



Keniston

## **Equality, Diversity and Inclusion**

# **Policy and Strategy 2024/25 to 2026/27**

*Smaller, Caring, Big Enough to Make a Difference*

### **1. About Keniston Housing Association**

1.1 Keniston Housing Association (Keniston) is a social landlord with charitable status registered with the Regulator of Social Housing. We predominantly provide low-cost rented homes to people who are in housing need and who would find it difficult to compete in the private rented sector. We currently have 845 rented and leaseholder homes for families and older residents across Southeast London, North London, and East Sussex. Around 40 staff members, led by the Chief Executive, deliver operations with a Board of 10 non-executive members who provide strategic leadership and monitor performance.

### **2. Equality, Diversity, and Inclusion Policy**

2.1 Equality, Diversity, and Inclusion (EDI) is not a new concept at Keniston. We have practiced and promoted fairness, equality, and inclusion for many years.

2.2 Our stance on EDI has not changed – our commitment to promote fairness, achieve equality of opportunity, to value diversity and be inclusive remains intrinsic to our culture and is at the heart of everything we do.

2.3 This revised policy is aligned to Keniston’s vision, values, and corporate objectives. It will more robustly reflect EDI to respond to the changing needs of our residents and communities, new regulatory Consumer Standards, and the Housing Ombudsman’s Complaints Handling Code. Minimising the risks of health and safety issues such as safeguarding, damp and mould and fire hazards and how we manage anti-social behaviour and nuisance will consider individual customer needs.

2.4 This policy applies to all aspects of our work and functions as a landlord, service provider and employer. It applies to members of the board, staff and trainees, residents, contractors and agents, other partners, and anyone else with whom we work, acts on our behalf, or who could receive a service from us.

### **3. Our definition of key terms**

3.1 We use the term EDI as an umbrella term to cover:

- **Equality: *Putting ourselves in other people's shoes***: Treating people fairly and removing barriers to achieve equality of opportunity for all, regardless of age, disability, gender reassignment or transgender status, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnicity, and national origin), religion or belief, sex, and sexual orientation. These factors are described as 'protected characteristics' in the Equality Act 2010.
- **Diversity: *Respecting and valuing differences***: Recognising that everyone is unique and valuing individual differences such as life experiences, cultural backgrounds, and other non-visible differences.
- **Inclusion: *Creating a culture where people can be themselves***. Enabling everyone to feel and be part of Keniston, knowing that they are valued for who they are and can thrive to achieve their potential.

3.2 **Vulnerability and stigma**: A person who may have difficulties with managing or sustaining their tenancy due to failing health, physical or mental disability, frailty, or other relevant issues such as safeguarding needs and financial difficulties. People also become marginalised, become socially isolated and/ or experience social stigma due to factors such as living in social housing, unemployment, when they leave statutory care or become homeless, some of which may be short-term difficulties.

## 4. Our corporate values and principles

4.1 EDI is a key priority for Keniston. This Equality, Diversity and Inclusion Policy underpins our aim to provide the best customer service in the most inclusive way. It is central to our mission to be ***Smaller, Caring, Big Enough to Make a Difference***, and to deliver our overall strategic objectives as set out in our 2024-27 Strategic Plan:

<b>Homes &amp; Communities</b>	We aim for all our homes to be safe, affordable, and well maintained, in communities that our residents are proud to live in
<b>Customer Experience</b>	We aim for a continued excellent customer experience, shaped by listening to our residents
<b>Our People</b>	We aim for a positive organisational culture where all our staff can flourish

4.2 Our commitment to EDI is shaped by our Values that support us to 'do the right thing' through:

- **Respect** Valuing diversity and treating everyone fairly as individuals
- **Openness** Listening, being accessible, and communicating clearly
- **Inclusivity** Our culture is one in which everybody matters
- **Integrity** Building trust by doing what we said we would
- **Excellence** Taking pride in providing the best customer experience

## 4 Keniston's EDI commitment

- 5.1 Everyone at Keniston, our external partners and customers are required to:
- a. Treat people fairly, give equal access to jobs, homes, services and contracts without discrimination, harassment, bullying and prejudice, and meet diverse needs through reasonable adjustments whenever possible and appropriate.
  - b. Not discriminate against any individuals or groups, not tolerate attitudes and behaviours that amount to or could result in discrimination and swiftly handle any reports of victimisation, bullying or harassment.
  - c. Acknowledge and value the differences by recognising people's individual circumstances, unique aspirations and needs, and responding appropriately.
  - d. Comply with relevant legislation, statutory codes and guidance designed to promote equality of opportunity and eliminate discrimination, such as the Equality Act 2010, Housing and other Regulatory Standards, and the Housing Ombudsman's Complaints Handling Code.
- 5.2 Everyone at Keniston must:
- a. Reflect EDI when creating or reviewing our policies and processes and meet the fundamental principles of fairness, equality, and inclusion.
  - b. Recognise the differences of people's individual circumstances, unique aspirations and needs and respond appropriately so that everyone can achieve their desired outcomes.
  - c. Acknowledge different perspectives, celebrate diversity, promote an inclusive culture, and recognise contributions that make Keniston a diverse and responsive landlord, employer, and a successful organisation.
  - d. Reflect good practice through learning from peers and others in the affordable housing sector and elsewhere.

## 5 Keniston's EDI journey so far

- 6.1 The above commitment has been developed in the light of our EDI journey to date. Whilst we focus below on key achievements, we acknowledge that we are on a journey and want to maximise the opportunities to make Keniston an even more inclusive organisation and deliver services in accessible and responsive ways.
- 6.2 This EDI policy and strategy review has given us an excellent opportunity to capture the following strengths and how we can build on these.

### Accessible services and homes

Customers can contact us in a variety of ways that best suit them, including booking appointments for face-to-face interaction, telephone, email, text and via an online customer portal.

Arrangements for responding to diverse needs include:

- A translation and interpreting service.

- Offering written information in large print and alternative formats.
- Ensuring that our repairs contractors have information they need about individual households to tailor services that require home visits.
- Offering a range of options for residents to access debt and money advice.
- Working with multi-agency partners to deal with safeguarding concerns, serious anti-social behaviour, and crimes such as domestic abuse and hate crime.
- Making physical adaptations to properties to enable residents to live independently and safely.
- Ensuring that the needs of people with disabilities are considered when we carry out major property improvements.
- Completing routine estate inspections to ensure that communal areas remain safe, clean, and accessible.
- Reletting most empty homes to people nominated from the local authority housing register to reduce homelessness and supporting people living in temporary accommodation to obtain a permanent home.
- Making reasonable adjustments to ensure that residents who need help to make complaints are well-supported.
- Working with actively engaged residents to consider issues from their experience and perspectives.
- Addressing fuel poverty through our property investment programme including by installing low energy lighting in communal areas, installing energy efficient heating systems in tenants' homes when replacing heating systems, and enhancing insulation.
- Ensuring that vulnerable residents have support plans and personal emergency evacuation plans to give dedicated help in emergency situations.

### **What we know about our customers**

The benefits of being a smaller landlord with staff who generally get to know customers over time means that our staff have built up knowledge about customers who are especially vulnerable and need extra support. As we grow and potentially have increased staff turnover, we will introduce more formalised processes to capture customer profiles and make strategic use of enriched information.

### **What our residents say**

Almost 400 residents (46% of the total) took part in an independent survey in 2023. The survey used a well-established and industry-wide method and survey questions to assess levels of satisfaction with the way we deliver services, look after our estates, and treat people.

The survey shows very high levels of satisfaction with the homes and services provided by Keniston with nine out of ten residents satisfied with the service overall and 89% saying that Keniston treats them fairly and with respect.

90% said that they find Keniston easy to deal with and 87% agreed that Keniston keeps them informed. Nearly eight out of 10 residents said that Keniston listens to them and acts on their voice.

Almost nine out of ten residents said that their home is well maintained and are satisfied with time taken to complete the last repair, with 88% reporting that they are happy with the repairs service.

88% feel that their home is safe and 86% report that communal areas are clean and well-maintained. Over three-quarters feel that Keniston makes a positive contribution to their neighbourhood.

More than six out of ten people would strongly recommend Keniston to others. This compares well with what tenants of other social landlords say.

The survey found that people aged between 60 and 64 reported higher levels (98%) of satisfaction in comparison to people aged 35-44 (77%). Although there was a very small number of respondents aged 85+, this cohort are least satisfied (67%) with the overall service.

People describing themselves as White British report slightly higher levels of overall satisfaction (90%) compared with 89% for Black/ British African and 82% for White Irish communities.

The overall results show that areas where more attention is needed include energy efficiency, how we handle anti-social behaviour and complaints about our service, and how we can improve the perception of our estates.

### **EDI leadership and commitment**

We have open, transparent, and fair processes for recruiting Board members. New members undergo a comprehensive induction process which includes Keniston's policy and approach to delivering EDI and ensuring legal and regulatory compliance.

Board members access reports through a cloud-based portal that enables users to change font sizes and colours. Face to face meetings and other Board events are held in accessible buildings. Other requirements such as dietary needs are catered for to meet individual needs.

EDI is reflected in decision-making as each issue considers risks and regulatory compliance.

### **What our Board Members say**

Two members of our Board who were involved in the EDI policy review said:

'As a long-term member of the Board, I feel that Keniston punches above its weight when it comes to EDI. The Board is inclusive, papers for meetings can be requested in alternative formats and meetings are run to ensure that everyone can have a say'.

'As a very new member of the Board, I must say that I found the recruitment process very thorough, fair, and run in a professional, respectful and friendly manner. I am undergoing induction training which includes how Keniston operates and reflects EDI in its work.'

'I think the Board is ambitious because of the respect and partnership working between the Board and senior staff. Constructive challenge is welcomed by all with healthy debates that

have led to decisions that improve services and homes such as investment in digital technology and planned maintenance to meet diverse needs.'

### **Inclusive employer**

We offer a range of working patterns, flexible and hybrid working and family-friendly arrangements. Staff have easy access to company policies and employment related information via the Staff Handbook and online portal. Managers operate an open-door policy and welcome staff views and opinions.

Regular staff events take place to engender team working and provide opportunities for people to get to know each other. This helps to break down barriers and understand diverse perspectives and cultures.

A diversity calendar is available so that Keniston can mark special events and celebrate diversity.

Reasonable adjustments are made for staff who are or who become disabled.

Arrangements for recruiting new staff are governed by a policy and robust processes to ensure fairness and to appoint people on merit.

### **Equipping staff with knowledge and tools**

All staff and new employees are briefed on the EDI policy and relevant processes to ensure that our approach is embedded in day-to-day operations.

Examples of this includes sharing a guide on Dementia and ensuring that our sheltered housing team use it as they are more likely to come across people with the condition.

A toolkit to support customers facing domestic abuse is available for staff. It will be reflected in the next review of our policy for handling Domestic Abuse.

### **What our staff say**

A staff survey conducted in 2023 to get staff perspectives on Keniston's approach to EDI, completed by 68% (27) of staff found that:

- 89% strongly agree or agree that Keniston is an inclusive organisation.
- 74% said that they can be 'themselves' at work.
- 85% disagreed or strongly disagreed that they have been treated unfairly because of their protected characteristics and 78% have not seen other colleagues being treated unfairly.
- 81% strongly agreed or agreed that their individual needs and changes in personal circumstances are formally considered by managers. 85% of staff said that they knew how to request reasonable adjustments.

The staff survey is informing the following specific areas that we will improve on:

- EDI training. 37% of survey respondents said that they had undergone training recently. This includes newer staff who undergo extensive induction training.
- Reporting discrimination incidents. Ensuring that staff know how to report discrimination if they experience or witness it in the workplace and have the

confidence that reports will be taken seriously. 18% did not know how to report incidents, and 15% did not feel confident in being able to report an incident.

- Tailoring services and supporting vulnerable residents: Developing and sharing information with colleagues so that they know which external organisations and agencies to approach to support vulnerable people. Less than 44% of survey respondents have the information.
- Sharing EDI plans: Although it is positive that 82% of respondents agreed that they know what is expected of them to fulfil Keniston's EDI policy, only 41% were familiar with their team's plans to deliver EDI.

### **Diversity of Board Members and staff**

We use the housing-sector diversity profiling tool to capture data about board members. Statistics compiled in March 2023, based on anonymous questionnaires completed by a total of 45 members of the Board and staff has been compared with results of the 2021 Census for England and the South-East, which covers all geographical areas in which Keniston operates and where Board and staff are likely to be based.

Although comparison on a like-for-like basis is not possible as questions are not identical, nevertheless, the overall picture shows that Keniston's people representative of a diverse age range and that 64% of are female. 4% of people describe their sexual orientation as gay, lesbian, or other sexual orientations, 33% have never married or are living with a partner compared with 49% who are married. Of the 19 people who revealed their religion 95% are Christian.

Analysis from Board and staff profiles to date gives the opportunity to interrogate the data further to help set meaningful targets and consider positive action measures.

## **6 Keniston's EDI vision and expectations**

7.1 We want Keniston to have a culture of fairness where everyone we deal with is treated with respect and dignity. We will work in ways that promote inclusivity and value diversity, and work in ways that reduce barriers to accessing our homes, services, and jobs. We recognise our moral and ethical responsibility to support people who need extra help and to reduce stigma.

7.2 Our EDI vision and expectations are to:

a. **Demonstrate diverse, inclusive, transparent, and accountable leadership**

We will enable and expect the Board and senior staff to champion and promote EDI.

b. **Become a more inclusive employer**

We aim to have a diverse workforce and an inclusive workplace where people feel proud to work.

c. **Remain an accessible and effective landlord**

We will provide homes and services that meet diverse needs, promote fairness and inclusion and foster neighbourhood sustainability and community cohesion.

d. **Remain a listening, responsive and learning landlord**

We will continue to hear the voices of and understand the experiences of diverse customers to improve services and influence decision-making.

The Action Plan attached at Appendix 1 shows what we will do to deliver EDI vision and expectations together with the critical success factors for 2024/25 to 2026/27.

## 7 Roles and responsibilities

8.1 We want Keniston to have a culture of fairness where everyone we deal with is treated with respect and dignity. We will work in ways that promote inclusivity and value diversity, and work in ways that reduce barriers to accessing our homes, services, and jobs. We recognise our moral and ethical responsibility to support people who need extra help and reduce stigma.

8.2 Individuals and groups have specific responsibilities:

- a. **Board members** exercise leadership through policy and strategy approval, holding executives to account for performance, and modelling appropriate behaviours and conduct.
- b. **Executive Team and managers** are responsible for visible leadership, the overall implementation of the policy and strategy, reporting performance and setting standards for exemplar behaviour and conduct. They are required to exercise operational leadership, demonstrate strong application of the policy in their area of work and model appropriate behaviours and conduct. They must:
  - Ensure that their staff are familiar with this policy.
  - Seek advice and guidance where necessary to implement the policy.
  - Help to highlight policies and practices that could lead to discrimination and unfairness.
  - Take speedy and appropriate action to deal with complaints/ incidents indicating actual or potential breach of this policy. Actions are in line with established practices, policies and procedures relating to Keniston's role as an employer and service provider.
  - Arrange to collect, monitor, and analyse data to highlight achievements and help to address shortfalls.
- c. **Staff, apprentices, volunteers, and contractors** are responsible for familiarising themselves with and acting in line with this policy. They must report actual or potential discrimination and negative consequences as soon as they become aware of them. Any such reports will be dealt with in line with established policies and practices.
- d. **Tenant and Residents' Groups** that operate formally or informally are required to follow this policy and ensure that they represent the views of diverse customers.
- e. **External partners** with whom we work, including statutory bodies and community agencies have a duty to abide by their own EDI policy.



- f. **Complaints:** Customers are encouraged to use our Complaints Policy and processes if they feel that they have been discriminated. Staff are encouraged to report any concerns to their line manager in the first instance and then follow Human Resources grievance procedures if they feel that they have been discriminated against. Our Whistleblowing policy is also available for staff.

## **8 Implementation, assurance, and accountability**

- 9.1 The policy will be implemented by the Management Team and operationally delivered via a dedicated delivery plan.
- 9.2 Performance will be monitored by the Board.
- 9.3 Accountability will be through sharing outcomes with staff, residents, and other stakeholders.

## **9 Policy review**

- 10.1 Keniston will keep this policy under review, and formally review it at least once every three years or earlier if required.

Agreed by Board on 21 March 2024. Next review is due 2027.

## EDI Strategy 2024-27 – overall delivery plan

EDI aim	EDI objectives	Lead	RAG <sup>1</sup>	Comments/ delivery status (success factors)
<b>Vision: Demonstrate diverse, inclusive, transparent, and accountable leadership</b>		<b>Strategic objective: Enable and expect the Board and senior staff to champion and promote EDI</b>		
<b>Evidence fair, diverse and inclusive leadership and culture where people are valued are respectful of each other and acknowledge their differences.</b>	<ul style="list-style-type: none"> <li>• Enable effective Board leadership and challenge for Keniston to build and maintain an inclusive culture.</li> <li>• Ensure that board recruitment and selection and governance arrangements are open, fair, transparent, and accessible.</li> </ul>	Chair  Chair CEO FRD	<div style="background-color: green; width: 100%; height: 100%;"></div>	A diverse Board and diverse staff who champion and ensure that EDI is reflected in performance management, assurance, decision-making and public accountability.  EDI is central to decision-making and operations.  Compliance with legislation, Regulatory Standards, the Code of Governance, and the Housing Ombudsman’s Complaints Handling Code.
<b>Vision: Become a more inclusive employer</b>		<b>Strategic objective: Have a diverse workforce and an inclusive workplace where people feel proud to work</b>		
<b>Build and maintain a workplace where people can be themselves, be able to express opinions and ideas, and be listened to without prejudice.</b>	<ul style="list-style-type: none"> <li>• Develop a more diverse workforce.</li> <li>• Ensure open and transparent recruitment and that career progression processes are fair and inclusive.</li> </ul>	CEO	<div style="background-color: yellow; width: 100%; height: 100%;"></div>	Keniston is a welcoming and inclusive workplace where everyone feels valued, feels able to be their true selves, and to contribute to this policy with confidence.  Staff have the knowledge, tools, and confidence to effectively implement this policy.

<sup>1</sup> Key: Green = on target/ Amber = progress made but more to do/ Red = slippage below targeted progress/ Grey = not yet due

EDI aim	EDI objectives	Lead	RAG <sup>1</sup>	Comments/ delivery status (success factors)
	<ul style="list-style-type: none"> <li>• Enable and support staff to gain new skills and abilities to reflect this policy in their roles.</li> <li>• Ensure that contractors and suppliers we work with operate to the same equality standards as those expected from our Board and staff.</li> </ul>			Contractors treat our residents and staff fairly and without bias, prejudice, or discrimination.
<b>Vision: Remain an accessible and effective landlord</b>	<b>Strategic objective: Provide homes and services that meet diverse needs, promote fairness and inclusion and foster neighbourhood sustainability and community cohesion</b>			
<p><b>Ensure that our homes and services are accessible and appropriate for people from all backgrounds and abilities to live with dignity, respect, choice, control and help to reduce stigma.</b></p>	<ul style="list-style-type: none"> <li>• Ensure equal access to information for diverse customers.</li> <li>• Deliver homes and services that support current and new tenants to help sustain tenancies and communities.</li> <li>• Acknowledge that everyone experiences challenging times in their lives and tailor services, give or arrange support for vulnerable tenants, seeking to</li> </ul>	OD		<p>Customers find it easy to access our services and deal with us.</p> <p>Our homes and services meet diverse needs and tenancies are sustained through support.</p> <p>We support the creation of safer and sustainable neighbourhoods where diverse communities are proud to live.</p>

EDI aim	EDI objectives	Lead	RAG <sup>1</sup>	Comments/ delivery status (success factors)
	enable them to sustain their tenancies.			
<b>Vision: Remain a listening, responsive and learning landlord</b>	<b>Strategic objective: Hear the voices of and understand the experiences of diverse customers to improve and influence services and decision-making</b>			
<b>Have a strong approach to partnership working with diverse residents.</b>	<ul style="list-style-type: none"> <li>Hear the voice of diverse customers, understand their experience of services, and make positive use of the customer opinions.</li> <li>Make it easy for tenants to tell us if they are unhappy or dissatisfied with our services, feel that they have been discriminated against or experienced stigma.</li> </ul>	OD		<p>Residents are central to shaping services and influencing how they experience services.</p> <p>Residents influence decisions.</p>