



**Islington & Shoreditch
Housing Association**

ISHA Equality, Diversity and Inclusion Strategy 2023-2025

Status	Board approval	Due for review
Draft. For Board away day 28/01/2023	March 2023	December 2024
RemComm draft 22/02/23		

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Strategy statement:

We expect all ISHA's staff, residents and stakeholders to be treated equitably and with respect in their dealings with us.

We will be inclusive and reflect the rich and diverse communities we exist to serve.

We will work to earn the trust and confidence of staff, residents and stakeholders that they can expect - from us and our contractors - respect, fairness, and equitable treatment.

Our values:

This is consistent with all ISHA's values, but especially 'Trusted to make the difference' and 'Respect for Everyone'.



Strategic context:

Delivering *this* strategy will further our vision, mission and overall strategic aims.

Our vision is: **To co-create homes and communities where everyone can flourish.**

Employing, involving, and co-creating with, a wide range of people with broad experience and perspectives will ensure better outcomes for the business, its staff and its customers. The fact that people will have been included, their input valued, and – if we create the right environment – they will have felt confident to engage as their true selves, will deliver positive psychological benefits and help them - and us - flourish.

Our mission is: By 2025 we will be viewed as a brilliant housing association by our residents, stakeholders, and our staff. "If people could choose, they'd choose us"

This strategy is particularly relevant to the 'staff'; 'service and satisfaction' and 'somewhere' strands of our strategic plan.

All ISHA's strategies have relevance to this strategy and vice versa, but those with most synergy are our resident involvement strategy, customer service strategy, and those that concern recruitment and employment.

What do we mean by equality, diversity and inclusion?

Equality is about equal opportunities and protecting people from being discriminated against while **diversity** is about recognising, respecting and valuing differences in people. **Inclusion** refers to an individual's experience within the workplace and in a wider society, and the extent to which they feel valued and included.

- **Equality** is about ensuring that all people are treated equally. This does not mean treating everyone the same, but recognising the differences in life situations, in experience and ensuring that there is equality of opportunity for all people, taking their needs into account.
- **Diversity** means valuing the uniqueness of individuals, celebrating difference, and recognising that everyone through their own mixture of skills and experience has a valuable contribution to make.
- **Inclusion** means that people feel appropriately respected, valued, and welcomed as a resident or colleague. ISHA recognises that there are many different types of barriers that make people feel excluded, so we will strive to ensure individuals are included in our services and employment.

Under the Equality Act 2010, we have a legal duty to have due regard to the need to promote equality of opportunity, eliminate unlawful discrimination and foster good relations between key equality strands. These include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

What this strategy covers:

1. What/who is in scope of the strategy
2. Where ISHA starts from
3. What evidence tells us works
4. What we will prioritise
5. Measures and outcomes

1. What/who is in scope of the strategy

This strategy is relevant to the Board, staff, and prospective Board and staff members, to residents and to stakeholders. It covers the services we provide directly and indirectly. It will be used when considering who to contract with. Contractors and their staff will be expected to uphold the spirit of the strategy.

2. Where ISHA starts from.

Intent

We start from a place of inspiration, not regulation. We need to have a strategy that targets improvements in order to comply with our chosen governance code: that published by the National Housing Federation (NHF). However, we are driven, first and foremost, by the conviction that principles of equality, diversity and inclusion should be central to an organisation founded in seeking to redress some of the world's ills. We also understand that it makes sound business sense to have governance, strategies, staff and service delivery influenced and delivered by the widest possible talent pool.

What we know about our Board, staff, residents and the communities we serve and why data is important

Data is critical to progressing equality, diversity, and inclusion. By being transparent and accountable, we show how serious we are about representing the communities we serve, building greater trust, and unlocking the benefits of a diverse organisation.

The requirement on organisations with more than 250 employees to publish gender pay gap statistics, for example, has led to a 1.6 percentage-point narrowing of the gap amongst affected employers. As former Associate Justice of the Supreme Court of the United States, Louis D. Brandeis said: "Sunlight is the best disinfectant."

We have/do collect data from our Board, staff, and residents. There are gaps and we do not, for example, routinely collect data about socio-economic background, caring responsibility, or marriage and partnership status.

Attached at Appendix A is the results of the National Housing Federation data tool for the areas in which we hold stock: Islington, Hackney, Waltham Forest, Camden, Tower Hamlets and Haringey. The tool was published in December 2021 along with a ground-breaking report on diversity in the sector. ISHA took part in the data collection, along with 173 other organisations, representing 71% of housing association stock in England. In the boroughs we work, there are 43 housing associations, and the workforce data in the data tool is from all of those employers rather than ISHA alone.

Data is sourced from the Office for National Statistics under the Open Government Licence. Data for many characteristics comes from the Annual Population Survey. This is a sample survey, which achieves a response from around 300,000 people in each 12-month period across the UK. While it is designed to achieve a representative sample at the local authority level, it is nonetheless vulnerable to a degree of sampling variability. This means that it is possible the sample chosen is not actually typical of the population. The ONS recommend using Census 2011 data, but, due to its age, the Federation decided not to and are updating the tool now the Census 2021 data is available. The new tool will be published in April 2023 and the Federation has recently published the questions it will be collecting data for in May and June 2023. They are attached at Appendix B.

Given that the Annual Population Survey is not as reliable a dataset as the Census, this draft strategy will draw headline insights from the population data but will re-visit findings later in 2023.

The Board

For Board the data we currently collect is:

- Gender
- Age
- Sexuality
- Disability (Yes/No/Prefer not to say, with no place to specify disability)
- Ethnicity
- Religion

Given the Board is a cohort of 12 people we have not published the results in full here, so that individuals cannot be identified. The UK General Data Protection Regulations and The Data Protection Act 2018, categorise racial, ethnic, religious and sexual orientation data as special categories of personal data, that can generally only be used for equality and diversity monitoring.

As of January 2023, we have data for all 12 Board members, though for religion and sexual orientation we do not have a full picture with some 'prefer not to say' returns.

We have a Board which is reasonably diverse in terms of gender – 58% men and 42% women; just 42% white British; with 42% of Board members being Black/Black British and Asian/Asian British. Half the Board would describe themselves as having religious belief/affiliation; half the Board have no religious affiliation.

Whilst younger than many sector Boards, we have no one younger than 35 years of age; we have no one with a disability.

Staff

We collect additional data for staff, and ask about disability and sexuality in a different way:

- Gender
- Age
- Sexual orientation
- Gender reassignment
- Disability (consider self to have)
- Ethnicity
- Race
- Religion
- Marital Status

The data is not as complete as that that we hold for Board members as can be seen at figure 1. Figure 2 is the data we hold in the most populous data sets, as of 14th November 2022.

Figure 1:

Characteristic	% of employees where we hold data as of 14/11/22
Gender	100%
Age	100%
Ethnic Origin	83%
Race	37%
Disability (consider self to have)	23%
Gender reassignment	19%
Marital Status	11%
Religion	19%
Sexual orientation	20%

Figure 2:

	No. of ISHA staff	Percentage of ISHA staff (%)
Gender		
Female	37	53.62
Male	32	46.38

Age (years)		
18-24	3	4.35
25-34	15	21.74
35-44	15	21.74
45-54	20	28.99
55-64	15	21.74
65+	1	1.45

Average age 44.6 years

Ethnic Origin

Any other ethnic group	1	1.45
Asian/Asian British (Chinese)	1	1.45
Asian/Asian British (Bangladeshi)	3	4.35
Asian/Asian British (Indian)	2	2.90
Asian/Asian British (Pakistani)	2	2.90
Black/African/Caribbean/Black British (African)	21	30.43
Black/African/Caribbean/Black British (Any other background)	1	1.45
Black/African/Caribbean/Black British (Caribbean)	3	4.35
Mixed (White and Black African)	1	1.45
Mixed/Multiple Ethnic Background (Any Other)	1	1.45
Other ethnic group (Arab)	1	1.45
Vietnamese	2	2.90
Total staff from an ethnic minority background	39	56.52
White (Any Other White Background)	5	7.25
White (English/Welsh/Northern Irish/Scottish/British)	13	18.84
White (Irish)	1	1.45
Total staff from a white background	19	27.54
Unknown	11	15.94

Race		
Indian Origin	1	1.45
Asian (other)	3	4.35
Black (African origin)	7	10.14
Black (Caribbean origin)	2	2.90
Other	1	1.45
White	6	8.70
Unknown	49	71.01

On disability, we have just one member of staff of the 23% who answered this question who says they are disabled, and just one member of staff who answered the sexual orientation question who was not heterosexual/straight.

Residents

We collect data from all residents – general needs, supported, shared owners and

leaseholders, but there are large gaps. We currently collect ED&I data at letting or sale and periodically update it (for example alongside satisfaction surveys). We have reasonably complete data on gender (the split for lead/joint tenancies and owners is 60.76% female, 38.27% male) and age.

Age Bands		
Row Labels	Age - Quantity	Age - % of Grand Total
0-9	232	8.32%
10-19	4	0.14%
20-29	96	3.44%
30-39	526	18.87%
40-49	684	24.53%
50-59	621	22.27%
60-69	379	13.59%
70-80	172	6.17%
>80	74	2.65%
Grand Total	2788	100.00%

[NB. we do not have tenants under the age of 9 – this is a product of someone entering new tenants into the first possible field].

Most concerning is our lack of data on disability. We know that residents in social housing are more likely than those in the general population to have a disability¹. In fact, one quarter of all disabled people in Britain live in social housing, with more people with a disability living in social housing (aged 16-64) than not. Given that 19.5% of the population of the boroughs in which we operate has a disability (see section ‘what does the data tell us?’), we would expect *at least* this proportion of our residents to have a disability. That we do not know this is concerning in terms of service delivery, let alone ‘reasonable adjustments’ under the Equalities Act 2010.

For ethnic origin we have pretty good data though it is missing for about a quarter of residents. Where we have the data, White British residents account for c27% of residents with the next biggest group being Black, African, Caribbean or Black British – African at 10.11%; then Black, African, Caribbean or Black British – Caribbean residents at 9.25%; and White ‘other’ at 8.46%. Residents who identify in any of the Asian or British Asian categories – be they Bangladeshi heritage, Indian heritage, Pakistani heritage or Chinese heritage make up 7.25% of residents.

¹ ONS Population survey 2019

Special Needs		
Row Labels	Special Needs - Quantity	Special Needs - % of Grand Total
Hearing Impairment	6	0.22%
Learning Disability	7	0.25%
Mental Health Issues	6	0.22%
No Disability	3	0.11%
Other	2	0.07%
Physical Disability	7	0.25%
Unknown	15	0.54%
No Data	2742	98.35%
Grand Total	2788	100.00%

Religion or Belief		
Row Labels	Religion Or Belief - Quantity	Religion Or Belief - % of Grand Total
Buddhist	69	2.47%
Christian	547	19.62%
Hindu	11	0.39%
Jewish	1	0.04%
Muslim	275	9.86%
NA	24	0.86%
No religion	226	8.11%
Not Known	11	0.39%
Other	52	1.87%
Prefer not to say	102	3.66%
Sikh	9	0.32%
to be collected	1461	52.40%
Grand Total	2788	100.00%

Ethnic Origin

Row Labels	Ethnic Origin - Quantity	Ethnic Origin - % of Grand Total
Asian or Asian British - Bangladeshi	42	1.51%
Asian or Asian British - Chinese	12	0.43%
Asian or Asian British - Indian	15	0.54%
Asian or Asian British - Other	94	3.37%
Asian or Asian British - Pakistani	39	1.40%
Black, African, Caribbean or Black British - African	282	10.11%
Black, African, Caribbean or Black British - Caribbean	258	9.25%
Black, African, Caribbean or Black British - Other	76	2.73%
Mixed - Other	46	1.65%
Mixed - White and Asian	6	0.22%
Mixed - White and Black African	10	0.36%
Mixed - White and Black Caribbean	19	0.68%

Not Applicable	25	0.90%
Other Ethnic Group - Arab	4	0.14%
Other Ethnic Group - Other	33	1.18%
Prefer not to say	73	2.62%
Removed - GDPR Compliance	1	0.04%
To be collected	641	22.99%
Vietnamese	80	2.87%
White - English, Scottish, Welsh, Northern Irish, British	744	26.69%
White - Gypsy, Irish Traveller	3	0.11%
White - Irish	49	1.76%
White - Other	236	8.46%
Grand Total	2788	100.00%

What does the data tell us?

Attached at Appendix C are the National Housing Federation's headline findings for London.

On sex, the population is roughly 50/50 in the areas we work. Compared to the population and ISHA's residents, women are underrepresented on ISHA's Board and slightly (c. 3.5%) overrepresented in the workforce compared to the population but underrepresented compared to the resident profile.

Young people aged 16-24, whilst making up 13.35% of our population, are absent from our Board and underrepresented by 10% in our workforce compared to population, but consistent with our resident demographics.

We do not have ethnicity data for 26% of our residents, nor 17% of staff.

However, where it is known, almost 12% of our staff are Asian/Asian British, which is broadly comparable to the populations we serve, though Asian/Asian British people are underrepresented in our tenant group.

Whilst 8.9% of the population in which ISHA works are Black/African/Carribbean/Black British, more than 22% of residents are and 36.23% of ISHA's workforce.

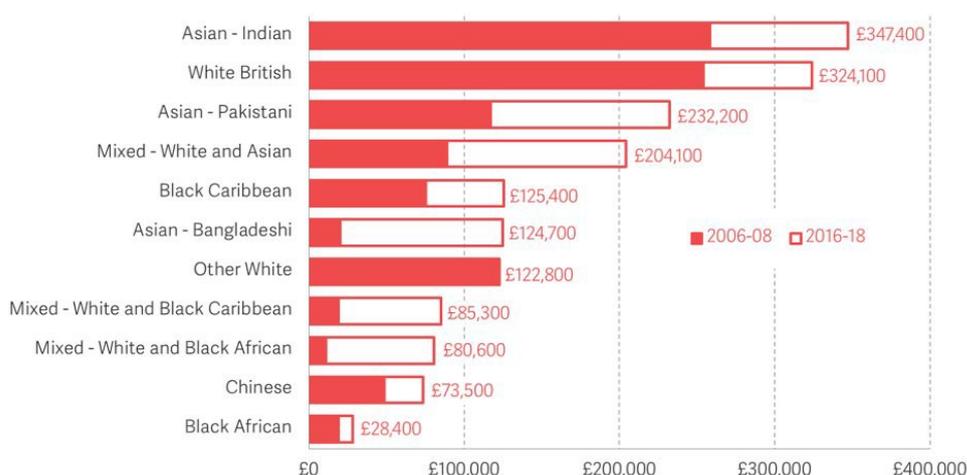
isha **How representative are we - ethnicity**

Ethnicity	Board	Staff	Residents	Population
White British	42%	18.84%	26.69%	60.31%
White other/White Irish	16.7%	c.9%	C.12%	c.13%
Asian/Asian British	25%	11.6%	C.7.25%	13.42%
Black/British Caribbean	16.7%	4.37%	9.25%	3.28%
Black/British African	-	30.43%	10.11%	4.49%

Both the underrepresentation of British Indian residents and overrepresentation of Black, African, Caribbean or Black British – African residents against the population benchmark is consistent with the economic experience of both groups in Britain.

Wealth gaps are large and persistent²

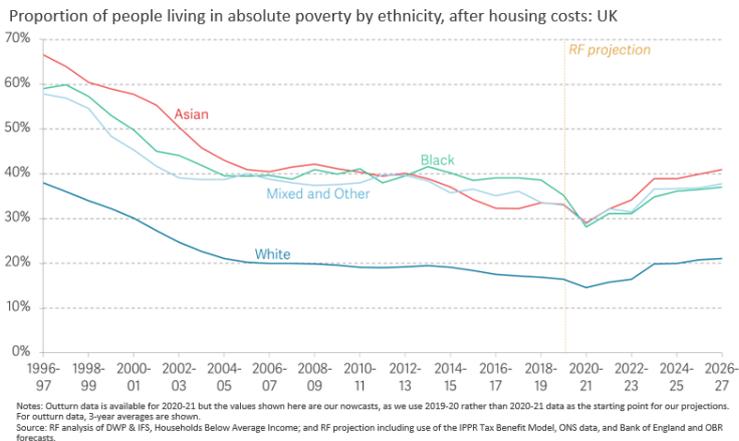
Median total net wealth by ethnicity: GB 2006-08 and 2016-18



² Notes: CPIH-adjusted to 2019-20 prices, and figures rounded to nearest £100. The average wealth of households of 'White Other' ethnicity fell by £1,200 over this time period. Household ethnicity is determined by the self-described ethnicity of the 'household reference person', usually the household member with the highest personal income. In this chart, business assets is excluded from household wealth, due to differences in measurement quality between the two periods of data analysed.

Source: RF analysis of ONS, Wealth and Assets Survey.

A higher proportion of ethnic minorities will be in absolute poverty



White staff from all groups account for 27.54% against a resident population which is 37% white and a wider population which is 72.41% white.

The Joseph Rowntree Foundation has shown that all minority ethnic communities, except heritage Indian ones, have higher rates of poverty than white ones. Given that social housing is such a scarce resource in the boroughs in which ISHA operates, poverty is almost a pre-requisite for accessing a social home in 2023.

At Board level we have no one who has a disability, and just one member of staff who has said they have a disability against a population in which 19.5% of people have a disability.

We have too little data on sexual orientation for staff to make any meaningful comparison, likewise, marital status and religion. We have none for socio-economic groups and caring responsibilities.

Intersectionality

Data puts people into boxes, but we can't do that with people. Who we are and how we got there is multi-faceted, structural and marvelously, complexly human. We need to measure and monitor, but it will never be a replacement for conversations based on our values with our Board, staff and residents about their needs and desires – especially for self-actualization. Intersectionality or the way that various characteristics (protected or otherwise) have shaped who we are, and our life chances, is central to understanding that and to addressing inequality.

Gender and ethnicity pay gaps – calculated October 2022

ISHA has an overall ethnicity pay gap of 27.85% and a gender pay gap of 7.97%. The ethnicity pay gap is small at Leadership Team level, and there is a negative ethnicity pay gap at Management Team level [the 11 Heads and professional leads in the organisation].

However, all but one member of staff in our lowest paid customer service team roles are Asian/Asian British or Black/African/Caribbean/Black British and all but one in Leadership Team are white. There is no evidence of Asian/Asian British or Black/African/Caribbean/Black British staff in the same role as a white colleague being paid less for the same role.

Our data shows we are performing better than the sector in terms of ethnic diversity at the leadership team level at 25%. Chief Executive of Winmark, John Jeffcock, has published research comparing the composition of housing leadership teams versus FTSE100 companies and tech or digital giants. Whilst being far in a way better on gender diversity than either of those two benchmark groups, on ethnicity the sector is worse. In FTSE100 leadership teams black or Asian executives account for 5% of executives, for digital giants it is 17%; for housing the figure is just 4%.

At Management Team the gender pay gap is wider than across the organisation as a whole or at Leadership Team level. This reflects the higher monetary value placed on assets, finance and development roles filled by men, and the housing management and HR roles filled by women.

Ethnicity pay gap reporting ('snapshot' date 31 October 2022)

All staff*	Median hourly pay**
All 'White' groups	£26.25
All 'BAME' groups	£18.94
Ethnicity pay gap	27.85%

Leadership team	Median hourly pay
All 'White' groups	£55.46
All 'BAME' groups	£53.71
Ethnicity pay gap	3.16%

Management team	Median hourly pay
All 'White' groups	£32.97
All 'BAME' groups	£38.55
Ethnicity pay gap	-15.5%

Gender pay gap reporting ('snapshot' 31 October 2022)

All staff*	Median hourly pay **
Male	£20.58
Female	£18.94
Gender pay gap	7.97%

Leadership team	Median hourly pay
Male	£55.46
Female	£53.71
Gender pay gap	3.16%

Management team	Median hourly pay
Male	£38.26
Female	£32.97
Gender pay gap	13.83%

*All staff in this context refers to those staff who are directly employed by ISHA and received their full pay during the 'snapshot' period. Does not include agency staff, consultants, or anyone who did not receive their usual full pay during the period.

**Median hourly rate is calculated using the 'full time relevant hourly pay' for each staff member. Part-time staff are included using an FTE hourly rate.

Pay gaps have been calculated using the Chartered Institute of Personnel and Development (CIPD) and government recommended methodologies.

Our ethnicity pay gap is higher than average figures. Most recent ONS data (which relates to 2019) found a 23.8% ethnicity pay gap in London. Because ethnicity pay gap reporting is voluntary there is not as much data as there is for the gender pay gap.

Lien Viet

Lien Viet is one of ISHA's legacy organisations and when it formally merged with ISHA in 2019, ISHA committed to continue to celebrate the achievements of the association and deliver culturally sensitive services to both ISHA residents and the wider community. We still have more than 80 Vietnamese residents accounting for almost 3% of residents overall.

As with most emerging ethnic groups in the UK, the largest concentrations of Vietnamese people are found in the larger metropolitan areas and cities. London has the majority at 33,000 and around one-third of all Vietnamese Londoners are in Hackney (one of our three core boroughs) or south of the river in Lewisham and Southwark.

Lien Viet has its roots in the mid 70s as refugees from Vietnam began arriving in numerous countries including the UK at the end of the Vietnam war. As with many refugee groups, the British government first sought to disperse arrivals throughout the country, isolating people away from any support and provision of services that meet their needs. By 1979 however the first Vietnamese community groups were established, mainly in London.

In 1988, An Viet Housing Association (later Lien Viet HA) was formed to specifically address the housing needs of refugees from Vietnam. Its mission was to provide a "safe haven" in the form of affordable, culturally sensitive housing. A year later, An Viet HA became the first Vietnamese housing association to be registered with the Housing Corporation.

By 1992 the number of Vietnamese people living in Hackney was more than 3,000 compared to just 200 in 1980, but immigration policy had hardened and resettlement to the UK became little more than a trickle. It was in 1992 that the association built its first homes and hostel schemes, and the following year it became a subsidiary of Ujima HA, a leading BME organisation. In the late 1990s/early 2000s Lien Viet commissioned academic research into the needs of the housing needs of Vietnamese elderly; people with mental health needs;

single homeless and domestic violence survivors. It was also instrumental in establishing a national network of Vietnamese workers in 2003. It was following the collapse of Ujima HA in 2007, that Lien Viet joined ISHA in 2008. When Lien Viet formally merged with ISHA a legacy fund was established to the Geffrye Museum, now the Museum of Home, in Hackney. They embarked on a project to provide a permanent legacy for Lien Viet, promoting public understanding of the story, lives and experience and contribution to the UK of people from Vietnam and their descendants.

What staff have told us

In December 2022 we held our annual staff awayday and spent the morning discussing ED&I, and especially racism, with Professor Patrick Vernon OBE who had run a similar workshop with Board members.

Staff groups, as with Board, were asked to rate ISHA on a continuum of becoming an antiracist multicultural organisation³ with 'one' being 'exclusive - an exclusionary institution' and 'six' being a 'fully inclusive – an anti-racist multicultural organisation in a transformed society.'

The range of answers from Board and staff was gratifyingly very similar, with the answers from all groups ranging between a '3' and a '5', with the average being 3.5 - which has ISHA currently sitting someway between 'a compliance organisation' and 'an affirming institution'.

Why anti-racism was a focus

George Floyd was murdered on 25 May 2020 by a policeman in Minneapolis. Given the history of extrajudicial killings of people of colour in the United States and indeed the UK this was not in itself a rare occurrence. This time the murder was filmed by bystanders who could be heard along with Mr Floyd urging the officer to remove his knee from Mr Floyd's neck and the videos went viral, being shared millions of times across the globe.

His murder was the catalyst for protest, and galvanized many to change and promise change, ISHA included.

We pledged to become an anti-racist organisation and held focus groups with staff about their experiences of racism in society and as employees; we established an equality and diversity council; ran training on inclusive leadership; we also established a process for raising racism and an action plan; recently we opened a prayer and quiet room after it became clear Muslim staff were having to hunt for quiet spaces to pray. But like many who pledged action, we faltered and did not maintain the momentum. The ED&I council was disbanded for lack of corporate support.

We need to consolidate what we have done so far, regain that momentum and make good the pledge we made in 2020. Having Prof Vernon deliver the sessions with staff and Board

³ ©Crossroads Ministry, Chicago, IL: Adapted from original concept by Bailey Jackson and Rita Hardiman et al

was about re-catalyzing that work.

A company called Variety Pack was commissioned to carry out the racism focus groups.

The Variety Pack focus groups report of October 2020:

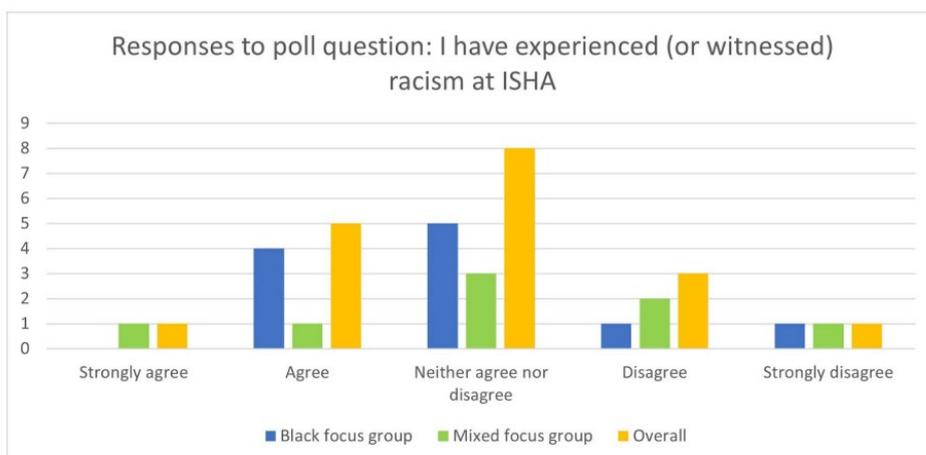
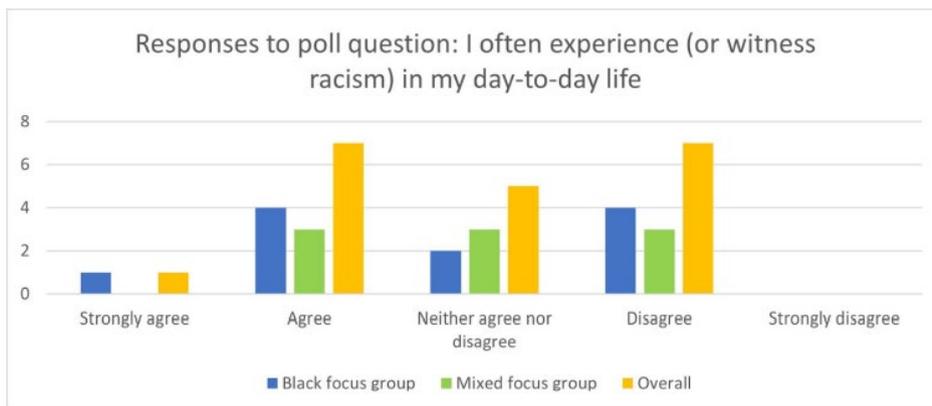
Aims

1.2 Aims

The aim of the focus groups was to offer a safe, support space for ISHA teams members to discuss issues related to race and racism. Focus groups aimed to explore:

- Participants' experiences of racism in day-to-day life
- Participants' experiences of racism within ISHA
- The impact that racism has on participants' lives
- Views on the ISHA's responses to racism and anything ISHA could do to improve the way it responds to racism

Participants from both the black only focus group (requested by staff) and the mixed focus group had experienced or witnessed racism both in everyday life and at ISHA.



Staff feedback was that they wanted:

- A clearer, more explicit stance on anti-racism and communication of organisational stance and actions
- A focus on system change, rather than simply hearts and minds
- Safe spaces and opportunities for open discussion
- Clear reporting structures and safe forums through which to highlight and discuss incidents of racism

Recommendations were made on safe spaces; inclusive language and allyship and an action plan adopted to deliver change across these areas. Some good work happened, such as a process on how to deal with intentional and unwitting racism. This needs to be reshared and promoted with staff.

Feedback from the (now disbanded) ED&I council:

The mission statement of the council, arrived at by council members themselves was:

“To ensure ISHA has a golden thread approach to EDI felt throughout every representation/interaction with accountability and follow through. That we foster a culture of inclusion and allyship where bias is recognised and addressed.”

There were nascent work streams on: colleagues; communications and buy-in; policies and getting our house in order; residents; contractors and consultants.

Mental health first aiders were established because of the council’s work.

Feedback from Staff Conference 2022:

What staff told us at our staff awayday in December 2022 was reasonably consistent with the focus groups two years earlier [and given staff turnover many of our staff will not have been involved in that earlier work].

- Publish an EDI strategy with goals
- Have a clear policy for anti-racism
- Conduct a census of staff
- As staff members, challenge and report racist comments
- Have a clear policy for ED&I
- Celebrate different cultures and religions
- Have coaching and a buddying system when people join
- Deliver mandatory training and awareness

- Re-run focus groups – there are many new staff
- Re-build the staff ED&I council
- Establish staff groups where people can say what they feel and give anonymized feedback to senior management/the organisation
- Safe spaces for different staff groups to share their issues and support each other
- Institute blind recruitment
- Target underrepresented groups and work to include them and the richness of perspective they will bring
- Get to know each other and residents better
- Community engagement
- Invest in staff and then promote internally
- Have higher levels of management reflect the workforce
- Involve staff more in scoping EDI work
- Communicate EDI work consistently, honestly and well
- Report back and what we said we would do. Be accountable
- Speak up and speak out – Be the change we want to see

We have not collected feedback from residents on issues of diversity, equity or inclusion.

3. What evidence tells us works (and doesn't)

Numerous research has shown that one cannot rely solely – or even at all – on policies, procedures and training to improve outcomes or to even reduce workplace bullying.

In *Best practices or best guesses? assessing the efficacy of corporate affirmative action and diversity policies*⁴, the authors concluded: “Attempts to reduce managerial bias through diversity training and diversity evaluations were the **least** effective methods of increasing the proportion of women (and people of colour) in management.”

In research carried out for the Equality and Human Rights Commission in 2018, Atewologun et al found no evidence for the effectiveness of unconscious bias training.

⁴ Kalev A, Dobbin F, Kelly E. (2006)

And in a 2015 Acas publication *Seeking better solutions: tackling bullying and ill-treatment in Britain's workplaces* the authors⁵ concluded: "In sum...research has generated no evidence that, in isolation, this approach (a reliance on policies, procedures and training) can work to reduce the overall incidence of bullying in Britain's workplaces.

Of course, one needs policies and procedures, in part to be legally compliant. But they do not deliver change.

What works? In short, leadership and accountability.

Roger Kline is a Research Fellow at Middlesex University Business School who has written numerous reports on race equality in the NHS; designed the NHS Workforce Race Equality Standard; and an extended review of research evidence on fair recruitment and career progression.

Based on research (cited below) he has concluded:

Debiasing processes is much more effective than debiasing people, Bohnet, Davidio, Kahneman and others

Awareness of accountability acts to pre-empt the introduction of bias into hiring decisions before it happens and helps challenge stereotypes when making decisions, Valian (1999). Individuals required to justify their decisions to a more senior person are likely to undertake more thoughtful evaluations, Foschi (1996).

Leadership is crucial

Goals motivate us, in particular through inserting accountability as an expectation that individuals (or the organisation) might be required to justify their acts or omissions to others. Lerner, Tetlock. (1999) Setting goals led to markedly higher performance than not doing so. Locke, Latham (1990).

Leaders tasked with accomplishing diversity goals were more likely to be effective when clear accountability existed. Dobbin, Schrage and Kalev (2015)

⁵ Justine Evesson Sarah Oxenbridge, David Taylor (Acas 2015)

Old model	New model
Emphasises importance of policies, procedures and staff diversity training	Emphasises importance of accountability transparency and debiasing processes Intervenes to encourage staff, seeing fair and effective career progression as a key management function
Relies on individuals raising concerns	Adopts a “public health” approach to improving outcomes, triangulating data to be proactive and preventative,
Encouragement and support to individuals to take advantage of development opportunities through mentoring and positive action.	Employer pays granular attention to mitigating bias at each stage of the career lifecycle Emphasises tracking every individual’s development proactively, linked to effective appraisals, transparent access to stretch opportunities
Delegated to HR and EDI staff	Key Board issue <u>led by CEO</u> but also focused on engaging front line managers

4. What we will prioritise

Publish and consult with Board and staff on our draft ED&I strategy and the goals and measurements within it.

Regain the momentum to becoming an anti-racist organisation, reaffirming this as our goal, publishing the process for raising and receiving complaints and concerns about racism and revisiting the draft action plan from 2020.

Agree terminology with staff (i.e., If not BAME what is the preferred terminology)

Prioritise data collection based on the new NHF questionnaire so we can understand our Board, staff and residents better.

Prioritise disability as an area of obvious underrepresentation, and also LGBTQI+ issues.

Audit and de-bias (if necessary) our policies and processes – including recruitment, disciplinary, promotion and training and development.

Seek to address pay gaps by investing in training and development for staff and grow our own talent. This will have the added benefit of aiding retention, boosting morale, strengthen organisational memory and consequently improving service delivery.

Celebrate cultures, diversity, and religious traditions.

Establish how best to continue the work of Lien Viet with Vietnamese communities in Hackney and celebrate its legacy, including investigate working with other communities fleeing war and persecution.

Seek to re-establish the ED&I council with a remit to work alongside the CEO and Board on the delivery of this strategy, and to provide a conduit to LT (Leadership Team) on issues of concern raised by staff.

Commit to honest, open feedback to staff and to reporting annually – including on ethnicity and gender pay gaps

January to March 2022/3

	Data collection	Consult on ED&I strategy and sign off at March Board, including terminology	L&D comms campaign and prep of quality PDPs	Re-establish ED&I council – meet CEO quarterly, report to LT quarterly and Board annually	Celebrate key events
Board	•	•			
Staff	•	•	•	•	•
Residents					
Stakeholders					

2023/24

	Data collection	Focus on L&D	Audit and de-bias policies & processes	Revisit racism action plan, prioritise, implement	Work on disability and improving access to jobs and services	Celebrate key events, including Pride
Board					•	

Staff		•	•	•	•	•
Residents	•			•	•	•
Stakeholders ⁶				•	•	

2024/25

The exact measures, but we will be focusing on contractors and the experience of residents throughout this year.

5. Measures and outcomes

By 2024/25 we will have:

Moved by *at least* one whole point (to 4.5) on the continuum of becoming an antiracist, inclusive organisation

Have taken concrete steps to being more inclusive of people with a disability for example becoming a Disability Confident Employer

Have reduced our ethnicity pay gap to below 15%

Achieved strategic plan turnover and staff engagement targets

Be known for our impactful work in ED&I

⁶ Specifically, charities and advocacy groups in our locality, local authorities, our contractors and the wider housing sector