

Equality, Diversity and Inclusion

Strategy 2024 - 2029

At NCHA, Equality, Diversity and Inclusion (ED&I) is at the very core of the work that we do. Social housing is about providing good quality, affordable accommodation and services which enable individuals and communities to belong, develop and thrive. At NCHA we have a great opportunity to reduce discrimination and deliver services that are representative and responsive to the needs of the communities we serve. This is truly an exercise in 'levelling up'.

This strategy sits alongside our Group Corporate Plan and other key strategies including: Our Customers, Our Places, Social Impact, Value for Money and Environmental Sustainability.

This strategy was co-created with our Diversity Champions who are NCHA colleagues with a keen interest in ED&I who represent a range of protected characteristics.

Our big ED&I challenges



Workforce:

Recruiting, developing and retaining a diverse workforce, specifically in people manager roles where colleagues from diverse heritage are underrepresented, particularly at senior levels.



Engagement:

Engaging colleagues and customers in our work to recognise and challenge inequality and unconscious bias.



Knowing our homes and our customers:

In order to offer customers the individual services and support they're going to find helpful, we need to have a better understanding of their needs, including any vulnerabilities. Our housing management system allows us to capture some of this information, but we recognise that we can do more to match this against what we know about our homes to provide services that are truly inclusive.



Our guiding principles



Responsibility

NCHA is serious about influencing positive ED&I outcomes in our communities and delivering improvements in our performance. We will make sure ED&I is considered as part of every strategic decision.



Evidence based

We'll continue to develop our data insight in to the ED&I impacts of our work. We'll use this data to drive action and share our insight with the housing sector to support wider policy and practice developments.



Informed by best practice

We'll retain our Housing Diversity Network accreditation and continue to engage with local and national networks to ensure we take account of emerging best practice and policy developments.

Priorities

for the strategy



Inclusive culture

We will nurture a culture in which diversity is recognised, valued and celebrated, and where everybody can be their authentic self.



Recruitment and retention

We will strive to improve the recruitment and retention of Diverse Heritage people managers across NCHA and women in our Property Services teams specifically.



Inclusive services

We will continue to develop our insight and data into customer satisfaction and sentiment against protected characteristics, including knowing our homes and our customers. We will use this information to drive action to reduce inequalities and improve services.



I'm a member of NCHA's Diverse Heritage Forum, and I'm proud to represent other diverse heritage colleagues at our Equality, Diversity and Inclusion Panel. Being part of these groups allows me to voice perspectives that might otherwise be overlooked, and makes sure our initiatives genuinely reflect the diversity in our organisation. I really value being able to contribute to creating an inclusive environment."



Mya Robinson
Diverse Heritage Forum

Our customers

The long-term vision

We'll know our customers, and their specific requirements for service adjustments in order that customers receive appropriate and inclusive services.

We will focus on improving customer satisfaction, complaint handling and tenancy sustainment overall, and specifically look at areas of dissatisfaction and access to services for customers with protected characteristics.

Where possible, we'll design our housing and property services side by side with our customers and other key stakeholders ensuring Equality Impact Assessments are in place to drive change.

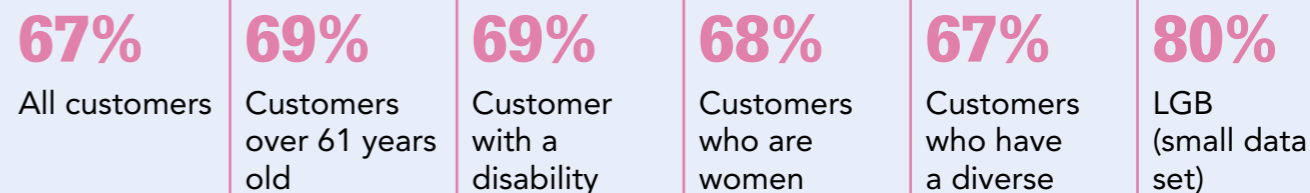
Our current position

We've reviewed and adopted the recommendations of the 2022 Better Social Housing Review and consulted with stakeholders and customers about where we need to improve. We've considered how we best meet the needs of more vulnerable customers and how we hear the voice of customers from black and minority ethnic backgrounds. Over the life of this strategy, we'll be incorporating this feedback, along with equalities monitoring data to drive forward improvements in service standards in the areas that most matter to our customers.

We've analysed our 2023 Tenant Satisfaction Measures (TSM) against customer data to consider any differences in the performance against protected characteristics. We're pleased to report that there are not any significant statistical disparities in satisfaction from customers with protected characteristics which is an indication that work that we do to address discrimination is having a positive impact.

The following is an extract from our tenant satisfaction measures for 2023 analysed by key protected characteristics. Our targets are based on satisfaction for customers with protected characteristics being equal to or less than the 'all customers' group.

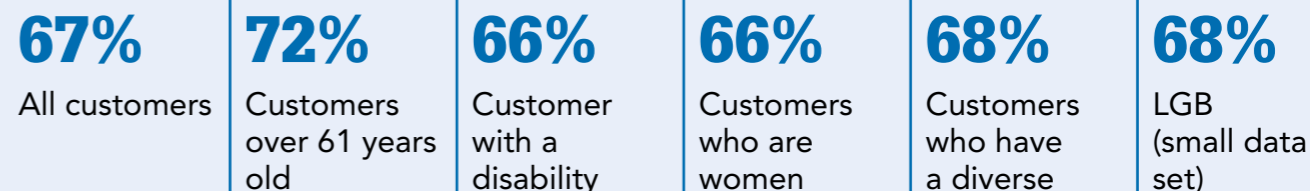
Taking everything into account, how satisfied or dissatisfied are you with the service provided by NCHA? *TSM measure



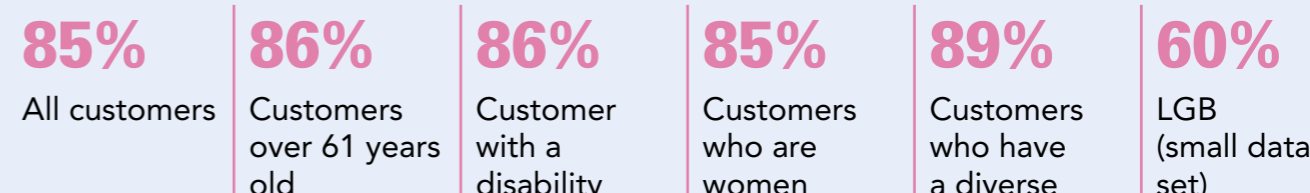
Thinking about the condition of the property or building you live in, how satisfied or dissatisfied are you that NCHA provides a home that is safe? *TSM measure



How satisfied or dissatisfied are you that NCHA listens to your views and acts upon them? *TSM measure



To what extent do you agree or disagree with the following: "NCHA treats me fairly and with respect?" *TSM measure



Complaints performance

How satisfied or dissatisfied are you with NCHA's approach to complaints handling? *TSM measure

| | | | | | |
|-----------------------------|---|--|---------------------------------------|--|-----------------------|
| 30% All customers | 35% Customers over 61 years old | 27% Customer with a disability | 28% Customers who are women | 30% Customers who have a diverse heritage (small data set) | No data LGB |
|-----------------------------|---|--|---------------------------------------|--|-----------------------|

| | |
|--------|--------------|
| Target | 23/24 actual |
|--------|--------------|

Complaints from customers who are women as a % of overall NCHA complaint numbers

| | |
|----------------|------------|
| < 66.0% | 50% |
|----------------|------------|

Complaints from diverse heritage customers as a % of overall NCHA complaint numbers

| | |
|----------------|------------|
| < 20.6% | 10% |
|----------------|------------|

Complaints from disabled customers as a % of overall NCHA complaint numbers

| | |
|----------------|------------|
| < 25.3% | 25% |
|----------------|------------|

Complaints from LGB customers as a % of overall NCHA complaint numbers

| | |
|---------------|-------------|
| < 3.2% | 1.4% |
|---------------|-------------|



Targets for this strategy

Our customers 2024-2029

| Area | Current | 2026 Targets | 2029 Targets |
|---|---|--|---|
| Customer satisfaction | Performance shows no significant statistical disparity in overall satisfaction in groups with protected characteristics | Satisfaction =/> 'all customers' satisfaction for customers with protected characteristics | Satisfaction =/> 'all customers' satisfaction for customers with protected characteristics |
| Customer contact | Insight tool launched to capture ease of dealing with NCHA. Current performance 28% | 35% ease of dealing with NCHA from contact survey | 50% ease of dealing with NCHA from contact survey |
| Complaints resolution | No significant complaint equalities disparities, however overall performance is poor with a 30% satisfaction with complaints handling, benchmarking as 4th quartile* | Complaint volumes reduced to 26 per 1000 property Satisfaction with complaint handling 40% | Top quartile performance in satisfaction and complaint numbers. Satisfaction with complaint handling 50% |
| Customer insight | Customer insight data collection tool launched with full reporting from April 2024 | Develop equalities monitoring of customer insight (sentiment) data and set appropriate targets | Meet equalities targets |
| Customer influence and involvement | All formal engagement groups are reviewed annually to ensure representative membership against gender and ethnicity targets. Current targets are met | Continue to maintain diverse panel and group membership | Continue to maintain diverse panel and group membership |
| Meeting the needs of customers with vulnerabilities | Working with Vulnerable Customers policy/procedures in place and system updates delivered for data capture for our non care and support customers 'Pathways to support' project launched | Delivery of 'Customers with Vulnerabilities' plan with associated targets met 25% of customers will have vulnerability attributes captured in housing management system | All vulnerable customers will have attributes captured in our housing management system – target = 30% of all customers |



Improved places



The long-term vision

Our customers will feel a sense of belonging in their community supported by our responsive and appropriate tenancy support, community safety, estate management and repairs and maintenance services.

Our current position

We're a member of 'Homes for Cathy', an alliance of housing associations dedicated to tackling homelessness and improving tenancy sustainment. As a large care and support provider with significant expertise in delivering person centred services, we enable people with a range of needs and abilities to live well in their homes. We continue to have very low eviction rates and low levels of tenancy failure.

Our ED&I panel set targets and review our performance against several key equality indicators in relation to our places. We continue to review trends to see what lessons can be learnt to improve our services.

The ED&I panel receive an annual Anti-Social Behaviour (ASB) report which reviews cases,

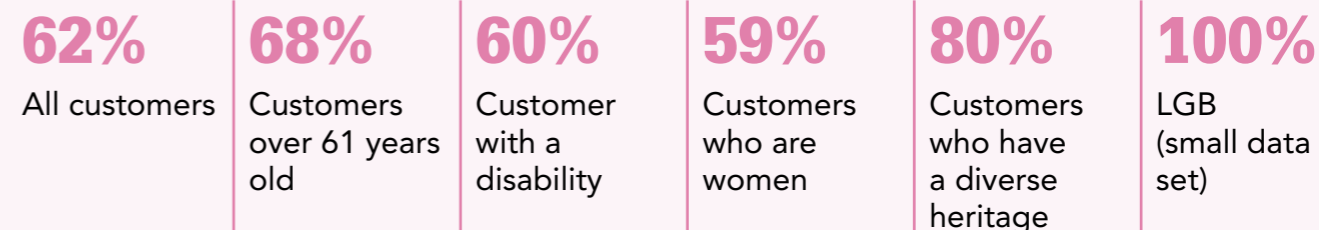
specifically hate crime, perpetrators and victims against protected characteristics. Just over 2% of ASB cases are logged as hate crime, and in these cases all but one was an allegation of racism. Our analysis of ASB cases overall for 2023/24 shows no significant disparities for ethnicity or gender, however customers who have a disability are more likely to be both a victim and a perpetrator of ASB.

We are improving training for colleagues as part of our 2024/25 plan for customers with vulnerabilities to ensure the correct advice and interventions are offered as part of our Community Safety team response to incidents of ASB.

Key Performance Indicators

| Key Performance Indicators | Target | 23/24 actual |
|--|----------------|--------------|
| Tenancy support services delivered to women as a % of all tenancy support offered | 66.0% | 63% |
| Tenancy support services delivered to diverse heritage customers as a % of all tenancy support offered | 21% | 16% |
| Tenancy support services delivered to LGB customers as a % of all tenancy support offered | 3% | 0% |
| Tenancy support services delivered to disabled customers as a % of all tenancy support offered | 25% | 44% |
| Evictions for women as a % of all evictions | <66% | 60% |
| Evictions for diverse heritage customers as a % of all evictions | <21% | 10% |
| Evictions for LGB customers as a % of all evictions | <3% | 0% |
| Evictions for disabled customers as a % of all evictions | <25% | 0% |

How satisfied or dissatisfied are you with NCHA's approach to handling anti-social behaviour? *TSM measure



Targets for this strategy

Our improved places 2024-2029

| Area | Current | 2026 Targets | 2029 Targets |
|-----------------------------|---|---|---|
| Tenancy support | Currently undergoing Domestic Abuse Housing Alliance re-accreditation A local leader and expert in the provision of domestic abuse services across Derbyshire Monitoring of access to tenancy support services Re-promotion of the tenancy support offer to increase referrals and engagement | Review targets and increase referrals to meet targets for our Domestic Abuse Co-ordinator Relaunch DA awareness and support for front line property services, YMM and YCC colleagues. Develop new model of tenancy support following the 'Pathways to Support' phase two project delivery Improve data collection on service users' needs. Measure impact of Pathways to Support on CST referrals | Create specialisms within the Community Support team based on service user need Widen our local leadership in domestic abuse into other area within the East Midlands |
| Safer communities | Customers with disabilities and women are marginally less satisfied with NCHA's handling of ASB Disabled customers are more likely to be a perpetrator and victim of ASB Hate incident case management included within ASB policy Hate Crime Awareness training delivered to Community Safety Team | ASB satisfaction for customers with protected characteristics to reflect 'all customer' satisfaction Deliver a partnership plan to better understand concerns with operating areas i.e hate crime and county lines Separate Hate Crime policy 25% hate crime cases subject to case review and lessons learned | ASB satisfaction for customers with protected characteristics to reflect 'all customer' satisfaction 0% of complaints upheld where hate crime case management cited |
| Sustainable Places Standard | Sustainable Places Standard working group created, with early drafts and consultation plan underway | Complete our Sustainable Places Standard to set our vision for homes and communities | Using our Sustainable Places Standard to audit the inclusiveness and accessibility of existing places |
| Homes for life | Surveys completed on two Independent Living for Older People schemes (ILOP) to plan for full refurbishment of communal areas. In 2022/23, 218 adaptations completed on homes including minor and major adaptations | Commence ILOPS improvement programme in two schemes Satisfaction with communal areas 90% | Achieve >98% occupancy and >95% customer satisfaction in ILOP schemes through completion of the Inspired Living programme, reviewing the business plan in line with the project recommendations |

New places



The long-term vision

Building new affordable homes and communities is fundamental to our vision and mission to help end the housing crisis which has a disproportionate impact on women and those from ethnic minorities. We'll continue to be a key provider of new and affordable homes, including supported housing for people with disabilities or who are homeless across the East Midlands. Designed alongside our customers, we'll use our in-house Sustainable Places Standard as a guide when we build new homes. This standard will consider the needs of different communities and people with disabilities to help ensure, where possible, that equality, diversity and inclusion impacts are considered on all of our new developments.

Our current position

In 2023 we collected data against a number of wellbeing questions as part of a social impact evaluation. It's clear that our customers feel more of a sense of belonging to a neighbourhood as a result of having an NCHA home, and worry less about being a victim of crime. We'll continue to monitor these trends to ensure that the letting of our homes helps improve wellbeing for customers with protected characteristics.

We've been working with our involved customer groups and colleague Diverse Heritage Forum on the Sustainable Places Standard which we aim to launch in 2024/2025.

Our new workplace in Clifton has been designed with equality, diversity and inclusion as a key priority. We've worked with our Diversity Champions to ensure our offices will provide business leading spaces for colleagues which meet their needs and promote success.

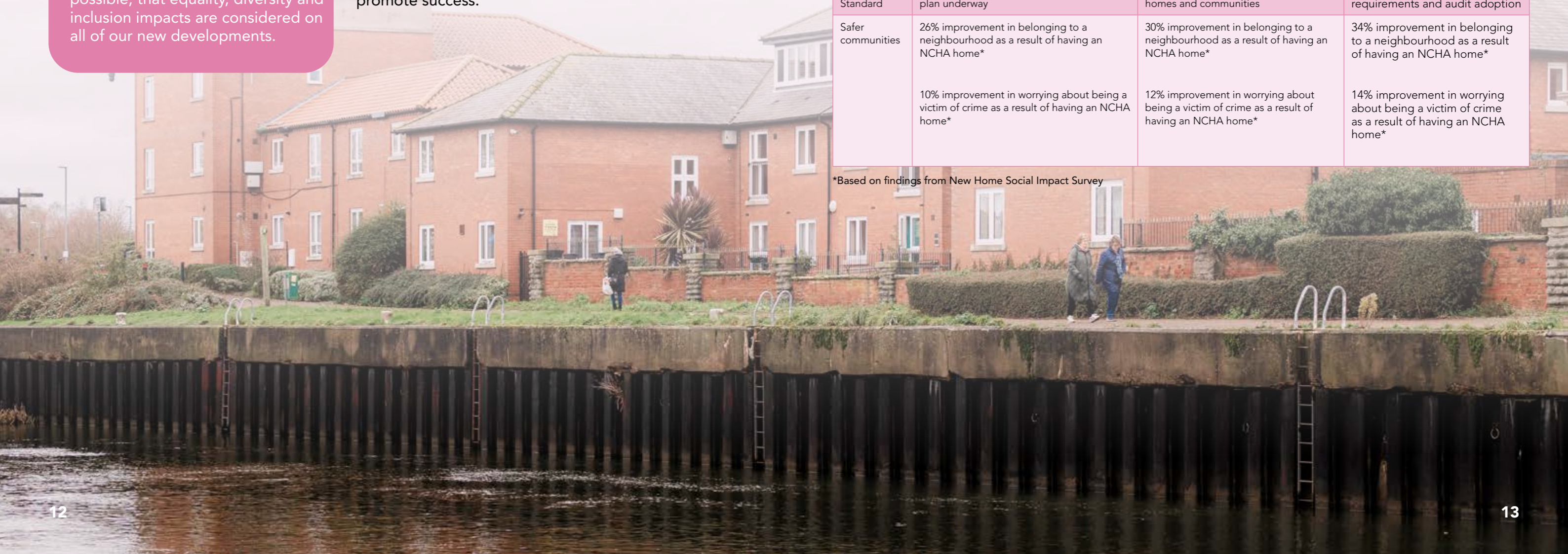
Key Performance Indicators

| Key Performance Indicators | 2023/24 target | Q4 2023/24 |
|--|---------------------------------|--------------|
| New lettings to diverse heritage applicants (affordable and social lettings) | Census data 2021 in local areas | 10% |
| Sales of shared ownership to diverse heritage applicants | 24% | 17.2% |
| Sales of shared ownership to disabled applicants | 5% | 7% |

Targets for this strategy

| Our new places 2024-2029 | | | |
|-----------------------------|--|--|--|
| Area | Current | 2026 Targets | 2029 Targets |
| New homes delivered | We're developing 70 new homes in Clifton for older people and people with vulnerabilities as part of our new workplace and residential development | Work with partners to deliver new supported living schemes under the 'right support, right care, right culture' principles set out by CQC | By 2028 we forecast completing 150 units of specialist supported housing Access other forms of capital grant to boost supply from local government, central government or the NHS |
| Sustainable Places Standard | Sustainable Places Standard working group created, with early drafts and consultation plan underway | Complete our Sustainable Places Standard to set our vision for liveable homes and communities | Adopt Sustainable Places Standard in employers' requirements and audit adoption |
| Safer communities | 26% improvement in belonging to a neighbourhood as a result of having an NCHA home* 10% improvement in worrying about being a victim of crime as a result of having an NCHA home* | 30% improvement in belonging to a neighbourhood as a result of having an NCHA home* 12% improvement in worrying about being a victim of crime as a result of having an NCHA home* | 34% improvement in belonging to a neighbourhood as a result of having an NCHA home* 14% improvement in worrying about being a victim of crime as a result of having an NCHA home* |

*Based on findings from New Home Social Impact Survey



Our people

The long-term vision

People are at the heart of NCHA. We will have a workforce that is representative of the communities we serve at all levels of the business from Board to our front line colleagues. We value and celebrate the diversity of all our colleagues, to make NCHA a great place to work and achieve. We will provide talent management programmes and ongoing support for our colleagues to learn and develop with a specific focus on recruiting and retaining diverse heritage colleagues in people manager positions.

Our culture will be inclusive and engender colleagues with a sense of belonging that results in NCHA achieving the best outcomes for all our customers.

Our current position

In 2023 we achieved Great Places to Work accreditation and our ED&I panel spent time analysing our results. We were delighted that overall our ED&I questions came back with some of our highest scoring results overall. However closer analysis against protected characteristics revealed that not all colleagues had the same positive experiences. We have used this data alongside our key equalities performance data to help shape our strategic targets below.

Although we have a proportionately low level of grievances and disciplinaries for an organisation of our size, we have an overrepresentation of diverse heritage,

disabled and LGB colleagues in our grievance figures. The grievance claims themselves are typically not linked to protected characteristics. Diverse heritage colleagues are also overrepresented in disciplinary cases.

We continue to be underrepresented with diverse heritage colleagues at a people manager level, despite having representative interview panels and using the 'Rooney Rule' for shortlisting. We are meeting targets in the training of diverse heritage colleagues on leadership programmes and apprenticeships, which is developing our people managers and leaders of the future.



Key Performance Indicators



| Key Performance Indicators | Target | 23/24 actual |
|--|--------------------------------------|-------------------|
| Diverse heritage colleagues as % of all colleagues | 20% | 26% |
| Diverse heritage managers as % of all managers | interim target is 14% by 2027 | 10% |
| Women managers % of all managers | 67% | 65% |
| Disabled managers as % of all managers | 10% | 9% |
| LGB colleagues as a % of all colleagues | 3% | 5% |
| LGB managers as a % of all managers | 5% | 3% |
| Colleague satisfaction by LGB profile matches NCHA overall colleague satisfaction | 69% | 74% |
| Colleague satisfaction by diverse heritage profile matches NCHA overall colleague satisfaction | 69% | 63% |
| Colleague satisfaction by disability profile matches NCHA overall colleague satisfaction | 69% | 67% |
| % of grievances from diverse heritage colleagues as a % of all grievances | <35% | 57% (7) |
| % of grievances from women as a % of all grievances | <67% | 64% (8) |
| % of grievances from LGB colleagues as a % of all grievances | <5% | 17% (2) |
| % of grievances from disabled colleagues as a % of all grievances | <10% | 21% (3) |
| Recruiting and retaining women in property trades - % of women in Property Services | 5% | 4.5% |
| Increase LGBT+ Allies in Property Services | 25% | 46% |
| Increase LGBT+ Allies in the Housing Services | 25% | 35% |
| % workforce across NCHA signed up as LGBT+ Allies | 25% | 24% |
| Delegates on apprenticeships are from diverse heritage backgrounds | 15% | 19% |
| A minimum of 25% of colleagues selected for the C&S Future Leaders programme (and any future aspiring leaders programmes) are from diverse heritage backgrounds. | >25% | 29% |

Targets for this strategy



Our people 2024-2029

| Area | Current | 2026 Targets | 2029 Targets |
|----------------------------------|---|--|--|
| Diverse heritage people managers | 10% | 12% | 14% |
| Gender pay gap (GPG) | 13.2% | 12% | 11% |
| Ethnicity pay gap (EPG) | 18.7% | 17% | 15% |
| Allies programme | LGBT+ Allies programme embedded Consideration of broader women in trades 5.4% | Ongoing monitoring of allies programme 5% | Ongoing monitoring of women in trades 8% |
| Apprenticeships | 19% delegates on apprenticeship programmes are from a diverse heritage background | 20% delegates on apprenticeship programmes are from a diverse heritage background | 22% delegates on apprenticeship programmes are from a diverse heritage background. |
| Talent management | 29% of colleagues selected for the Future Leaders programme (and any future aspiring leaders programmes) are from diverse heritage backgrounds | 25% of colleagues selected for the Future Leaders programme (and any future aspiring leaders programmes) are from diverse heritage backgrounds Introduce formal positive action development programme across NCHA to support diverse heritage colleagues into management and leadership positions Provide targeted mentoring to colleagues with protected characteristics to support career development Develop reporting for internal promotions against protected characteristics | 25% of colleagues selected for the Future Leaders programme (and any future aspiring leaders programmes) are from diverse heritage backgrounds Develop neurodiversity recruitment and retention campaign linked to specific recruitment needs with appropriate management and colleague support to ensure success |
| Inclusive culture | We have met all 2024 targets in this areas from the 2022/ 27 ED&I strategy | Develop high levels of diversity awareness through: 1.Commissioning external speakers linked to campaigns 2.Peer support groups on ED&I issues 3.Lunch and learn events through Diversity Champions and other speakers 4.Curating external and internal ED&I material/ blogs/ podcasts to host on IGLOO and e-learning platform. | Reobtain accreditation – improved engagement scores. 73% colleagues consider NCHA a Great Place to Work. Similar engagement scores achieved against a range of protected characteristics. |
| Support for colleagues | Grievances from disabled and diverse heritage colleagues exceeding targets. ED&I Adviser appointed and will explore reasons and develop action plan with colleagues from the People team | Deliver Vulnerable Customers Thematic Plan, including further training and development for colleagues working in challenging circumstances Grievances from disabled colleagues <10% Grievances from diverse heritage colleagues <35% Neurodiversity audit undertaken with further work to ensure colleagues self-declare and seek support where needed | Grievances from disabled colleagues <8% Grievances from diverse heritage colleagues <30% |



| | | | |
|---|--|---|---|
| Colleague engagement/ satisfaction (Great Places to Work actions and targets) | All results have been reviewed by lead managers from all directorates and functions. Detailed focus groups held in Homes and Wellbeing in order to establish a bespoke action plan in the area requiring greatest improvement. Colleague Voice have reviewed, with suggestions feeding into a corporate working group, to identify cross-cutting goals. | Reobtain accreditation – improved engagement scores. 70% colleagues consider NCHA a Great Place to Work. Similar engagement scores achieved against a range of protected characteristics. | Reobtain accreditation – improved engagement scores. 73% colleagues consider NCHA a Great Place to Work. Similar engagement scores achieved against a range of protected characteristics. |
| ED&I panel have reviewed scores against protected characteristics. Our ED&I Adviser will develop an appropriate action plan with support from relevant colleagues | | | |

Our business

The long-term vision

NCHA has representative and diverse governance arrangements, including the Board and committees which lead NCHA. Equality, diversity and inclusion considerations will be embedded into all strategic decisions through Equality Impact Assessments (EIA). NCHA will become a leader in the field of equality, diversity and inclusion on a local level and contribute nationally to the development of good practice in the housing and care and support sectors.

Our current position

NCHA has a diverse Board and committees and actively monitors representation in these areas. Our equality, diversity and inclusion work is overseen by our ED&I panel, led by the Director of Homes and Wellbeing and comprised of Diversity Champions with a range of lived experience who are passionate about driving change and improvements in our work.

In 2022 NCHA achieved the Housing Diversity Network DNA accreditation for our work in equality, diversity and inclusion. Areas of distinction were achieved in the areas of leadership, governance, data collection and analysis, communications to colleagues and colleague wellbeing.









Targets for this strategy

Our business 2024-2029

| Area | Current | 2026 Targets | 2029 Targets |
|---------------------------------------|--|---|--|
| Governance | 48% of female Board and committee members 28% of diverse heritage Board and committee members 0% of LGB Board and committee members 8% disabled Board and committee members | Ensure Board and committee membership is representative of customer base | Ensure Board and committee membership is representative of customer base |
| Accreditation | HDN DNA accreditation achieved | DNA re-accreditation | |
| ED&I campaigns and visible leadership | A comprehensive calendar of campaigns and events in place with support from NCHA Diversity Champions | Delivery of campaigns calendar and targeted communications across colleague and customer groups | |
| National and local engagement | Director of Homes and Wellbeing a member of National Housing Federation leaders group for ED&I | Active participation and leadership of local area ED&I networking opportunities | |





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