

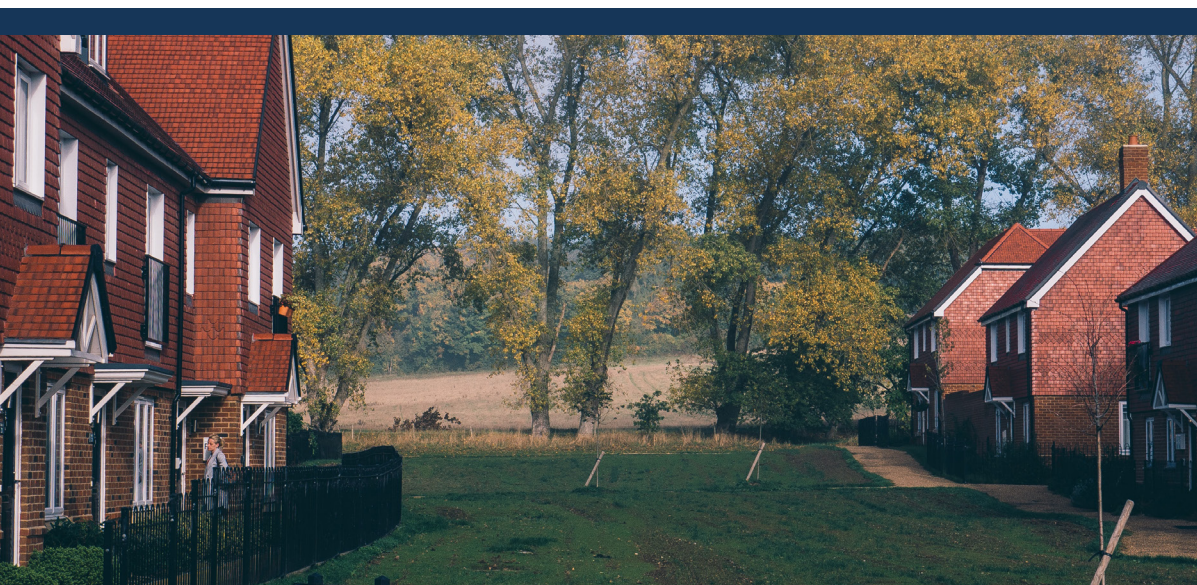
A photograph of a tall building under construction, completely covered in a dense network of metal scaffolding. The image is tinted with a dark purple/blue color, creating a moody atmosphere. The scaffolding is intricate, with many levels and cross-braces visible.

Equality, Diversity and Inclusion and tenant voice

Written by: Anne-Marie Bancroft, Bekah Ryder and Jenny Brown

EDI and tenant voice

- 1.1.** Altair has observed the relationship between equality, diversity, and inclusion (EDI) and tenant voice, especially the overlap of difficulties in breaking down inbuilt inequities and reducing disenfranchisement.
- 1.2.** To understand more, and to work with the sector to find ways to rise to the challenges, we conducted a series of five closed-room conversations in 2022 with key sector leaders: board chairs and local authority leads. The topics were:
 1. Stigma and social housing.
 2. Consumer regulation.
 3. Inclusion in the boardroom.
 4. Service delivery.
- 1.3.** Each session was supported by subject matter experts from the Regulator of Social Housing ('the Regulator'), the National Housing Federation ('the NHF'), the authors of 'Stigma and Social Housing in England'¹ and tenants sitting in strategic positions for housing providers across the country.
- 1.4.** We paused on the next steps, given changes to consumer regulation, but with further details of these changes published, the introduction of the Tenant Satisfaction Measures, and growing engagement with EDI across the sector, now is the ideal time to review where the sector is and to explore taking the topic further.
- 1.5.** This paper sets out where we are now and covers proposed next steps. It starts by reviewing who lives in social housing, considers research on social housing stigma and discrimination, and outlines the position on EDI in the sector, including its regulation and governance. We then discuss Altair's work on the issue so far and our proposed next steps. From this, we pose some EDI and tenant voice questions that you might like to consider in your organisation.



¹ Ejiogu, A. and Denedo, M. (2021) *Stigma and Social Housing in England*.

Background

Who lives in social housing?

- 2.1.** Social housing has a long and proud history, starting with medieval almshouses founded by religious orders to care for the poor. Scandalous housing conditions in the Victorian period, which saw rapid migration from the country to towns and cities, led philanthropists to found housing for the (so-called deserving) poor and working classes. The post-war period led to large-scale development of social housing by local councils. At this time, social housing had a far broader appeal as it made up a greater proportion of all dwellings. Pre-1970, stigma attached to living in social housing was not widespread.² In the 1980s the Right to Buy policy meant better off tenants in more attractive areas bought their houses, contributing to a residualisation of social housing.
- 2.2.** Demand for social housing consistently exceeds supply, with an estimated 4.2 million people currently in need of social housing.³ Supply restrictions mean that housing is allocated on a needs basis, with only those in the most severe housing need being given priority (such as homeless people, victims of domestic abuse, urgent moves on medical grounds, and severely overcrowded households).
- 2.3.** Housing need interacts with disadvantage. Social housing tenants are more likely to be disabled, in lone-parent families, from an ethnic minority, in lower income groups, or economically inactive compared to other forms of tenure (private rented and owner occupied).⁴
- 2.4.** The Joseph Rowntree Foundation recently demonstrated that the inequalities faced by non-white ethnic minority communities in accessing affordable and secure homes are rooted in structural injustices.⁵ These include lower levels of pay, greater insecurity at work, and immigration policies (such as No Recourse to Public Funds).
- 2.5.** This residualisation and allocation based on need has led to persistent and harmful stigmatisation of social housing tenants. Recent research concluded stigma in social housing is “more complex than is usually assumed as it intersects with other stigmas such as poverty stigma, crime stigma, mental health stigma and race and immigration stigma”.⁶

² [Ejiogu, A. and Denedo, M. \(2021\) Stigma and Social Housing in England.](#)

³ [National Housing Federation \(2021\) People in Housing Need.](#)

⁴ [English Housing Survey \(2021\) Social rented sector, 2020-21.](#)

⁵ [Rogaly, K., Elliott, J. and Baxter, D. \(2021\) What's causing structural racism in housing?](#)

⁶ [Ejiogu, A. and Denedo, M. \(2021\) Stigma and Social Housing in England, p.6.](#)

- 2.6.** Stigma can be seen in political discourse (George Osborne talking about people “sleeping off a life on benefits”⁷), in new developments (such as “poor doors” or restricting access to shared facilities⁸), the media (with references to social housing linked to social problems⁹), and in social housing itself (where tenants’ complaints are not always listened to, and problems might be blamed on lifestyle¹⁰).

Existing housing, stigma and discrimination research

- 2.7.** Research has investigated both stigmatisation in social housing and also how equality, diversity and inclusion affect experiences of housing.
- 2.8.** The Chartered Institute of Housing’s (CIH) 2018 report, ‘Rethinking Social Housing’, called on the sector and government to challenge the stigma and stereotyping attached to social housing. It noted that both social housing and the people who live in it are subject to stigmatisation and stereotyping. Polling commissioned for the report showed 65% of people agreed that the negative view of the people that live in social housing was unfair, with only 10% disagreeing.¹¹
- 2.9.** There have been campaigns to deal with the issue in recent years, including See the Person (formerly Benefit to Society)¹², which has developed guides with CIH on tackling stigma.¹³ Efforts, however, have been said to suffer from structural and organisational factors, such as lack of funding, political will and institutional support.¹⁴
- 2.10.** Research into stigmatisation and discrimination remains limited, yet there is evidence of differences in experience based on protected characteristics.
- 2.11.** One survey of 225 LGBTQ+ social housing residents found:
- Nearly a third (29%) did not agree that their landlord was sensitive to the needs of LGBTQ+ people.
 - A fifth of gay men reported that they regularly modify their home if their landlord or a repairs person visits to make their sexuality less visible.
 - A third of survey respondents (34%) felt that their housing provider was not able to deal effectively with problems such as harassment.¹⁵

⁷ [The Economist \(2015\) George Osborne’s sad triumph, 9 July 2015.](#)

⁸ [Grant, H. and Michael, C. \(2019\) Too poor to play: children in social housing blocked from communal playground. The Guardian, 25 March 2019](#)

⁹ [Dempsey, J. \(2022\) Poundbury: After 30 years has King Charles’ town worked? BBC, 16 September 2022.](#)

¹⁰ [Housing Ombudsman Service \(2021\) Spotlight on: Damp and mould, it’s not lifestyle.](#)

¹¹ [Chartered Institute of Housing \(2018\) Rethinking Social Housing.](#)

¹² <https://www.facebook.com/www.seetheperson.org/>

¹³ <https://www.cih.org/publications/its-not-okay-a-guide-to-tackling-stigma-in-social-housing>

¹⁴ [Ejiogu, A. and Denedo, M. \(2021\) Stigma and Social Housing in England.](#)

¹⁵ [HouseProud and University of Surrey \(2017\) No Place like Home?](#)

- 2.12.** Human City Institute research from 2018 found that protected characteristic groups had lower levels of satisfaction with homes, neighbourhoods, services and trust, with a satisfaction gap of 10% between black and ethnic minority residents, and white residents.¹⁶
- 2.13.** More recently, the Department for Levelling Up, Housing and Communities' (DLUHC) residents' survey for the Social Housing Quality Programme found that ethnic minority residents (excluding white minorities) were less positive about the service they received across virtually all satisfaction measures.¹⁷
- 2.14.** White residents were more likely to be satisfied with the service provided by their landlord (at 69%) compared with non-white, ethnic minority residents (57%). Ethnic minority residents were also less likely to agree that their landlord treats them with respect compared to white residents.
- 2.15.** Recent press coverage in relation to social housing conditions by ITV¹⁸ and through tenant activists on Twitter,¹⁹ also show links between race, disability and not being listened to by housing providers. The case of Lara Tate shows that housing association staff do not always understand discrimination legal principles.²⁰ Racism is also thought to have contributed to recent high-profile cases of damp and mould, such as the tragic death of two-year-old Awaab Ishak.²¹ Structural inequalities and racism were threads in evidence heard by the recent Better Social Housing Review independent panel, as acknowledged in their report and recommendations.²²

Equality, diversity and inclusion within the sector

- 2.16.** Within the sector, the CIH's 2015 presidential commission on diversity in housing, "Leading Diversity by 2020" examined ways to improve the diversity of industry leaders.²³ It set targets and challenges for housing providers, recruitment agencies and contractors working in the sector, and regulatory bodies.
- 2.17.** There is no publicly available, centralised dataset on employment within the housing association sector. Until the NHF developed their EDI data tool²⁴ most evidence was from relatively small surveys, often with a self-selecting sample, such as those run by 'Inside Housing'.

¹⁶ Human City Institute (2018) Fit for All – Equality, Diversity and Satisfaction in 21st Century Social Housing.

¹⁷ Department for Levelling Up, Housing and Communities (2022) Social Housing Quality Programme – Residents Survey Report.

¹⁸ <https://www.itv.com/news/2022-03-21/the-12-month-investigation-that-uncovered-appalling-conditions-in-social-housing>

¹⁹ <https://www.voice-online.co.uk/news/uk-news/2022/02/24/black-tenants-living-in-inhumane-social-housing-says-leading-campaigner/>

²⁰ Odunoye, J. (2021) Housing Management Case Handling: Independent Investigation. L&Q Resident Services Board.

²¹ <https://www.insidehousing.co.uk/insight/the-question-a-little-boys-death-raises-about-racism-and-the-housing-sector-79321>

²² Better Social Housing Review (2022).

²³ CIH (2015) Leading Diversity by 2020.

²⁴ National Housing Federation (2021) How diverse is the housing association workforce in England?

- 2.18.** Altair's review in 2017 for Leadership 2025 was the first recent deep-dive into ethnic diversity in the sector and the benefits of greater diversity.²⁵ It concluded that "there is still a serious lack of black and minority ethnic (BME) representation at senior levels within housing associations" and recommended a five-point plan:
1. Report annually on key diversity statistics.
 2. Set aspirational targets.
 3. Interview more diverse pools of candidates.
 4. Develop the leadership pipeline.
 5. Lead by example.
- 2.19.** [Leadership 2025](#), which is supported by Altair, aims to tackle this issue directly by offering a nine-month intensive course for senior managers from ethnic minority backgrounds. Through supporting talent and cultural impact, it intends to increase the ethnic diversity of housing sector leadership.
- 2.20.** In 2019, the NHF launched their work on EDI within the housing association workforce. Along with Housing Diversity Network, they published an insight review in 2020 which concluded that there was not enough data on the workforce to understand how representative it was of the community served.²⁶
- 2.21.** The NHF has since focused a large part of its work on EDI in the sector on improving data and promoting case studies of good practice,²⁷ as well as placing more responsibilities on boards to embed EDI within their organisation. This was through the Code of Governance 2020²⁸ and the Chairs' Challenge, which includes the inclusive recruitment toolkit developed by Altair and Green Park.²⁹

Regulation

- 2.22.** Relevant standards for housing providers from the Regulator of Social Housing include the Tenant Involvement and Empowerment Standard 2017, which requires providers to treat tenants with fairness and respect and demonstrate they understand their diverse needs, including in relation to equality.
- 2.23.** The Regulator makes no EDI provisions for the workforces of registered providers, though it does have its own Equality Objectives, under the Public Sector Equality Duty (PSED).

²⁵ Altair (2017) [The Altair Review: Delivering a step-change in ethnically diverse leadership across the housing sector](#).

²⁶ [Housing Diversity Network and National Housing Federation \(2020\) Equality, Diversity and Inclusion: An insight review of housing association staff in England](#).

²⁷ <https://www.housing.org.uk/our-work/diversity-and-equality/>

²⁸ [National Housing Federation \(2020\) Code of Governance 2020](#).

²⁹ [NHF \(2023\) Chairs' Challenge toolkit](#).

- 2.24.** Following the Grenfell Tower fire and the resulting Social Housing White Paper, there are a number of regulatory changes to consumer standards. One of the principles of this new approach is to ensure tenants' views are listened to and acted on, including being treated with fairness and respect and recognition of diverse needs.
- 2.25.** The first change being introduced is the Tenant Satisfaction Measures, which come into effect in April 2023.³⁰ These require all social landlords to collect and report on key satisfaction measures, including overall satisfaction and satisfaction with repairs and other services.
- 2.26.** Further changes will follow from legislation contained in The Social Housing Regulation Bill. When enacted, this will provide the Regulator with necessary powers for greater enforcement, including greater sanctions and intervention when services are failing, and extended standard setting powers. Routine inspections of large landlords will ensure that standards are being met.
- 2.27.** The Regulator has set out its next steps and preparation for the new approach.³¹ This includes stakeholder engagement and pilots with eight housing associations and local authorities on consumer regulation inspections.
- 2.28.** The Regulator will also be consulting on new standards and codes of practice and (due to increased costs) any changes to fee principles before the Bill comes into force.
- 2.29.** Landlords must be prepared for the new consumer regulation, which comes into force in April 2024.

Governance

- 2.30.** The [NHF Code of Governance 2020](#) places much greater emphasis on EDI. It requires the board to take an active lead in committing to equality of opportunity, diversity and inclusion in all of the organisation's activities as well as in its own composition.
- 2.31.** There are further requirements relating to the selection of board members, and that the board composition comprises people with diverse backgrounds and attributes, as well as the board role in ensuring EDI is embedded throughout the organisation and that relevant information is published.

³⁰ [Regulator of Social Housing \(2022\) Tenant Satisfaction Measures.](#)

³¹ [Regulator of Social Housing \(2023\) Reshaping consumer regulation: Our implementation plan.](#)

Findings so far

- 3.1.** From our sessions in 2022, the group concluded that the key areas for improvement in relation to EDI and tenant voice are:
- Communication.
 - Professionalism.
 - Equality.
 - Knowing our tenants.
- 3.2.** It was acknowledged that some pockets of very good, proactive behaviours exist in relation to tenant voice and diversity; however, nothing had been done at that point to strengthen activity by considering both topics together.
- 3.3.** It was also felt there was an underappreciation of the challenges that tenant board members face in both representing board and community in the board room though, again, some very good practice exists in supporting tenant board members
- 3.4.** Altair's series of conversations concluded with a discussion of how to generate momentum for this topic. This acknowledged what was happening across the sector for certain elements, such as TPAS, HACT, the NHF, Housing Diversity Network and The Northern Housing Consortium.
- 3.5.** The group suggested the following next steps:
1. Extend the conversation in relation to EDI and tenant voice.
 2. Create a short White Paper around the role of inclusion and tenant voice to engage more housing providers in the conversation.
 3. Bring individual pockets of conversation together.
 4. While not a topic in the series, participants felt a need to consider the role of EDI and tenant voice in sustainability and its associated solutions (net zero and retrofit).

Questions to ask

What should your organisation be asking itself?

4.1. The Regulator's consumer regulations emphasise the importance of meeting diverse needs and treating tenants with respect. The Regulator says they are asking themselves questions to support their thinking, questions which we think boards and executives should also consider:³²

- Do landlords know what outcomes are achieved across the diverse spectrum of their tenants?
- What data do landlords have access to?
- Does everyone get fair access to and receive good services?
- How do landlords know?
- If different groups of tenants are expressing different levels of satisfaction do landlords know why and do they have an action plan to address this?

4.2. Fiona MacGregor, the Chief Executive of the Regulator for Social Housing, has also suggested landlords should be asking:³³

- While your systems and tenant satisfaction might be good, do you ask yourself what you don't know but should know? And what are you doing to try to find that out?
- Does your culture go beyond merely the data?
- Are your people encouraged to identify and fix issues when they are in a home or a neighbourhood you have responsibility for?
- Do you capture insight from individual reports to identify wider themes?



³² [Regulator of Social Housing \(2023\) Reshaping consumer regulation: Our implementation plan.](#)

³³ [MacGregor, F. \(2021\) Prepare for changes to consumer regulation by asking yourself the right questions. Inside Housing. 09.12.21.](#)

4.3. We suggest that boards and executives focus on the following to ensure EDI and tenant voice are thought of together and to help them prepare for the new consumer regulations:

1. Understand your customers.

- What data do you have on EDI of your tenants?
- Do you have gaps in your knowledge, or poor-quality data?
- Have you got a plan in place to review and improve your data?
- What does your tenant EDI data tell you about any difference in experiences of services?
- What does your tenant EDI data tell you about any different needs of service users?

2. Understand your staff.

- What data do you have on EDI of your staff and leadership? Have you used the [NHF's EDI data tool](#)?
- Do you have gaps in your knowledge, or poor quality data?
- Have you got a plan in place to review and improve your data?
- What evidence do you have of an organisational culture that supports EDI?
- How will you act on what your data tells you about representation amongst your staff? Have you signed up to sector initiatives, such as [Leadership 2025](#), the [NHF's Chairs' Challenge](#) or [CIH's 2023 Presidential Campaign 'In my shoes'](#)?

3. Understand your services.

- Do you have a map of key contact and feedback points for tenant services?
- What data do you have on tenant experience across these services (including tenant satisfaction, complaints and any other feedback, as well as talking to staff and contractors)?
- How do you ensure and evidence that your people, including contractors, understand and meet diverse tenant needs?
- Does your organisational culture ensure your people and contractors have curiosity and power to investigate and fix issues tenants have?
- How will you act on what your data tells you about EDI of tenants and any differences in experience of services?
- Have you got a plan in place to ensure there is consistency and quality of service across all touch points for all your tenants, accounting for diversity of needs?

Next steps

- 5.1.** Drawing on the next steps highlighted by participants in Altair's series, we want to inspire the sector to explore the links between EDI and the tenant voice in culture, consumer standards and service delivery.
- 5.2.** We want landlords to understand the challenges faced by tenants, the impact diversity of organisations has, and improve relationships between tenants and landlords.
- 5.3.** Over 2023, we will be producing blogs focusing on structural and procedural issues in social housing providers that interact with EDI and the tenant voice, specifically:
 - Leadership and culture.
 - Formal complaints.
 - Housing policy and procedures.
- 5.4.** We will also explore topic-specific issues around EDI and tenant voice, such as:
 - Quality of homes.
 - Net zero, including challenges around retrofit.

Join the conversation

If you are interested in joining the conversation and exploring these issues with us, please contact:

Jenny Brown, Director on Jenny.Brown@altairltd.co.uk

Anne-Marie Bancroft, Principal Consultant on Anne-Marie.Bancroft@altairltd.co.uk