serve.

- **Annual training sessions** – all staff at Homes England should be equipped with the tools they need to live the Diversity value, especially as it pertains to ethnicity and race. Any annual training programme for all colleagues should be aligned to that which is delivered to the Senior Leadership Team.
- **Financial budget for the BAME Network** – there are various actions under the matrix which can be undertaken by the BAME Network with the express support of Homes England. Support includes a ringfenced budget for Network. Activities include inclusive events throughout the year, professional development events targeted at BAME employees, collaboration with external BAME networks [(e.g. MHCLG and CBRE)].
- **Annual communication strategy** - set an annual strategy for BAME Network communications with will increase awareness and understanding of the inequalities that Black, Asian and Minority Ethnic people face in the workplace and ways to stop this, help attract, develop and retain a diverse pool of talent to Homes England and include plans for a campaign encouraging all employees and business partners to pledge to be actively antiracist
- **BAME Recruitment KPIs** - set recruitment targets to ensure the percentage of BAME professionals on talent programmes is reflective of BAME representation within the local working population.
- **Supply Chain Diversity Strategy** - ensure that the supply chain has a strategy towards its commitment to diversity and inclusion with suppliers.

Address unconscious bias discrimination, inequality or exclusion in the workplace.

- **Annual reporting** - use HR data to annually monitor progression, retention and attrition of BAME employees at all levels of the business. Ensure that data is seen by the Board Level sponsor.

Additional recommendations

The following recommendation do not form part of the Investing in Ethnicity Matrix but are additional recommendations being made as part of this document.

- **Board level sponsorship** - to underpin the recommendations in this report, this paper also recommends that Board-level sponsor take responsibility for delivery of the recommendations in this [report]. Whilst the BAME Network has **S. 40(2)** as a Senior Sponsor to provide support to the BAME Network and champion its activities, Board level accountability for this report's actions is required to ensure cross-directorate collaboration and success outcomes.
- **Independent channel for employees to raise any issues**– empower colleagues to raise issues of bullying, harassment and racial discrimination through an independent channel with an aim to reach an resolution.
- **Independent race and ethnicity professional** – to put in place a dedicated professional framework required to carry out the recommendations of this paper and to put in place commensurate KPIs against which to measure the Agency's progress with BAME network executive involvement throughout.
- **Expert advice**- work with the BAME Network and third sector organisations to develop a simple guide to discuss race in the workplace on an ongoing basis
- **BAME network support** – the provision of a development programme for those involved in the management of the BAME Network. This can be part of a wider programme to support all those in staff network leadership positions.
- **Outreach and collaboration with BAME industry bodies and professionals** – there are professionals and bodies in the housing industry which have long since championed diversity in the sector and are rich resource for providing knowledge and tools to help the Agency achieve its aims.

- **Support for BAME Housing Associations and Registered Providers** – which will focus the impact of our interventions in this space and ensure that organisations, the objectives of which already align with BAME communities get the assistance they need.
- **Independent research on Placemaking** - professional research into this area of place making and how Homes England can intervene to tackle racial housing inequality which can then inform recommendations to MHCLG. As a part of our evaluation an impact study we can dovetail this piece of research.
- **Strategic Action Plan as a recruitment tool** – whilst we improve BAME representation at higher levels of the organisation and to relieve pressure existing BAME members of staff might feel being asked to participate in recruitment activities, this document can be used as a recruitment tool to highlight the Agency's commitment to long terms change in this area.

What does success look like in each delivery year

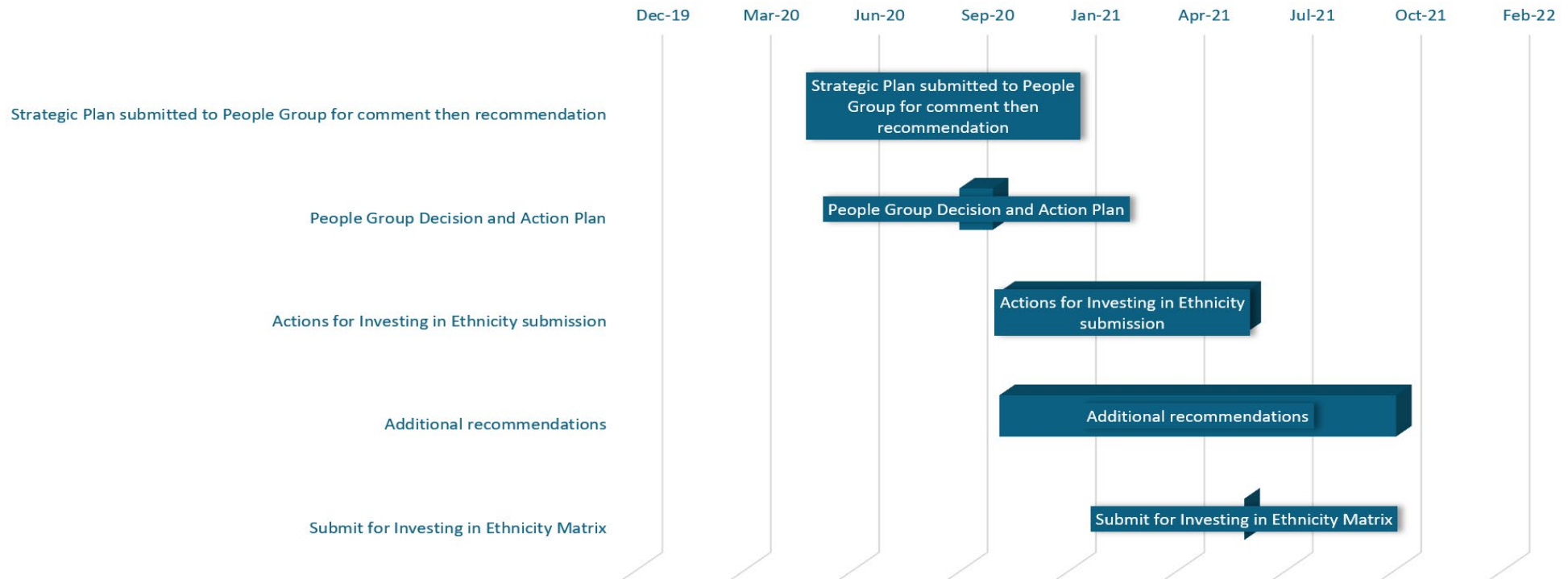
As previously stated, in approving the recommendation in this [plan] Homes England will take meaningful steps towards creating the environment envisaged by the Homes England Way and the Diversity and Inclusion report. This plan ensures that the ethnicity lens of Homes England's commitments in the Diversity and Inclusion report are progressed in a meaningful manner to which the Agency can be held to account. Attaining Investing in Ethnicity Matrix Advanced Employer also allows to set a true example to the industry whilst embedding behaviours into our culture.

The recommendations in this document are submitted for People Group's review and ratification. It is envisaged that, in response to this document, the members of people group will have up to a month to provide ratification in the form of an action plan which is fully integrated into the Agency's D&I activities and will meet the suggested timelines for completion. The recommendations along with overall ownership of ensuring the completion of those actions to sit with People's Group. If ratification of any of the recommendations in this paper is not possible, then written confirmation with justifications are required in response.

The BAME Network will be fully engaged as consultants and, where possible actively implement the actions required to make these recommendations a reality. It is, however, not up to the Staff Networks nor ethnic monitories to drive this change. If this is an issue that is truly of importance to the Agency, Homes England and those in senior positions have to be the ones to drive Change For Real.

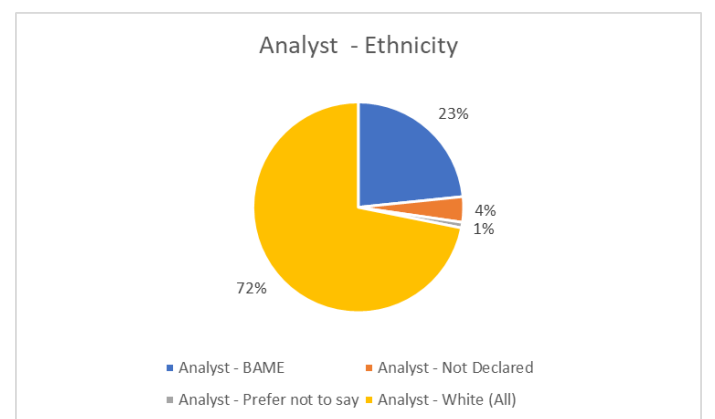
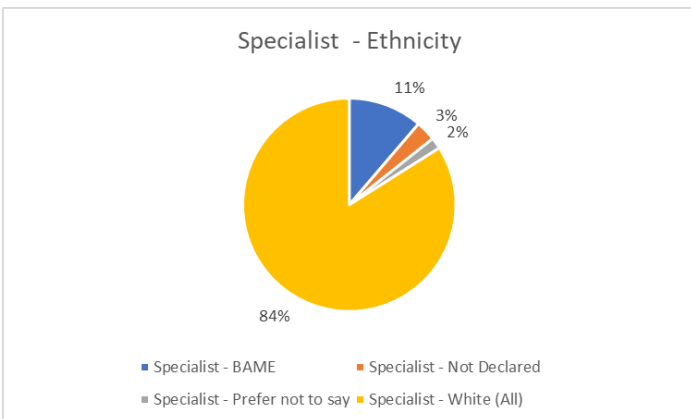
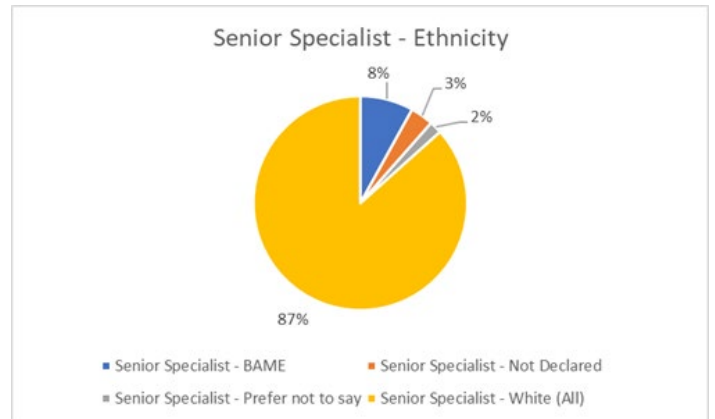
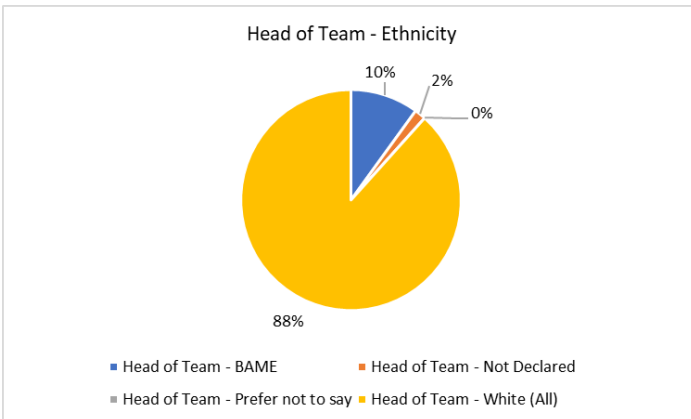
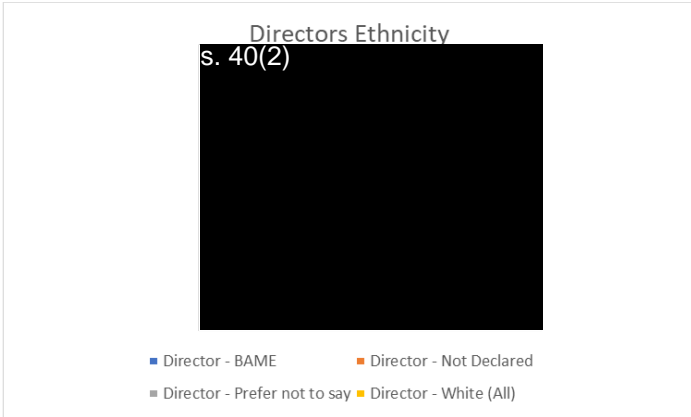
Below is an outline of the recommended timeframes.

<u>Action</u>	<u>Date</u>
Collate feedback, suggestions for improvement both from People Group and wider membership	July – Sept 2020
Strategic Plan submitted to People Group for comment then recommendation	Sept 2020
People Group Decision and Action Plan	Oct 2020
Actions for Investing in Ethnicity Matrix (submission by June 2021)	Oct 2020- May 2021
Additional recommendations	Oct 2020- Oct 2021
Investing in the Ethnicity Matrix - Accreditation	Sept 2021



Appendices

APPENDIX A - Ethnicity break down by role:



APPENDIX B – Change for Real Example Action plan:

This action plan is for illustrative purposes only and notes a only a sample of actions as contained in the Investing in Ethnicity Matrix (IEM). It is not a definitive list of actions that meet the requirements of level 3 of the IEM.

REF	Recommendations	Action	Owner	Target Date	Status
A. Tackle underrepresentation of BAME colleagues in Senior Leadership					
A1	Reverse mentoring - senior leaders and executive board members engage with individuals from different ethnic backgrounds in more junior roles to provide guidance and advises to career progression and be mentored in Ethnicity and Race matters as reciprocal relationship. This will help them understand the progression barriers faced and the positive impact of diversity can have.	<p>Action for reverse mentoring to be in place for all leadership objectives. Pilot to be launched.</p> <p>Initial actions</p> <ul style="list-style-type: none"> i. define who is a Senior leader and exec team ii. develop a briefing note that explains concept iii. identify who will be mentee's and mentor <p>Initial actions to be completed by Christmas 2020</p> <p>Homes England to take forward with the BAME network working with HR to help generate interest and volunteers.</p> <p>Aim is to have pilot scheme running from January 2021 using BAME Net colleagues, with wider roll out thereafter</p>	Homes England HR S.	January 2021	
A2	Annual reporting - ensure that your HR systems are capturing data on ethnicity, which is then used to analyse BAME representation at all levels within annual reports and to align to [this strategy]. The Agency is currently lacking in this capability and should be improved as a matter of urgency. The executive team should reference what steps they are taking to	<p>An Application tracking system is being considered to monitor applications (including ethnicity data)</p> <p>Focus effort to get all teams to update characteristics data on current HR systems. This will provide a baseline.</p>	Homes England HR S.	Tbc Ongoing tbc	

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	improve BAME representation and progression within their annual report.	<p>A report will be provided to the Executive and Board on a quarterly basis to track progress</p> <p>An ethnicity pay gap report will be produce in 2021</p>		tbc tbc	
A3	Annual senior training - ensure that executive and senior teams have mandatory BAME inclusion training as a stand-alone programme that is beyond currently available unconscious bias training.	<p>Training on D&I is a standard part of the current programme of training for executives.</p> <p>S. and S. to discuss with S. (HR Director) how this can be expended out to the wider leadership team.</p> <p>Compare proficiency of current unconscious bias training programme with similar programmes</p> <p>Practical support and guidance to address micro aggression</p>	s. 40(2)	Ongoing	
A4	KPIs - The KPIs included should be measurable objectives that align to wider inclusion objectives and be assessed annually. KPIs should be tied to the data for each department to ensure that BAME employees are given the same access to career progression and programmes, and that recruitment of appointments are chosen fairly from a diverse talent pool.	<p>Initial action to carry out a desk-top review of KPI's – gap analysis to determine what information we have and what information we need (may need external resource to do this)</p> <p>S. to explore options with the aim to ensure D&I/ethnicity is explicit in evidence gathering</p>	S.	Ongoing	
A5	3rd party recruitment - actively ensure a diverse long and short list from head-hunters and recruitment agencies for all senior recruitment positions. When recruiting through third parties, reject lists that are neither reflective nor representative of the ethnic origin of the local working age population.	<p>Workshop with networks to determine what is needed and what works well. This will lead to an action plan to improve how we recruit through third parties.</p> <p>Questions to be considered How often do we use 3rd party recruiters?</p>	s. 40(2)		

		<p>What guidance do we provide them on our expectations on D&I/Ethnicity consideration? What messaging is given to the supply chain on out D&I/ethnicity expectations?</p> <p>S. to ensure our expectations and commitments are considered in vacancy ads and panels (with s. 40(2))</p> <p>S. to discuss process of blind CV's and logic in use with s. 40(2)</p>			
A6	Diverse interview panels - ensure BAME representation on recruitment panels for all roles (especially senior roles) by having an interview panel register from which interviewers are chosen and ensure inclusion related questions are posed during the interviews.	<p>Improving panels make up – work in progress led by s. 40(2) and S. in HR.</p> <p>S. and s. 40(2) to provide update on progress</p>	S. & HR		
A7	Recruitment advertising and summer programmes - actively promote early career and current job opportunities to BAME communities and a broader range of educational institutions e.g.. through job fairs, demographic-specific advertising to nurture an interest in housing from an early age and to broaden the pool of talent available for selection. This may include outreach into educational establishments encouraging those from disadvantaged backgrounds.	Tied into A5 and A6	S. & HR		
A8	Have meaningful interview questions that test a candidate's commitment/track record to diversity/inclusion and working with BAME staff in a constructive professional manner	Tied into A5, A6 and A7	S. & HR		
<p>B. Nurture and support the talent through career progression of BAME colleagues and address any ethnicity pay gap.</p>					

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B1	Development programmes - identify top BAME talent at middle and senior levels and place them on career or talent programmes developed for those that want to progress in the Agency.	<p>This will link to B2, People group to discuss the robustness and organisational approach to nurturing talent. S. to lead and to ensure there is consideration given BAME and D&I objectives</p> <p>Identify best practice:</p> <p>From other organisations or civil service for similar BAME development plans for implementation</p> <p>From LGBT and Stonewall that enables the network/agency to become an attractive employer</p>	S. and People Group		
B2	Recruitment - ensure succession planning is fair and monitor BAME and other groups inclusion in career progression plans to enhance and maximise talent pipeline.	As B1	S. and People Group		
B3	BAME role models - build a pool of talented BAME role models at senior levels. Visibility of role models is key factor in impacting the extent to which BAME staff feel Homes England leadership is developing BAME talent.	Embed visible BAME role models in the evolving Talent and Succession delivery plans.	HR		
B4	Clear route of progression - produce detailed and transparent guidelines with information on how Homes England's career progression works, including pay, promotions and rewards. This should be available to all staff including new entrants.	<p>Career Builder concept to be considered and worked up – Develop a tool that provides access to information that demonstrate the pathway to different positions (e.g. qualifications needed, skills required, training that's available, funding available for training etc) – Link in to succession planning, personal development and use KPI to track.</p> <p>Main stream consideration for Homes England . To be raised at People group as part of pay and grading considerations by S. and HR</p>	S.		

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B5	BAME Mentoring scheme: develop and implement mentoring scheme where BAME staff are matched with mentor to acquire/ gain soft and technical skills for career progression, and in reciprocal be mentored in Ethnicity and Race matters	L&OD currently developing a mentoring scheme	L&OD (with S.)		
C. Create an inclusive culture through our ways of working both internally for our BAME colleagues, and the wider BAME communities that we serve.					
C1	Annual training sessions – all staff at Homes England should be equipped with the tools they need to live the Diversity value, especially as it pertains to ethnicity and race. Any annual training programme for all colleagues should be aligned to that which is delivered to the Senior Leadership Team.	This is part of the current review of D&I training that is available and forms part of the objectives for Corp Resources function (s. 40(2) and s. 40(2)) L&D need to drive forward training on a mandatory basis annually for all staff Link to A3	HR and L&OD		
C2	Financial budget for the BAME Network – there are various actions under the matrix which can be undertaken by the BAME Network with the express support of Homes England. Support includes a ringfenced budget for Network. Activities include inclusive events throughout the year, professional development events targeted at BAME employees, collaboration with external BAME networks [(e.g. MHCLG and CBRE)].	Budgets are currently in place with D&I oversight. S. to provide a breakdown to networks of what is available to promote understanding of how much there is and what it can be used for to all network leads.	S.		
C3	Annual communication strategy - set an annual comms strategy for communications about BAME news every quarter in collaboration with and to be delivered by the BAME Network.	Comms strategy currently with BAME Network Exec team. To be progressed	BAME Exec		
C4	BAME Recruitment KPIs - set recruitment targets to ensure the percentage of BAME professionals on talent programmes is reflective of BAME representation within the local working population.	As per A5 A6, A7 above			

C5	Supply Chain Diversity Strategy - ensure that your supply chain has a strategy towards its commitment to diversity and inclusion with suppliers.	As per A5 above			
C6	Independent channel for employees to raise any issues	People group to consider alternative options including an independent organisation act as a critical friend.			
D. Address unconscious bias discrimination, inequality or exclusion in the workplace.					
D1	Annual reporting - use HR data to annually monitor progression, retention and attrition of BAME employees at all levels of the business. Ensure that data is seen by the Board Level sponsor.	Links to A2, A4, B3, B4 above			
E. [Additional] recommendations					
E1	Board level sponsorship - to underpin the recommendations in this report, this paper also recommends that Board-level sponsor take responsibility for delivery of the recommendations in this [report]. Whilst the BAME Network has s. 40(2) as a Senior Sponsor to provide support to the BAME Network and champion its activities, it is important to have higher level accountability for the actions to be undertaken by this report, which will require cross-directorate collaboration.	s. 40(2) to be approached to have direct involvement in the BAME network to help guide and shape the conversation around BAME issues – s. also to chat to s. re above	s. 40(2) and BAME execs s.		
E2	Independent channel for employees to raise any issues	People group to consider alternative options including an independent organisation act as a critical friend.	Tbc		
E3	Independent race and ethnicity professional – to put in place a dedicated professional to put in place the framework required to carry out the recommendations of this paper and to put	This is to be reviewed as implementation of actions progresses. May need to be a combination of consultancy support and internal expertise tapping into the work that’s ongoing	Tbc		

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	in place commensurate KPIs against which to measure the Agency's progress with BAME network executive involvement throughout.	and focusing this on BAME needs and delivery of this strategy If there is a need for an external involvement to progress this may be re-visiting if progress isn't being made. On hold			
E4	Expert advice- work with the BAME Network and third sector organisations to develop and simple guide to discuss race in the workplace on an ongoing basis	Similar to E2 – S. acts as a conduit to getting the right expert advice with recourse to external expertise as and when there is a need for particular focus. On hold	Tbc		
E5	BAME network support – the provision of a development programme for those involved in the management of the BAME Network. This can be part of a wider programme to support all those in staff network leadership positions.	Need support in how to use network effectively. Consideration need to be given to taking network activities to the next level to take the organisation forward. Where do organisation responsibility start and end and where do networks responsibility start and stop . Conversation Action - Conversation with S. and S. to discuss role of networks generally S. to consider matter and way forward with network leads	Tbc		
E6	Outreach and collaboration with BAME industry bodies and professionals – there are professionals and bodies in the housing industry which have long since championed diversity in the sector and are rich resource for providing knowledge and tools to help the Agency achieve its aims.	Engagement between the agency and wider industry to show we are actively collaborating with others on matters of RACE and inclusion. Action is for the wider BAME network to help promote with input from comms. Comms input is needed to help promote this – Conversation with BAME net/S. and Comms to determine approach and actions to help promote and deliver.	Tbc		

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E7	Support for BAME Housing Associations and Registered Providers – Independent research on Placemaking - professional research into this area of place making and how Homes England can intervene to tackle racial housing inequality which can then inform recommendations to MHCLG	All to consider the role of the networks and how we develop an identity that is coherent and works with the wider organisational branding so that network comms align with branding and tone of agency. BAME Execs, S. [REDACTED] and Network leads to discuss	Tbc		

APPENDIX C – Investing in Ethnicity Maturity Matrix

[enc.]

APPENDIX D : Extract taken from Structurally Unsound Report produced by The Resolution Foundation

Figure 1 Families in which one or more adults is BAME spend the highest proportion of their incomes on housing costs

Housing-cost-to-income ratios (net of housing benefit), by disability status and ethnicity of adults in family: 2015–17, UK

Notes

Disability refers to Equality Act 2010 definitions. BAME includes all non-white groups including mixed.

Source

Resolution Foundation analysis of DWP, Family Resources Survey 2015–17.

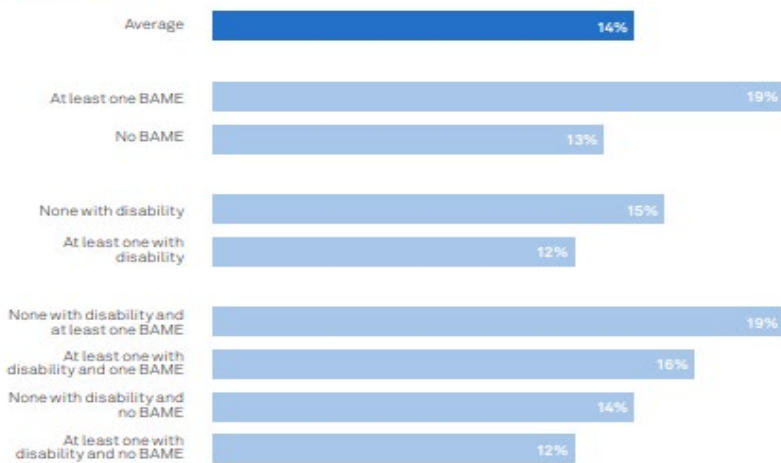
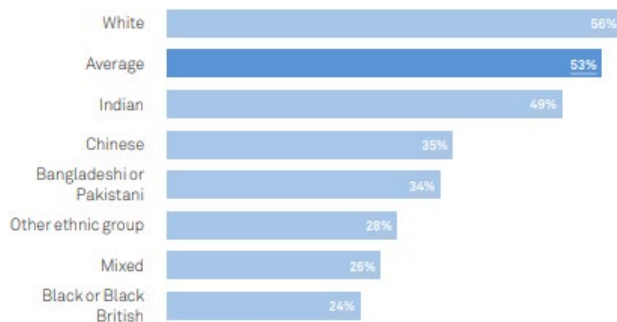


Figure 1 also shows that the proportion of income spent on housing-related costs is lower for families in which one adult has a disability than the UK average (at 12 per cent, compared with 14 per cent). This is largely driven by higher housing benefit payments for those with disabilities. However, the HCIR measure fails to account for the additional costs associated with having a disability. Disabled people face a large

Furthermore, Figure 2 shows homeownership rates are much lower than the UK average for all ethnic minority groups. In particular, the homeownership rate for black families (at 24 per cent) is less than half the UK average (53 per cent) and the rate for white families (56 per cent). The homeownership rate is also particularly low for Bangladeshi and Pakistani and Chinese groups at 34 per cent and 35 per cent respectively.

Figure 2 Black families are less than half as likely as white families to be home owners
Homeownership rates, by ethnicity of head of family: 2015–17, UK



Source
Resolution Foundation analysis of ONS Labour Force Survey 2018.

Prior family wealth also drives housing inequalities. At age 30, those without parental property wealth are approximately 60 per cent less likely to be homeowners than people whose parents are homeowners.¹⁷⁶ The long-term outcome of this is that wealth has become concentrated in the hands of those with a family history of property ownership, making it increasingly harder for those without to become homeowners.

Source: <https://www.ucl.ac.uk/grand-challenges/sites/grand-challenges/files/structurally-unsound-report.pdf>

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