

# Reflections



Newlon Housing Trust's Equality, Diversity, and Inclusion Framework  
2023 to 2026



## 1. INTRODUCTION

Our Equality, Diversity and Inclusion (EDI) framework, **Reflections**, reaffirms our deep commitment to equality, diversity, and inclusion, sets out our core principles and priorities for development, and links with our overarching goal to provide high quality affordable homes in London.

In order to achieve this goal we will need to:

- Maintain and improve on Newlon's culture, that reflects and values the diversity of our residents, Board members, employees, and other organisations we work with.
- Provide services and communications that reflect individual needs and preferences, taking intersectionality into account.
- Ensure that our customers and residents know about, can easily access, and are happy with their experience of services provided by Newlon, and our systems and procedures for doing so reflect their requirements.
- Ensure a diverse, talented and motivated governing body and workforce that understands and reflects the needs of the communities we serve, and is recruited, developed and retained in line with Equality, Diversity and Inclusion principles.

Our EDI framework, **Reflections**, aims to ensure Newlon's policies, procedures and practices relating to our workforce, residents, and contractors and suppliers, reflect and promote good practice throughout.

To do so everyone in our organisation has a responsibility to consider EDI implications in their work, and to reflect this duty in everything they do.

Our commitment is to make sure that no individual or group experiences unfair treatment in recruitment, pay, promotions or housing and any other services we provide, such as lettings, housing advice, repairs and rent collection.

## 2. OUR CORPORATE VISION

Newlon Housing Trust provides housing and support for some of the UK's most diverse communities. We own or manage more than 8,350 affordable homes, primarily in nine boroughs in north and east London, with many more in development. These homes are made up of a mix of affordable tenures and we provide housing for people nominated from local authority waiting lists, specialised accommodation for Key Workers, and Shared Ownership homes to help people take their first step on the property ladder.

As part of our 2021-2024 Corporate Plan working with our Board we have set out five key business priorities:

- To provide excellent services.
- To provide high quality homes.
- To continue to grow and provide more new homes.
- To have a dynamic workplace.
- To be efficient and effective.

We are committed to ensuring that our services to residents take into account how people's characteristics combine to affect their experiences. It is important to look beyond the definitions of protected characteristics and be able to look at EDI through the lens of intersectionality, wider elements such as socio-economic status, care responsibilities, and ensuring mental health is included when looking at disability. We also need to recognise and engage with the many forms of community that may exist and co-exist, including communities of location and identity. This may mean that additional proportionate resources are required in some cases to achieve this. We will work with our residents and the communities they live in to advance equality, diversity and inclusion.

We aim to be a exemplar employer and an organisation where people are rewarded, motivated, and managed fairly and consistently, and who deliver accessible and high quality services.

### 3. EQUALITY, DIVERSITY, AND INCLUSION IN HOUSING

We have a duty as an employer to uphold the law and to ensure that anyone who works with, or for, us is treated with dignity and respect.

#### Public Sector Equality Duty

In general terms this legislation requires public sector organisations to have due regard to three general duties. These are to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

Newlon is not listed as a public body for this legislation, but works in partnership with those that are. As such the principles of good practice are adopted to ensure no individual or group of individuals are disadvantaged.

The Residents' Services Committee has delegated responsibility for ensuring due regard is given to the three principles of the Equality Duty as established by the Act .

#### Chartered Institute for Housing Charter for Equality and Diversity in Housing

Newlon has signed the Chartered Institute for Housing (CIH) Charter for Equality and Diversity in Housing, which is a public commitment to delivering a fair and accessible housing service in accordance with the Charter principles.

#### Regulator of Social Housing Tenant Involvement and Empowerment Standard

Newlon is regulated by the Regulator of Social Housing (RSH). Through its Tenant Involvement and Empowerment Standard, the RSH highlights the importance of treating residents and potential residents with fairness and respect, and providing choices, information, and communications that are appropriate to the diverse needs of residents. The introduction of Tenant Satisfaction Measures covering five main themes, including repairs, building safety, effective complaint-handling, respectful and helpful tenant engagement, and responsible neighbourhood management, will assess how well social housing landlords in England are doing at providing good quality homes and services.

#### The National Housing Federation's Code of Governance

The Newlon Board have adopted the National Housing Federation's (NHF) code of Governance which promotes fairness and equality of opportunity, and recognition of diversity in all aspects of the organisation's governance.

#### Equality and Human Rights Commission

The Equality and Human Rights Commission (EHRC) is the regulatory body responsible for enforcing the Equality Act 2010. They are an independent advocate for equality, human rights and good relations in the UK, and their duties include reducing inequality, eliminating discrimination and promoting and protecting human rights.

Human rights have a special significance in relation to social housing. The EHRC states that quality of housing can have a huge impact on wellbeing. Inadequate housing increases the risk of severe ill health and disability, it can also lead to poor mental health, lower educational attainment, unemployment and poverty. Equality in housing is therefore an important issue and the ambitious aims of the EHRC can only be achieved in partnerships with organisations such as Newlon and other housing providers.

#### Internal Governance

Newlon monitors progress and regularly reports to the People and Governance and Residents' Services Committee on EDI issues.

Summaries of our Gender and Ethnicity analysis are published on our Website.

In keeping with our duties we will continue to engage, confer, monitor and act upon equality data, and to assess the impact, or potential impact, of key policies, processes and practices on equality.

## 4. OUR EQUALITY, DIVERSITY AND INCLUSION FRAMEWORK - REFLECTIONS

This Framework sets out our approach to equality, diversity, and inclusion and applies to all Newlon staff, resident involvement, customers and stakeholders, service delivery and procurement. This Framework complements and links to a number of relevant policies, procedures and corporate documents including the Business Plan, Resident Involvement Strategy, Lettings and Tenancy Policy and Procedure, Communications Strategy, procurement procedures, and all recruitment and Human Resources Management processes.

We will focus our equality, diversity, and inclusion activity around three different domains. Within each domain, we have set out our commitments and what we will achieve.

**As an organisation that values our staff**  
*Newlon will foster inclusive working practices and aim to reflect the community in which we operate, so that we can achieve the organisation's vision.*

**As a provider of services**  
*We are committed to ensuring that our services to residents take into account how people's characteristics combine to affect their experiences, so we can provide the same level of service from us whatever their ethnic background, or level of support and care needs.*  
*We will work with the communities to advance equality of opportunity and foster good relations between the different communities we serve.*

**Through partnerships**  
*In order to deliver high quality services, it is essential that there is a culture of partnership, participative decision making and collaboration. We will work with our partners to champion equality, diversity, and inclusion best practice for our residents, staff, and wider society.*

## 5. WHAT IS EQUALITY, DIVERSITY, AND INCLUSION?

<p><b>Equality: The right of different groups of people to receive the same treatment.</b></p>	<p>The Equality Act 2010 consolidated many pieces of anti-discrimination legislation into a single legal framework to simplify, strengthen and remove inconsistencies that previously existed.          Equality means treating people fairly and consistency regardless of their background, beliefs and defining experiences.</p>
<p><b>Diversity: Respecting and valuing differences in individuals, and recognizing these as a positive force.</b></p>	<p>A diversity approach aims to recognise, value, and manage differences in individuals and to positively strive to meet their needs.          It's about respecting and appreciating what makes people different, in terms of age, gender, ethnicity, religion, disability, sexual orientation, education, and national origin, valuing the diverse range of experiences our staff and residents have.</p>
<p><b>Inclusion: A sense of belonging; feeling supported so you can do your best at work.</b></p>	<p>Inclusion means accepting individuals' differences, embracing their strengths, and providing opportunities for people to achieve their full potential, allowing each person to contribute their unique experiences to the workplace. This will impact positively on internal activities and relationships, and on the experiences of residents and other stakeholders.          An organization can be diverse without being inclusive. Inclusion means working with staff and residents encouraging them to participate, and listening to what they have to say- to understand what people need in policies, processes, physical spaces, and products to feel valued and included.</p>

## 6. KEY COMMITMENTS

**As an organisation that values our staff we are committed to sustaining a workplace where the dignity and rights of all are respected and protected, the needs of staff are met, and staff are able to thrive. We:**

- Celebrate equality, diversity and inclusion within Newlon.
- Design and implement policies, procedures and practices that actively reflect best practice.
- Equip staff with knowledge and skills needed to contribute to EDI.
- Ensure appropriate use of language in all communications.
- Identify and eradicate discrimination and harassment.
- Maintain fair and transparent recruitment, promotion and reward processes.
- Plan for colleague development to address career progression, confidence, and opportunity.

**As a provider of service we are committed to promoting equality in the day-to-day delivery of our services and doing all we can to deliver these in a way that meets the diverse needs of our residents and service users. We:**

- Design and provide homes that offer a good quality of living environment and meets the needs of our residents by addressing their cultural and physical needs to ensure fair and equal access to services.
- Ensure staff are aware of, and trained in, diversity and equality issues.
- Embed a culture of respect for all.
- Increased, purposeful data that ensures we continue to improve and deliver services fairly and inclusively.

**Through Partnerships we are committed to demonstrating leadership on EDI issues. We:**

- Participate on EDI, housing sector, and community based networks.
- Screen our procurement policies to ensure they meet EDI best practice principles.
- Work only with contractors who have equal opportunities and diversity policies and we use any leverage we have to persuade them to improve their diversity in employment and practice.

## 7. MEASURING SUCCESS

**As an organisation that values our staff:**

- Our staff demographic continues to reflect the community in which we operate. In 2023, 58% of staff recorded themselves as female, 67 percent of staff from BAME backgrounds, and 16% of staff were Newlon residents.
- The Staff Attitude Survey shows improvement in the confidence of staff in how EDI issues are resolved.
- All staff have training on EDI issues at least once a year.
- Recruitment practices are scrutinised and reported to the People and Governance Committee at least annually.
- Newlon's size means we are not required to report on Gender Pay Gap as, given the relatively small number of staff within Newlon, any statistical significance is unlikely to be robust. However Newlon still undertakes this analysis annually to see if any major lessons can be learned.

**As a provider of services**

- We monitor lettings, sales, and referrals in line with good practice and work with our local authority partners to ensure that our procedures are free from discrimination. Where we detect breaches we take action to remove them.
- We scrutinize patterns of reports of things such as antisocial behavior to see if these issues affect some of our residents disproportionately than others.
- Concerns over EDI issues are addressed promptly, fairly, and transparently.
- EDI practices are scrutinised and reported to the Residents' Services Committee at least annually.

**Through Partnerships**

- All procurement exercises request evidence of EDI principles in place.
- Our residents and service users, irrespective of ethnicity, gender, sexual preference, or disability, have the same level of satisfaction with the services of our contractors and we monitor this performance.
- Our principle service delivery partners continue to demonstrate EDI best practice and, where complaints are received, they are dealt with in a sensitive, and effective manner.

## 8. OUR WORKPLAN

As an organisation that values our staff	
What this entails	Actions and timeline
<b>A) We will regularly analyse workforce data in order to identify areas for improvement around equality, diversity, and inclusion.</b>	
We will improve the quality of monitoring data on our systems	a. Achieve and maintain 95% completion rate of employee diversity data by December 2023. This is to include “prefer not to say”.
We undertake a regular staff survey and take actions to address concerns	b. When relevant, publish a response to any EDI concerns from the staff survey within six months of the survey being completed.
We will report on recruitment data annually	c. Annual reports will be presented to the TET, People and Governance Committee, and Board.
<b>B) We will pay fair wages and, as an employer, support employees in embracing good financial practices</b>	
Ensure pay practices are transparent and fair, and position salaries at the median of the social housing sector market	a. We will conduct a market review of our pay levels every two years, and act on any issues raised to maintain pay levels in line with the Median for the Housing Sector. b. We will undertake an analysis of any Gender and Ethnicity pay gaps every year and publish a summary of findings on our intranet c. The People and Governance Committee will consider pay related issues as a standing item on their agenda.
<b>C) We will enhance access to employment opportunities for under-represented groups</b>	
Encourage high quality candidates from all backgrounds to apply for vacancies and ensure equal and fair treatment throughout the recruitment process	a. Wherever possible externally advertised posts will be advertised widely in order to provide a reasonable opportunity to apply. b. All advertisement will reflect the job description and person specification, essential criteria will only reflect requirements of the role, and do not disadvantage some qualified candidates, and no recruitment documentation will contain words or phrases that indicate bias. c. All applicants will be assessed on the basis of merit using objective and measurable job-related criteria consistently applied to all candidates. d. Reasonable adjustments will be considered throughout the recruitment, selection, and promotion processes for applicants with disabilities. e. All employees involved in recruitment and selection receive training on Newlon’s recruitment procedures and equal opportunities. f. We will provide flexible learning opportunities such as mentoring, coaching and shadowing to help empower colleagues to take control of their own development, build a more inclusive workplace culture and contribute creatively to our vision.
<b>D) We will celebrate our different cultures, and life experiences of our staff</b>	
Recognise and rejoice in the richness of Newlon’s staff and residents diverse backgrounds and cultures	a. Support other aspects of diversity, by recognising and celebrating religious days and festivals, and having EDI calendar of events, including Pride Month, Black History Month, Positive Aging, Disability History Month, International Women’s Day. b. Explore partnerships and accreditation such as the Diversity Network Accreditation or HouseProud

## OUR WORKPLAN (cont.)

As an organisation that values our staff	
What this entails	Actions and timeline
<b>E) We will have policies, procedures and practices in place that engender a culture of inclusivity, particularly in relation to protected characteristics</b>	
All policies and procedures are scrutinised to ensure they embed EDI principles	<ul style="list-style-type: none"> <li>a. Policies and procedures are reviewed in line with the review schedule, and sent to the Staff Consultation Forum for comment.</li> <li>b. Additional Policies and procedures that enhance staff work/life balance and wellbeing, and address other EDI concerns are introduced as part of the review.</li> </ul>
<b>F) We will take action to maintain the diversity of our Board and Executive</b>	
All Board and Exec appointments are conducted in line with EDI principles	<ul style="list-style-type: none"> <li>a. Posts will be advertised widely in order to provide a reasonable opportunity to apply.</li> <li>b. Recruitment packs will be welcoming and inclusive and not use words or phrases that indicate bias.</li> <li>c. All applicants will be assessed on the basis of merit using objective and measurable role-related criteria consistently applied to all candidates.</li> <li>d. All applicants to complete an equal opportunities monitoring form which will not be made available to the selection panel.</li> <li>e. Reasonable adjustments will be considered throughout the recruitment and selection processes for applicants with disabilities.</li> </ul>
<b>G) Our leaders and managers will consistently demonstrate inclusive leadership behaviours</b>	
EDI is driven from the top and shapes our organisational culture	<ul style="list-style-type: none"> <li>a. All leaders and managers are required to complete EDI refresher training at least every three years.</li> <li>b. Newlon communications will reviewed to ensure they encompass EDI principles.</li> <li>c. The Board, Executive, and Senior Managers will work together to establish a culture of inclusiveness, where staff feel safe to get involved and comment.</li> <li>d. Feedback from staff will be acted on, and all complaints investigated appropriately.</li> </ul>
<b>H) We will create inclusive conditions and support the mental health and wellbeing of staff</b>	
Newlon promotes good mental health and provides support for employees who are experiencing mental ill health including anxiety or depression	<ul style="list-style-type: none"> <li>a. Relevant policies and procedures are reviewed, and new policies introduced as necessary.</li> <li>b. All HR staff are trained Mental Health First Aiders.</li> <li>c. Newlon's benefit package is enhanced in line with good practice.</li> <li>d. Learning and development provision includes awareness training, and how to support colleagues who are experiencing mental health issues.</li> </ul>

## OUR WORKPLAN (cont.)

As a provider of services	
What this entails	Actions and timeline
<b>A) We will ensure that the public sector duty is appropriately reflected in all policies, procedures, processes, projects, and training</b>	
Assess where we already pay due regard to the Public Sector Equality Duty (PSED) for compliance purposes, then look to go beyond compliance	a) Providers to consider PSED requirements when reviewing relevant policies and procedures.
	b) Where possible we will provide interpreters from within our staff to assist with resident queries.
	c) Assess where possible, where residents are disproportionately impacted by issues such as anti-social behaviour.
<b>B) We will enhance the voice of residents in the services we shape and create</b>	
Our Resident Engagement Strategy 2023 to 2026 will ensure that we engage and empower the voice of our residents to be heard at all levels so that their insight shapes and influences services.	a) We will <b>co-design services</b> - where residents and staff work together to design services, with particular emphasis on repairs.
	b) <b>We will enable people</b> – where we make sure that our staff and residents have the knowledge, skills and behaviours needed for effective and meaningful resident engagement.
	c) <b>We will adopt ways of involving</b> – where we make the experience of residents getting involved with us as seamless, easy, and effective as possible by providing choice that suits them. This includes making full use of the Scrutiny Panel, and Readers Panel expertise.
	d) <b>We will maintain at least one Resident Board member</b> to use their experience, expertise and insight to help determine our strategy and direction, and that of our Group members.
<b>C) We will regularly analyse resident data in order to identify areas for improvement around equality, diversity, and inclusion.</b>	
We will undertake a regular Resident Satisfaction survey and take actions to address concerns	a) We will review our collection of data, to continuously improve and provide a framework for robust and reliable equality data to be collected, analysed, reported, and shared appropriately.
	When relevant we will publish a response to any EDI concerns from residents within six months of the survey being completed.
<b>D) We will continue to model Trust Newlon principles throughout our services</b>	
Trust Newlon is an organisation wide initiative that focuses on rebuilding the trust with our tenants.	a) All services reflect Trust Newlon priorities, which can be recognised by residents in the service they receive.
	b) Training on ‘Dealing with Empathy’ will be implemented in 2023.



## OUR WORKPLAN (cont.)

Through partnerships	
<b>What this entails</b>	Actions and timeline
<b>A) We will work with our partners to provide services that recognise equality, diversity, and inclusion best practice for our residents, staff, and wider society.</b>	
When working on our behalf residents do not distinguish between contractor and Newlon staff. Therefore all contractors delivering services must act in accordance with Newlon's own EDI principles	<ul style="list-style-type: none"> <li>a) All contractor staff are expected to act appropriately when dealing with Newlon residents and staff and any breaches will be investigated and action taken where necessary.</li> <li>b) All contractors will be asked to confirm that their operatives have received EDI training.</li> </ul>
<b>A) We will work with our partners to champion equality, diversity, and inclusion best practice for our residents, staff, and wider society.</b>	
All policies and procedures are scrutinised to ensure they embed EDI principles	<ul style="list-style-type: none"> <li>a) We will screen all procurement policies in line with the review schedule to ensure they meet EDI best practice principles.</li> <li>b) All employees involved in procurement and commissioning receive training on Newlon's procedures and equal opportunities.</li> </ul>
<b>B) We will work only with contractors who have equal opportunities and diversity policies and we will use any leverage we have to persuade them to improve their diversity in employment and practice</b>	
We will require evidence on EDI policies during procurement for contractors and partners	<ul style="list-style-type: none"> <li>a) Evidence is provided during the procurement process of how suppliers build equality considerations into their services.</li> </ul>
<b>C) We will work in a collaborative, non-adversarial, and forward thinking way to encourage partners to embrace EDI practices</b>	
We will consider partnerships with like-minded organisations to further develop EDI practices and support for staff and residents	<ul style="list-style-type: none"> <li>a) We will look to establish links with organisations such as the Housing Diversity Network, National Equality Standard, and Chartered Institute of Housing to support initiatives like 'Make a Stand'.</li> </ul>

## 9. ROLES AND RESPONSIBILITIES

### We all have a responsibility to:

- Understand, and comply with the Framework and associated policies.
- Undertake training and development as required.

### The Board and Executive Team are responsible for:

- Governance of EDI across Newlon.
- Approving the Equality Diversity and Inclusion Framework.
- Undertaking an annual review of Performance in delivering the objectives.
- Ensuring all legislative and regulatory obligations are met.

### Senior Management are responsible for:

- Ensuring implementation and compliance with the Framework and associated policies and procedures within their areas of responsibility.
- Monitoring progress against the objectives and actions listed within the strategy.

### Managers are responsible for:

- Promoting and implementing the Framework.
- Role-modelling behaviours.
- Communicating the strategy to staff and stakeholders.
- Ensuring compliance by staff and taking appropriate action in instances of non-compliance.

### Human Resources:

- Drafting and keeping up-to-date the Equality, Diversity, and Inclusion Framework.
- Ensuring policies, procedures and practices are monitored and adhered to.

## 10. CURRENT STATISTICS *(needs to be updated)*

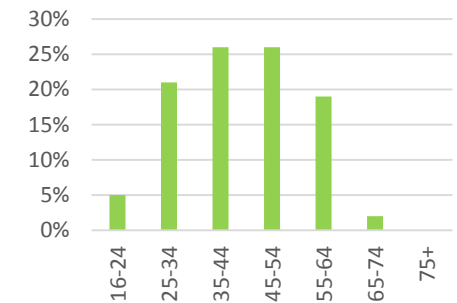
NB: At Newlon we store any personal or sensitive data in accordance with the Data Protection Act (1998) and The General Data Protection Regulation (GDPR, May 2018).

### Staff Data:

#### In Newlon:

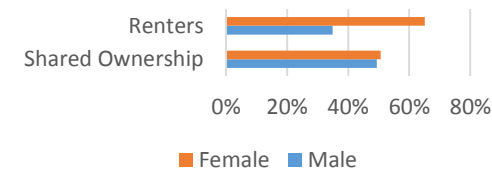
- 58% of staff are female.
- 67% are from BAME backgrounds.

Age range: Staff

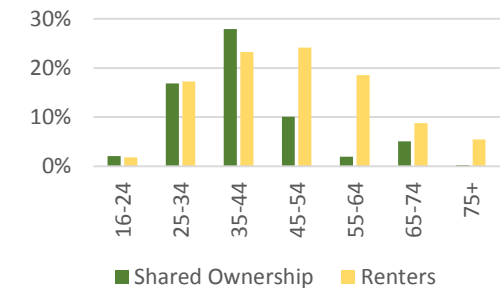


### Service Users Data:

Gender: Principle Resident



Age Range: Principle Resident



## 11. GETTING INVOLVED

There are various ways you can get involved with our work in Equality, Diversity and Inclusion at Newlon. Regardless of your role, location or time commitments everyone can play a part. Most of our information is on our intranet pages, but here are a few starting points:

- Look at what training you have done.
- Our employee data is vital to our understanding of how we can best meet the needs of staff in Newlon. Please fill in the information on SelectHR, or review it to check it is up-to-date. Even choosing “prefer not to say” is useful for us. This information will be strictly confidential and held in accordance with The Data Protection Act 1998 and the General Data Protection Regulations (GDPR).
- Get involved in a project.
- Give feedback through the Staff Consultation Forum

## 12. REVIEW AND IMPLEMENTATION

### Monitoring

- Continuous evaluation ensures that feedback can be acted upon in a timely manner for maximum impact and effectiveness.
- We will keep this framework under review and will regularly assess the progress we are making towards achieving our EDI commitment.

### Action Plan

- We will continue to deliver on the EDI action plan including any gaps identified with staff, residents, and external stakeholders.
- Delivery of the action plan will be monitored and reviewed by the People and Governance Committee.

## 13. COMMENTS AND FEEDBACK

We want to hear from you. If you would like to discuss the Equality, Diversity and Inclusion Framework, are interested in finding out more, or just have a comment, please contact Heather Bryson on [heather.bryson@newlon.org.uk](mailto:heather.bryson@newlon.org.uk).

## ANNEX: PROTECTED CHARACTERISTICS

The Equality Act 2010 makes it unlawful to discriminate against people with a 'protected characteristic'. These protected characteristics are:

<b>Age</b>	Where this is referred to, it refers to a person belonging to a particular age (for example 32 year-olds) or range of ages (for example 18 to 30 year olds).
<b>Disability</b>	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities .
<b>Sex</b>	This refers to whether a person is a man or a woman.
<b>Gender reassignment</b>	This is the process of transitioning from one gender to another.
<b>Race</b>	This refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.
<b>Religion and belief</b>	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
<b>Sexual orientation</b>	This is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.
<b>Marriage and Civil Partnerships</b>	Marriage is no longer restricted to a union between a man and a woman. A Marriage now includes a marriage between a same sex couple. Same sex couples can have their relationships legally recognised as a 'civil partnership'. Civil partners must not be treated less favourably than married couples except where permitted by the Equality Act).
<b>Pregnancy and maternity</b>	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.