



Regulator of
Social Housing

Consultation on equality objectives

Decision statement



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Consultation on equality objectives – Decision statement

1. Introduction

- 1.1. The regulator published a consultation on our draft Equality Objectives on 25 April 2023. The consultation closed on 30 June 2023.
- 1.2. Although there is no formal requirement to consult publicly on the proposed equality objectives, the regulator chose to do so to give individuals and organisations the opportunity to influence the final equality objectives that we set.
- 1.3. This document provides a summary of the key areas of feedback and sets out the regulator’s decision on the final equality objectives. This document is not intended to be an exhaustive exploration of all responses received (all of which have been taken into account in reaching the conclusions set out in this Decision statement), but a summary of the key issues and comments made. A list of respondents is provided in Annex 1.

2. Overview

- 2.1. The Equality Act 2010 requires all public bodies to publish equality objectives it thinks it should achieve to meet the general equality duty.
- 2.2. In preparing the equality objectives we have considered:
 - i. our fundamental objectives
 - ii. provisions in the Equality Act 2010
 - iii. the sector we regulate
 - iv. our regulatory approach
 - v. the progress against our current objectives.
- 2.3. We have proposed three equality objectives, two external and one internal. Both our existing external objectives have moved to business as usual. We want our new external objectives to build on our first set of objectives.
- 2.4. The objectives we consulted on were:
 - i. We will encourage the sector to better understand the diversity of the communities that they serve and that measures are in place to promote equity in relation to their service delivery
 - ii. We will be respectful and inclusive in our engagement and communication
 - iii. We will provide a supportive and inclusive working environment for all

2.5. These objectives are not the full picture of RSH's equality, diversity and inclusion (EDI) work. We have already taken steps to embed good practice, and the objectives identified are certain priority areas which build upon existing work and enable us to continue to improve.

3. Summary of responses

3.1. A total of 26 responses were received, 24 online and 2 in writing. Of these:

- 10 (38%) responses were from local authorities
- 9 (35%) responses were from individuals
- 6 (23%) responses were from private registered providers; and
- 1 (8%) response was from trade or representative body.

4. Analysis of individual questions

Question 1 – Do you agree the proposed objectives meet our obligations under the Equality Act?

4.1. All 26 respondents provided a response to this question.

Table 1: Overview of responses to Question 1

Question 1 – overview	Yes	Yes%	No	No%
Do you agree the proposed objectives meet our obligations under the Equality Act?	23	88%	3	12%

Issues raised by the response to Question 1

Comment	RSH response
<i>“The reference to Equity in the first objective lies outside the scope of the Equality Act and is a subjective and highly political term which is likely to cause confusion when the new standard is being introduced. If it was replaced with ‘Equality of Opportunity’ this would make more sense and be easier to interpret.”</i>	We are proposing some amendments to the wording of this objective. However, we think that the use of the word equity is appropriate. As part of our standards, we will be issuing codes of practice which will help providers interpret what is required. It is also worth noting that the vast majority of respondents considered equity to be an appropriate word to use.
<i>“No [quantitative] targets to enable regulator and users of regulators services to assess whether objectives met or not.”</i>	We believe that a combination of qualitative and quantitative targets is appropriate. For some actions it is not possible to quantify the outcome or effect. However, that does not mean that you cannot assess whether the actions have been met or not. We will publish an annual review of our progress against the objectives which will enable stakeholders to assess whether they are being met. For objective 3 our EDI strategy will set out more actions, including quantitative ones.
<i>“Despite our support for equality objectives and Government efforts to improve these, we do not agree that the proposed objectives go far enough.”</i> This respondent provided some detail to explain their rationale which covered the delivery proposals.	This comment was largely in relation to objective one where there was a discrepancy in the published delivery activity between the HTML version of the consultation and the pdf version. This affected part of this response which commented on out-of-date deliverables.

4.2. The overall response to this question was very positive with the vast majority of respondents agreeing that the proposed equality objectives would meet our obligations under the Equality Act. Three (12%) respondents answered no to this question, and gave their reasoning for this answer through the qualifying comments:

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

4.3. All 26 respondents provided a response to this question.

Table 2: Overview of responses to Question 2

Question 2 - overview	Yes	Yes %	No	No %
Do you agree that we have identified appropriate activity to help achieve the overall objective?	20	77%	6	23%

Issues raised by the response to Question 2

4.4. The response to this question was also positive with only 6 (23%) respondents disagreeing with the question. These respondents, as well as some that answered ‘yes’ also made suggestions for further activity to consider, to help the regulator achieve the objectives. In relation to objective one there was a discrepancy in the published delivery activity between the HTML version of the consultation and the pdf version. This affected part of one response which commented on out-of-date deliverables. These comments are not included in the summary of the responses we received.

4.5. One of our objectives relates to our new consumer regulation role. Some suggestions were about how we will carry out consumer regulation from 1 April 2024 (e.g. implementation of tenant satisfaction measures, setting baselines for data we think providers should collect). Those suggestions will be provided to the team working on our approach to consumer regulation but will not be included in the summary of responses here. This is because our work on consumer regulation is driven by our fundamental objectives and any proposals for it need to be considered in the round. Our consumer standards are subject to a separate statutory consultation. As part of the development of consumer regulation, we will be considering the Equality Act and what we can do to support the Public Sector Equality Duty (PSED). For example, in the consumer standards consultation we have proposed expectations for registered providers (RPs) to understand and support diverse needs of tenants. All other responses are summarised below.

Objective	Suggested activity	RSH response
<p>1. We will encourage the sector to better understand the diversity of the communities that they serve and that measures are in place to promote equity in relation to their service delivery.</p>	<p>For the first objective we consider that it would be beneficial to split the objective into two separate objectives. We suggest that the first should focus on data collection and understanding the diversity of communities we serve. The second should focus on the measures in place to embed changes in service delivery as a result of this. This would drive attention to ensure both elements of this wider objective are focused on as both are equally important. If you decide not to split into separate objectives, we recommend splitting the objective into two sentences for clarity to the reader. It is a long sentence currently and the two separate elements could be missed.</p>	<p>We have updated the wording of our first objective.</p>
<p>2. We will be respectful and inclusive in our engagement and communication.</p>	<p>Include an activity about lessons learnt from feedback</p> <p>The regulator should seek to build its own knowledge and relationships with communities, people with lived experience and organisations that understand the experiences of people with protected characteristics and encourage providers to show evidence that they are doing the same</p>	<p>We agree that it is important to learn lessons from feedback, but do not think this merits a standalone action. We have a well-embedded approach to learning lessons from all our regulatory activity. However, we will make explicit reference to feedback in action ii.</p> <p>We agree it is important we understand the experiences of people with protected characteristics and will continue to look at ways to do so.</p>

	<p>The regulator should seek to proactively ensure direct communication and engagement directly with under-represented groups. There are lots of residents and community groups who are not aware that there is a regulator, or how it supports residents</p>	<p>It is important that as many tenants as possible are aware of our role and we will continue to promote it as best we can. We aim to specifically consider what methods of communication or engagement would be most appropriate in respect of under-represented groups.</p> <p>Engagement with tenants will have to be within the context of our available resources.</p>
<p>3. We will provide a supportive and inclusive working environment for all.</p>	<p>The regulator should ensure it collects data on all protected characteristics of its staff to enable it to understand if it is meeting its obligations under the Equality Act.</p>	<p>We will review the data we collect and assess the feasibility of capturing all protected characteristics, while respecting individuals' right to not declare their characteristics.</p>

Question 3 – Have you got any other comments on our consultation?

4.6. 16 respondents provided a response to this question.

Issues raised by the response to Question 3

4.7. Question 3 differed from other questions as it did not ask for any agreement and instead asked for any further comments. 16 respondents provided additional comments.

4.8. Some of these responses suggested some actions we can take which have been incorporated in the feedback for question two.

4.9. A number of the responses expressed their support for the proposals and highlighted work that the respondent was doing which linked to it.

4.10. Three made recommendations on further equality objectives:

- The objectives should explicitly mention tackling stigma around social housing.
- More needs to be done on the intersectional lens of protected characteristics exploring how many glass ceiling[s] are barriers for people with multiple characteristics.
- The objectives should link in with the new tenant satisfaction measures.

4.11. We have carefully considered these and our response is set out below

- We believe that all the work we do in delivering our fundamental objectives and statutory remit serves to counter stigma. We consider that any specific initiatives on tackling stigma around social housing is more of a role for sector representative bodies such as the National Housing Federation and the Chartered Institute of Housing.
- We agree that understanding barriers for people with multiple characteristics is important and the first step to this is improving the quality of data the sector holds which is supported by our first objective.
- We believe that the focus of our objectives on the consumer standards is the correct one. However, providers may wish to cross reference the work they are doing on equality with the tenant satisfaction measures.

4.12. The final objectives and action plan are set out in the next section.

5. The Regulator’s response to the consultation feedback – Final position on the Equality objectives.

- 5.1. The following section presents the final position on the Regulator’s Equality Objectives and outlines any areas of change following the consultation. New/ changed text is in **red**.
- 5.2. We are changing the wording of objective one. This objective flows from our new consumer standards and the change in wording reflects the wording in that draft standard. We flagged in our consultation that the wording would remain under review. We believe the revised wording strengthens the objective. The precise wording of the objective and of deliverables ii) and iii) may need to be amended following the closure of our consultation on the new consumer standards. We will not re-open the consultation on equality objectives if we do so.

Proposed objective	Delivered by?
<p>1. We will use our role to help ensure that registered providers better understand the diverse needs of tenants. We will expect registered providers to take action to deliver equitable service outcomes for all.</p> <p>(Original proposal was: We will encourage the sector to better understand the diversity of the communities that they serve and that measures are in place to promote equity in relation to their service delivery.)</p>	<ul style="list-style-type: none"> i. Emphasising the importance of EDI in our engagement with the sector, including at speaking events, in public consultations and sector-facing guidance and publication ii. Reviewing the requirement in our existing standards which sets expectations of providers in respect of understanding the diverse needs of their tenants and consulting on any proposed changes¹ iii. Reviewing how we gather assurance that providers meet the requirements in respect of diverse needs set out in the consumer standards as part of our new operating model² iv. Considering the PSED in the formulation of our standards and carrying out inclusive consultation to allow for feedback from a range of stakeholders v. Carrying out Equalities Impact Assessments on policies and programmes where our PSED applies and it is appropriate to do so.

¹ Exact wording of this deliverable may change depending on the outcome of the separate statutory consultation on our consumer standards

² Exact wording of this deliverable may change depending on the outcome of the separate statutory consultation on our consumer standards and decision on how we will regulate against them

2. We will be respectful and inclusive in our engagement and communication.

- i. Respectful, fair and inclusive communications and engagement that, where practical to do so, meet individuals' communication needs
- ii. Induction and regular refresher training on accessible communication skills for externally facing roles, **this will include learning based on feedback received**
- iii. Our regulatory engagement with stakeholders, especially with tenants
- iv. Adoption of a Staff Code of Conduct which builds on and reinforces our values and behaviours
- v. Reviewing, updating and training our staff on our style guide in line with current good practice on inclusive communication to provide consistency in how we communicate.

3. We will provide a supportive and inclusive working environment for all.

- i. developing our approach to EDI in line with current and emerging research and good practice to cultivate a fair and inclusive environment where people feel valued and respected
- ii. making our recruitment processes fully inclusive to attract and recruit a diverse range of people, focussing particularly on increasing ethnic diversity at senior levels
- iii. developing our training offer to embed a positive working culture and provide everyone with opportunities to learn, develop and play to their strengths wherever possible
- iv. providing opportunities for all to have their voices heard and to feel part of the regulator to promote individual wellbeing and increase visibility of different experiences.

Annex 1: List of respondents to the consultation on the equality objectives

The table below shows the respondents to the consultation. Where the response was on behalf of an organisation and the respondent used a corporate email address, the organisation's name is given rather than the individual officer who completed the response.

Anonymous individual – 7 responses	Nigel Cook (individual)
Braintree DC	Notting Hill Genesis
Bristol City Council	South Tyneside Council
CHP	Southampton City Council
Dr Ian Gardner (individual)	Stevenage Borough Council
Lambeth Council	Stockport Homes
LiveWest	whg
Midland Heart	Wrekin Housing Group
National Housing Federation	Your Homes Newcastle

Annex 2: Equality objectives



Regulator of
Social Housing

Equality objectives

October 2023



Proposed objective	Delivered by?
<p>1. We will use our role to help ensure that registered providers better understand the diverse needs of tenants. We will expect registered providers to take action to deliver equitable service outcomes for all.</p>	<ul style="list-style-type: none"> i. Emphasising the importance of EDI in our engagement with the sector, including at speaking events, in public consultations and sector-facing guidance and publications ii. Reviewing the requirement in our existing standards which sets expectations of providers in respect of understanding the diverse needs of their tenants and consulting on any proposed changes¹ iii. Reviewing how we gather assurance that providers meet the requirements in respect of diverse needs set out in the consumer standards as part of our new operating model² iv. Considering the PSED in the formulation of our standards and carrying out inclusive consultation to allow for feedback from a range of stakeholders v. Carrying out Equalities Impact Assessments on policies and programmes where our PSED applies and it is appropriate to do so.
<p>2. We will be respectful and inclusive in our engagement and communication.</p>	<ul style="list-style-type: none"> i. Respectful, fair and inclusive communications and engagement that, where practical to do so, meet individuals' communication needs ii. Induction and regular refresher training on accessible communication skills for externally facing roles, this will include learning based on feedback received iii. Our regulatory engagement with stakeholders, especially with tenants iv. Adoption of a Staff Code of Conduct which builds on and reinforces our values and behaviours v. Reviewing, updating and training our staff on our style guide in line with current good practice on inclusive communication to provide consistency in how we communicate.

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- iv. providing opportunities for all to have their voices heard and to feel part of the regulator to promote individual wellbeing and increase visibility of different experiences.



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The Regulator of Social Housing regulates registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver and maintain homes of appropriate quality that meet a range of needs.