



Regulator of  
Social Housing

# Equality information report

**31 March 2022 – 31 March 2023**

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# Contents

- 1. Introduction..... 2
- 2. Our staff..... 3
  - Diversity profile ..... 3
  - RSH diversity profile as at 31 March 2023 ..... 4
  - Recruitment ..... 6
  - Employee engagement..... 6
- 3. Equality for those affected by our policies and practices ..... 7
  - Registration decisions ..... 7
  - Consultations..... 7
  - Regulatory referrals ..... 8
  - Regulation Executive Team and Board decisions ..... 8
- 4. Annual review of equality objectives..... 9

# 1. Introduction

- 1.1 The Regulator of Social Housing as a public body with more than 150 employees<sup>1</sup>, is required to publish relevant, proportionate equality information to demonstrate compliance with the Equality Duty and to promote transparency and accountability for our equality performance.
- 1.2 The information contained within this report has been compiled to comply with the specific duty to publish and demonstrates due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relationships between people who share a protected characteristic and those who do not.
- 1.3 It covers:
- our staff, including equality and diversity data about our staff
  - those affected by our policies and procedures
  - the annual review of progress against our equality objectives.
- 1.4 The information within this report covers the year ending 31 March 2023.

While we believe it is important to be as transparent as we can on these matters, as a relatively small organisation, there may be circumstances where we cannot publish all our diversity information to ensure we preserve the anonymity of staff.

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<sup>1</sup> 219 as at 31 March 2023

## 2. Our staff

- 2.1 One of RSH's core values is that "We embrace diversity and seek to be an inclusive and supportive organisation".
- 2.2 In 2023/24 we refreshed our Equality Objectives. Alongside this we are updating our Equality diversity and inclusion (EDI) strategy and action plan which will be completed early in 2024/25.
- 2.3 Our focus in the coming year is to continue to build on the strong foundations we have laid. We have been clear that one of the main areas we need to address is increased ethnic minority representation at senior levels in the organisation. We will continue to focus on recruitment and development of existing staff to seek to improve ethnic diversity at senior levels, where opportunities arise through expansion or staff turnover.
- 2.4 The delivery of our EDI strategy and action plan is fully supported by both the Board and the Executive, who review progress on a regular basis, and who have appointed individuals to provide an equalities challenge function. We also have a Senior Leadership Team EDI steering group which supports the delivery of the action plan, as well as a Women's Network and a Black, Asian and Minority Ethnic (BAME) network. To supplement these groups in 2022/23 we introduced a staff EDI Sounding Board and an advisory group of staff with disabilities.

### Diversity profile

- 2.5 The data below summarises our workforce diversity profile as at 31 March 2023 with comparative data for the previous two years.
- 2.6 In some cases, staff have either not completed the relevant sections or have declined to provide the data, referenced above as 'Declined to respond/ undeclared'. We take diversity monitoring seriously and continue to encourage staff to update their information to ensure that our analysis remains relevant.
- 2.7 Most of the changes are small and relate to natural variation from staff turnover in a small organisation. In 2023/24 and 2024/25 we will be experiencing significant growth which may lead to some changes in our demographics.

RSH diversity profile as at 31 March 2023<sup>2</sup>

Characteristic	Percentage of staff			Change from 2022-2023
	March 2023	March 2022	March 2021	
<b>Ethnicity</b>				
<b>Ethnic minority</b>	17%	18%	16%	-1%
<b>White</b>	81%	80%	82%	+1%
<b>Declined to respond/ undeclared</b>	2%	2%	2%	-
<b>Gender</b>				
<b>Male</b>	38%	37%	37%	+1%
<b>Female</b>	62%	63%	63%	-1%
<b>Sexual orientation</b>				
<b>Lesbian/ gay/ bisexual</b>	8%	7%	6%	+1%
<b>Heterosexual</b>	83%	82%	82%	+1%
<b>Declined to respond/ undeclared</b>	9%	11%	13%	-2%
<b>Working pattern</b>				
<b>Full time</b>	94%	94%	94%	-
<b>Part time</b>	6%	6%	6%	-
<b>Age</b>				
<b>65+</b>	2%	0%	0%	+2%
<b>55-64</b>	23%	22%	23%	+1%
<b>45-54</b>	31%	32%	34%	-1%
<b>35-44</b>	28%	27%	27%	+1%
<b>25-34</b>	16%	18%	16%	-2%
<b>Under 25</b>	0%	0%	1%	-
<b>Disability</b>				
<b>Declared disabled</b>	10%	9%	9%	+1%
<b>Declared non-disabled</b>	84%	85%	85%	-1%
<b>Declined to respond/ undeclared</b>	6%	7%	6%	-1%

<sup>2</sup> Totals may not add up to 100% due to rounding

The table below provides a further breakdown for 2023 of these characteristics by staff grade. As shown in the table, there is a lack of ethnic diversity in senior management. There is good level of diversity in relation to other characteristics. Increasing the ethnic diversity of senior management is a priority for the organisation.

Characteristic	Senior Management			All other staff		
	March 2023	March 2022	Change	March 2023	March 2022	Change
<b>Ethnicity</b>						
<b>Ethnic minority</b>	3%	1%	+2%	24%	26%	-2%
<b>White</b>	94%	96%	-2%	74%	72%	+2%
<b>Declined to respond/ undeclared</b>	3%	3%	-	2%	2%	-
<b>Gender</b>						
<b>Male</b>	48%	49%	-1%	34%	30%	+4%
<b>Female</b>	52%	51%	+1%	66%	70%	-4%
<b>Sexual orientation</b>						
<b>Lesbian/ gay/ bisexual</b>	11%	12%	-1%	7%	5%	+2%
<b>Heterosexual</b>	76%	73%	+3%	86%	86%	-
<b>Declined to respond/ undeclared</b>	13%	15%	-2%	7%	9%	-2%
<b>Working pattern</b>						
<b>Full time</b>	96%	96%	-	93%	94%	-1%
<b>Part time</b>	4%	4%	-	7%	6%	+1%
<b>Age</b>						
<b>65+</b>	0%	0%	-	3%	0%	+3%
<b>55-64</b>	23%	21%	+2%	23%	23%	-
<b>45-54</b>	41%	37%	+4%	26%	30%	-4%
<b>35-44</b>	31%	36%	-5%	26%	23%	+3%
<b>25-34</b>	6%	6%	-	22%	24%	-2%
<b>Under 25</b>	0%	0%	-	0%	0%	-
<b>Disability</b>						
<b>Declared disabled</b>	14%	15%	-1%	7%	5%	+2%
<b>Declared non-disabled</b>	79%	79%	-	86%	88%	-2%
<b>Declined to respond/ undeclared</b>	7%	6%	+1%	6%	7%	-1%

## Recruitment

- 2.8 We encourage applications from a diverse range of candidates and carry out anonymised shortlisting.

Where permissible we take positive action. We keep under review where we advertise vacancies, including use of a number of specialist job sites. We have operated anonymised shortlisting in recruitment for some time but have taken further positive action. We have for some time offered a guaranteed interview for candidates with a disability that meet the benchmark requirements for the role.

## Employee engagement

- 2.9 We currently carry out our staff survey every two years with the latest run in early Summer 2023. Our results were strong with the majority of ratings at or above the relevant public sector and Civil Service benchmarks. We have identified some priority areas to target with follow up actions.

### 3. Equality for those affected by our policies and practices

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

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

#### Registration decisions

- 3.2 There are two stages to RSH's application process for registering an organisation as a registered provider; during the second (detailed) application stage, applicants are asked to provide assurance on their compliance with the Equality Act 2010.
- 3.3 In particular, RSH asks whether applicants have any, or intend to have any, restrictions of services in place regarding persons sharing a relevant protected characteristic. Where RSH establishes that such restrictions are in place, or will be put in place, it asks the applicant for specific assurance on how it has satisfied itself that it is acting lawfully under the current equality legislation.

#### Consultations

- 3.4 As a public body, we consult on any proposed changes to our regulatory standards. As part of the consultation process, we ensure that we consider our duties under the Equality Act 2010.
- 3.5 Equalities requirements are considered at relevant stages of the drafting process when we are developing new regulatory standards and approaches. Where issues are identified, these are specifically set out in reports to both REG and the Board, to enable appropriate consideration at relevant stages of the decision-making process.
- 3.6 As part of the consultation we normally include a specific question to respondents on their agreement with and understanding of the equalities analysis we have undertaken, and we invite comment and recommendations for further consideration should it be felt we have missed anything relevant of note.



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

## Regulatory referrals

- 3.9 RSH has due regard to its equality duties in carrying out its consumer regulation work and will seek to make reasonable adjustments for individuals contacting RSH where appropriate. For example: providing correspondence in large print, taking details of complaints over the telephone (where an individual has difficulty with written forms of communication), and arranging translations of key documents and our correspondence (e.g. into Braille).
- 3.10 Where we receive individual referrals that suggest a registered provider may not have taken tenants' needs into account (in respect of a protected characteristic), we have due regard to our equality duties through our consumer regulation processes.
- 3.11 Where appropriate, we signpost the individual to services who may be able to assist, including the Equalities and Human Rights Commission and the Housing Ombudsman Service.

## Regulation Executive Team and Board decisions

The Executive Team and Board consider operational and strategic matters brought before them through the submission of formal papers. The Executive Team and Board each have members specifically charged to challenge the equality and diversity impact of organisational decisions.

- 3.12 Both Executive and Board papers include a section on equality and diversity implications, within which the author should demonstrate how RSH has given due regard to the Equality Duty in the consideration of proposals.
- 3.13 This enables appropriate consideration at the relevant stages of the decision-making process. We have developed guidance and training for staff to help them integrate thinking on equality and diversity into the development of policies and operational delivery.

## 4. Annual review of equality objectives

- 4.1 The Equality Act 2010 requires all public bodies to publish equality objectives it thinks it should achieve to meet the general Equality Duty (sometimes called the Public Sector Equality Duty). The general Equality Duty says that public bodies must, in the exercise of their functions, have due regard to the need to:
- i. eliminate discrimination, harassment, and victimisation
  - ii. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - iii. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 4.2 We published our first set of equality objectives in July 2020 following a statutory consultation between January and March 2020. There is a requirement to review objectives within four years. We committed to reviewing them earlier than this as we considered it most appropriate for our first equalities objectives to focus on areas where we can have the most immediate impact and as such we were likely to be able to make good progress on. We also wanted to ensure our objectives reflected any changes in our remit.
- 4.3 Our first three objectives were:
- i. Ensure that where equality and diversity concerns are raised through our enquiries process, they are considered in line with our statutory objectives
  - ii. The Regulator will review its methods of communicating to ensure that it does so in an inclusive way
  - iii. We will provide a supportive and inclusive working environment for all
- 4.4 We have made good progress across these objectives. The actions associated with objectives one and three have mostly been completed and mainstreamed into business as usual as required. Objective two has been completed.
- 4.5 As such, and in keeping with our commitment to review within the mandatory period, we consulted on revised objectives in Spring 2023. We published updated objectives in October 2023.
- 4.6 Our updated objectives, which build on the work of our first equality objectives, are:

- i. 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
- ii. We will be respectful and inclusive in our engagement and communication
- iii. We will provide a supportive and inclusive working environment for all

4.7 These objectives are not the full picture of RSH's equality, diversity and inclusion 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.

4.8 The work we have been doing in preparing for our expanded regulatory remit takes account of these objectives and they were worded to support the work we are doing. Our final objective remains the same. As we grow as an organisation it is vital we continue to provide a supportive and inclusive workplace and we have been undertaking a lot of work to support that objective. We will report progress against our new objectives in next year's equality information report.

