



Regulator of
Social Housing

Equality information report

1 April 2023 – 31 March 2024

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OFFICIAL

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1. Introduction

- 1.1 The RSH as a public body with more than 150 employees¹, is required to publish relevant, proportionate equality information to demonstrate compliance with the general duty of the Public Sector Equality Duty ('General Equality Duty'). We are committed to being transparent about and taking 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 2024.
- 1.5 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.

¹ 273 as at 31 March 2024

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 October 2023 we refreshed our Equality Objectives. Alongside this we are updating our Equality Diversity and Inclusion (EDI) strategy and action plan which will be incorporated into our People Plan when that is refreshed in early 2025/26.
- 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.
- 2.4 The delivery of our EDI objectives 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. We also have 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 2024 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 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.

RSH diversity profile as at 31 March 2024²

Characteristic	Percentage of staff			Change from 2023-2024
	March 2024	March 2023	March 2022	
Ethnicity				
Ethnic minority	18%	17%	18%	+1%
White	80%	81%	80%	-1%
Declined to respond/ undeclared	2%	2%	2%	-
Gender				
Male	37%	38%	37%	-1%
Female	63%	62%	63%	+1%
Sexual orientation				
Lesbian/ gay/ bisexual	7%	8%	7%	-1%
Heterosexual	85%	83%	82%	+2%
Declined to respond/ undeclared	8%	9%	11%	-1%
Working pattern				
Full time	93%	94%	94%	-1%
Part time	7%	6%	6%	+1%
Age				
65+	2%	2%	0%	-
55-64	21%	23%	22%	-2%
45-54	32%	31%	32%	+1%
35-44	27%	28%	27%	-1%
25-34	16%	16%	18%	-
Under 25	2%	0%	0%	+2%
Disability				
Declared disabled	10%	10%	9%	-
Declared non-disabled	82%	84%	85%	-2%
Declined to respond/ undeclared	8%	6%	7%	+2%

² Totals may not add up to 100% due to rounding

- 2.8 The table below provides a further breakdown for 2024 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, with greater representation at senior level for sexual orientation and declared disability compared to other staff.
- 2.9 Increasing the ethnic diversity of senior management remains a priority for the organisation. We have started to make progress against this with the increase of senior management (G19 and above) from an ethnic minority to 9% from 3%. This represents 22% of new G19 and above being from an ethnic minority. There is still more to do. One area of focus will be to develop our own talent as we have a high number of internal promotions. Amongst other things we will look at work we can do on talent management and succession planning in our People Plan to help us achieve our EDI ambitions. Additionally, we will review what data we have against all the protected characteristics to help us further target our actions.

Characteristic	Senior Management			All other staff		
	March 2024	March 2023	Change	March 2024	March 2023	Change
Ethnicity						
Ethnic minority	9%	3%	+6%	22%	24%	-2%
White	89%	94%	-5%	76%	74%	+2%
Declined to respond/ undeclared	2%	3%	-1%	2%	2%	-
Gender						
Male	43%	48%	-5%	34%	34%	-
Female	57%	52%	+5%	66%	66%	-
Sexual orientation						
Lesbian/ gay/ bisexual	8%	11%	-3%	6%	7%	-1%
Heterosexual	83%	76%	+7%	86%	86%	-
Declined to respond/ undeclared	9%	13%	-4%	8%	7%	+1%
Working pattern						
Full time	96%	96%	-	91%	93%	-2%
Part time	4%	4%	-	9%	7%	+2%
Age						

65+	1%	0%	+1%	3%	3%	-
55-64	21%	23%	-2%	20%	23%	-3%
45-54	42%	41%	+1%	26%	26%	-
35-44	29%	31%	-2%	27%	26%	+1%
25-34	7%	6%	+1%	21%	22%	-1%
Under 25	0	0%	-	3%	0%	+3%
Disability						
Declared disabled	13%	14%	-1%	8%	7%	+1%
Declared non-disabled	82%	79%	+3%	83%	86%	-3%
Declined to respond/ undeclared	5%	7%	-2%	9%	6%	+3%

Recruitment

- 2.10 We encourage applications from a diverse range of candidates and carry out anonymised shortlisting.
- 2.11 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

- 2.12 We currently carry out our staff survey every two years with the latest survey having taken place in 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. 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.
- 3.2 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; and decisions made by the Regulation Executive Team and Board.

Registration decisions

- 3.3 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.
- 3.4 In particular, we ask whether applicants have any, or intend to have any, restrictions of services in place regarding persons sharing a relevant protected characteristic (e.g. corporate objectives which refer to particular groups of people). If such restrictions are in place, or will be put in place, we ask the applicant for specific assurance on how it has satisfied itself that it is acting lawfully under the current equality legislation.

Consultations

- 3.5 As a public body, we conduct statutory consultations. As part of these consultations, we ensure we consider our duties under the Equality Act 2010.
- 3.6 In 2023, we carried out consultations relating to changes to our fee regime, revisions to our statutory guidance under Section 215 of the Housing and Regeneration Act 2008 and our revised Consumer Standards.
- 3.7 Equalities requirements were considered throughout these consultation processes. We included a specific question in the consultation documents inviting respondents to provide comments on our equality analysis. Where we received comments, these were carefully considered and, where appropriate, revisions were made. The outcome of the consultations were reported to our Executive Group and Board, and any feedback about equality implications were specifically highlighted.
- 3.8 We reported the outcome of the consultations in decision statements, which touched upon any feedback we received on the equality analysis and any updates made.
- 3.9 The consultation documents and decision statements are available on our website.

Regulatory referrals

- 3.10 RSH has due regard to its equality duties in carrying out its regulation work and will 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).
- 3.11 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 regulation processes.
- 3.12 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 Group and Board decisions

- 3.13 The Executive Team and Board consider operational and strategic matters brought before them through the submission of formal papers. The Executive Group and Board each have members specifically tasked to challenge the equality and diversity organisational decisions.
- 3.14 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 General Equality Duty in the consideration of proposals.
- 3.15 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. 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 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 RSH will review its methods of communicating to ensure that it does so in an inclusive way; and
- 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 were mostly completed and mainstreamed into business as usual as required. Objective two was 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; and
- iii. We will provide a supportive and inclusive working environment for all.

- 4.7 We have already taken steps to embed good practice in relation to EDI, 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 the 2024/25 equality information report.



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