



## **Equality & Diversity and Inclusion Strategy 2019 - 2022**

## **Index**

Introduction

Context

Vision

Delivering the strategy

Resources

Monitoring and reviewing the strategy

Key risks

## Introduction

This strategy is relevant to everyone at Nottingham City Homes and everybody we provide services for. Everyone is unique and different. We believe in respecting the individual, treating everyone fairly and valuing the wonderful diversity our city has to offer.

Nottingham is a great city to experience and live in but like most places also suffers from inequality. Most of our daily activity helps to tackle disadvantage, poverty and reduce the effect of inequality in our city. Nottingham City Homes itself is group of housing companies that work together to deliver the vision of creating homes and places where people want to live. It comprises Nottingham City Homes, NCH Registered Provider and NCH Enterprises Limited.

The Group manages its homes on behalf of Nottingham City Council as well as its own homes and homes owned by other landlords. It also provides its own services to support people in the communities it serves. Around 27,500 homes are under the Group's management, and a fifth of Nottingham households live in NCH Group homes. We are proud to serve one of the most diverse cities in the country and are committed to putting our tenants and leaseholders at the heart of everything we do.

NCH is governed by a Board of Directors responsible for setting out the Company's vision and direction. Our Board is appointed from the communities we serve. We believe that having a diverse Board with a range of experience, backgrounds and understanding contributes to more effective and successful decision making.

We are ambitious for NCH. We were the UKHA Landlord of the Year 2018 and want to be recognised as a leading innovator in social housing. We want this to drive delivery of an excellent range of services to the benefit of our diverse customer base.

People are our biggest resource and instrumental to realising our vision. We directly employ around 1000 people from a diverse range of backgrounds and circumstances. We aim to support all of them to perform at their best, fulfil their ambitions and remove any barriers that deter this. One of our key aims is to tackle disadvantage, recognising that some people face barriers to service provision or jobs. We aim to tackle these barriers – allowing equal access to services and jobs, levelling the playing field, and helping people fulfil their maximum potential.

We want to be an inclusive organisation where everyone is treated fairly and respectfully, has equal access to opportunities and resources, and can contribute fully to our organisation's success. This strategy is key to achieving this and our ambition of creating homes and places where people want to live

## Developing this strategy

This strategy has been developed in line with our Corporate Plan and company values. We have consulted widely and invited a wide range of partners, staff, stakeholders and tenants to comment on our strategy. The findings of this consultation have shaped this strategy.

## Context

### National and legislative context

#### **Social Housing Green Paper: A New Deal for Social Housing**

The Government's Green Paper on social housing<sup>1</sup>, published in summer 2018, will have a significant influence on this Strategy. Following the tragic fire at Grenfell Tower in London, in 2017, a debate about wider issues relating to social housing quickly emerged. This debate encompassed issues much wider than fire safety, including the way tenants and residents perceived that they were viewed, and a strong sense that people living in social housing were stigmatised more generally. There were important equalities dimensions to this debate, which have been highlighted by the Equality and Human Rights Commission<sup>2</sup>.

The Green Paper includes important sections on empowering residents, tackling stigma, and celebrating thriving communities, as well as other sections on safety, quality, complaints handling, regulation and new housing supply. The document stimulated a wide ranging debate engaging the housing sector, tenants and residents, and others. NCH actively contributed to this, sending responses to government on the Green Paper's proposals, in particular making a strong case in support of measures to tackle stigma. It is anticipated that the Government will bring forward firm proposals on these topics in due course, which would be during the period of this Strategy. NCH will respond appropriately when the Government's intentions are confirmed.

#### **Brexit**

The United Kingdom is expected to leave the European Union (EU) in by October 2019. At the time of writing the precise details of the terms of this departure are not clearly known, and the impact is difficult to predict. However, it is clear that Brexit will have a significant impact on many issues of direct and indirect relevant to NCH and the people we serve. There has been an increase in hate crime since the outcome of the Brexit Referendum was announced. It may affect the status of EU nationals already living in the UK, and their rights of access to social housing, and it would certainly be expected to alter the rights of people seeking to reside in the UK. Amongst other things, these issues might be expected to have an impact on the diversity of the profile of Nottingham citizens, potentially an increase in hate crime and in turn the people we seek to serve, as well as on the local labour force. Nottingham City Homes are committed to assisting its EU employees accessing the European Settlement Scheme

**The Equality Act 2010** provides individuals with greater protection from unfair discrimination and made it easier for employers and organisations to understand their

---

<sup>1</sup> Social Housing Green Paper, CM 9671:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733605/A\\_new\\_deal\\_for\\_social\\_housing\\_web\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733605/A_new_deal_for_social_housing_web_accessible.pdf)

<sup>2</sup> <https://www.equalityhumanrights.com/en/following-grenfell>

EHRC: *Our work to highlight the human rights and equality dimension of the Grenfell Tower fire.*

responsibilities. It sets a standard for those who provide public services to treat everyone with dignity and respect. This Act provides the prime legislative basis under which this strategy operates.

### **Protected Characteristics**

The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act.

- Age
- Race
- Sex
- Sexual Orientation
- Marriage/ Civil Partnership
- Disability
- Gender reassignment
- Religion or Belief
- Maternity and Paternity

Although "gender reassignment" is one of the nine protected characteristics as provided for under the Equality Act 2010, we will go above and beyond the protection of people undergoing gender reassignment. Our commitment is extended to those with gender identity or expression. This will include people who do not live full time in their preferred gender, those who do not intend to undergo gender reassignment and intersex people (born with a wide range of natural variations in sex characteristics that do not fit the typical definition of male or female.)

**The Public Sector Equality Duty** (the Equality Duty created under the Equality Act 2010) came into force on 5 April 2011 to extend the protection of the new "protected characteristics". It requires public bodies and others carrying out public functions to have due regard to the need to eliminate discrimination, to advance equality of opportunities and foster good relations. Compliance with the equality duty enables us to provide services to meet the diverse needs of our users, and to carry our core business more efficiently and cost effectively. Whilst carrying out our work we must have due regard to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations between different communities.

### **Gender Pay Gap**

New legislation came into effect in 2017 requiring employers to publish figures regarding any gender pay gap. NCH has already introduced consistent procedures around pay and bonuses which narrow its gender pay gap although these will not impact on our figure until 2020. We will continue to review all areas of the organisation to identify the barriers (and the drivers) for appointing women, particularly at a more senior level. Our current gender pay gap analysis shows a mean pay gap of 16.4% which is below the national average of 17.5%.

## **Ethnicity Pay Gap**

Following the 2017 McGregor-Smith<sup>3</sup> review the Government are currently consulting on ethnicity pay gap reporting which will require employers to publish pay differentials between people from different ethnic backgrounds. Although there are no firm details it is thought that reporting will mirror the gender pay gap formula. Nottingham City Homes is committed to improving the ethnic diversity of our workforce and will use ethnicity pay gap reporting as a starting point to develop an action plan to begin the work of addressing any pay inequality in terms of ethnicity.

## **Modern Day Slavery Act 2015**

Legislation requires Nottingham City Homes Group to prepare a slavery and human trafficking statement each financial year and to publish on our website and to tackle slavery wherever it find it. We recognise the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner.

## **Social Housing Equality Framework (SHEF)**

The Local Government Association's Social Housing Equality Framework helps us to promote equality and diversity in our everyday work. The SHEF comprises of five performance areas

- Knowing your customers and equality mapping
- Leadership, partnership and organisational commitment
- Community engagement and satisfaction
- Responsive services and customer care
- A progressive and diverse workforce

Nottingham City Homes have been awarded an Excellent level accreditation from the SHEF in 2016 in recognition of its commitment to promoting equality and diversity. The Excellent level acknowledged commitment from the Board and colleagues and recognises equality and diversity is truly embedded throughout the organisation. External challenge noted significant areas of strength across the organisation's work with customers, partners and staff alike.

The panel found NCH to be a self-aware and inclusive organisation commenting that the Chair of Board and Chief Executive visibly promote and demonstrate clear leadership and ensure focus is on outcomes not just processes. They also highlighted areas where NCH goes beyond its statutory responsibilities through initiatives including Safer Notts Partnership, Future Leaders programme, employability and tenant involvement. (*link for full report can be found [here](#)*)

## **Board Membership**

Recent studies have highlighted under representation at Board level across the sector. Of 80 organisations recently surveyed, only 37% of the Board positions and 32% of chair positions were held by women. Only 20% of audit chair positions were held by women. A survey conducted by the CIH this year also found that only 20% applications for Board Member positions were from women. It also found that 1.6% of Housing Association Board members were from a LGBT background and 6.8% BME. NCH will

---

3

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/59433/6/race-in-workplace-mcgregor-smith-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/59433/6/race-in-workplace-mcgregor-smith-review.pdf)

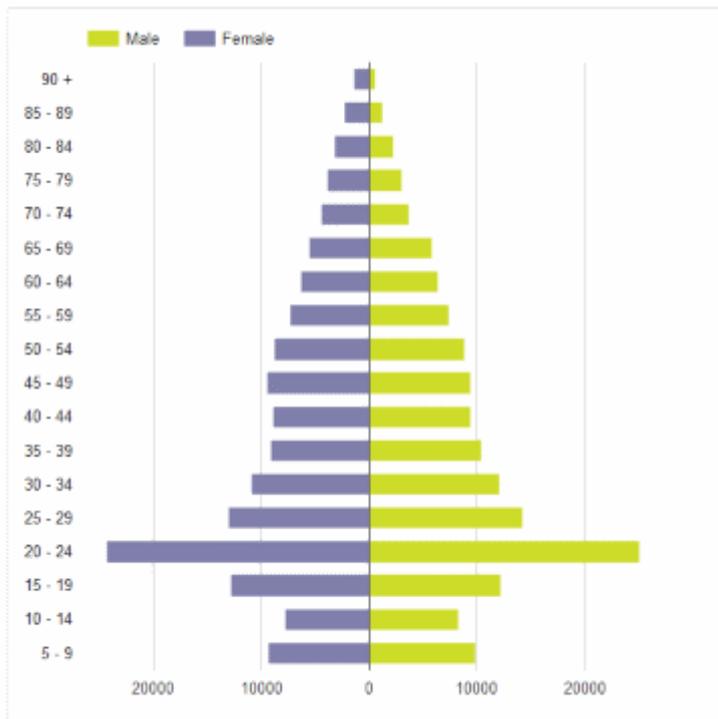
be populating new Board populations shortly and will ensure that it reaches as wide an audience as possible for its vacancies.

## Local context

### Nottingham City's Headline Statistics

Nottingham is a diverse city. The pyramid below is taken from Nottingham Insight<sup>4</sup> and illustrates the diverse make up in terms of age

Total population: population pyramid



Source: ONS Mid-year estimates (2015)

- Total population - 329,200
- Working age population (16-64) - 229,950
- Males - 166,830
- Females - 162,380
- University students - 37,000

9.1% of people in Nottingham City had a long term health problem or disability which limited their daily activities a lot. A further 9.1% are limited a little. 8.8% of the City's population provide unpaid care. 3% of people have declared that they identify as LGBT, though the census does not yet collect information on gender identity or expression. The 2011 Census shows 35% of the population as being from BME groups; an increase from 19% in 2001. In addition, there has been an increase in agency, self-employed and low pay sectors across the City and the hourly pay rate in Nottingham is £11 compared with £14 nationally.

### Composition of tenants

Around 55,000 people live in the homes we are responsible for. There is no such thing as a 'typical council resident'. We house working families, older people, and people with

<sup>4</sup> <https://www.nottinghaminsight.org.uk/population/>  
NCHP040, V.6 July 2019

long term illnesses or disabilities. Children and young people live in our homes, and all sorts of people seek the accommodation we provide.

**Age** - 30% of NCH residents are 60 years of age or older (29% in 2015), 4% of residents are 24 years of age or younger (down from 5% in 2015)

**Disability** - 12% of NCH residents have declared they or someone in their household consider themselves to be disabled (down from 14% in 2015)

**Gender identity or expression** - Figures are not shown in report due to low numbers involved. NCH has developed a trans suite of policies for residents.

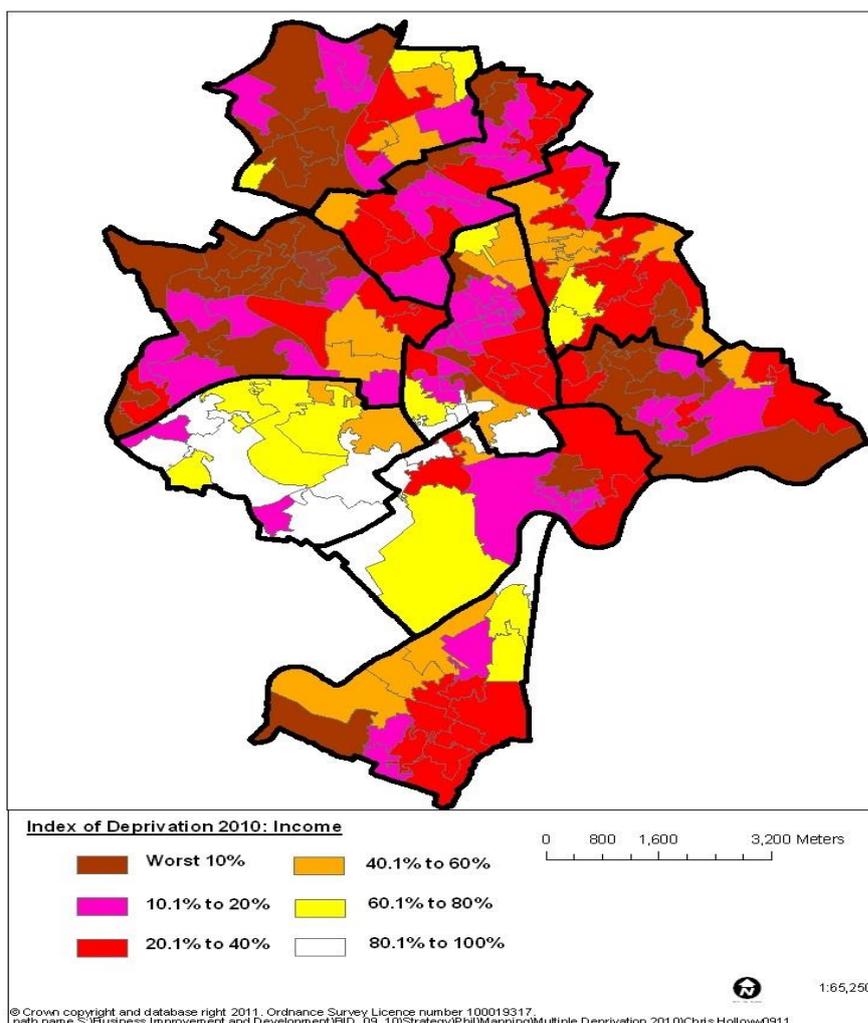
**Sexual orientation** -1.1% of residents have told us they are lesbian, gay or bisexual

**Race** - 29% of our residents are from black or minority ethnic backgrounds (up from 27% in 2015)

**Gender** - 61% of tenants are women (an increase from 59% in 2015). 39% of residents are men

### **Other Factors**

A number of our residents receive Housing Benefit to help them afford their rent. Only 30% of residents under 65 years of age receive Housing Benefit payments that meet their rent in full – the remaining 70% receive partial Housing Benefit or no benefit at all, indicating that they are likely to be in full or part time work. There are more than 8,200 Nottingham households on our housing register, including families towards whom the council has a homeless duty and existing residents wanting to move. The map below shows the income deprivation across the City from 2010.



## Workforce composition

We employ approximately 1000 employees including administrators, assistive technology officers, surveyors, caretakers, housing professionals, trade colleagues and apprentices. We currently host three employee equality forums

- Disabled Employees and Carers Forum
- Lesbian, Gay, Bi sexual and Trans Forum
- Ethnically Diverse Forum

And our wider staff group Your Forum open to all staff from across the company.

Our forums provide support and guidance across the organisation, welcoming employees from our diverse staff group regardless of any protected characteristic including those with a trans/gender identity. We will use our forums collectively to support and contribute to the work of the organisation.

Comparison figures from the 2016-18 Equality and Diversity strategy are shown as a point of reference

**Age** - 28.655% of our staff are 55 years of age or older whilst 18.9% are 34 years of age or younger an increase of 7.8% and decrease of 5.4% respectively. We have an ageing workforce despite our apprenticeship recruitment.

**Disability** - 7.2% of staff have declared that they have a disability a decrease of 2.6%

**Gender identity or expression** - This information is collected via the HR Management Information system. Figures are not shown in report due to low numbers involved. NCH have developed a trans suite of policies for staff.

**Sexual Orientation** - 2.4% of staff have told us that they are lesbian, gay, bisexual an increase of 1.3% whilst the <sup>5</sup>national average is 2%.

**Race** -23.2% of our staff are from black or minority ethnic background an increase of 6.1%in the past two years.

**Gender** - 37.2% of staff are women an increase of 3.4% in the past two years.

## **Local Strategic Direction**

NCH works to support the strategic objectives for the City of Nottingham as a key partner to a range of other public, private and voluntary sector bodies. The Nottingham Plan to 2020 sets out the strategic direction for the city. The Plan commits partners to work to maintain community cohesion and the city's cohesiveness for future generations and promoting equalities is at the heart of this.

Strengthening communities, improving services and transforming neighbourhoods requires more than housing and physical development. In partnership with others, NCH is committed to supporting the Plan's objectives to "work with communities and the voluntary sector to strengthen social capital and cohesion, and rebuild civic pride in every neighbourhood".

## **Success from the last strategy**

We achieved some significant landmarks following our last strategy document. These are set out below.

### For our residents – highlights include

- attracted over £1 million European and construction skills funding that will help support our tenants into employment
- created a dedicated employability team who support employment in the local community and supported over 150 tenants back into work
- Completed "Grander Designs Programs" for older residents
- Rent and welfare support for those experiencing universal credit
- Visible leadership at key events - Pride, Carnival
- Bespoke work on properties to support people with disabilities
- used the Public Sector Equality Duty and Equality Impact Assessment process to make sure that all policies, procedures and projects do not discriminate or disadvantage any vulnerable persons including those with a protected characteristic.

- commit through our Anti-Social Behaviour and Crime strategy tackling hate crime and preventing anti-social behaviour, supported a number of women into construction through our dedicated Women in Construction (WiC) programme
- reduce energy use and tackling fuel poverty

#### For our employees – we have

- become Stonewall Diversity Champions- rising from 89<sup>th</sup> in 2017 to 44<sup>th</sup> in 2019
- trained all recruiting managers to ensure that there is no discrimination in the recruitment and selection process
- joined Best Companies with the view of making NCH a great place to work and taking positive steps to increase diversity and opportunity throughout the organisation
- funded and supported the Nottingham Citywide Future Leaders programme aimed at producing a diverse range of leaders from different sectors across the city. A number have gone onto manager positions in NCH.
- aligned trade pay terms and conditions, removing the bonus element and using the same job evaluation scheme across the entire organisation which will reduce the gender pay differential
- introduced a new Absence Policy designed to support employees back to work quickly and a new “Fit and Ready” (wellbeing) programme for employees
- introduced flexible and mobile working for colleagues and invested significantly in new technology
- appointed more females into the senior leadership team
- increased BME representation in the workplace
- drafted a suite of trans inclusion policies

#### **Our Vision for 2019-2022**

This strategy sets out our commitment to promote inclusion, equality of opportunity and diversity among our residents and employees. We aspire to better reflect the demographics of Nottingham as an employer and landlord and ensure all services are accessible and inclusive. The strategy will support our values, in particular to be respectful to our colleagues, customers and communities. We will tackle disadvantage, recognising that some people face barriers to service provision or jobs. We will provide equal access to services and jobs, levelling the playing field, and helping people fulfil their maximum potential.

The strategy will also aims to provide a mechanism for engaging with and supporting all of our diverse employees, tenants, leaseholders and communities to enable the right services and support needed to deliver NCH’s vision and strategic goals as described below:

<p><b>NCH vision is to “create homes and place people want to live.”</b></p>
--

#### **Strategic Goals:**

1. To listen to our tenants and provide an excellent service
2. To make all our estates great places to live
3. To build high quality affordable new homes for local people
4. To diversify our services, re-investing in our communities
5. To be a great place to work

### **NCH Values**

Our values define the way we work, set out who we are as an organisation and shape customer expectations.

#### **We will DRIVE our culture and embed our values in everything we do:**

- Passionate about Delivering outstanding services
- Respectful - to our colleagues, our customers, our communities
- Always looking for ways to Improve
- Providing great Value for money
- Effectively team working with each other, our customers and our partners

Our values will continue to DRIVE our culture and the delivery of this strategy

### **Our Cultural Vision:**

#### **We want Nottingham City Homes to be:**

- a great place to work, with a clear sense of direction, shared by all, and ambitious to succeed on behalf of our customers
- a place where people work together as one team, where people believe in the values of the company and go the extra mile to deliver homes and places where our customers want to live
- a place where colleagues are kept well informed, are listened to and whose views are respected, where colleagues are encouraged to learn and develop, where talent is nurtured, a place which has the courage to do things differently, where people are empowered to perform and individual performance is well managed, where success is celebrated and where we are proud to let others know about our successes
- widely respected as an efficient, professional organisation, demonstrably fair and honest, which respects the individual and reflects the communities we serve, with a strong, confident external image both in word and deed

### **Delivering our new strategy**

There will be three key themes to our strategy

1. Provide quality services to meet the needs of all citizens; and improve customer satisfaction from residents with protected characteristics (where this is below average customer satisfaction)
2. Offer employment opportunities fairly to all of Nottingham's diverse communities, with additional support for disadvantaged groups; offering development and support to staff, ensuring that all promotions are based on merit
3. Provide visible leadership in the City, promoting the value of diversity

**1. Provide quality services to meet the needs all citizens; and improve customer satisfaction from residents with protected characteristics (where this is below average customer satisfaction)**

We will:

- Improve our use of customer insight data to better understand the individual needs and satisfaction levels across citizens
- understand any disparities in levels of customer satisfaction between groups with protected characteristics and average customer satisfaction / identify actions which can reduce disparity
- tackle worklessness and develop the confidence, skills and knowledge of those tenants looking to gain meaningful employment by creating more accredited training opportunities linked to our tenant academy
- support increased access to service areas such as adaptations for people with disabilities, promoting older persons services, focussing on youth engagement and under representation in tenant involvement activities
- continue to work towards eradicating modern day slavery including support for the “Make Nottingham a Slavery Free City” campaign.
- have a strong working relationship with Nottinghamshire Police and the city’s community Protection team to ensure Nottingham is a safe place to live
- work with NCC to develop our supported housing offer for older people and those with disabilities and health needs.

**2. Offer employment opportunities fairly to all of Nottingham’s diverse communities, with additional support for disadvantaged groups; offering development and support to staff, ensuring that all promotions are based on merit**

We will:

- take positive action to increase the underrepresented groups across the organisation
- continue to use Future Leaders programme to positively recruit participants
- continue to champion Stonewall, Disability Confidence, Women in Construction and the Social Housing Equality Framework using these to benchmark our services
- review our recruitment policies, and analyse recruitment data to seek trends, taking action against any negative patterns.
- narrow the gender pay gap focusing on attracting more women into construction and supporting women to progress to management and senior management positions
- prepare for reporting on the introduction of Ethnicity Pay Gap data
- ensure succession and workforce planning are effectively embedded
- train and develop our managers to manage equality and diversity effectively in their work area and promote fairness, inclusion and respect across the whole business
- continue to invest in initiatives and programmes to support employee wellbeing, identifying best practice from other organisations and ensuring this is embedded across NCH
- create a management information framework to monitor this strategy.

- continue to help residents into training, apprenticeships and employment with NCH,

### 3. Provide visible leadership in the City, promoting the value of diversity

We will

- Ensure we have a diverse Board representative of the City and residents we serve
- support public events such as Nottinghamshire Pride, Mela, and Caribbean Carnival
- be a Stonewall Diversity Champion, embracing those who identify as LGBT+,
- use the Social Housing Equality Framework as a benchmarking tool, committing to a peer review over the lifetime of this strategy
- have a zero tolerance on discrimination, train employees accordingly and use disciplinary action where appropriate
- have a strong working relationship with Nottinghamshire Police and the city's community Protection team and the city council to tackle hate crime
- work with other housing providers in Nottingham and our contractor partners to ensure the sector as a whole has a high profile leadership role
- working closely with NCC to deliver shared goals and objectives.

## Governance

The Equality and Diversity Steering Group (EDSG) will oversee the implementation of the strategy and report back to Board and EMT on progress. The EDSG will be responsible for setting out a work programme to achieve our ambitions and monitor progress against the key objectives. Our Equality Forums will support the EDSG in this.

All managers and employees have a responsibility for supporting the delivery of our equality agenda. They are supported by a dedicated Equality and Diversity Manager. Managers will support the work of the employee forums who will continue to monitor what we do and make recommendations for improvement.

Membership of the EDSG will include one NCH ALMO Board Member, the EMT lead for Inclusion, Head of OD, Equality and Diversity Manager, one service manager from each of our four Directorates, Equality Forum Chairs, a minimum of two other NCH tenants, a trade union representative and a member from Your Forum.

Corporate goal	Corporate Plan Performance Measures	Target 2021
To be a great place to work	<ul style="list-style-type: none"> <li>• Continue to work within legislation and frameworks (ie Stonewall, Future Leaders of Nottingham, Disability Confident Leaders, SHEF, Gender and Ethnicity pay gaps)</li> </ul>	<p>Our target is to eliminate any pay gap for disadvantaged groups. As a stepping stone over the life time of this strategy we aim to deliver:</p> <p>Gender Pay Gap 11.5%</p>

	<ul style="list-style-type: none"> <li>• Review recruitment and promotion to target under-representation at all levels</li> <li>• Use the Future Leaders programme to address under-representation in the business</li> <li>• New apprenticeships</li> </ul>	<p>Ethnicity pay gap to be set in line with forthcoming regulations.</p> <p>SHEF Excellent</p> <p>NCH better reflects citywide working age population.</p> <p>12 delegates to be trained</p> <p>10 each year</p>
To make all our estates great places to live	<ul style="list-style-type: none"> <li>• We will improve our approach to delivering services to our diverse customer service base.</li> </ul>	Reduce any disparity in customer satisfaction for protected characteristics .

## Key risks

Key risk	Mitigation
Board and Senior Management leadership in ensuring the agenda is prioritised and delivered	<ul style="list-style-type: none"> <li>• Board and management Equality and Diversity training as part of wider Equality and Diversity training action</li> <li>• Ongoing self-assessment against Equality and Diversity Frameworks including Social Housing Equality Framework, Stonewall and Disability Confidence</li> <li>• Regular internal performance reporting</li> </ul>
Resource	<ul style="list-style-type: none"> <li>• E and D Manager to operate as strategic/co-ordinating role</li> <li>• Support to come from equality forums</li> </ul>
Fail to engage residents in relation to the broader aims of the agenda	<ul style="list-style-type: none"> <li>• Awareness raising on E&amp;D issues through external communication channels</li> <li>• Resident members on EDSG</li> </ul>
Fail to engage partners in delivery of the agenda	<ul style="list-style-type: none"> <li>• Maintain contact with key E&amp;D partners and involve them in developments where appropriate</li> <li>• Involvement in wider structures such as</li> </ul>

	Nottingham Diversity Partnership
Employment	<ul style="list-style-type: none"><li>• ensure targets embedded into recruitment priorities</li><li>• E and D Manager is based in the OD Team</li></ul>