



# Homes England

Date: 29 September 2023

Our Ref: RFI4469

Tel: 0300 1234 500

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

[REDACTED]  
By Email Only

Dear [REDACTED]

## **RE: Request for Information – RFI4469**

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA).

You requested the following information:

**I am writing to you under the FOIA to request a copy of the full National Equality Standard report produced by Ernst & Young for Homes England.**

**I would also like a copy of the summarised report also produced by Ernst & Young for Homes England together with all correspondence within HR including emails and teams messages where a decision was made to withhold the full report from JNCC and have [REDACTED] encourage JNCC to withdraw their previous FOIA request.**

## **Response**

We can confirm that we do hold the requested information which we have enclosed within Annex A which is attached to this response.

We rely on Section 40(2) of the FOIA to withhold some of the information from disclosure.

## **Section 40 – Personal information**

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





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To disclose personal data, such as names, contact details, addresses, email addresses 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>

## **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](mailto:infogov@homesengland.gov.uk)

Information Governance Team  
Homes England  
Windsor House  
6<sup>th</sup> Floor  
42-50 Victoria Street  
London  
SW1H 0TL  
United Kingdom

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.

6<sup>th</sup> Floor  
Windsor House  
42 - 50 Victoria Street, Westminster  
London, SW1H 0TL

0300 1234 500  
@HomesEngland  
[www.gov.uk/homes-england](http://www.gov.uk/homes-england)





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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/>

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



# National Equality Standard

## Homes England

Final Assessment Report 2022



Homes England



# In this report

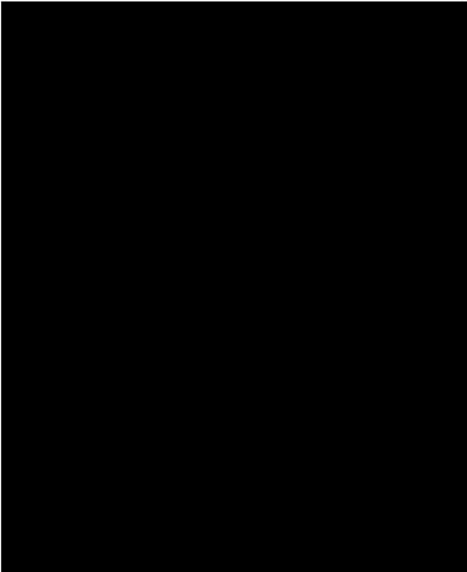
1.	Foreword	2
2.	Methodology	4
3.	Summary of results	6
4.	Key outcomes	14
5.	Detailed recommendations	17
6.	Assessment	44
7.	Appendix	52

## Assessing organisation

Ernst & Young LLP  
1 More London Place  
London  
United Kingdom  
SE1 2AF

NES is a registered trademark of Ernst & Young LLP.  
This is a confidential document. You are prohibited from sharing the content of this document with any third party without the explicit consent of the EY NES CEO.



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We are delighted to be assisting Homes England with its National Equality Standard accreditation. To date, EY has supported c.300 cross-sector clients with their Equality, Diversity and Inclusion (ED&I) programmes. In light of recent events, and a heightened global awareness of the importance of diversity, it is important for organisations to continue driving change. COVID-19 has accelerated progress towards more agile workplace cultures. Future-focused organisations should harness this increased awareness and improved agility to foster long-term sustainable inclusion.

It was noticeable that Homes England has put significant effort into defining its ED&I activities and that this is having a positive impact on the organisation. It is encouraging to see an increased focus on mental health and wellbeing, the organisational efforts in promoting and ensuring fair and equitable pay and the energy and enthusiasm of the employee network groups.

Notwithstanding the successes to date, there is some room for improvement, and we are sure that the recommendations outlined in this report will help Homes England progress to the next stage in its ED&I evolution.

Our methodology incorporated a robust review of documentation and a broad set of interviews and consultations. Thank you to [REDACTED] and [REDACTED] for all the support and engagement with us and to all who have contributed to this immensely important piece of work.



The National Equality Standard (NES) assessment for Homes England took place between November 2021 and February 2022 and consists of five key stages.

Stage 1: Evidence review	Stage 2: SME interviews	Stage 3: Interim report	Stage 4: Focus groups and leadership interviews	Stage 5: Final report and presentation
<ul style="list-style-type: none"> <li>An evidence-building HR workshop focused on identifying key documents and materials in support of the assessment</li> <li>A detailed review of all documentation that was discussed within the workshop</li> </ul>	<ul style="list-style-type: none"> <li>Evidence-clarification conversations with 10 subject matter experts to contextualise the submitted documents and provide further clarification on processes and practices</li> </ul>	<ul style="list-style-type: none"> <li>An interim view of the organisational results against the 35 competency criteria based on the documentary review, interviews and focus groups</li> <li>Further documentary evidence was requested for any competencies where more content was required</li> </ul>	<ul style="list-style-type: none"> <li>Overall, we led 25 hours of employee focus groups and leadership interviews</li> <li>Interviews with leaders within your business, including Peter Denton, Harry Swales and Isabella Freeman</li> <li>The purpose of these focus groups and interviews was to:               <ul style="list-style-type: none"> <li>Validate the evidence reviewed during stage one</li> <li>Explore perceptions of Homes England's ED&amp;I initiatives more broadly</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The final report outlines our findings and associated recommendations against the 35 NES competencies based on all of the information gathered through stages one, two, three and four</li> <li>Discussion of results and recommendations with Homes England's senior leadership and the NES team</li> </ul>



**200+**

Pieces of supporting documentation reviewed



**50+**

Employees participated in interviews and focus groups

**12+**

Leadership interviews





### Overview

Homes England engaged EY to conduct a National Equality Standard (NES) assessment. The NES is the leading practice framework designed to assess an organisation's proficiency in respect of:

- All areas of diversity as defined by the Equality Act 2010, alongside social mobility
- Broader regulatory requirements such as the FRC Governance Code.

Homes England's policies and practices relating to ED&I have been assessed against the 35 competencies contained within the NES framework.

The pages overleaf outline Homes England's performance against the 35 competencies individually, as benchmarked against the NES client average and as mapped on a maturity model. We also reviewed Homes England's initiatives against the nine protected characteristics under the Equality Act 2010.

We would like to thank **s. 40(2)** and the wider team for their commitment, drive and coordination of all activities throughout the NES assessment.

Our findings represent a snapshot in time, between November 2021 and February 2022, focused on Homes England operations and activities of the public body that may have progressed since the assessment was conducted.

### Headline results

Homes England has not achieved NES certification. However, its NES results provide a solid platform on which to submit for reassessment.

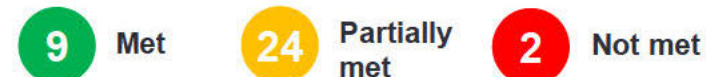
#### Overall scoring criteria

Criteria for NES certification	Result
Minimum 3 out of 5 competencies met in each of the 7 pillars	1/7
Minimum 25 competencies graded 'Met'	9
No competencies graded 'Not met'	2

#### To achieve certification requires:

1. A minimum of 25 (70%) of the NES's 35 competencies to be graded 'Met'
2. A minimum of 3/5 competencies to be graded 'Met' in each of the 7 areas that the NES's competencies are divided into
3. 0 competencies to be graded 'Not met'

#### Scoring against 35 competencies



### Overall scoring criteria

Minimum 3 out of 5 competencies met in each of the 7 standards

Minimum 25 competencies in total

No competencies 'Not met'

Each of the 35 competencies will be graded 'Met', 'Partially met' or 'Not met.'

#### Not met

Your organisation presented no documentary or qualitative evidence to demonstrate compliance with this competency.

#### Partially met

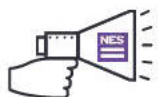
Your organisation presented partial evidence, but there are some significant gaps. The gaps could include (but are not not exclusively limited to):

- Parts of your organisation which are currently not meeting the competencies
- Areas where the quality of the evidence is weak, inconsistent or incomplete
- Areas that have only just begun to be addressed and are subject to significant further development
- Areas where interviews were unable to substantiate documentary evidence presented.

#### Met

Your organisation presented a variety of good quality evidence that demonstrates that you are fully compliant with this competency.

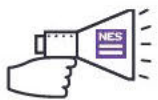
The evidence presented is consistent throughout and embedded in the culture of the organisation.



Homes England results against each of the 35 competencies within the NES framework:

1 Core components EDI	2 Your talent	3 Your business	4 Your personnel	5 Your leadership	6 Your relationships	7 Review and measurement
● 1.1 Culture	● 2.1 Talent attraction	● 3.1 Strategy	● 4.1 Feedback mechanism	● 5.1 Commitment & accountability	● 6.1 External relationships & CSR	● 7.1 Pay gap
● 1.2 Policies & practices	● 2.2 Recruitment & onboarding	● 3.2 Bias	● 4.2 Mental health & wellbeing	● 5.2 Visibility & messaging	● 6.2 Supplier relationships	● 7.2 Data analysis
● 1.3 Engagement survey	● 2.3 Appraisal & performance monitoring	● 3.3 Business case	● 4.3 Flexible working	● 5.3 Inclusive leadership	● 6.3 Customer insight	● 7.3 Action planning & implementation
● 1.4 Targeted training	● 2.4 Career progression	● 3.4 Governance	● 4.4 Adjustments & accessibility	● 5.4 Senior level scrutiny	● 6.4 Industry insight & regulations	● 7.4 Review
● 1.5 Communications	● 2.5 Learning & development	● 3.5 Setting priorities	● 4.5 Caring responsibilities	● 5.5 Middle management	● 6.5 Human rights & modern slavery	● 7.5 Measuring impact
1/5 X	1/5 X	0/5 X	2/5 X	1/5 X	3/5 ✓	1/5 X

Key: ● Competency has been graded 'Met' ● Competency has been graded 'Partially met' ● Competency has been graded 'Not met'



The charts below show Homes England's NES results when benchmarked against all organisations that have undertaken an NES assessment. We use this benchmarking to highlight comparative areas of strength and weakness.

#### The 35 competencies

Comparative areas of strength

- Supplier relationships
- Visibility and messaging
- Pay gap
- Learning and development
- Industry insight and regulation
- Communications
- Feedback mechanism
- Customer insight

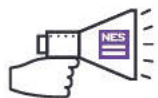
- Mental Health and wellbeing
- Data Analysis
- Measuring impact
- Bias
- Appraisal and performance monitoring
- Middle management
- Business case
- Action planning and implementation
- Commitment and accountability
- Senior level scrutiny
- Engagement survey
- Flexible working
- Culture
- Setting priorities
- Review
- Recruitment and onboarding
- Targeted training
- Governance
- Caring responsibilities
- Talent attraction
- Strategy
- Policies and practices
- Human Rights and modern slavery
- Adjustments and accessibility
- External relationships and CSR
- Career progression
- Inclusive leadership

Comparative areas for development

Cumulative NES scores within a quartile

Upper 135-175	Upper-middle 129-134
Lower-middle 119-128	Lower 95-118

Homes England



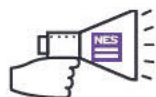
The chart below shows Homes England's overall result benchmarked against organisations in the UK government sector that have undertaken a National Equality Standard assessment.

Underlying each of the 35 competencies are five-point scoring criteria. These criteria range from one point (competency 'Not met') to 4 or 5 points (competency 'Met'). The maximum available score is 175, and Homes England has scored 110.



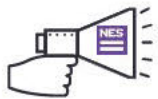
# Summary of results

## Findings against protected characteristics



The NES is a holistic assessment that seeks to ensure all legal regulations have been considered and the nine protected characteristics supported. This table indicates Homes England's activities against a summary of legal regulations and key activities that relate to each of the protected characteristics – plus social mobility, which is not currently protected under UK equality law. As part of this assessment, we have also compared the diversity representation of the Executive Leadership Team against the recommendations of the Hampton Alexander Review and the Parker Review. Although this is not a requirement for Homes England, it would be good practice to align with the ambitions of the reviews at executive level and, in particular, look at increasing gender and ethnicity representation at senior levels.

Protected characteristics under the Equality Act 2010	Age	Awareness events in D&I comms calendar [1.5]			
	Disability	Certified Disability Confident Employer [1.5]	Disability & Carers Network and Neurodiversity Network [4.1]	Workplace Adjustments Passport [5.5]	Awareness events in D&I comms calendar [1.5]
	Gender reassignment	Transitioning at Work policy and guidance [1.2]	Stonewall top 20 Trans Employer [1.5]	Build Together & Friends Network [4.1]	
	Marriage/ Civil Partnership	No evidence of non-compliance with the Equality Act 2010			
	Pregnancy and maternity	Statutory legislation met on maternity, paternity, shared parental and adoption policies [1.2, 4.5]	Emergency leave offered as part of maternity and adoption leave [1.2, 4.5]	Disability & Carers Network [4.1]	
	Race	Investing in Ethnicity Maturity Matrix - Level 2 [7.4]	BAME Network [4.1]	Proposed reverse mentoring between directors and BAME Network members [2.4]	Awareness events in D&I comms calendar [1.5]
	Religion and belief	Faith Network [4.1]	Awareness events in D&I comms calendar [1.5]		
	Sex	Gender pay gap reporting [7.1]	Awareness events in D&I comms calendar [1.5]	Menopause resources [1.4]	
	Sexual orientation	Stonewall's Top 100 LGBT+ Inclusive Employers [1.5] and Stonewall Workplace Index [7.4]	Build Together & Friends Network [4.1]	Participation in industry events and support for LGBTQ+ extra care housing scheme [6.3, 6.4]	Awareness events in D&I comms calendar [1.5]
Other	Social mobility	Collaboration with local housing associations [6.1]	Apprenticeships offered [2.1]	Graduate & Apprentice Network and Future Leaders Network [4.1]	Socio-economic group considered in Equality Impact Assessments [7.4]
	Culture	Organisational culture questions as part of the people survey [1.3]			



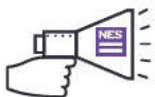
The NES D&I maturity model below demonstrates the assessor's analysis of Homes England's current maturity level. The model shows increasing levels of proficiency concerning the extent to which D&I culture is embedded within an organisation. The model may be used as a tool to identify an organisation's standing within the broader maturity spectrum and the stages that it will need to travel through to achieve and sustain a truly inclusive culture.

	Level 1	Level 2	Level 3	Level 4	Level 5
	We are compliant	We are all the same	We encourage everyone to be themselves	D&I is part of everything we do	D&I is who we are, not what we do
What issues are you tackling?	<ul style="list-style-type: none"> <li>Employees can be judgemental about cultural differences</li> <li>Our workforce is disillusioned</li> <li>We do not have the right D&amp;I data</li> </ul>	<ul style="list-style-type: none"> <li>We have a one size fits all approach</li> <li>We struggle to identify the gaps and set targets</li> <li>We do not know how to start the conversation</li> <li>We don't have leadership commitment</li> </ul>	<ul style="list-style-type: none"> <li>We know where the barriers to progression are</li> <li>We tend to focus on traditional interventions that do not tackle systemic barriers</li> <li>We have a strategy, but it is not followed through</li> </ul>	<ul style="list-style-type: none"> <li>We're very focused on D&amp;I, but it is not yet a part of our everyday culture</li> <li>We have clear accountability, but not everyone contributes</li> <li>We struggle to manage this against other priorities</li> </ul>	<ul style="list-style-type: none"> <li>We can articulate the ROI of our investment, and we want to do more to evidence non-financial value to a broad set of stakeholders</li> <li>We want to use our progress to influence others and drive broader societal change</li> </ul>
What is the organisation doing?	<ul style="list-style-type: none"> <li>Focusing policy on only regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>Collecting limited diversity data but not proactively analysing it</li> </ul>	<ul style="list-style-type: none"> <li>A strategy is in place with leadership commitment, but limited follow-through</li> <li>Interventions are in place but not always targeted</li> <li>Building awareness</li> <li>Limited metrics and tracking</li> <li>Network groups drive change</li> </ul>	<ul style="list-style-type: none"> <li>Leadership are accountable</li> <li>Can demonstrate progress against objectives</li> <li>Collect diversity data that shapes the approach</li> <li>The organisational case for ED&amp;I is part of strategic activities</li> </ul>	<ul style="list-style-type: none"> <li>Cultural evolution is core to organisational strategy</li> <li>Progress is evaluated, and lessons learned are fed back into every part of the business</li> <li>All employees are empowered to influence</li> <li>Dedicated budget</li> </ul>
What is the impact?	<ul style="list-style-type: none"> <li>High attrition, absenteeism</li> <li>Employees are cynical of leadership</li> </ul>	<ul style="list-style-type: none"> <li>'Don't ask, don't tell' culture stifles team spirit and creativity</li> <li>Employees are disengaged</li> </ul>	<ul style="list-style-type: none"> <li>Positive impact on productivity</li> <li>Employees feel valued, and teams perform well</li> </ul>	<ul style="list-style-type: none"> <li>Better engagement scores</li> <li>Senior management is more diverse</li> <li>Employees take responsibility for their career development</li> </ul>	<ul style="list-style-type: none"> <li>Improved organisational performance</li> <li>Employees are passionate brand ambassadors</li> <li>Voice in the market that is shaping the conversation around D&amp;I</li> </ul>









We observed the following areas of strength within our assessment:

### Communications, visibility & messaging

Detailed D&I comms plan with a range of internal channels and audiences

Channel	Audience	Frequency	Content	Owner
Intranet	All employees	Quarterly	Company news, D&I updates	HR
Internal newsletters	Departmental	Monthly	Departmental news, D&I focus	Departmental leads
Internal social media	All employees	Daily	Employee stories, D&I initiatives	Employee network
Internal events	All employees	Quarterly	Workshops, training, networking	HR & Departmental leads

### Learning & development

A range of training, including the recently launched Building Brilliant Managers blueprint

### Feedback mechanism

Active engagement of nine employee networks

### Mental health & wellbeing

Both proactive and reactive support-resource hub, EAP, wellness action plans, champions

### Pay gap

Action planning and quarterly updates to leadership on the gender pay gap

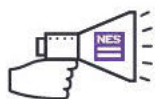
Period	Mean Gender Pay Gap	Median Gender Pay Gap
1st March 2017	18.0%	15.0%
31st March 2018	18.2%	15.2%
31st March 2019	18.0%	15.0%
31st March 2020	18.0%	15.0%

### Industry & customer insight

Involvement in external events on D&I, particularly LGBTQ+, in the property industry and support for the LGBTQ+ extra care housing scheme

### Supplier relationships

Supported the development of the Developer Partner Panel with D&I requirements



The pages overleaf outline the steps required to move each *Partially met* or *Not met* competency to *Met*.

**RECOMMENDATION 1 (PAGE 17)**

Developing a set of actionable and measurable priorities to enhance the existing ED&I strategy

**RECOMMENDATION 2 (PAGE 20)**

Building out a formalised ED&I governance structure

**RECOMMENDATION 3 (PAGE 21)**

Introducing inclusive leadership expectations

**RECOMMENDATION 4 (PAGE 23)**

Leveraging employee data to support strategic ED&I decisions

Grade	Female	Male
Analyst	35.19%	64.81%
Specialist	50.14%	49.86%
Senior Specialist	54.66%	45.34%
Head of Team	50.00%	50.00%
Executive Director	62.00%	38.00%
Assistant Director	65.11%	34.89%

**RECOMMENDATION 5 (PAGE 27)**

Fostering an inclusive culture at Homes England

**RECOMMENDATION 6 (PAGE 31)**

Supporting the career progression of diverse employee groups

**RECOMMENDATION 7 (PAGE 33)**

Enhancing your existing performance monitoring process to be more inclusive

**RECOMMENDATION 8 (PAGE 34)**

Developing your approach to diverse talent attraction and recruitment

**RECOMMENDATION 9 (PAGE 36)**

Supporting your middle managers through targeted training

**RECOMMENDATION 10 (PAGE 37)**

Expanding your approach to employee adjustments and accessibility needs

**RECOMMENDATION 11 (PAGE 39)**

Providing further support to employees with diverse caring responsibilities



#### 3.1 Strategy

#### 3.5 Setting priorities

#### 7.4 Review

### What we observed

#### Strategy

- Homes England published its first Annual ED&I Report in 2020 with five key ED&I objectives to achieve by 2024. The objectives encompass internal policies, processes and systems; organisational culture; leadership commitment and action; partners and suppliers; and the communities that Homes England serves.

#### Setting priorities

- The ED&I objectives, success criteria and 2020/21 priorities have not been fully developed to address data-driven areas of disproportionality.
- It is unclear how the actions of the employee networks directly feed into the ED&I objectives and priorities.

#### Review

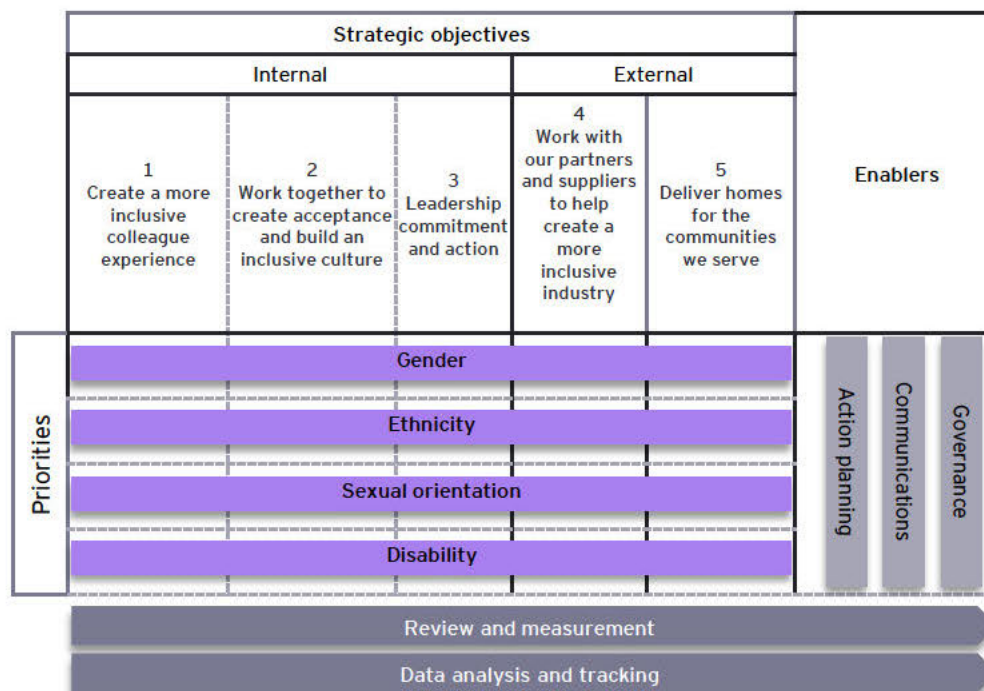
- There are no clear targets under the success criteria for each objective.
- The ED&I report includes priorities for 2020-2021 however does not include a timeline with key actions or milestones per objective up to 2024.
- Our focus groups highlighted that whilst employees are typically aware of the ED&I objectives, they are unaware of the progress against the objectives or specific actions undertaken.

### What we recommend (1/3)

Homes England should further define its ED&I objectives against clear priorities to address the most significant areas of disproportionality and thus accelerate the progress of its strategy. Success criteria should be quantified, and activities under each objective should be mapped against a timeline through to 2024.

#### Connect priorities with objectives and initiatives

ED&I priorities should be informed by organisational data to ensure areas of under-representation can be identified and addressed. These should be focused on targeted diverse groups across the nine protected characteristics. We have set out an example structure of linking strategic objectives and priorities or focus areas.

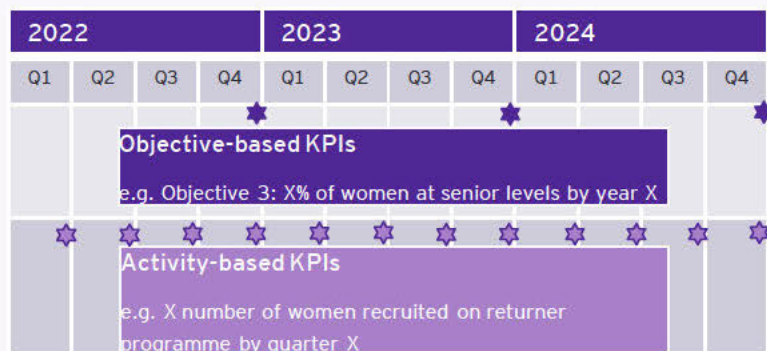


- Some priorities may have an increased focus internally (e.g. disability), and some may have an increased external focus (e.g. ethnicity).
- Key enablers (governance, communications and action plans) support progress against the focus areas.
- For leading organisations, these are periodically reviewed and informed by up-to-date data.

### What we recommend (2/3)

#### Identify and set clear success criteria

- The criteria for success against ED&I objectives should be considered, e.g. overall representation, progression rates and engagement levels by priority area.
- Success criteria should be mapped against a strategy timeline and via key performance indicators at regular time intervals to allow for review and monitoring of progress. KPIs should be objective-based (e.g. representation targets), with activity-based KPIs feeding into the objective KPIs. An example timeline is below:



#### Develop an overarching action plan

- A central ED&I action plan should be developed to drive the main corporate ED&I objectives. Recommendations and insights from the NES report could feed into this. The plan will help identify efficiencies, e.g. resource and knowledge sharing, as well as drive accountability and consolidated reporting.
- Employee network action plans should be formally incorporated into the central ED&I action plan.
- The plan should include specific objectives and targets along with the detailed activities required to achieve them, owners and deadlines against each activity to ensure accountability, dependencies and risks identified to mitigate setbacks and milestones and status checks to review and report progress.
- A devolved governance structure should be embedded that embeds ED&I across all areas of the organisation. For more detailed insights on governance, please see [page 20](#).

#### Report progress

- Progress against the activities should be tracked regularly to ensure momentum is maintained and to anticipate and workaround any issues as they occur.
- The strategic ED&I priorities and objectives should be reviewed annually to ensure that they address the most relevant issues. As part of this review, any new or arising issues to address will also be identified.

#### What we recommend (3/3)

#### Example considerations

Homes England should define what success looks like for each objective at a more granular level, and activities or initiatives should be targeted to achieve the success criteria identified. Example considerations across both categories include:

Priorities	Objectives	Success criteria	Activities/ initiatives	Related recommendation
<p>For example:</p> <ul style="list-style-type: none"> <li>Increase gender representation at senior levels (Assistant Director, Director and Executive Director)</li> <li>Increase representation of ethnicity at all levels</li> <li>Track positive % increase year-on-year for other protected characteristics, e.g. sexual orientation and disability</li> </ul>	<p><b>Objective 1:</b> Create a more inclusive colleague experience</p>	<ul style="list-style-type: none"> <li>Success criteria refers to improvement in the diversity of employees and applicants – by how much and which diverse groups in particular?</li> <li>What will success look like across key employee processes?</li> <li>Consider linking pay gap monitoring to the success of this objective</li> </ul>	<ul style="list-style-type: none"> <li>How will data declaration be promoted?</li> <li>What ED&amp;I initiatives will take place per key employee process and how will ED&amp;I be measured?</li> <li>How will equality impact assessments (EIAs) of policies and processes be used to support this objective?</li> </ul>	<p>Recommendation 4, p.23-26</p> <p>Recommendations 6-11, p.31-40</p>
	<p><b>Objective 2:</b> Work together to create acceptance and build an inclusive culture</p>	<ul style="list-style-type: none"> <li>How will culture be assessed? What will the role of the engagement survey have in this objective?</li> <li>Consider the impact of 'speaking up'/ cultural training on the number of incidents reported of bullying and harassment – might the number initially increase?</li> </ul>	<ul style="list-style-type: none"> <li>How will behaviours be used to support the ED&amp;I agenda and how will these be assessed during the Building Brilliant Performance cycle?</li> <li>What ED&amp;I training will be offered and how will Homes England receive feedback on this?</li> <li>How will employee network engagement be measured?</li> </ul>	<p>Recommendation 5, p.27-30</p> <p>Recommendation 9, p.36</p>
	<p><b>Objective 3:</b> Leadership commitment and action</p>	<ul style="list-style-type: none"> <li>How will leaders be held accountable for ED&amp;I? Will scorecards be used? (see page 22)</li> <li>How will feedback be received from employees on senior-level engagement on ED&amp;I topics?</li> </ul>	<ul style="list-style-type: none"> <li>How will inclusive leadership behaviours be assessed during the Building Brilliant Performance cycle?</li> <li>What does the role of an ED&amp;I senior sponsor entail?</li> <li>How will mentoring/reverse mentoring programmes be monitored?</li> </ul>	<p>Recommendation 3, p.21-22</p>
	<p><b>Objective 4:</b> Work with our partners and suppliers to help create a more inclusive industry</p>	<ul style="list-style-type: none"> <li>How will ED&amp;I be monitored among partners and suppliers and what will success look like?</li> <li>Who owns the industry-wide ED&amp;I survey and how does Homes England feed into this? How can Homes England measure its impact on the survey?</li> </ul>	<ul style="list-style-type: none"> <li>What ED&amp;I requirements have been/will be set for partners and suppliers via the procurement survey? How can supplier ED&amp;I maturity and progress be measured?</li> <li>How many industry ED&amp;I discussions will Homes England participate in?</li> <li>How will Homes England grow networks in the industry?</li> </ul>	<p>Recommendation 4, p.25</p>
	<p><b>Objective 5:</b> Deliver homes for the communities we serve</p>	<ul style="list-style-type: none"> <li>How will impact on communities be measured in terms of ED&amp;I? Will this target particular diverse groups?</li> </ul>	<ul style="list-style-type: none"> <li>How will data be collected on the communities that Homes England serves? Could an EIA be used to understand the impact of initiatives on protected characteristics?</li> <li>In which research projects will Homes England be involved?</li> </ul>	<p>Recommendation 4, p.25</p> <p>Additional recommendations, p.41</p>

### 3.4 Governance

### 5.1 Commitment & accountability

### 7.3 Action planning & implementation

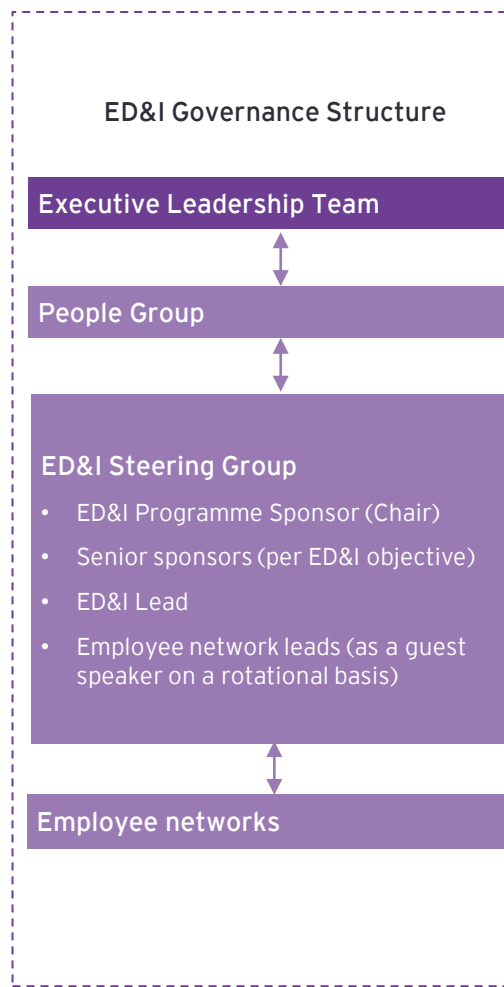
#### What we observed

- Ownership of the ED&I agenda and its implementation sits in practice with the ED&I lead in HR. As part of the ED&I agenda, each ED&I objective has a Senior Sponsor and there are plans under objective 2 for employee networks to also have a Senior Sponsor.
- There is, however, a lack of clarity on expectations on the role of a Senior ED&I Sponsor, and recent changes in leadership has resulted in some gaps in sponsorship.
- There are nine employee networks, and network leads meet quarterly.
- ED&I updates are reported to the People Group on a quarterly basis and ED&I objectives are planned to be reviewed and published annually.
- ED&I data is referenced at the Nominations and Remuneration Committee (NRC); however, it is unclear on the extent to which ED&I data and updates are actively challenged and driven at the executive leadership level.
- There are plans to launch a new Homes England People Strategy and a possible new People Committee, Staff Committee and Junior Board.
- ERG network members expressed concerns that they are not recognised for their efforts formally and recommendations being made to the leadership team are not actioned upon.

#### What we recommend

Homes England should consider formalising the governance structure for ED&I under the launch of the new People Strategy, expanding leadership involvement and ownership and embedding the feedback and input from employee network groups into the overall ED&I action plan.

Level	Key Responsibilities	Success requirements
Exec Leadership Team	<ul style="list-style-type: none"> <li>Overall responsibility for the delivery of the ED&amp;I strategy</li> <li>Embed ED&amp;I into the overall organisation's strategy and empower the business to prioritise the topic</li> </ul>	<ul style="list-style-type: none"> <li>Have a standing ED&amp;I agenda item on quarterly leadership meetings facilitated by the People Leader for Homes England</li> <li>Facilitate a robust conversation on ED&amp;I at leadership level, taking into account diverse perspectives</li> </ul>
People Group	<ul style="list-style-type: none"> <li>Help guide the direction of the ED&amp;I strategy in alignment with overall people strategy of Homes England</li> </ul>	<ul style="list-style-type: none"> <li>View into ED&amp;I action plans progress and relevant data on a monthly basis</li> </ul>
ED&I Steering Group	<ul style="list-style-type: none"> <li>Set and deliver on ED&amp;I strategy and action plans</li> <li>Provide programme sign-offs and approvals</li> <li>Review action plans, progress and delivery on a monthly basis</li> <li>Review ED&amp;I data monthly</li> <li>Report progress to People Group and prepare Exec Leadership briefings</li> <li>Provide forum for sharing good practice and ideas</li> <li>Report gaps in implementation to People Group</li> </ul>	<ul style="list-style-type: none"> <li>Nominate an ED&amp;I Steering Group Chair (suggested chair being a C-level leader)</li> <li>A detailed description of the senior sponsor role to drive ownership and accountability</li> <li>Formalise relevant Terms of Reference for the steering group</li> <li>Embed sponsor roles into leadership performance scorecards, reviewing respective performance at annual performance cycle for leaders</li> <li>Facilitate regular conversation with the employee network groups, staff committee and junior board members</li> </ul>
Employee Networks	<ul style="list-style-type: none"> <li>Articulate and advocate ED&amp;I strategy and programme to employees</li> <li>Act as a ED&amp;I point of contact for employees</li> <li>Obtain employee feedback</li> </ul>	<ul style="list-style-type: none"> <li>Formally recognise employee participation in network groups, including this in regular performance conversations</li> <li>Consider expanding the training budget of employee network groups to facilitate further initiatives and action plan execution</li> <li>Align network activities to ED&amp;I objectives and action plans to ensure consistency</li> </ul>





### 5.3 Inclusive leadership

#### What we observed

- Objective 3 of the ED&I strategy aims to increase leadership commitment and accountability towards inclusion, for example, challenging behaviours that go against Homes England's values.
- One of the 2020/21 actions of the objective is to increase understanding and acceptance by senior leaders of different groups through a series of training sessions.
- There are general leadership training sessions under the BRAVE framework.
- We have not seen evidence of Homes England having specified inclusive leadership behaviours or expectations of its senior leaders.
- Focus groups indicated some instances of directors using non-inclusive or inappropriate language.
- Interviewed leaders reported they had received no communications about inclusive behaviour expectations.
- Leaders further expressed an interest in having more robust training on ED&I at their level and the introduction of consistent ED&I related leadership expectations across Homes England.

#### What we recommend (1/2)

Senior leaders and middle managers are critical to shaping an inclusive working culture in an organisation. Homes England should seek to develop and introduce consistent inclusive behavioural guidance and objectives across all levels of leadership to strengthen the ED&I commitment.

#### Developing your vision of leadership

- Define:** Inclusive behaviour objectives should be defined for all leaders in order to embed accountability for cultural improvement and to bolster the commitment to ED&I as a strategic objective. Consider utilising a behavioural framework that provides a clear reference of what is expected of leaders and line managers [example in Appendix 1]
- Develop:** In developing the inclusive leadership behaviour objectives consider:
  - The values and behaviours that will drive operational and organisational successes such as “I actively seek out perspectives different from my own and take advice” [example in Appendix 1]
  - The overall organisational values that are set out within the Homes England Way booklet
  - The values and behaviours that will be required to address existing pain points (e.g. speaking up, creating a trusted and open environment)
- Train:** Enhance existing leadership training, such as the BRAVE leadership programme, with specific content on inclusive leadership for all senior leaders. Supplement this with more bespoke inclusive leadership sessions for the executive leadership team, where leaders can develop the personal and collective capability required to build and engage diverse teams consistently over time.
- Embed:** It is important that Homes England considers a phased approach to embedding behavioural objectives to gain maximum engagement and ensure gradual buy-in from the business. Integrate at least one inclusive behaviour objective in leaders' scorecards and provide examples of how the behaviours can be exhibited. Fulfilment of behaviours should be integrated into key organisational processes such as performance appraisal conversations and promotion decisions and should guide overall leadership career progressions.
- Measure:** Ensure that the inclusive behaviour objectives are measurable with clear success criteria and benchmarks. Consider tracking progress by capturing anonymous upward feedback from leaders' teams reviewing demographic variances in engagement survey analysis, utilising regular pulse surveys and reviewing themes from inclusive behaviour objectives in quarterly ED&I data reviews by functional leadership teams. Identify key performance indicators (KPIs) that can be used to assess how aligned each leader or manager is to the inclusive leadership objectives/ ED&I objectives via a scorecard. See examples of leadership and manager KPIs on the following page.

#### Leading practice

- Senior leaders at [Johnson & Johnson](#) have key ED&I objectives to drive accountability success.
- Leaders at [IBM](#) are formally accountable for ED&I outcomes within the organisation and the supply chain. They also publicly lobby on the LGBTQ+ agenda.
- [Unilever](#) has a Gender Appointment Ratio which tracks senior leaders' records in appointing women, in addition to targeted development programmes aligned with the SDGs.



### What we recommend (2/2)

We have put examples of these KPIs for a leader and manager below:

#### Example of a leadership scorecard\*

Example metrics	Target	Actual
1 Number of executive responsibilities for diversity initiatives	2	1
2 Reverse-mentoring relationship in place with associates from an underrepresented groups	Yes	Yes
3 x% of team to have completed mandatory ED&I training	90%	95%
4 Gender balance of immediate succession pipeline	15%	15%
5 % of female promotions within team	15%	19%
6 Positive responses to the engagement survey question: I feel I truly belong here**	65%	60%
7 Positive responses to the engagement survey question: I feel comfortable being myself when I'm at work**	75%	80%
8 Positive responses to the engagement survey question: Perspectives like mine are included in any decision-making**	80%	65%

#### Example of a management scorecard\*

Example metrics	Target	Actual
1 Number of diversity initiatives involved in	1	2
2 Completed ED&I training	Yes	Yes
3 Reverse-mentoring relationship in place with associate from an underrepresented group	Yes	Yes
4 Positive upwards feedback from direct reports referencing inclusive behaviours	3	2

Scorecards could be reviewed during the Building Brilliant Performance cycle and could have a tangible impact on promotion decisions.

\*Note: The KPIs in the scorecards above are illustrative examples. Actual KPIs should be tailored to rank.

\*\* Where engagement survey questions are included, consider targets relating to variances in survey responses by priority/ protected characteristic.

7.2 Data analysis

7.5 Measuring impact

5.4 Senior level scrutiny

1.3 Engagement survey

#### What we observed

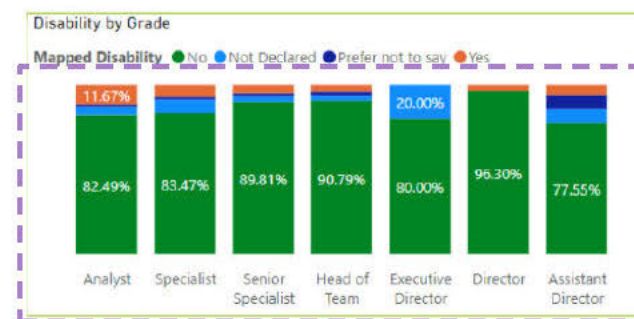
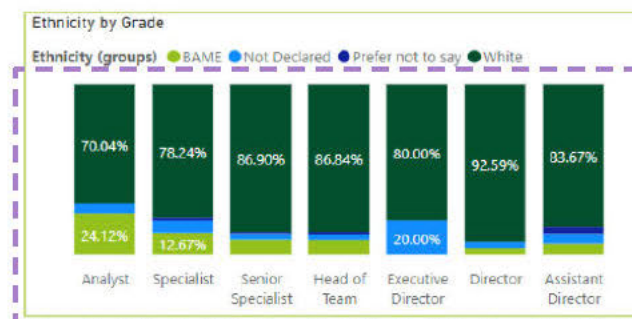
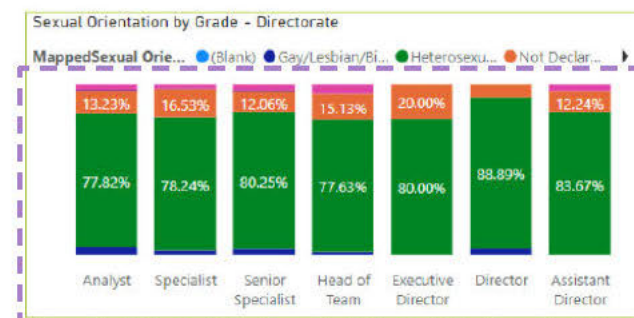
- Data is collected on the diversity profile of Homes England; however, there is little link between the data and the ED&I strategy, priorities and objectives. A recent quarterly update to the People Group noted difficulties in measuring impact of the strategy.
- There have been efforts to increase data disclosure, with aims to increase data declaration rate to 95%.
- There are plans to analyse applicant ED&I data but, in general, there is limited analysis of ED&I across key processes throughout the employee lifecycle such as appraisal, promotion and exit.
- Engagement survey results have not been analysed meaningfully by demographic.
- There is an ED&I dashboard using PowerBi, and diversity data is monitored monthly and reported to senior leadership and the Board on a quarterly basis; however, there appears to be limited scrutiny.

#### What we recommend (1/4)

In line with UK GDPR legislation, a broad range of employee data should be captured and analysed to understand differential experiences within Homes England and inform where disproportionality is present. A data-driven and evidence-based approach will be key to understanding the priorities, identifying any disproportionality at a more granular level (beyond just composition of the whole organisation) and understanding what may need improving to facilitate inclusion of diverse groups.

#### Develop data-driven priorities

Homes England should review its ED&I data across the workforce against national data and its peers in order to prioritise areas of underrepresentation. Based upon data from September 2021\*, Homes England should consider prioritising the increase of employee representation across gender, ethnicity, sexual orientation and disability. These priorities should provide direction to the ED&I objectives and activities.



\*Taken from Homes England HR Monthly dashboard, Sept 2021

## What we recommend (2/4)

## Expand ED&amp;I categories

## Understand data gaps

- Establish why you are collecting ED&I data and how it will support your ED&I aspirations. This will form the narrative that will be used to position your diversity data drive [example data maturity framework in Appendix 3]
- Set up a regular review process with your legal teams, as what is available and acceptable to capture today may change over time.

## Capture data on social mobility

- Homes England should consider expanding its ED&I data collection to include social mobility. While this is a harder measure to quantify, it can have significant cumulative effects on an individual's career opportunities.
- Some of the following questions could be used to capture this information: parental attendance of higher education, parental occupation and type of school the individual attended and/or an employee's eligibility for free school meals.

## Drive greater ED&amp;I data disclosure

Homes England can improve employee disclosure of ED&I data by considering some of the following. The organisation should look at which protected characteristics have the lowest declaration rate and could make targeted efforts for these characteristics.

## Mandating disclosure on HRnet

Mandate the completion of each question on the diversity page of HRnet/diversity monitoring form or attaching completion of the questions to mandatory processes such as the induction process. **Important:** For legal reasons, ensure there is a *prefer not to say* option for each question.

## Targeted communication

Launch annual comms campaigns to promote a clear understanding of the importance and uses of employee data and challenge any misconceptions or fears of providing this information, i.e. what the diversity data **will not** be used for. The employee networks will be an important resource for tailoring campaign language.

## Manager support

Team managers should be equipped with additional guidance incorporated in the monthly team briefing packs, including FAQs, to help them explain the benefits of Homes England having accurate data around the diversity of its workforce.

## Driving data from the top

Ensure senior leaders are communicating about the importance of ED&I data through leadership updates, links to the diversity page in HRnet in the email signatures of key messengers and leaders, blogs on the intranet and other communication forums. [example language in Appendix 2]

## Disclosure rate league table

Any increase in the level of disclosure could be tracked at the directorate level, as it is a measure of increased trust and engagement. Consider driving competition amongst directorates by creating an overall disclosure rate league table.

## Leader scorecards

Include a diversity disclosure rate within leader scorecards to drive accountability. Consider the role of ED&I sponsors here.

### What we recommend (3/4)

#### Understanding employee experience

- The next employee engagement survey results should be analysed by distinct protected characteristics in a meaningful way to better understand and address differential experiences by diverse groups and, in particular, priority areas.
- Granular diversity data (supported by employee interviews) should be used to provide your leadership team with evidence of the employee experiences of underrepresented employee groups. Consider deploying more regular employee listening mechanisms, e.g. listening sessions, targeted focus groups or 'lunch and learns'. Some organisations choose to run dedicated annual ED&I surveys that provide a much more detailed view of the challenges for diverse employee groups. Consider running a dedicated culture audit on your workforce to support the insights on employee experience. The results from the analysis should be cross-referenced with the results from the employee surveys.

#### Improve analysis of diversity across talent processes

- Homes England should continue its work on improving its applicant ED&I data collection and analyse drop-out rates per stage of the recruitment process for different demographics and in particular the priority areas of the ED&I strategy.
- The organisation should seek to analyse diversity data across a range of key organisational processes, including promotions, time to promotion, performance review outcomes, number of grievances received and upheld, or exit (*Appendix 4*). The results could be correlated with other data, e.g. from employee listening sessions.
- Homes England should explore any disproportionalities for diverse employee groups, identify outliers and YoY trends. Greater data analysis and a better understanding of the experience of diverse groups, should be used to further inform the ED&I strategy, diverse talent recruitment drives and shape the employee offering to be more suited towards diverse groups. In the future, the process could be evolved to include predictive capabilities.

#### Expand ED&I data to identify external impact

- In line with objectives 4 and 5, there is an opportunity to expand ED&I data collection and analysis to partners and suppliers via the purchasing system and to the communities that Homes England serves. Whilst Homes England currently assesses new partners and suppliers against ED&I criteria as part of the Developer Partner Panel (DPP 4) tender process, Homes England could consider an assessment of ED&I maturity across its supply chain. An example assessment would be EY's Supplier Equality Standard that helps organisations measure the maturity of suppliers' ED&I practices & policies - further information can be found in *Appendix 5*.



#### Spotlight example: Gender analysis

- Integrate female representation data with findings from the Grow Your Own agenda, mentoring schemes and promotions analysis, for example
- Consider exploring the differential experiences of sub-groups of female employees: working mothers, for example

#### Example approaches

- Consider expanding descriptive analysis methods with correlation and regression analysis
- When reporting the outcomes of your analysis, consider anchoring the results alongside a reputable external benchmark of diversity and the ED&I objectives

#### Example questions

- What other data sources can we integrate to understand why female representation declines with seniority?
- What are the underlying cultural/employee value issues preventing senior female talent progression?
- Have we considered qualitative data through employee surveys and focus groups that can help us understand the employee experience better?
- Have we effectively utilised existing mechanisms of capturing employee data?

#### What we recommend (4/4)

##### Expanded ED&I dashboard

The ED&I PowerBi dashboard should be expanded to include the full diversity profile of Homes England in line with increases in data disclosure. Data analysis should be developed towards trend and forecast analysis. The dashboard should also be expanded to include any data across key employee processes such as recruitment, performance appraisals and promotions. An example data blueprint can be found in *Appendix 4*. Dashboards per directorate should include any focused ED&I related initiatives and inclusive behavioural objectives for the leaders across the specific business (see pages 21 and 22).

##### Data scrutiny

Although there are opportunities for leaders to review diversity data, going forward, Homes England should ensure there are formal opportunities and processes (i.e. standing meeting agenda item) in place for senior leaders to regularly scrutinise more detailed diversity data and progress towards any targets set (see page 20). Example reporting below.

Business unit/ team leader	No. of employees	Gender			Disability			Diversity turnover	Conversion rate of diverse applicants		Completion rate for D&I training
		%	Aspirational %	Aspiration reached?	%	Aspirational %	Aspiration reached?	Gender	Gender	Ethnicity	%
Leader 1 (BU)											
Leader 2 (BU)											
...											
<b>Total Staff:</b>											
Homes England leaders:											

## 1.1 Culture

## What we observed

- Diversity is identified and communicated as one of the core values of the organisation and referenced in the employee culture handbook.
- The annual ED&I report, published in 2020, references an ambition for a “culture of acceptance, inclusion and belonging, where our differences are celebrated”
- Whilst ED&I objective 2 focuses on building an inclusive culture, focus groups highlighted current cultural challenges with references to a hierarchal, 'old fashioned' and inconsistent organisational culture and, in general, a lack of psychological safety in calling out inappropriate behaviours.
- We noted some incidents of bullying and harassment being raised through the focus group conversations, such as directors using non-inclusive language and mixed messaging.
- Employees also reported instances of feeling reluctant to speak up at public forums due to fear of repercussions.

## What we recommend (1/4)

Homes England could benefit from actively working towards cultivating an inclusive organisational culture that supports rapid organisational growth and minimises the possibilities for biased decisions. This could be achieved by better understanding and measuring the existing organisational culture through identifying the prevalent behaviours currently in the business, defining a set of desired inclusive behaviours and measuring to what extent these are being adopted throughout the organisation.



## Defining and promoting organisational values and behaviours required to foster an inclusive culture

- Consider adding a new inclusion-related value to the Homes England Way to highlight the organisational commitment to ED&I and how it should be core to the company.
- Consider how this new inclusion-related value will be engaging and in line with the current culture at the organisation, going beyond just 'diversity' to capture the workforce's passion around ED&I (such as allyship or advocacy).
- Throughout this, it is important to engage with leadership and employees to test and challenge the new value through a 'values project'. This serves as a consultation with the wider organisation to understand what employees and leaders feel should be a core ED&I related company value, allowing employees to select their preference and the reason why.

## Developing a Speak Up programme

- As part of creating an inclusive organisational culture, Homes England should focus on developing a Speak Up programme that will allow employees to be open and transparent when experiencing or witnessing inappropriate behaviours, as this is fundamental to a successful ED&I programme.
- Outlined are components of a successful speak-up programme which we believe could benefit Homes England if introduced:
  - Creating leadership accountability for creating an inclusive working environment
  - Improve data capture around unacceptable behaviours
  - Emphasise positive messaging around speaking up
  - Build multiple points of feedback into the performance appraisal process
  - Carry out detailed and granular trends analysis
  - Review the diversity of those fielding complaints
  - Acknowledge the contribution made by those who speak up

Further details on  
the following page

### What we recommend (2/4)



#### Leadership accountability for creating an inclusive working environment

All leaders and middle managers should be held accountable for creating an inclusive working environment that empowers their direct reports to speak up.

1. Consider embedding ED&I objectives and KPIs into leadership and middle management performance reviews that positively contribute to creating a “culture of acceptance, inclusion and belonging” as per your ED&I strategy (see examples on page 22).

2. Data points that evidence the inclusivity of the working environment that the leader or line manager has created. This evidence could be ascertained through:

- Engagement survey results for their function, for example, by including additional questions such as
  - *“I believe senior leadership are prepared to manage a diverse workforce”*
  - *“I think senior leadership consistently demonstrates and embodies inclusive behaviours in all their decisions”*
- Upwards feedback from peers and teams
- In-function pulse or barometer-style surveys



#### Improve data capture around unacceptable behaviours

When reviewing data from formal and informal employee reporting channels, consider not only the rates of formal grievance complaints but also the **grievance outcomes**.

Start with a review of the number and nature of employee complaints, specifically focusing on parts of the business where there has been either a sharp increase or a sharp decrease of reporting rates to identify any underlying potential cultural issues and instigate remediation plans. Continue with a review of the number and nature of the grievance outcomes resulting from these complaints, testing for any disproportionalities across the business in terms of locations, ranks, type of outcomes and severity of complaint.



#### Positive messaging around speaking up

Positive messaging will **increase the likelihood** of employees feeling comfortable to speak up.\* Reporting misconduct should be rebadged ‘supporting others’ and silence as ‘a problem that we are collectively working to resolve’.

As part of Objective 2 of the current ED&I strategy, consider partnering with the internal communications function to develop a storytelling campaign, for example, a series of employee ‘role model’ stories to raise awareness of the impact of speaking up. This can focus on the psychological safety that is required for people to bring forward instances of inappropriate behaviour, including examples of adequately addressing and challenging the behaviours and language that might make others feel uncomfortable.



#### Building multiple point of feedback into organisational processes

Encourage leaders to **promote a feedback culture** and set clear expectations with their direct reports to role model the expectation across processes and ranks.

Employees should obtain regular feedback from multiple colleagues to achieve a fair assessment of performance, especially important when being considered for promotion. Incorporate mandatory upwards feedback mechanism as part of the new “Building Brilliant Performance” manager guide currently being implemented across the organisation, possibly under the “seeking perspectives” section. (Please refer to pages 31-33)



### What we recommend (3/4)



#### Detailed and granular analysis of trends

Establish **clear and consistent categories** to report the nature of both formal and informal complaints, especially those related to harassment, bullying and discrimination. This data should include the specific protected characteristics of those raising the grievance. Include the information as part of regular leadership reporting on ED&I, at a minimum on a monthly basis, and for more urgent cases as soon as complaints are raised.



#### Review the diversity of those fielding complaints

**Review the diversity** of those that have responsibility for responding to complaints and concerns. The option should exist for diverse employees to have the opportunity to talk with personnel from a similar demographic when speaking up.



#### Acknowledging the contribution made by those who speak up

Leaders should use communications to **reinforce the importance of speaking up**. Messages should thank those who have raised concerns, acknowledge their courage and set out how speaking up is integral to any successful organisation. This should include a range of leaders, but as a minimum responsibility for this should be owned by the function or department lead and in specific circumstances the CEO.

You may include high-level details of the interventions you have made in responding to complaints or concerns within these communications. This will build trust that issues are always responded to.

#### Leading practice

##### Unilever, Interactive Complain Management Approach



The organisation has a dedicated Business Integrity Committee that oversees investigations of all potential breaches raised by employees. There is an interactive reporting platform that connects the complaint reporter with a Business Integrity Officer, ensuring secure exchange of messages and preserving the reporter anonymity. The platform supports both web reporting of volume and type of cases and dedicated translation services for employees.

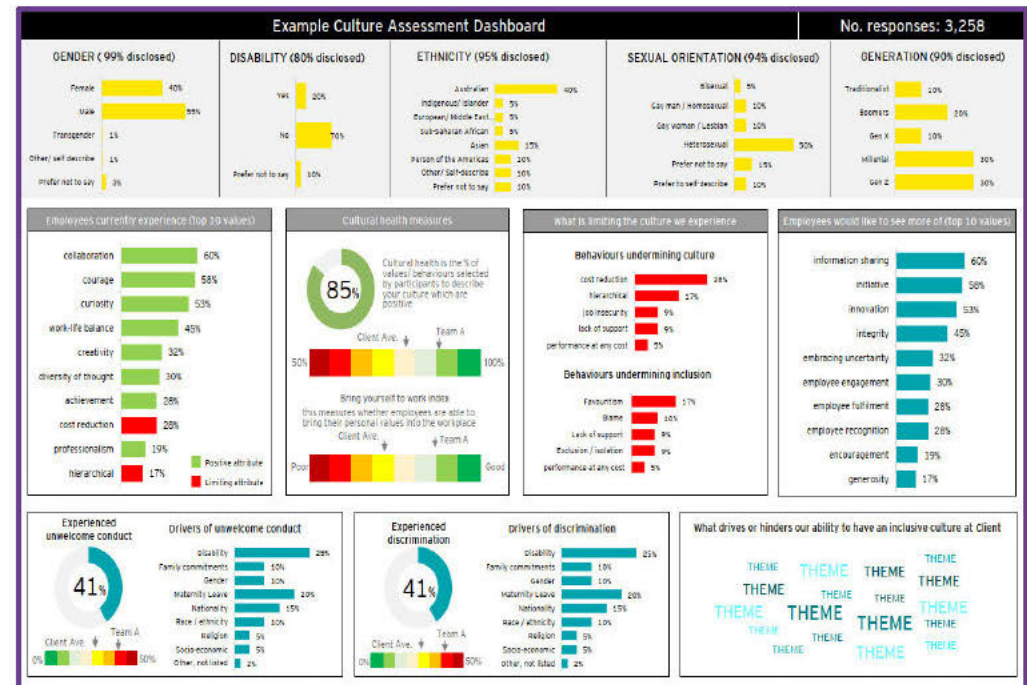
#### What we recommend (4/4)

##### Embedding the values and behaviours to ensure employee and leadership alignment

- **Appraisals:** Consider if it is possible to include a weighted behavioural element in development conversations. For example, in line manager and direct report development conversations as part of the Building Brilliant Performance reviews, employees could be asked to describe which two values they have lived the most in that assessing period and how they have done this. These points can then be discussed to recognise the contribution of those whose performance is aligned to the company purpose and objectives.
- **Training:** It could be of benefit to consider curating values learning 'playlists' to provide guidance on how to live the required behaviours defined in the Homes England Way. The purpose of this is to raise a common level of awareness and understanding of how to live company values and what this means for the ways of working. It is also recommended to include core resources and materials in the onboarding process for new joiners.
- **Reward and recognition:** Further to the existing 'excellence awards', Homes England could review the possibility of holding monthly or quarterly 'values awards'. Employees and leaders nominate those they feel are living the company behaviours, with a sentence to explain how. Winners are selected against the explanation and given a small prize or voucher.

##### Measuring and monitoring culture

- Undertake a company-wide review to understand the current and desired cultural attributes and behaviours across each business unit. This should include a deep dive into the enablers and blockers related to the desired organisational culture, taking into account issues raised by employee groups through structured feedback or other listening mechanisms.
- The review should explore alignment between the ambition of the ED&I strategy and employee perceptions, highlighting areas of dysfunction and identifying variances in experiences of diverse staff.
- The review should also include a lens on core organisational processes such as promotions and career development and the impact of current cultural attributes on these.
- The cultural assessment could be repeated annually, and the results analysed with other available organisational data to explore correlations between culture and business performance.
- Please see an example of a cultural assessment dashboard, which can be used to deep-dive on existing and desired behaviours over time, track progress and summarise employee sentiment.



### 2.4 Career progression

### 3.2 Bias

#### What we observed

- While we have noted that career pathways are under consideration together with a push for a 'Grow Your Own' agenda, Homes England does not currently provide career pathways or dedicated progression support for diverse employees.
- In 2020, 65% of employees agreed with the statement 'I believe there are opportunities for me to develop my career here', and focus groups identified a lack of guidance to progress, e.g. on CVs in order to apply for an internal move.
- Some targeted efforts have been made in promoting coaching, mentoring and in proposed reverse mentoring between directors and employee network members.
- Focus groups referred to a 'glass ceiling' in progressing to senior levels, in particular, and highlighted a lack of diverse representation and role modelling at the senior leadership level.
- In recruitment, candidates with disabilities who meet minimum criteria are automatically shortlisted for interviews and at least one woman who meets minimum criteria for senior roles. ED&I data is not currently considered in promotions and succession planning.

#### What we recommend (1/2)

Expand on the existing plans to develop dedicated career pathways for Home England's employees with career-defined competencies that would bring clarity and transparency to existing career opportunities. Homes England can further benefit from more targeted interventions to develop and progress diverse talent.

##### Representation targets

Homes England should consider setting representation targets at leadership level in line with priorities to achieve its ED&I objectives (*please reference page 17*). As part of this, consider:

- That representation targets are ambitious and broadly consistent with the overall aspiration for ED&I at Homes England.
- The format that these representation targets will take. Leading practice organisations take a consistent approach to representation targets across different demographics by following the Board, Exco and Exco +1 approach (in line with UK Government-backed Hampton-Alexander review)
- Representation targets should be both time-bound and with leadership accountability for their delivery (and this accountability is reflected with reward and remuneration).
- Representation targets should be both modelled and realistic. Homes England will need to consider the impact on recruitment and promotion decisions that achieving the representation targets will have.

##### Talent mapping

To fill high-priority roles with the diverse talent already in your ranks, start by mapping where that talent lies within Homes England. Consider charting the skills of each role identifying capabilities that workers can leverage as they progress. Initiate talent mapping every six months to identify high performers. Talent mapping should also include proactive equality impact assessments to ensure that candidates across different characteristics are given sufficient opportunity to progress. This will help to highlight the particular departments in the organisation that require greater diversity at different levels. Soft targets could also be introduced for underrepresented talent.

##### Targeted programmes

Homes England should consider programmes targeted to key underrepresented groups (e.g. women, BAME) to support their progression or ensure a diverse population in existing leadership development courses. In designing these targeted approaches, it is important to ensure the programmes are holistic and focused on broader cultural change, instead of providing training for participants in isolation.

These programmes should include multiple workstreams, such as a focus on personal and professional development for participants, engagement of nominated allies to understand cultural challenges and the use of long-term senior sponsors to identify progression opportunities and provide accountability for participants' success. As with any initiative, it will also be important to measure the success of these programmes by tracking how participants' development has progressed (e.g. via monitoring appraisal ratings, time to promotion(s) and number of promotions). The rate of success should be used to review the effectiveness of the programmes.

### What we recommend (2/2)

#### Sponsorship

Consider introducing a leadership sponsorship programme for high-potential diverse talent in addition to already existing internal coaching and mentorship programmes. This should be available to all and targeted towards women, BAME and other underrepresented groups. This will help with career progression and can also provide valuable insight on specific challenges and barriers faced. Leadership should be tracked and held accountable for the progress and progression of the employees through performance review and remuneration. Consider partnering with an external coaching programme to provide diverse employees with role models to help support their development.

#### Stretch opportunities

Explore possible opportunities for high-performing, diverse talent to take on more challenging stretch assignments as part of their career development plans, building up the experiences they need for progression. For example, a high-potential female is placed into a more senior position for a pre-agreed period of time. The employee will receive support in role from a mentor or 'sponsor'. If the candidate is successful in role, they will be promoted into the new position. If they are not able to meet the required high standards, they will return to their previous role.

#### Structural biases

Review your organisational processes relating to promotion and progression with a lens on identifying and eliminating potential biases and ensuring equitable outcomes for diverse employee groups. This could take the form of:

- Building standardised checkpoints as part of promotion processes to ensure decisions get challenged before being made final (matching the employee population demographic makeup with the makeup of the promotion cohort)
- Making sure the promotion panels have a diverse representation, including ED&I senior sponsors and allies, who are asked to role-model and challenge the process in order to reach equitable outcomes for diverse employee groups
- Leveraging data insights to explore and identify potential gaps in promotion rates for underrepresented groups, such as comparing promotions percentages across protected characteristics. Then, reviewing these for all functions and levels at Homes England to understand where there might be further underlying issues impacting diverse career progression (*reference page 25*).

S159 of the Equality Act 2020 sets out the position for the use of positive action within a recruitment process. S159 permits an employer to give preferential treatment to a suitably qualified candidate from an underrepresented group, where candidate scores within a recruitment process are identical.

### 2.3 Appraisal and performance monitoring

#### What we observed

- Homes England introduced a simplified performance appraisal process, 'Building Brilliant Performance', in 2021 that consists of annual priorities, quarterly review & objective setting and monthly 1:1 conversations between the employee and line manager, using the Clear Review digital system to capture feedback.
- Guidance materials have been provided for employees and managers and these include information on reviewing progress in terms of 'exceeding,' 'on track,' or 'off track' performance categories.
- Performance expectations, however, per grade, level or directorate are not defined, and focus groups have expressed concern over inconsistent workloads per directorate.
- There is no guidance on performance management for agency or contingent workers, and 360 feedback is not in place.

#### What we recommend

In order to fully develop and progress existing diverse talent in the organisation, consider enhancing the current performance review process with robust and actionable conversations about career development opportunities, utilising consistent and well-defined performance objectives.

**Develop a set of objective, well-articulated performance expectations per rank, directorate and level and introduce these in the Building Brilliant Performance cycles as part of the performance review processes to enhance transparency around line manager decisions. Expand these to agency and contingent workforce employees.**

Multiple feedback providers	Performance and career development	Data and quality assurance	Middle managers
Homes England should consider introducing stronger guidance for employees and line managers on getting feedback from a variety of different colleagues to achieve a fair assessment of performance. 360 feedback can be particularly important for employees from underrepresented backgrounds as it helps eliminate bias, increase employee self-awareness and facilitates insights on their performance from multiple different perspectives.	Continually reinforce the link between constructive feedback and career development, making it transparent for employees how regular objectives-setting and open and honest conversations can positively impact their career aspirations. This should be threaded through leadership briefings, team meetings, training events and the profiling of employees who can articulate how specific feedback has helped them to develop.	Use data collected from the performance appraisal process in Homes England in order to identify any disproportionality in ratings between diverse employee groups. These results should be used to understand the reasons for any differences and tailor initiatives to improve performance. Consider encouraging Directorate leaders to scrutinise and mitigate any potential disproportionalities.  Consider implementing HR spot checks with line managers to review employee feedback several times a year and challenge feedback that lacks sufficient explanation or evidence, especially when assessing employees who have had any type of adjustment to day work schedule.	Ensure all managers understand that diversity representation is a key focus of talent assessment.  Provide managers with timely information about bias mitigation before preparing for assessment and during calibration. Instigate discussions of possible bias and how that can influence perceptions of performance. Support managers with inclusion nudges/reminders in relation to performance and potential attribution.

### 2.1 Talent attraction

### 2.2 Recruitment & onboarding

#### What we observed

##### Talent attraction

- The ED&I Annual Report 2020/21 refers to ensuring an inclusive talent attraction process and leveraging candidate ED&I data under objective 1.
- The report identified a 2020/21 priority to develop an ED&I recruitment strategy. A recruitment action plan was developed and this included a priority action to attract underrepresented groups. There is, however, limited progress noted against the actions.
- Some efforts have been made to attract diverse talent at entry level, such as the Homes England apprenticeship programme and recent ED&I analysis of universities to target and there is no evidence of initiatives at experienced-hire level.
- Applications go through the Applicant Tracking System (ATS), and some data is collected on ED&I. Further collection and analysis of applicant ED&I data is under development.

##### Recruitment

- Organisational processes have been designed to mitigate bias, e.g. hiring manager training, gender-balanced panels, shortlisting candidates with disabilities who meet minimum criteria and at least one woman who meets minimum criteria for senior roles.
- Focus groups noted some gaps in implementation, e.g. inconsistencies in CVs being blind to protected characteristics and a lack of transparency in the process for temporary positions, especially at senior levels.

#### What we recommend (1/2)

In line with Homes England's ambition to attract talent from underrepresented groups, the organisation should deploy a more pro-active approach to finding and cultivating relationship with diverse talent, especially when it concerns building senior talent pipelines.

##### Employee value proposition

- As planned in the recruitment action plan, prioritise reviewing Glassdoor and Indeed ratings. Consult with existing diverse employee networks to understand what they enjoy about working for Homes England. Use individual stories from these consultations as the narrative for a targeted marketing campaign around why Homes England is a great place to work.
- Encourage network groups to become formally involved in talent attraction, shape marketing campaigns and act as 'influencers' publicising your EVP amongst their network.
- Consider a variety of channels for promoting your brand as an inclusive employer, including university collaborations, speaking engagements, social media posts and print publications.

##### Relationship Management

- Once engaged in the interview process, actively seek to understand what an inclusive workforce would look like for the prospective employee, talk to them about current ED&I initiatives and provide them with assurances where needed.
- Enable the candidate to meet with existing diverse employees and employee network groups to discuss their experiences of working at Homes England.

##### Eliminating bias in recruitment

- Ensure consistent implementation of diverse recruitment practices already in place, such as blind CV sifting ahead of hiring managers reviews.
- Apply the same rigour and attention to recruiting for temporary positions as you would for permanent ones, making job opportunities visible internally and considering existing talent, where a temporary position might constitute a stretch or development opportunity
- Perform spot check reviews on the quality and outcomes of recruitment practices on a quarterly basis, having a senior HR leader review recruitment decisions and challenge instances where there is a lack of sufficient evidence of certain decisions.

##### Talent mapping (leadership)

- Engage a trusted third party to perform a mapping of diverse talent within the real estate/social housing industry. This mapping should include an indication of the likelihood of the prospective employee moving roles within the coming year. Using this talent mapping, facilitate mechanisms for Homes England's leadership team to network with prospective candidates, putting relationships in place for when vacancies arise. This may be through invitations to Homes England's career events or identifying mutual contacts to facilitate introductions.
- Homes England may want to use the talent mapping as a basis for directly approaching prospective employees.

##### 'Near-miss' talent

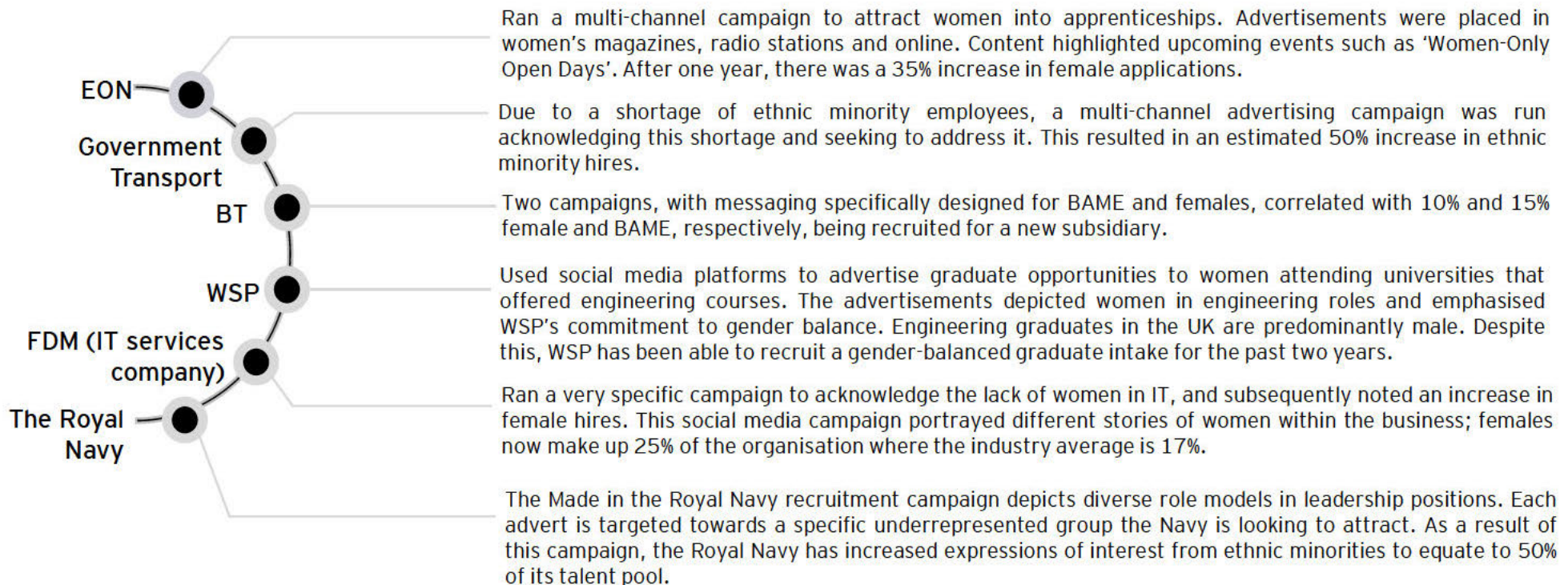
- Homes England should identify a pool of 'near-miss' talent. This should constitute external candidates from underrepresented groups, who performed well at interview, but were not offered the role. Where used, reserve lists for roles may be used as a guide for the prospective talent that would qualify for this pool.
- Actively seek to stay in regular contact with the pool of near-miss talent through regular updates on ED&I initiatives and information on forthcoming job opportunities.

### What we recommend (2/2)



#### Examples of leading practice

- External organisations who are mature in their ED&I journeys recognise that solely ensuring campaign imagery is inclusive does not necessarily attract diverse groups. External organisations that have seen notable success are ones that partnered with marketing specialists to run campaigns **with specific content tailored towards the targeted audience**. Furthermore, external organisations find that campaigns targeted towards a diverse group correlated with not only an increase in interest from the targeted group but also an increase in interest from the wider population.
- For your reference and interest, we include some examples of initiatives that have worked well from our client base, below:



5.5 Middle management

1.4 Targeted training

1.2 Policies &amp; practices

4.3 Flexible working

### What we observed

- The ED&I objectives note regular dedicated ED&I learning opportunities for senior leaders, but do not target middle managers specifically.
- The objectives refer to building a mandatory ED&I training. Whilst the Civil Service ED&I training is no longer offered, there are strands of ED&I training available.
- The Building Brilliant Managers blueprint was launched in September 2021, covering a range of people management topics, including recruitment and induction, career development, absence and wellbeing. Each topic has a self-assessment tool and development sessions are planned for some topics.
- Line managers are supported on some targeted topics on managing diverse teams, e.g. 1-1 guidance during the pandemic and to support trans people in the workplace and application of the policy. They also receive FAQs on the gender pay gap.
- Participants in the employee focus groups expressed inconsistencies in middle management, commenting that critical moments such as requesting flexible working involved a high degree of manager subjectivity. This could potentially lead to creating an environment for biased decisions and introducing an element of uncertainty among employees.
- Some employees in our focus groups did not feel comfortable approaching managers on D&I topics.

### What we recommend



#### Enhance training

- Enhance the Building Brilliant Managers blueprint and support to include operational aspects of managing a diverse team and mitigating bias (e.g. responding to flexible working requests, applying family-leave policies, approval of participation in coaching and mentoring programmes, and fair work allocation). This should include increased guidance around policies and practical examples of how managers can inclusively manage scenarios arising in teams and navigate bias effectively.
- Embed targeted ED&I content as part of a separate independent learning module communicated via the Learning & Organisational Development (L&OD) learning hub or aligned to key employee lifecycle milestones such as promotions.



#### Learning map

- Consolidated role-specific learning maps should be created for all employees to be aware of what specific training (both ED&I and organisational process related) is accessible to them and applicable to their role. Consider integrating this within any career pathways that may be developed.
- Periodic reviews of the learning maps should be undertaken to ensure that the training resources themselves are up to date (with current ED&I issues), in line with shifting or expanding priorities and that employees continue to be steered towards the most valuable courses.
- Additional content should also be incorporated to support Homes England's ED&I objectives.



#### Reinforced learning

- Homes England may wish to consider introducing 'inclusion nudges' to reinforce the learning experience of middle managers in relation to ED&I.
- A well-structured inclusion nudge plan includes a series of timely interventions to reinforce the principles of inclusion. This could include a variety of formats such as personal exercises or management team discussions to minimise the risk of bias throughout the application of policies and practices that are subject to managerial subjectivity.



#### Additional support

- A buddy system to pair new managers with a more experienced manager who is recognised as having an inclusive leadership style. These managers could be identified through employee feedback or through the performance against an inclusive leadership behavioural framework (reference page 22). The coaching and mentoring programmes could also be leveraged here for managers.
- The buddy systems would help with confidence and consistency in using discretion relating to, for example, flexible working requests, family emergency leave or compassionate leave.
- Ensure that all managers have received the Building Brilliant Managers blueprint and all the ED&I related guidance and any other development sessions that discuss key skills for leadership and methods for mitigating bias.



#### Measurement

- Track the impact of such focused training through employee satisfaction rates, voluntary attrition rates and absence rates, comparing data prior and post training in quarterly intervals in line with other ED&I reporting cycles.



### 4.4 Adjustments & accessibility

#### What we observed

- Homes England has a Disability & Carers employee network and a Neurodiversity employee network. The Disability & Carers network has a clear Terms of Reference and includes reference to physical impairment, mental ill-health, developmental conditions or any other condition covered by disability legislation.
- Homes England is a certified Disability Confident Employer.
- Whilst reasonable adjustments are available when asked, there is no policy. Our focus groups highlighted that little information is provided on the process and what is available.
- A workplace adjustments passport was developed by the Disability & Carers employee network to support conversations with managers.
- Office guides are available, and there is some consideration for diverse needs in some offices, e.g. gender-neutral toilets.
- There is some guidance on digital accessibility, and there are plans to improve digital accessibility. Feedback has been provided by the Neurodiversity network.
- Data relating to disability (by directorate and by grade) is reported via the D&I dashboard to leadership.

#### What we recommend (1/2)

Homes England should consider a more structured approach to reasonable adjustments and accessibility, ensuring employee needs are met, and **all are educated on when and how to implement reasonable adjustments.**

##### Understand the population needs

- Homes England could conduct listening sessions to understand the experience of these groups better, any barriers encountered and to generate ideas. Questions should be asked relating to physical, visual and mental accessibility requirements and adjustments.
- In the near future, Homes England could conduct third party independent accessibility audits of physical and online spaces and proactively ensure ongoing accessibility for these spaces.
- Homes England may also consider creating a working group made up of senior sponsors, network members, external specialists and function and facilities leads. The group could work to develop a reasonable adjustments policy/ framework with a view to creating a wider accessibility strategy.

##### Develop a reasonable adjustments policy/ framework

- Homes England could develop an adjustments policy or a roadmap for both employees and managers. The policy should cover legal requirements for providing a fully accessible workplace as well as details on a wide range of accessibility requirements and adjustments. There should also be reference to the grievance process and Dignity & Respect at Work policy.
- When developing the accessibility roadmaps for employees, consider outlining the different circumstances in which adjustments may be required, the adjustments available and where to request these. This should include getting specialist equipment.
- For the manager roadmap, more specifically, details should be included on considering adjustments during objective setting and performance reviews. It should clarify that employees are to be assessed against their contributions for the period of time they have worked and that expectations and targets must take into account any long-term absences or issues.

### What we recommend (2/2)

#### Develop an accessibility strategy

- Building upon a defined policy for reasonable adjustments, Homes England may consider developing a wider accessibility strategy to attract, engage and develop people with all disabilities, including physical, sensory and learning, and neurodiversity and mental health. The organisation should consider how this feeds into the ED&I strategy and objectives.
- The strategy design could begin with an in-depth accessibility assessment of processes, learning and communications to identify any barriers that prevent or impede any groups from accessing information or undertaking activities required for their role and general ability to engage at work. This assessment could form a baseline to set KPIs and the ongoing review process.
- Suggested workstreams for the strategy include office, online and client sites (where applicable) with enabling technologies and culture change.
- Contributions from the network members should be on paid time (see *page 20*), ensuring capacity for meaningful input.
- Training content on managing the full spectrum of disability could be developed by the working group and integrated into manager training to develop organisational capability in recognising and supporting different abilities.
- As a longer-term aim, the group should consider how best to establish a process and a 'safe space' to support those employees who do not disclose mental health challenges for fear of detrimental impact to their careers but can suffer in performance appraisals as a result.

## 4.5 Caring responsibilities

## What we observed

- Homes England meets statutory legislation on maternity, paternity, shared parental and adoption policies. KIT days are offered during maternity and adoption leave.
- 5 paid days leave within any 12 month period are offered to deal with emergency situations as part of maternity and adoption leave only.
- There is little evidence of targeted support for those with caring responsibilities beyond parental responsibilities, such as looking after ageing parents or dependants with a disability or medical needs.
- Data is collected to understand the scale and nature of caring responsibilities across the workforce; however, this has not yet been included in the D&I data dashboard, and there is little evidence of action taken as a result of the findings.
- Homes England has an active Disability & Carers employee network with +100 members.

## What we recommend (1/2)

## Understand the carer population

- Any request for data should be accompanied by a clear definition of what constitutes being a carer, e.g. *a carer provides support to a family member, partner or friend who could not manage without this help; this could be due to disability, frailty or illness.*
- Please see page 24 on driving data disclosure. Caring responsibility findings should be included in the D&I data dashboard and regular reporting and should inform the support offered.
- Homes England could conduct listening sessions to better understand the barriers being encountered and generate ideas for developing a dedicated policy.

## Benchmark against the industry

- Homes England could look to perform a benchmarking analysis on what market and property industry-leading companies offer in terms of best-in-class provisions for carers. This analysis should focus on other categories of carers beyond parents.
- This benchmarking exercise could review the possibility of increasing the paid leave provisions for employees with caring responsibilities.
- Furthermore, it could explore and seek to articulate the value to Homes England through increased talent retention and satisfaction rates or reduction in employee absence.

## Developing a policy or framework

- Building upon an understanding of the Homes England caring population and best in class caring provisions in the industry, consider creating a dedicated carers policy covering the new set of provisions, eligibility criteria and how employees can access those.
- Any policy or framework should include a variety of support mechanisms, provide links to other resources and be widely published and promoted.
- Draft policies should be reviewed by the Disability & Carers network for feedback and amended as needed.

## Leading practice

Centrica offers employees four weeks' paid leave a year for caring. They calculated the estimated annual financial saving is c.£1.8 million by avoiding unplanned absences and presenteeism.



### What we recommend (2/2)

#### Develop market leading support

Consider implementing a series of features of support, including, but not limited to:

- Additional paid leave for carers
- Flexibility with career breaks and annualised days contracts
- Additional support for managers on how to apply policies and support employees through various caring scenarios, including during performance reviews.
- Introduce a 'carer's passport' to explain responsibilities and agreed arrangements to new project teams and managers.
- Escalation route for assistance in negotiating schedule adjustments with managers if required.
- Communications campaign, potentially during Carers Week, to celebrate the efforts of carers and explain the importance of a culture that supports them.

#### Managerial support

The employee's immediate team are the most important source of support and can 'make or break' the experience of transitioning to and from leave or taking time off to look after a dependent.

In the cases of parental and carers leave, ensure that open and supportive conversations are held with the employee before they go on leave, covering:

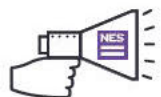
- How the handover should be managed
- Method and frequency of communications with Homes England during leave.
- Their career aspirations and the support they require from the team to reach these
- Potential changes to working patterns once back from leave and/or the longer-term impact of their caring responsibilities e.g. hours, location, types of role.

Managers should be actively supported to lead such conversation through the Building Brilliant Managers blueprint and dedicated HR business partners.

#### Buddy system

Homes England may want to consider implementing a parents and carers buddy scheme. This could be through the Disability & Carers network or the coaching programme.

- Individuals who are about to go on leave are paired with a colleague who may also have caring responsibilities, and this 'buddy' gives support through regular mentoring-type conversations and discussing questions and concerns that the individual may have.
- Alternatively, the buddy role could be undertaken by someone without caring responsibilities but who is an effective coach or listener who may have been trained through the coaching programme.



On this page we set out a series of actions that you can use to move your remaining 'Partially met' NES competencies to 'Met'.

Competency	Suggested action
3.3 Business case ●	<ul style="list-style-type: none"> <li>▪ We noted an opportunity for Homes England to further strengthen the existing business case for ED&amp;I (as presented in the annual ED&amp;I report 2020/21) by emphasising and bringing specific examples of the unique value the organisation brings through serving and empowering diverse local communities.</li> <li>▪ The business case should articulate how ED&amp;I supports the vision, purpose and organisational strategy of Homes England's agenda and how this relates to the overall direction of the company, aimed at ensuring that more homes are built in the areas of greatest need.</li> <li>▪ Examples could include giving a voice to the experiences of employees from different backgrounds working on Homes England's projects through a dedicated storytelling campaign as well as highlighting commercial successes where ED&amp;I has been a material factor in winning work or strengthening key client relationships.</li> <li>▪ To ensure buy-in across the whole workforce, the business case could be supplemented with versatile examples of ED&amp;I creating personal and business value for majority and minority employee groups alike.</li> </ul>
6.1 External relationships and CSR ●	<ul style="list-style-type: none"> <li>▪ Homes England would benefit from developing a dedicated CSR strategy emphasising how engagement with local communities impacts and supports ambitions towards promoting diversity and inclusion. The strategy should consolidate the foundational purpose of the organisation such as building and providing affordable housing, along with existing charitable work such as the support for "Young Minds", St Mungos, Bristol council and various housing associations.</li> <li>▪ The CSR strategy should extrapolate the overall positive impact of the organisation in one cohesive, engaging message that can be shared externally.</li> <li>▪ Homes England should seek to develop a dedicated volunteering policy for employees, providing them with paid dedicated volunteer days and easy access to charitable initiatives and community projects where employees can actively participate and be recognised for their contributions.</li> </ul>
6.5 Human rights and modern slavery ●	<ul style="list-style-type: none"> <li>▪ In addition to the internal risk assessments that Homes England performs in relation to modern slavery and human rights, the organisation should consider engaging an independent third-party assessor to perform an annual risk assessment of the structural operations.</li> <li>▪ The findings of this assessment should be shared directly with the Board and any gaps should be prioritised for remediation</li> <li>▪ Consider expanding the existing modern slavery training for managers to all grades within the organisation with a mandatory annual completion requirement.</li> </ul>



# Assessment



## Core components

### 1.1 Culture

'Diversity' is identified and communicated as one of the core values of the Homes England Way; however, employees suggested that the Homes England values are not actively promoted. Our focus groups highlighted some cultural challenges with references to a hierarchal and inconsistent organisational culture. The ED&I Report noted some instances of bullying and harassment, and our focus groups identified a lack of psychological safety in calling out inappropriate behaviours.

### 1.2 Policies and practices

Clear policies are in place, including maternity, paternity, shared parental and adoption policies, flexible working and Dignity & Respect at Work. A transitioning at work policy is in place that goes beyond statutory requirements. While some guidance materials are available to managers to support implementation, our focus groups identified some inconsistencies between managers on policy implementation. Employee network groups are typically consulted during policy review via Equality Impact Assessments.

### 1.3 Engagement survey

Homes England recently expanded the engagement survey question set during its new pilot in 2020 to include several statements relating to ED&I. Networks were consulted on the pilot questions. Survey results can be split by demographic; however, there is no evidence of meaningful analysis by demographic. Results are shared with senior leadership and engagement plans have been created for each Directorate. Focus group participants expressed a lack of awareness of actions taken as a result of engagement survey results.

### 1.4 Targeted training

Under its ED&I objectives, Homes England aims to improve the mandatory ED&I training and offer training on the Public Sector Equality Duty. Our focus groups highlighted that employees no longer have access to Civil Service ED&I training. Some strands of ED&I training have been offered, e.g. on neurodiversity, race, menopause, domestic abuse and housing inequalities. Some targeted ED&I training has been offered to managers, to the recruitment team and to employee network members.

### 1.5 Communications

A detailed ED&I communications plan is in place, including a range of key messages, target audiences and measures for success. This covers internal channels only, including emails, intranet articles, blog posts and virtual events. Externally, there are ED&I communications via the ED&I Report and evidence of participation in ED&I industry events. In 2020, Homes England secured a place in Stonewall's Top 100 LGBT+ Inclusive Employers and was recognised as a top 20 Trans Employer.



## Your talent

### 2.1 Talent attraction

ED&I objective 1 refers to ensuring inclusive talent attraction and recruitment processes. Some efforts have been made to attract diverse talent at entry level, such as the Homes England apprenticeship programme and recent EED&I analysis of universities to target. There is no evidence of initiatives at experienced-hire level. Applications go through the Applicant Tracking System (ATS), and data is collected on ED&I. There are plans for further collection and analysis of applicant ED&I data.

### 2.2 Recruitment and onboarding

ED&I objective 1 refers to ensuring inclusive recruitment and onboarding. Processes have been designed to mitigate bias, e.g. training, gender-balanced panels, shortlisting candidates with disabilities who meet minimum criteria and at least one woman who meets minimum criteria for senior roles. Our focus groups noted some gaps in implementation, e.g. on blind CVs and a lack of transparency in the process for temporary positions, especially at senior levels. New joiners receive some information on ED&I during induction.

### 2.3 Appraisal and performance monitoring

Homes England introduced Building Brilliant Performance in 2021. This consists of annual priorities, quarterly review & objective setting and monthly 1:1 conversations between the employee and manager. Guidance materials have been provided on general performance expectations; however, expectations have not been defined per grade. 360 feedback is not in place and there is no guidance for agency or contingent workers.

### 2.4 Career progression

Whilst Homes England has ambitions for a 'Grow Your Own' agenda, there are currently no career pathways or progression routes that employees can follow in order to progress, and our focus groups expressed concerns over the lack of guidance on progression. ED&I data is not currently considered in promotions or succession planning. Some efforts have been made in coaching and mentoring programmes, and a pilot reverse mentoring programme between BAME network members and directors has been proposed by the network.

### 2.5 Learning and development

A learning hub is available on the Learning & Organisational Development (L&OD) intranet site. This includes a range of materials, e.g. on induction, the coaching and mentoring programmes, the Building Brilliant Managers blueprint, the BRAVE leadership programme and information on professional qualifications. Feedback has been provided by the Neurodiversity network on some training. The Building Brilliant Managers blueprint was launched in September 2021 and covers a range of people management topics.

## Your business

### 3.1 Strategy

Homes England published its first ED&I Report in 2020 containing its ED&I strategy. This contains five ED&I objectives to achieve by 2024, covering internal policies, processes and systems; organisational culture; leadership commitment and action; partners and suppliers; and the communities that Homes England serves. Each objective has a senior sponsor; however, our focus groups expressed concerns that ED&I might not be viewed as a strategic priority among some leaders.

### 3.2 Bias

There is evidence of reducing bias in the recruitment process, e.g. through hiring manager training, gender-balanced panels, shortlisting candidates with disabilities who meet minimum criteria and at least one woman who meets minimum criteria for senior roles. An introduction to unconscious bias is provided to new joiners as part of induction training. Focus groups, however, highlighted that employees would like more training on unconscious bias across employee processes and more guidance on challenging inappropriate behaviour.

### 3.3 Business case

The business case for ED&I has been shared in the ED&I Report. This includes some reference to the communities that Homes England serves and the wider property industry. Several blog posts have been shared by leaders on the business case, and employee networks have demonstrated good understanding of the business case in terms of reference and strategic documents. Our focus groups expressed interest in more information on how Homes England can impact diverse communities.

### 3.4 Governance

Ownership of the ED&I strategy sits in practice with the ED&I lead in HR. Each ED&I objective has a senior sponsor, and there are plans for networks to each have a senior sponsor. Some leaders have expressed lack of clarity over expectations of the role of senior sponsor. Updates are reported to the People Group on a quarterly basis, and objectives are planned to be reviewed and published annually. There are nine employee networks; network leads meet quarterly, and there are aims to formalise the influence of networks on the strategy.

### 3.5 Setting priorities

Yearly priorities have been set for each of the five ED&I objectives within the ED&I Annual Report. Whilst there has been some work targeting specific protected characteristics - e.g. gender pay gap reporting, achievement of level 2 accreditation in the Investing in Ethnicity Maturity Matrix and plans to measure ethnicity pay gap in 2022, a recent Stonewall assessment and Disability Confident Employer certification - priorities have not been set in order to target specific diverse groups strategically nor to address areas of evidenced disproportionality.

## Your people

4.1

### Feedback mechanism

Homes England has nine employee networks with high levels of engagement. Some networks have terms of reference and strategic delivery plans. Networks were consulted on the development of the ED&I strategy and are involved in policy reviews via EIAs. For example, the BAME Network recently provided feedback on the Future of Work strategy. Networks would like their efforts to be formally recognised in terms of performance management and influence on the ED&I strategy.

4.2

### Mental health and wellbeing

Homes England offers a range of proactive and reactive support on mental health and wellbeing. This includes a wellbeing resource hub, access to a wellbeing app, employee assistance programme (EAP), wellness and recovery action plans and Mental Health First Aiders. Some targeted support has been offered, e.g. on domestic abuse. During the Covid-19 pandemic, a survey was conducted to understand better the experiences of BAME and disabled employees on wellbeing.

4.3

### Flexible working

Homes England has a flexible working policy with guidance materials and a checklist to support consistent application. The organisation also recently shared a Future Working Strategy with clear guidance and expectations for a '50-50' blended working model. Although employee networks were consulted on the strategy, our focus groups expressed concerns that there is not enough acceptance and buy-in from leadership on flexible working.

4.4

### Adjustments and accessibility

Whilst reasonable adjustments are available when asked, there is no policy, and limited information is provided on the process. Homes England is a certified Disability Confident Employer, and the Disability & Carers network and Neurodiversity network are engaged. A workplace adjustments passport was developed by the Disability & Carers network. Office guides are available, and there is consideration for diverse needs in some offices, e.g. gender-neutral toilets. The Neurodiversity network has provided feedback on digital accessibility, and there are plans to improve this further.

4.5

### Caring responsibilities

Homes England meets statutory legislation on maternity, paternity, shared parental and adoption policies, and employees are entitled to 10 'keeping in touch' days during maternity and adoption leave. Five paid days leave within any 12 month period are offered to deal with emergency situations as part of maternity and adoption leave only. Data is collected to understand the scale and nature of caring responsibilities across the workforce. However, there is little evidence of support for carers beyond parents. The Disability and Carers employee network has over 100 members.

## Your leadership

5.1

### Commitment and accountability

The ED&I strategy has been signed by executive directors, and each ED&I objective has a senior sponsor. There are plans under objective 2 for networks to each have a senior sponsor. However, some leaders have expressed a lack of clarity on expectations of what the role of a senior sponsor entails. Leaders are not held accountable for achieving the ED&I objectives or any measures of success.

5.2

### Visibility and messaging

We noted a variety of leaders and ED&I sponsors championing ED&I internally within Homes England and coming forward on a variety of relevant topics, including sharing personal stories. There is still an opportunity for the leadership team to take a more vocal role at external industry events and amplify the importance of ED&I for the social housing sector.

5.3

### Inclusive leadership

Whilst objective 3 references role modelling of inclusive behaviours at a senior level, Homes England has not articulated any leadership-specific expectations for inclusive behaviours that go beyond the 'diversity' value of the Homes England Way. General leadership training has been offered through the BRAVE training; however, there is no targeted ED&I training for leaders. Our focus groups noted some use of non-inclusive language among leaders. Leaders expressed interest in more robust ED&I training and expectations.

5.5

### Senior level scrutiny

Diversity data is reported to the senior leadership and the People Group on a quarterly basis. The data is referenced at the Nominations and Remuneration Committee (NRC); however, it is generally unclear to what extent diversity data is actively scrutinised at Executive Leadership/ Board/ NRC level. Leaders highlighted that priority had been given to data relating to gender pay gap reporting. There is currently limited meaningful data analysis to understand experiences among diverse groups, including across key processes throughout the employee lifecycle.

5.5

### Middle management

The Building Brilliant Managers blueprint was launched in September 2021, covering a range of people management topics. Topics have self-assessment tools and optional development sessions. Some targeted guidance is provided, e.g. on the transitioning at work policy. Our focus groups highlighted some inconsistencies in middle management with critical moments such as requesting flexible working, performance conversations and promotion decisions involving a high degree of manager subjectivity.

## Your relationships

6.1

### External relationships and CSR

Homes England has a range of external relationships relating to ED&I, e.g. with Young Minds", St Mungos, Bristol Council and various housing associations. It does not, however, have a CSR strategy or approach in place for its external relationships. There are no formal CSR activities available to employees, e.g. volunteering days.

6.2

### Supplier relationships

Homes England supported the development of the Developer Partner Panel (DPP 4) tender process, with D&I requirements for its supply chain. Policies and practices on ED&I are requested via the purchasing system, and awarding the contract is based on meeting the criteria according to the questionnaire. Suppliers can be accepted if selecting 'no but willing to commit.' Our interview highlighted that suppliers had been encouraged to publish ED&I objectives.

6.3

### Customer insight

Homes England impacts communities through its purpose. ED&I objective 5 aims to understand its impact on diverse communities with planned research projects into this impact. Some independent assessments have previously taken place, e.g. on the Help to Buy scheme. Homes England has recently supported the UK's first LGBTQ+ extra care housing scheme.

6.4

### Industry insight and regulations

Homes England has been involved in a range of external events on ED&I in the property industry, particularly relating to LGBTQ+. This has included collaboration with Real Estate Balance (REB), participation on advisory panels and contribution to the Estates Gazette industry-wide LGBTQ+ survey.

6.5

### Human rights and modern slavery

Homes England's Modern Slavery Act Statement adheres to compliance requirements relating to transparency provisions. The statement is supported by internal policy and statement benchmarking and sets out the key steps taken to address modern slavery within the operations and supply chain. The statement includes risk assessment and mitigation measures; however, there is no third-party assessment.

## Review and measurement

### 7.1 Pay gap

Equal pay reviews and gender pay gap analysis has been carried out and published. Updates on the gender pay gap are reported to the People Group on a quarterly basis. A subsequent pay and grading exercise recently took place across all levels of the organisation. Our interviews identified aims for ethnicity pay gap reporting.

### 7.2 Data analysis

Data is collected on the diversity profile of Homes England, and ED&I objective 1 refers to aims to increase the data declaration rate to 95%. Data is monitored monthly and reported quarterly to the People Group. There is no meaningful analysis of experiences by diverse group, e.g. through the engagement survey. Some ED&I data is collected from applicants through ATS, and there are aims to understand better the possible barriers within recruitment. There is currently limited data analysis across key organisational processes throughout the employee lifecycle, such as promotion and exit.

### 7.3 Action planning and implementation

Whilst the ED&I strategy includes 2020/21 priorities for each objective and how the objective will be achieved, there is no timeline of actions year-by-year. Updates to the People Group include only actions for the next quarter. An ED&I recruitment action plan has been developed in addition to some employee network delivery plans; however, it is unclear how these feed into the specific ED&I objectives. Our focus groups identified a lack of clarity on what is required to achieve the objectives and the implementation of those actions.

### 7.4 Review

Quarterly updates on the ED&I objectives are provided to the People Group, and the ED&I objectives are reviewed annually (and typically published in the annual ED&I report). The first review of the ED&I objectives is due to take place. Policies and practices are periodically reviewed through EIAs. These assess impact on the nine protected characteristics plus carers, socio-economic group and working patterns. Our focus groups suggested that EIAs no longer take place regularly and limited insight into the actions taken as a result.

### 7.5 Measuring impact

Success criteria have been defined for each ED&I objective; however, the criteria are high-level, and the January 2021 quarterly update to the People Group noted that the objectives are difficult to measure. No targets or key performance indicators have been set in order to measure progress.

# Appendices



I am aware  
of my own  
preferences  
and biases

I actively  
seek out  
perspectives  
different from  
my own and  
take advice

I enable  
everyone to  
contribute

I adapt my own  
style to work  
effectively with  
others

I open my  
decision  
making to  
other  
perspectives

I make success  
possible  
for all

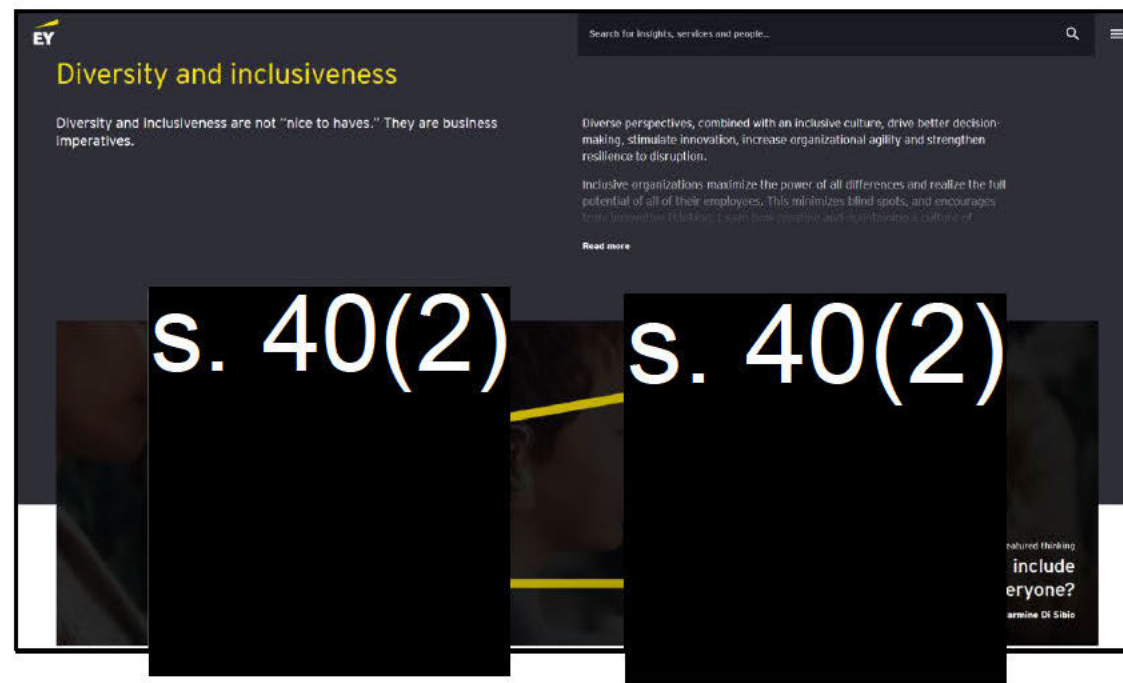


# Appendix 2: Example language to encourage sharing of data

On each job application advertised by EY, the below statement is included, which encourages applicants to share personal D&I information. This statement ties back to EY's purpose, and links to EY's D&I commitments, which are published publicly.



"Please note: prior to finalising your application, you will be asked to provide personal information across several dimensions of diversity and inclusiveness. The information you provide is kept entirely confidential and will not be used to evaluate your candidacy. We collect this data to help us analyse our recruitment process holistically and implement actions that promote diversity and inclusiveness. While optional, we encourage you to provide this information to hold us accountable towards our goal of building a better working world. Read more about our commitment to diversity and inclusiveness [here](#). We ask because it matters!"



# Appendix 3: ED&I data maturity assessment framework

		Ad hoc	Formal, Aligned	Enterprise-wide, Proactive	Continuous, Validated	Best of Breed
		Increasing Maturity				
		Level 1	Level 2	Level 3	Level 4	Level 5
Information Management Assessment Dimensions	Data Governance	No data governance within the organisation. Processes are ad-hoc, unpredictable, poorly controlled, and reactive. Lack of ownership of the data may lead to or sustain data quality issues.	Some standard policies and processes exist, but are applied on an ad-hoc basis. Minimal data quality checks performed upon extraction from source systems to the data warehouse.	Data governance exists and these are used to establish consistency in the organisation's data repositories, driven primarily by business unit, initiative, or program.	Data governance framework exists and is actively applied. Data Governance has an active role in data management, data quality, and key architecture projects.	Quantitative enterprise-wide data standards are firmly established, applied across the architecture and measured. Standards are reviewed and updated to reflect changing business objectives.
	Data Quality	No data quality exist within data architecture. Data is regularly transformed, combined, and reused with minimal testing	Minimal data quality checks performed upon extraction from source systems to the data warehouse. Data checks are limited to technical validations with no input from the business.	Data quality standards and policy exist but may not be actively applied across all data stores. Tools are in place to verify data quality, cleanse and enrich during import to the data repositories (warehouse, marts, etc.).	Business is engaged in setting policy and standards for data quality. High level of consistency across systems with validation and analysis performed on data available in the data repositories	Data quality is actively managed in the data stores, with erroneous records identified through automated controls and user feedback. Changes flow back to source systems.
	Data Usage	Reporting is performed with heavy use of non-standard desktop tools. Reports are static and point-in-time	Spreadsheets and analytic tools are used and bespoke data marts are created with minimal enterprise guidance	Interactive reporting and analysis across functional boundaries. End user tools exist for direct access to enterprise data but with functional gaps.	Data architecture supports analysis beyond static reporting and uses standard enterprise tools. Users understand definitions and have tractability to source of information	Real-time interactive reporting and dashboards provide the business with a comprehensive view of the organisation to support strategic business decisions and operations.
	Data Management	Point to point solutions for data integration. Wide use of excel spreadsheets and Microsoft access databases. No data management standards exist. Metadata is not centrally managed or maintained.	Multiple data marts. Metadata management exists within but is extremely limited in scope and usage. Data movement tools and standards are inconsistent.	Integrated data flow across well established data repositories providing enterprise metadata. Data privacy rules established	Service components and framework defined for modular implementation of repositories and data movement. Adaptive metadata. Data visibility rules are applied and auditable.	Integrated master data and metadata with data integration.. Use of structured and unstructured data. Supports real time integration as well as batch
	Data Architecture	Data design and architecture is driven by the business units with no common standards nor strategy	Architecture standards exist but are not enforced. Tactical needs drive the design and use of data stores within the Business Units. Data services are limited and manually intensive.	Established data framework based on defined business strategy. Clearly defined technology standards. Documented data models. Data architecture improvements are considered as part of the annual budgeting process.	Service Orientated Architecture for data distribution is followed across the enterprise. Established set of reusable design components. An object model for data is used to drive architecture decisions and align new projects to the enterprise strategy.	Integrated architecture processes exists across all architecture domains and are actively maintained. Architecture aligns with enterprise strategy and is scalable and flexible to adapt to changing business needs.

## Appendix 4: Example ED&I data analysis blueprint

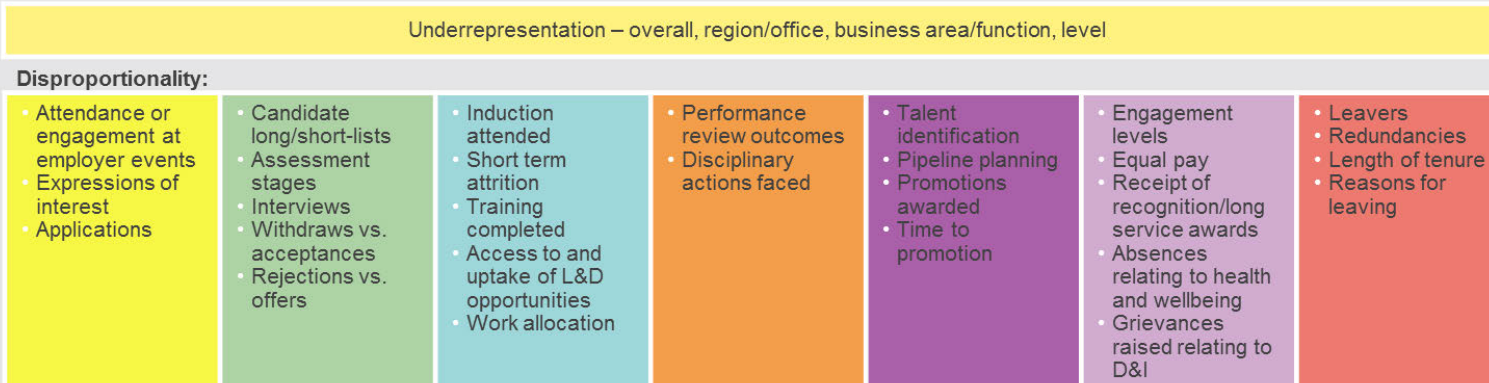
### Information captured...

Capture data through application/onboarding forms and HR systems (on an ongoing basis) and track this data against key talent process



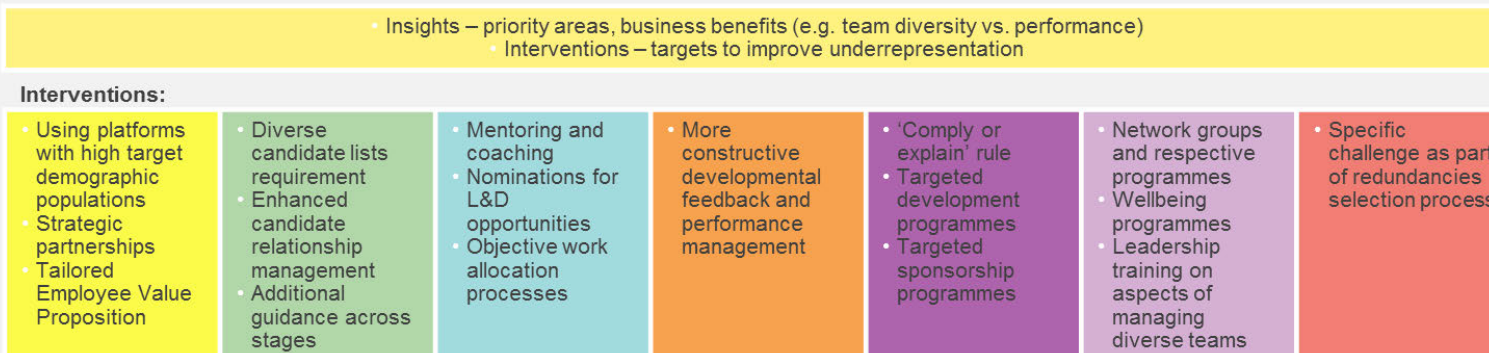
### ...enables analysis...

Develop an understanding of any underrepresentation across the organisation and disproportionality of outcomes across talent processes



### ...that drives insights and interventions.

Help make informed decisions, shape future strategy and support interventions to increase representation and improve fairness of talent processes.



# 07 Appendix 5: Supplier Equality Standard overview (1/2)

## About EY SES

- ▶ Using existing diversity, inclusive and sustainability methodology frameworks and insights gathered by EY teams, the survey-based global solution can help you to measure the maturity of your suppliers' practices and policies.
- ▶ The tool has been designed to be customized to your requirements, offering a user-friendly interface that is easily accessible through a link, providing you with the flexibility to allow one or multiple teams within your supplier's organization to connect to and provide answers to the assessment, as well as upload supporting documentation.
- ▶ Upon completion of the assessment by your suppliers, EY teams will review the survey results and produce a summary report which will highlight the vendors' responses and achievement against the EY SES assessment framework. It will also be possible to generate vendor specific reports for additional detail.
- ▶ Organizations can undergo a D&I-only supplier assessment or combine the assessment to also include sustainability-focused topics.

A global service utilizing the **latest survey technology** and leveraging a **bespoke reporting application**

Consists of both sustainability and D&I frameworks to cover the most business-critical considerations for a supply chain

Industry-agnostic, **relevant and applicable**, regardless of sector and size, with tailorable questions to address sector priorities and challenges

Accessible and non-burdensome with a high-end user experience

Registered trademark at a global level

# 07 Appendix 5: Supplier Equality Standard overview (2/2)

## Key functionalities of the EY SES

The EY SES has been developed with two options, both of which can be tailored to the needs of the participating organizations. The assessment is structured in the form of a survey with specific topics and supporting questions for each topic. EY teams can analyze the results and provide a final report to you, comparing all suppliers in terms of proficiency, along with identifying the underlying details contributing to each supplier's individual score.



# National Equality Standard

Homes England

Final presentation

March 2022



Homes England



# In this presentation

1. A recap on the National Equality Standard
2. Your NES journey
3. Headline results and benchmarking
4. Key strengths and areas for development
5. Next steps

## Assessing organisation

Ernst & Young LLP  
1 More London Place  
London  
United Kingdom  
SE1 2AF

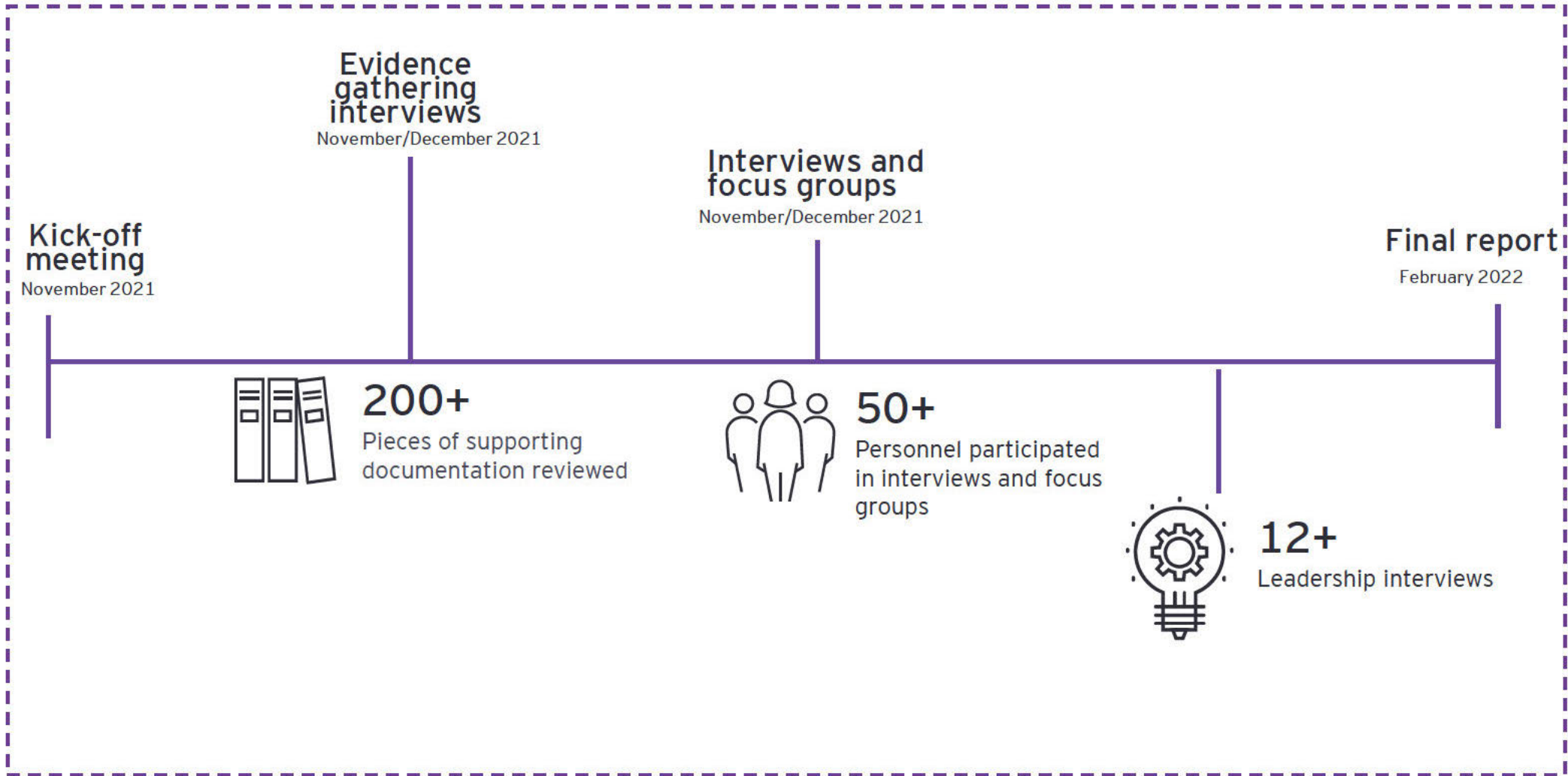
NES is a registered trademark of Ernst & Young LLP.  
This is a confidential document. You are prohibited from sharing the content of this document with any third party without the explicit consent of the EY NES CEO.



- Government backed and industry recognised national standard for equality, diversity and inclusion
- External benchmark which provides a comprehensive review of policies and practices and strategic guidance and recommendations
- 400+ cross-sector clients
- Leadership role on Race Disparity Advisory Group / Parker Review



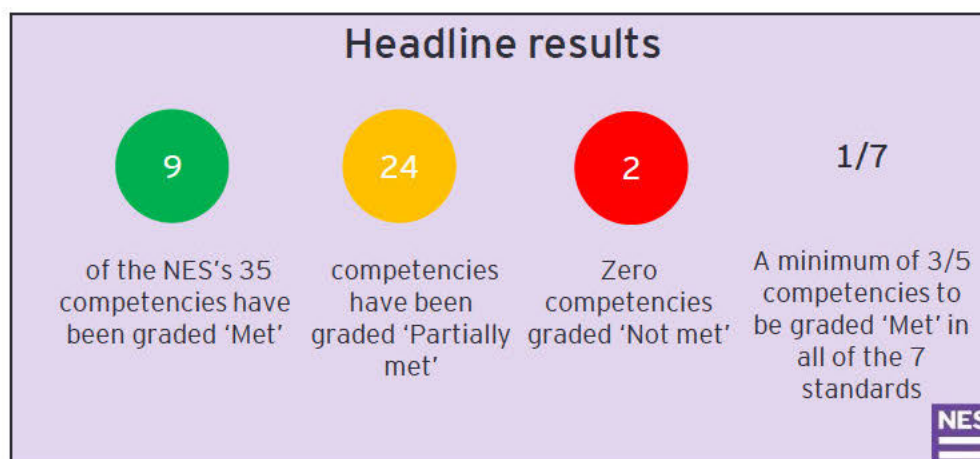




The **National Equality Standard** consists of 35 competencies, each of which will be graded 'Met', 'Partially met' or 'Not met'.

To achieve certification requires:

1. A minimum of 25 (70%) of the NES's 35 competencies to be graded 'Met'
2. A minimum of 3/5 competencies to be graded 'Met' in each of the 7 areas that the NES's competencies are divided into
3. 0 competencies to be graded 'Not met'



# 03

## Summary of results



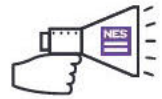
Homes England results against each of the 35 competencies within the NES framework:

1 Core components EDI	2 Your talent	3 Your business	4 Your personnel	5 Your leadership	6 Your relationships	7 Review and measurement
● 1.1 Culture	● 2.1 Talent attraction	● 3.1 Strategy	● 4.1 Feedback mechanism	● 5.1 Commitment & accountability	● 6.1 External relationships & CSR	● 7.1 Pay gap
● 1.2 Policies & practices	● 2.2 Recruitment & onboarding	● 3.2 Bias	● 4.2 Mental health & wellbeing	● 5.2 Visibility & messaging	● 6.2 Supplier relationships	● 7.2 Data analysis
● 1.3 Engagement survey	● 2.3 Appraisal & performance monitoring	● 3.3 Business case	● 4.3 Flexible working	● 5.3 Inclusive leadership	● 6.3 Customer insight	● 7.3 Action planning & implementation
● 1.4 Targeted training	● 2.4 Career progression	● 3.4 Governance	● 4.4 Adjustments & accessibility	● 5.4 Senior level scrutiny	● 6.4 Industry insight & regulations	● 7.4 Review
● 1.5 Communications	● 2.5 Learning & development	● 3.5 Setting priorities	● 4.5 Caring responsibilities	● 5.5 Middle management	● 6.5 Human rights & modern slavery	● 7.5 Measuring impact
1/5	1/5	0/5	2/5	1/5	3/5	1/5
X	X	X	X	X	✓	X

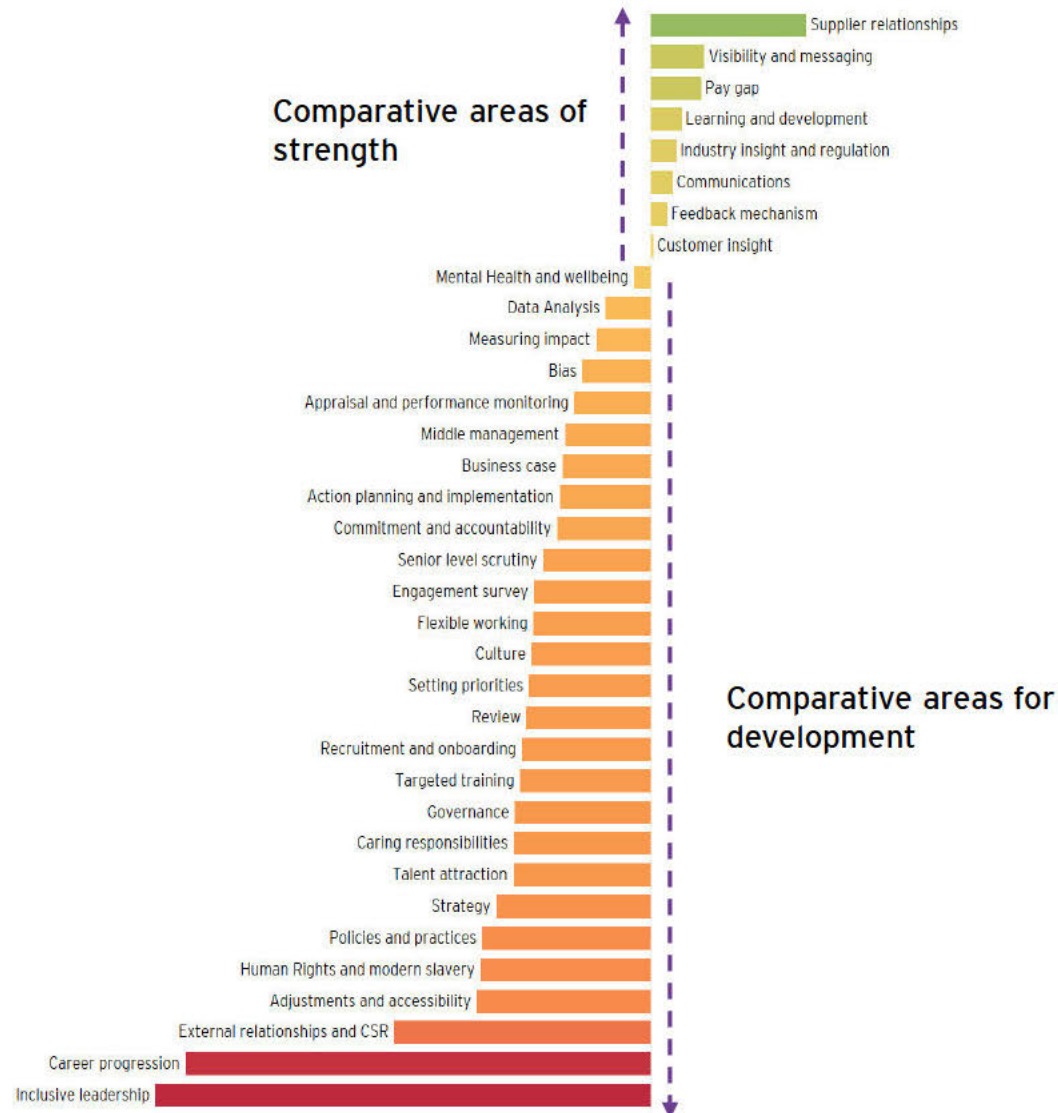
Key: ● Competency has been graded Met ● Competency has been graded Partially Met ● Competency has been graded Not Met

# 03

## Benchmarking - all clients

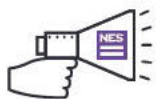


The charts below show Homes England's NES results when benchmarked against all organisations that have undertaken an NES assessment. We use this benchmarking to highlight comparative areas of strength and weakness.



# 03

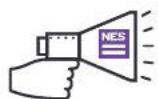
## Benchmarking - Industry specific



Homes England's overall result benchmarked against organisations in the UK government sector that have undertaken a National Equality Standard assessment.

Underlying each of the 35 competencies are five-point scoring criteria. These criteria range from one point (competency 'not met') to 4 or 5 points (competency 'met'). The maximum available score is 175 and Homes England have scored 110.





We observed the following areas of strength within our assessment:

### Communications, visibility & messaging

Detailed D&I comms plan with a range of internal channels and audiences

### Learning & development

A range of training including the recently launched Building Brilliant Managers blueprint

### Feedback mechanism

Active engagement of nine employee networks

### Mental health & wellbeing

Both proactive and reactive support - resource hub, EAP, wellness action plans, champions

### Pay gap

Action planning and quarterly updates to leadership on the gender pay gap

Year	Mean Gender Pay Gap	Median Gender Pay Gap
1st March 2017	18.60%	15.60%
31st March 2018	18.25%	15.50%
31st March 2019	18.00%	15.30%
31st March 2020	18.00%	15.24%

### Industry & customer insight

Involvement in external events on D&I, particularly LGBTQ+, in the property industry and support for the LGBTQ+ extra care housing scheme

### Supplier relationships

Supported the development of the Developer Partner Panel with D&I requirements



The pages overleaf outline the steps required to move each *Partially met* or *Not met* competency to *Met*. Overall, Homes England has scored Partially met or Not met across 26 competencies. In order to achieve the NES, Homes England requires 16 competencies to *Met*. We have structured these into the below 11 recommendations.

#### RECOMMENDATION 1

Developing a set of actionable and measurable priorities to enhance the existing ED&I strategy

**Objectives:**

- 1. Systems
- 2. Internal
- 3. Leadership/Board
- 4. External
- 5. Customer

**Activities/initiatives:**

- E.g. 1. Develop internal culture, diversity, equality, inclusion, gender, pay, pay equity, pay transparency, etc.
- E.g. 2. Develop ED&I strategy, internal communication, training, etc.
- E.g. 3. Develop ED&I strategy, internal communication, training, etc.
- E.g. 4. Develop ED&I strategy, internal communication, training, etc.
- E.g. 5. Develop ED&I strategy, internal communication, training, etc.

#### RECOMMENDATION 2

Building out a formalised ED&I governance structure

**ED&I Governance Structure:**

- Executive Leadership Team
- People Group
- ED&I Strategic Drive
- ED&I Resource Governance
- ED&I Strategy and Planning
- ED&I Reporting and Accountability
- ED&I Data and Analytics
- ED&I Communications
- ED&I Training and Development
- ED&I Partnerships
- ED&I External Relations
- ED&I Internal Communications
- ED&I HR and Talent
- ED&I Legal and Compliance
- ED&I Risk and Resilience
- ED&I Sustainability
- ED&I Innovation
- ED&I Digital
- ED&I Security
- ED&I Health and Safety
- ED&I Environment
- ED&I Social
- ED&I Governance

#### RECOMMENDATION 3

Introducing inclusive leadership expectations

**Define** **Develop**

**Train** **Embed**

**Measure**

#### RECOMMENDATION 4

Leveraging employee data to support strategic ED&I decisions

**Gender by Grade - Directorate**

Grade	Female	Male
Analyst	38.12%	61.88%
Specialist	32.14%	67.86%
Senior Specialist	34.42%	65.58%
Head of Service	30.07%	69.93%
Director	32.96%	67.04%
Assistant Director	33.11%	66.89%

#### RECOMMENDATION 5

Fostering an inclusive culture at Homes England

#### RECOMMENDATION 6

Supporting the career progression of diverse employee groups

**Mapping** **Sponsor** **Programmes** **Bias** **Opportunities**

#### RECOMMENDATION 7

Enhancing your existing performance monitoring process to be more inclusive

**Subject matter expertise** + **Performance evidence** + **Other quality evidence** = **Single process**

#### RECOMMENDATION 8

Developing your approach to diverse talent attraction and recruitment

**Job opening** → **Recruitment** → **Offer**

#### RECOMMENDATION 9

Supporting your middle managers through targeted training

**Targeted training**

#### RECOMMENDATION 10

Expanding your approach to employee adjustments and accessibility needs

#### RECOMMENDATION 11

Providing further support to employees with diverse caring responsibilities

**Carers population** **Industry benchmark** **Dedicated policy** **Support mechanisms**

# 04

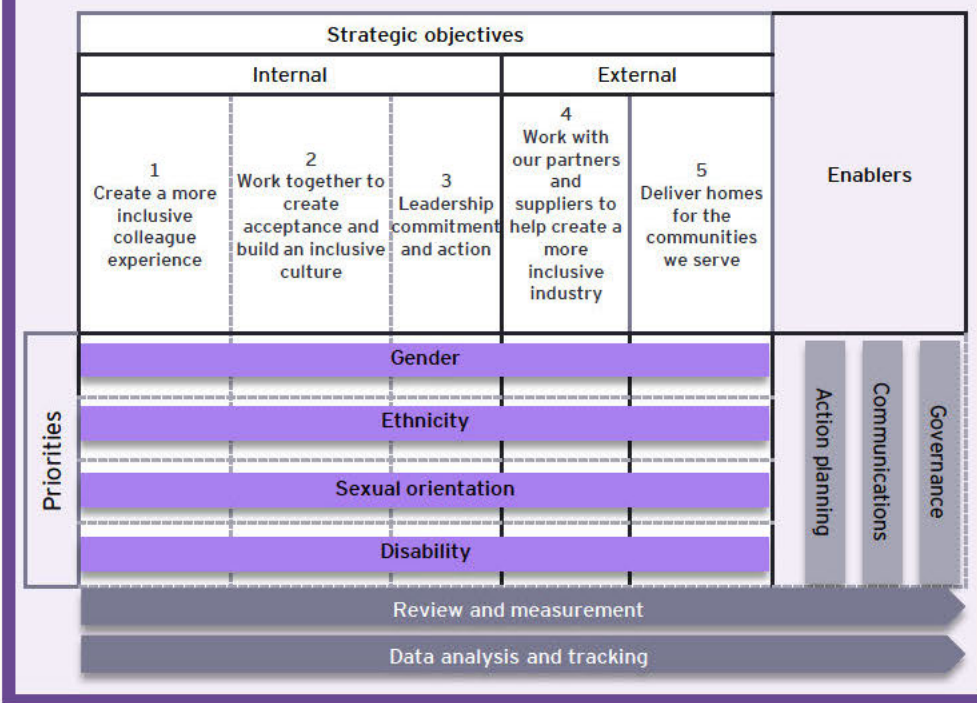
## Recommendation 1

3.1 Strategy

3.5 Setting priorities

7.4 Review

### Developing a set of actionable and measurable priorities to enhance the existing ED&I strategy



- Underpin the 5 ED&I objectives and associated initiatives with data-driven priorities based upon targeted protected characteristics
- Identify and set clear, measurable success criteria for the ED&I objectives
- Develop a central ED&I action plan for the objectives, including objective targets/success criteria, clear owners for each action (including employee networks), risks and dependencies, and milestones
- Report progress regularly and review the ED&I objectives and priorities annually

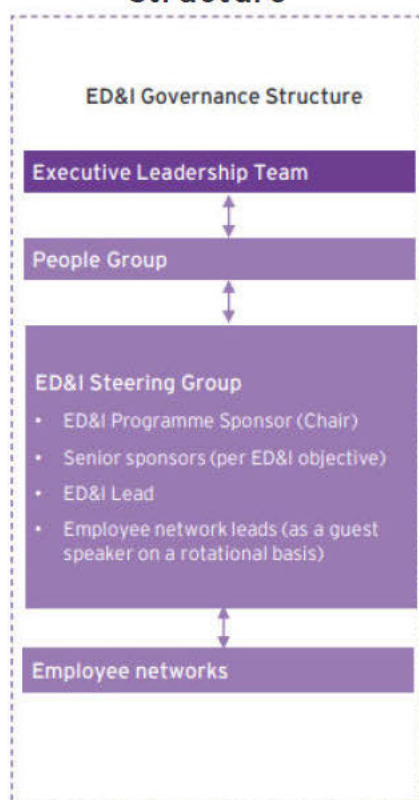


## 3.4 Governance

## 5.1 Commitment and accountability

## 7.3 Action planning and implementation

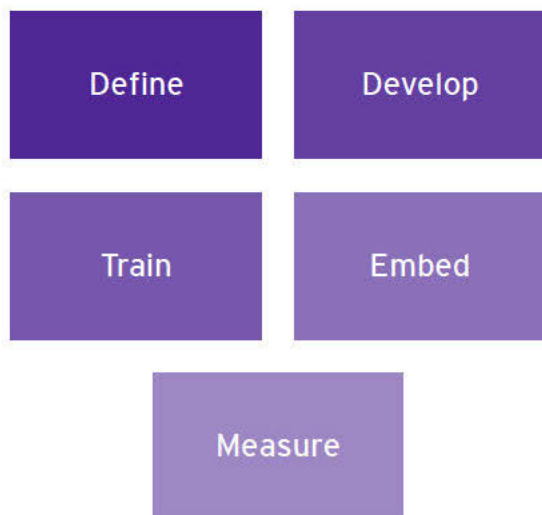
## Building out a formalised ED&amp;I governance structure



- Formalise your ED&I governance structure, embedding ED&I across all areas of the organisation
- Define key responsibilities and success requirements, including for ELT and senior sponsors
- ELT - responsibilities:
  - Overall responsibility for the delivery of the ED&I strategy
  - Embed ED&I into the overall organisation's strategy and empower the business to prioritise the topic
- ELT - success requirements:
  - Have a standing ED&I agenda item on quarterly leadership meetings facilitated by the People Leader for Homes England
  - Facilitate a robust conversation on ED&I at leadership level, taking into account diverse perspectives

## 5.3 Inclusive leadership

## Introducing inclusive leadership expectations



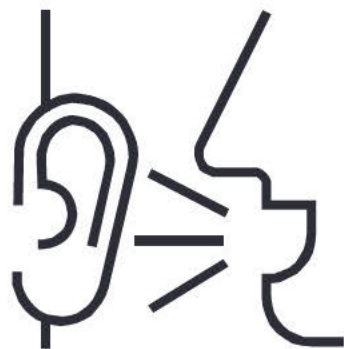
- Develop a set of inclusive behaviour objectives that build upon the values set out in the Homes England Way
- Embed behaviour objectives in the business, for example, through training, key processes and leadership scorecards
- Measure the success of these by leveraging upward feedback, pulse surveys and ED&I data reviews

## Leading practice

- Senior leaders at Johnson & Johnson have key ED&I objectives to drive accountability success.
- Leaders at IBM are formally accountable for ED&I outcomes within the organization and the supply chain. They also publicly lobby on the LGBTQ+ agenda.
- Unilever has a Gender Appointment Ratio which tracks senior leaders' records in appointing women, in addition to targeted development programs aligned with the SDGs.



## 1.1 Culture

Fostering an inclusive culture at  
Homes England

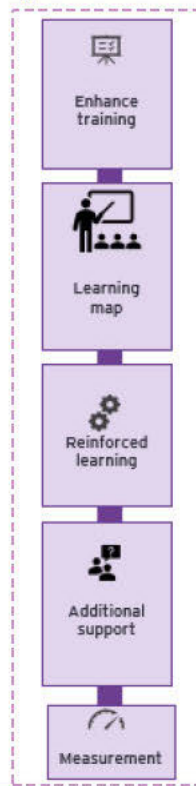
- Define and promote organisational values and behaviours required to foster an inclusive culture
- Develop a Speak Up programme that will allow employees to be open and transparent when experiencing or witnessing inappropriate behaviour
- Ensure employee and leadership alignment
- Improve data capture around unacceptable behaviours, and measure and monitor culture

5.5 Middle management

1.4 Targeted training

1.2 Policies &amp; practices

### Supporting your middle managers through targeted training



- Enhance existing Building Brilliant Manager training, with practical elements and scenarios
- Develop a role-specific learning map
- Leverage ‘inclusion nudges’
- Encourage a ‘buddy’ system between new and experienced managers
- Assessing learning progression for example comparing data on employee satisfaction rates, voluntary attrition rates and absence rates

In relation to Homes England NES certification efforts, we would like to propose the below option for immediate next steps:

- Homes England to review the NES recommendations and prepare a detailed ED&I action plan by the end of April/beginning of May to be reviewed and discussed with EY
- Conduct a check-in conversation with EY, September/October to select the 16 competencies which will be prioritised for reassessment
- EY to review and reassess Homes England's selected competencies by the end of December 2022.

I am aware  
of my own  
preferences  
and biases

I actively  
seek out  
perspectives  
different from  
my own and  
take advice

I enable  
everyone to  
contribute

I adapt my own  
style to work  
effectively with  
others

I open my  
decision  
making to  
other  
perspectives

I make success  
possible  
for all

## Example of a leadership scorecard\*

Example metrics	Target	Actual
1 Number of executive responsibilities for diversity initiatives	2	1
2 Reverse-mentoring relationship in place with associates from an underrepresented groups	Yes	Yes
3 x% of team to have completed mandatory ED&I training	90%	95%
4 Gender balance of immediate succession pipeline	15%	15%
5 % of female promotions within team	15%	19%
6 Positive responses to the engagement survey question: I feel I truly belong here**	65%	60%
7 Positive responses to the engagement survey question: I feel comfortable being myself when I'm at work**	75%	80%
8 Positive responses to the engagement survey question: Perspectives like mine are included in any decision making**	80%	65%

## Example of a management scorecard\*

Example metrics	Target	Actual
1 Number of diversity initiatives involved in	1	2
2 Completed ED&I training	Yes	Yes
3 Reverse-mentoring relationship in place with associate from an underrepresented group	Yes	Yes
4 Positive upwards feedback from direct reports referencing inclusive behaviours	3	2

Scorecards could be reviewed during the Building Brilliant Performance cycle and could have a tangible impact on promotion decisions.

\*Note: The KPIs in the scorecards above are illustrative examples. Actual KPIs should be tailored to rank.

\*\* Where engagement survey questions are included, consider targets relating to variances in survey responses by priority/ protected characteristic.

## EY | Assurance | Tax | Transactions | Advisory

### About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

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# Out of scope

OFFICIAL

From: [REDACTED]@homesengland.gov.uk>

Sent: Thursday, January 26, 2023 12:53 PM

To: [REDACTED]@homesengland.gov.uk>

Subject: FW: PCS Union - Withdrawal of FOIA request in respect of National Equality Standard (NES) report

FYI

[REDACTED]

[REDACTED]

IR Lead

M [REDACTED]  
E [REDACTED][@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)



**#MakingHomesHappen**

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)

---

**From:** [REDACTED]

**Sent:** 26 January 2023 12:52

**To:** [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

**Subject:** RE: PCS Union - Withdrawal of FOIA request in respect of National Equality Standard (NES) report

Thanks for closing that down [REDACTED]

[REDACTED]

[REDACTED]

IR Lead

M [REDACTED]

E [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)



Homes  
England

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**From:** [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

**Sent:** 26 January 2023 12:03

To: Info Gov <[infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)>

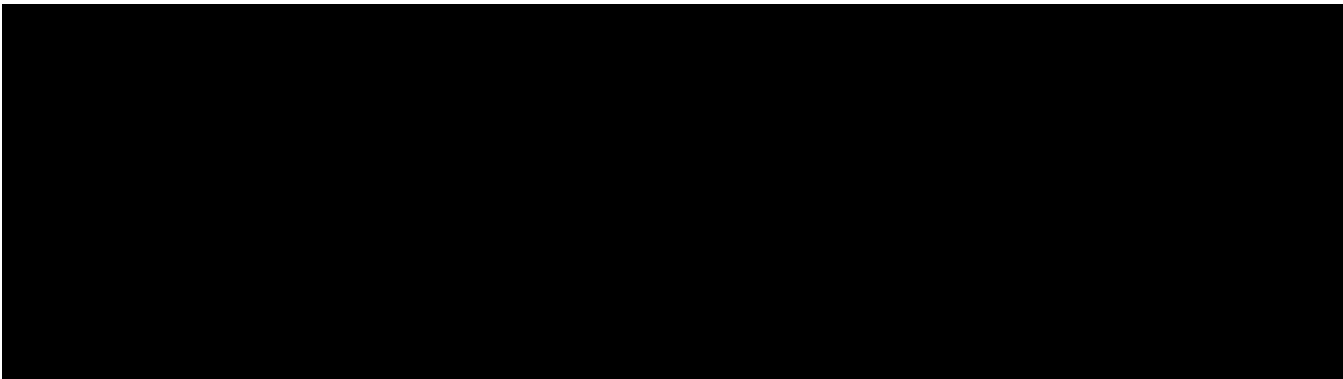
Cc: [REDACTED]@homesengland.gov.uk; [REDACTED]@homesengland.gov.uk

Subject: RE: PCS Union - Withdrawal of FOIA request in respect of National Equality Standard (NES) report

Dear Info.Gov

I have now received a copy of the NES Audit Report requested below via JNCC. This document has now been disclosed, I am happy to discontinue and withdraw my active FOIA request with respect to this specific document.

Thanks



---

From: [REDACTED]

Sent: 13 January 2023 14:34

To: Info Gov <[infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)>

Cc: [REDACTED]@homesengland.gov.uk

Subject: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Dear Homes England

**Re: a disclosure request under FOIA and TULRCA: - for a copy of the [REDACTED] National Equality Standard Audit Report**

I understand Homes England signed up to the **National Equality Standard** which 'sets clear ED&I criteria' (against which the Agency could then be independently assessed).

Homes England communicated it had commissioned an NES Audit consisting of 'a full review of all of its systems and processes (together with) conversations with stakeholders at all levels across the organisation". This NES Audit reported back last year.

As far as I am aware this **NES Audit Report** has not been shared with either:

- Homes England colleagues;
- Staff Networks;
- Trade Unions;
- Appropriate colleagues, such as ED&I champions; Mental Health First Aiders etc

PCS union anticipates Homes England will be willing to share the report with our branch. As it is in the public and union interest to have sight of the Report, this email constitutes a formal request for me to receive a copy. This request is made by me, [REDACTED] [REDACTED] [REDACTED] from this email address, under the following statutory provisions for disclosures of information:

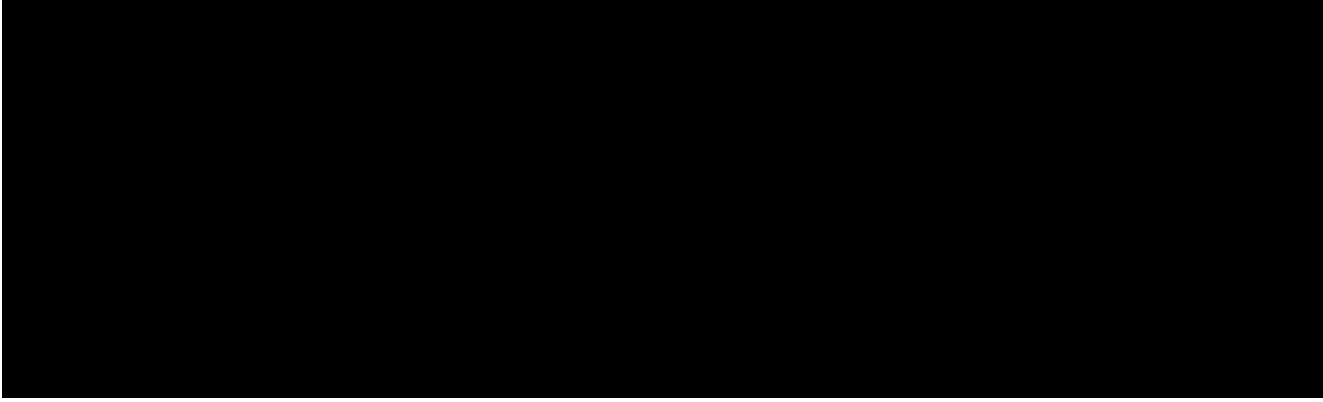
- Section 181 & Section 188, Labour Relations Act 1992 (disclosure of information concerning collective bargaining and consultation to avoid dismissals and mitigate their consequences)
- Section 8, Freedom of Information Act 2000

## Working with National Equality Standard (NES)

We have taken additional steps to critically assess our achievements, challenges and gaps. To help us set ourselves up for success we have signed up to the **National Equality Standard (NES)**. The government backed UK National Equality Standard was developed by business for business and sets clear ED&I criteria against which companies are independently assessed.

We will conduct a full review of all of our systems and process and through conversations with stakeholders at all levels across the organisation. We anticipate the outcome of the NES audit will be completed later in the year.

Thanks



# Out of scope

OFFICIAL

From: [REDACTED]@homesengland.gov.uk>

Sent: Wednesday, January 18, 2023 11:55 AM

To: [REDACTED]@homesengland.gov.uk>

Subject: FW: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

FYI

[REDACTED]

[REDACTED]

IR Lead

M [REDACTED]

E [REDACTED]@homesengland.gov.uk



Homes  
England

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---

**From:** [REDACTED] <[REDACTED]@homesengland.gov.uk>

**Sent:** 18 January 2023 10:32

**To:** [REDACTED] <[REDACTED]@homesengland.gov.uk>

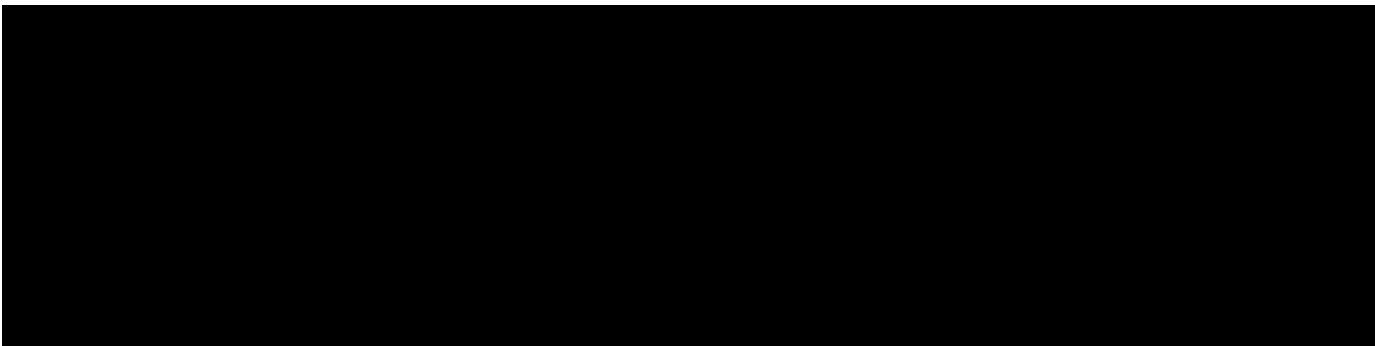
**Cc:** [REDACTED] <[REDACTED]@homesengland.gov.uk>; [REDACTED] <[REDACTED]@homesengland.gov.uk>; [REDACTED] <[REDACTED]@homesengland.gov.uk>; [REDACTED] <[REDACTED]@homesengland.gov.uk>

**Subject:** RE: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Hi [REDACTED]

Thanks for getting back. I agree that both of PCS's requests relating to this matter (under FOIA and TULRCA) will be formally withdrawn once we receive the unredacted and full copy of the NES Audit Report as is promised at this afternoon's JNCC. We will then share this report with our members.

Cheers



---

**From:** [REDACTED] <[REDACTED]@homesengland.gov.uk>

**Sent:** 18 January 2023 08:41

**To:** [REDACTED] <[REDACTED]@homesengland.gov.uk>

**Subject:** RE: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Hi [REDACTED]

Is this request still live given we're sharing the report today within JNCC?

[REDACTED]

[REDACTED]  
IR Lead

M [REDACTED]  
E [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)



### #MakingHomesHappen

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---

**From:** [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

**Sent:** 13 January 2023 16:37

**To:** [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

**Subject:** RE: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Hi [REDACTED] Thanks for getting back, I copied you in as I'm not sure to whom I should address Section 181 disclosure requests you see (and it oughtn't to have also mentioned section 188 as that has no application here, ah the perils of 'cut'n'paste' eh?!!) My apologies if it isn't you, I forgot about [REDACTED] maybe it should've been to him?

[REDACTED]



Call me if you like!

---

From: [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

Sent: 13 January 2023 16:10

To: [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

Subject: RE: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Hi [REDACTED]

Is this something that you've requested at JNCC (or to me/[REDACTED]) already and not received?

[REDACTED]

[REDACTED]

IR Lead

M [REDACTED]

E [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>



Homes  
England

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---

From: [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

Sent: 13 January 2023 14:34

To: Info Gov <[infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)>

Cc: [REDACTED]@homesengland.gov.uk>

Subject: PCS Union - FOIA and TULRCA disclosure requests - for a copy of the 2021 National Equality Standard Audit Report

Dear Homes England

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- Trade Unions;
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- Section 8, Freedom of Information Act 2000

Thanks

