



Regulator of
Social Housing

Equality information report and ethnicity pay gap report

31 March 2019 – 31 March 2020

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OFFICIAL

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1. Introduction

The Regulator of Social Housing (RSH) as a public body with at least 150 employees, is required to publish relevant, proportionate equality information to demonstrate compliance with the Equality Duty and to promote transparency and accountability for our equality performance.

The information contained within this report has been compiled to comply with the specific duty to publish and demonstrates due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relationships between people who share a protected characteristic and those who do not.

It covers:

- our staff, including equality and diversity data about our staff; and
- those affected by our policies and procedures.

This information within this report covers the year ending 31 March 2020. In preparing this report we have been mindful of the published guidance from the Equalities and Human Rights Commission¹. Whilst we wish to be as transparent as we can on these matters, as a relatively small organisation with just over 150 employees, there are a number of areas where we cannot publish our diversity information to ensure we preserve the anonymity of staff.

In this report, in addition to the information relevant to our specific duty to publish, we have also chosen to publish findings of review of our Ethnicity pay gap at 31 March 2020. These findings are published on a purely voluntary basis as we believe it is best practice and transparent to fully support the regulations regarding equal pay across the public sector.

This information is presented in a similar format to that for Gender pay gap reporting.

¹ <https://www.equalityhumanrights.com/en/advice-and-guidance>

2. Our staff

One of RSH's core values is that "We embrace diversity and seek to be an inclusive and supportive organisation".

RSH has a Positive Working Group made up of staff from all levels and areas of the organisation, which has a purpose to inspire and support a culture at RSH that respects diversity, inclusivity and staff wellbeing and promotes supportive behaviours.

2.1 Diversity profile

The data overleaf summarises our workforce diversity profile as at 31 March 2020 with comparative data for 2019² using data extracted from our Human Resources (HR) management system. It is based on the total headcount at 31 March 2020 of 161 (2019 – 152).

In some cases, staff have either not completed the relevant sections or have declined to provide the data, referenced above as 'Declined to respond/ un-declared'. We take diversity monitoring seriously and continue to encourage staff to update their information to ensure that our analysis remains relevant.

In October 2020 we introduced an online application system which will make collection and analysis of equality data at application stage more effective.

² 2019 data was originally published on 30 March 2019. Figures presented have been updated to correct minor errors in 2019 data subsequently identified.

RSH diversity profile as at 31 March 2020

Characteristic	Percentage of staff		Change
	Mar-20	Mar-19	
Ethnicity			
BAME (Black and minority ethnic)	16%	16%	0%
Non-BAME	83%	82%	1%
Declined to respond/ un-declared	2%	2%	0%
Gender			
Male	37%	38%	-1%
Female	63%	62%	1%
Sexual orientation			
Lesbian, gay, bisexual (LGB)	7%	7%	0%
Heterosexual	78%	76%	2%
Declined to respond/ un-declared	15%	18%	-3%
Working pattern			
Full time	95%	93%	2%
Part time	5%	7%	-2%
Age			
55-64	24%	20%	4%
45-54	35%	39%	-4%
35-44	25%	27%	-2%
25-34	14%	13%	1%
Under 25	1%	1%	0%
Disability			
Declared disabled	8%	9%	-1%
Declared non-disabled	43%	38%	5%
Declined to respond/ un-declared	48%	53%	-5%

2.2 Recruitment

We encourage applications from a diverse range of candidates and carry out blind shortlisting, as well as mandating unconscious bias training for interviewers. We also encourage applicants to request reasonable adjustments where necessary. Additional actions which are being taken to support diversity in recruitment, particularly in senior levels of the organisation are discussed further below.

2.3 People strategy

We have in place a People strategy which aims to ensure that RSH is able to attract, develop and retain the best staff who will continue to do our valuable work in effectively regulating the social housing sector.

The strategy helps to:

- ensure that we have the capacity, capability and flexibility to deliver our business strategy in a changing environment
- embrace our core values as an effective regulator and reinforce the culture we want to work in
- ensure we have a fair, transparent and appropriate recognition and reward framework
- engage with staff in a collaborative and iterative way to improve the way we work together
- demonstrate excellence in leadership and management in the ways which we work.

The themes of equality and wellbeing run across all workstreams under the People Strategy.

2.4 Employee engagement

In June 2019, we completed our first staff survey as a standalone organisation. Our results were strong with ratings at or above the relevant public sector and Civil Service benchmarks. The survey has helped us to identify some areas where we would like to improve our performance and we commissioned follow up work to help us better understand these. We continue to work with our staff to implement actions coming out of this work, including seeking to improve our diversity at senior level. This is discussed further in relation to our Ethnicity pay gap.

3. Equality for those affected by our policies and practices

This section details how we meet our duty to those who are affected by our policies and practices, or who engage with us in relation to the exercise of our regulatory function.

The following sections provide a narrative summary of our approach to ensuring we have due regard to the aims of the duty in decision-making with regard to registration decisions; equality impact assessments on statutory consultations; the consumer regulation panel; and decisions made by the Regulation Executive Group and Board.

3.1 Registration decisions

There are two stages to RSH's application process for registering an organisation as a registered provider; during the second (detailed) application stage, applicants are asked to provide assurance on their compliance with the Equality Act 2010.

In particular, RSH asks whether applicants have any, or intend to have any, restrictions of services in place regarding persons sharing a relevant protected characteristic. Where RSH establishes that such restrictions are in place, or will be put in place, it asks the applicant for specific assurance on how it has satisfied itself that it is acting lawfully under the current equality legislation.

3.2 Consultations

As a public body, we are required to consult on any proposed changes to our regulatory approach. As part of the consultation process, we ensure that we consider our duties under the Equality Act 2010.

Equalities requirements are considered at relevant stages of the drafting process when we are developing new regulatory standards and approaches. Where issues are identified, these are specifically set out in reports to both the Regulation Executive group and the Board, to enable appropriate consideration at relevant stages of the decision-making process.

As part of the consultation we normally include a specific question to respondents on their agreement with and understanding of the equalities analysis we have undertaken, and we invite comment and recommendations for further consideration should it be felt we have missed anything relevant of note.

Following the end of the formal consultation period we analyse the feedback on our equality analysis and where appropriate to do so, propose revisions in light of the feedback. We then report the results of the consultation to our Executive group and Board and specifically highlight any feedback we receive with equalities implications. Following approval, we formally report the results of the consultation publicly via a Decision Statement which both explores the feedback we received on the equality analysis but also includes the updated analysis. Where appropriate, and based on feedback, we may make reasonable adjustments in relation to the issue under consultation.

3.3 Consumer regulation

RSH has due regard to its equality duties in carrying out its consumer regulation work and will seek to make reasonable adjustments for individuals contacting RSH where appropriate. For example: providing correspondence in large print, taking details of complaints over the telephone (where an individual has difficulty with written forms of communication), and arranging translations of key documents and our correspondence (e.g. into Braille).

Where we receive individual referrals that suggest a registered provider may not have taken tenants' needs into account (in respect of a protected characteristic), we have due regard to our equality duties through our consumer regulation processes.

Where appropriate, we signpost the individual to services who may be able to assist, including the Equalities & Human Rights Commission and the Housing Ombudsman Service.

3.4 Regulation Executive Group and Board decisions

The Regulation Executive Group and Board consider operational and strategic matters brought before them through the submission of formal papers. The Executive Group and Board each have members specifically charged to challenge the equality and diversity impact of organisational decisions. Both Executive and Board papers include a section on equality and diversity implications, within which the author should demonstrate how RSH has given due regard to the Equality Duty in the consideration of proposals. This enables appropriate consideration at the relevant stages of the decision-making process. We have developed guidance and training for staff to help them integrate thinking on equality and diversity into the development of policies and operational delivery.

4. Ethnicity pay gap

There is no statutory requirement for any organisation to report their Ethnicity pay gap, but we believe that it is best practice to be open and transparent to fully support RSH’s approach in ensuring that we offer a diverse and inclusive workplace for all staff, present and future. As there is no defined format for an Ethnicity pay gap report, currently, we have chosen to adopt a common approach to that prescribed for presenting the Gender pay gap.

The Ethnicity pay gap is measured in terms of the differential between the mean and median average hourly pay received by White and BAME staff. It is not a measure of pay equality for equivalent roles.

4.1 Ethnicity pay gap analysis

Our figures as at 31 March 2020 will set a benchmark against which we can measure future performance. The comparison of mean and median pay in RSH ethnicity shows a gap in favour of White staff.

	31 March 2020
Mean pay gap ³	20.28%
Median pay gap ⁴	16.8%

These pay gaps are representative of the demographic profile of the organisation at different pay levels as shown in the proportion of White and BAME employees at RSH in each pay quartile:

Pay quartile	White %	BAME %
Top quartile	97.5%	2.5%
Upper middle quartile	82.1%	17.9%
Lower middle quartile	80.0%	20.0%
Bottom quartile	77.5%	22.5%
Total	84.3%	15.7%

³ mean is the average in the data set

⁴ median is the middle number in the data set

4.2 Action plan

BAME staff make up 15.7% of the overall workforce but only 2.5% of the top quartile of staff pay. This lower representation in the upper quartile results in lower mean and median pay and a pay gap in favour of White staff. It is therefore necessary to look at staff recruitment and retention in seeking to address the gap.

RSH is fully committed to the principles of equality, diversity and equal treatment for all its employees, regardless of gender or any other protected characteristic. We offer a very flexible employment package with the opportunity to work full or part time, and flexibility on work locations. We will also consider variations in working patterns where practicable. We believe this assists equality and opportunity, but we continue to look to identify and address, where possible, any further barriers to recruitment or progression.

We have a number of actions in progress which will help to support increased diversity in recruitment, particularly at senior levels. A consequence of success in recruitment at senior levels will be a reduction in the Ethnicity pay gap. We are engaging with other organisations to understand how others have sought to address similar issues. We also advertise on networks and websites which may be of interest as potential sources of applicants. We continue to use blind shortlisting and use mixed gender panels for interviews wherever possible.

With management support, our staff have established a BAME network where staff will be able to contribute insight and make recommendations to attract and retain BAME candidates particularly at senior manager level and above.

We are also committed to positive action in our recruitment, ensuring that BAME candidates make up at least 20% of all shortlists and adding candidates to achieve that level, where they pass the benchmark for job applications, if it is not achieved, or exceeded, via the initial sift.



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RSH regulates private registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver homes that meet a range of needs.