



NLM Housing Association

Equality, Diversity & Inclusion Strategy

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1 Introduction

Welcome to NLM Housing's Equality, Diversity & Inclusion (EDI) strategy for 2025 – 2028 which sets our commitment to EDI for customers, colleagues and partners.

This strategy has been developed in conjunction with our EDI Policy, which is our corporate plan that sets our clear intentions to put customers at the heart of our business, provide homes people can be proud of and deliver the very best performance to raise our customer promise, of healthy homes and a fair and friendly service.

The Corporate Plan also sets out our vision and values, and these, along with our promise to customers is set out below. Our values, underpin our behaviours and guide everything we do.

1.1 Our Vision:

“To transform the lives of our communities through the provision of high quality, affordable homes.”

1.2 Our Mission statement:

“Empowering our communities through the provision of safe and secure affordable homes and services.”

1.3 Corporate Objectives: 5 Pillars of NLM:

1. Maintain and improve good governance as a trusted and socially responsible housing association.
2. Maintain our financial robustness including VFM as an efficient and effective team.
3. Provide safe, decent and energy efficient homes. Develop more homes, the right type of homes in the right locations;
4. Be truly customer driven by placing our residents at the heart of all we do
5. Be an employer of choice, strategically cultivating a positive company culture, developing leadership styles and engaging with staff to support business goals.

1.4 Our Values – we have embraced and practice the following 5 values:

1. Valuing people

We put our residents at the centre of our approach, compassion and fairness. We build trust and confidence by being honest and sincere in what we do.

2. Taking Responsibility

We show accountability for finding speedy resolutions and do what we say we will. Ensuring that all voices from our stakeholders are heard and valued in decision-making processes.

3. Acting with integrity

We practice workplace integrity embracing strong principles, values and ethics, which we demonstrate through our conduct in the work environment.

4. Working together

We work closely with all stakeholders, our effective teamwork contributes to our success, morale and the retention of staff.

5. Being Innovative

Think consistently of ways to improve and add value to NLM's operations, business model and work culture which focuses on making systems more efficient and enhancing service quality.

Our EDI strategy supports the way NLM operates and is guided by our values. It sets out our plans for fulfilling our strategic priority to create a truly inclusive and diverse culture. As part of our approach to embedding EDI we are committed to ensuring fair and equal service provision to unheard voices, ensuring everyone is treated with respect. We have an ambition to ensure EDI is at the heart of what we do and to be known for our proactive and innovative approach to EDI which raises aspirations, creates opportunities, and breaks down barriers.

This EDI strategy builds on the progress we have made so far and sets out the foundation of what needs to be in place within the next three years. It will be shaped with input from colleagues, board, residents, and our Scrutiny Panel. We appreciate that we cannot achieve our aims without continuing to work with colleagues, customers, and partners.

Although this strategy sets out our overarching commitment to advance EDI, it is not an isolated document and there are a range of other strategies that support this commitment namely Resident Engagement Strategy, EDI Policy, Tenant Satisfaction Measures survey, EDI Policy etc.

1.5 Embedding Value for Money and Risk Assurance.

Each of the objectives within the corporate plan and associated corporate goals are supported by a medium term financial business plan and inter-dependencies between core strategies and corporate cross cutting strategies. This is further supported by a link to the strategic risk framework and NLM's approach to achieving value for money.

NLM measures itself against the Value for Money Metrics set out by the Regulator of Social Housing. Also, in line with the NLM Value for Money strategy, each strategy and business function has targets to make best use of social housing assets and resources available.

This strategy is also aligned with the Strategic Risk framework, setting out how it will be delivered and progress measured, ensuring risk mitigations are in place. This strategy is 4 linked with key aspects of the current strategic risk register, which will be identified within each risk and strategy update report in this area, with triggers in place to signal any risk of non-delivery.

2 What do we mean by EDI?

We know that people can sometimes be uncertain about the words they use when talking about equality, diversity and inclusion. Language is evolving all the time and the language we use and words we choose to express ourselves matter.

We have summarised below what we mean by some of the key words and phrases that we use throughout this strategy. This is not a complete list, and the aim is for it to be a starting point to help everyone understand this strategy. We know that there are often different views and opinions about the best way to describe what these words and phrases mean.

- Equality - Is about fairness and equitable treatment. It is ensuring everyone is treated fairly and according to their needs and that no one is treated differently or discriminated against because of their personal characteristics.
- Diversity - Is about recognising, respecting and valuing all the ways in which we differ. It includes the differences we can see (e.g. visible disabilities, ethnicity) but also the differences that we can't see (e.g. age, sexual orientation, mental health).
- Inclusion - Is about ensuring that everyone is given the opportunity to participate and that no-one feels left out and that everyone feels they belong.

Inclusion Protected Characteristics are characteristics that are protected by the Equality Act 2010.

Outside of the Equalities Act 2010 there are other 'characteristics' that are also commonly subjected to unfair treatment either consciously or unconsciously which can lead to inequality. Examples of these include:

- Caring responsibilities
- Care Leavers
- Adverse Childhood Experience (ACE)
- Socio-economic backgrounds
- Ex armed forces
- Ex offenders
- Refugee status

Although we have a legal responsibility to ensure we do not discriminate against those identified as having protected characteristics, NLM's EDI strategy will consider all those facing unfair treatment and inequality and not just those protected by the law.

The nine protected characteristics are as follows:

- Age
- Disability
- Sex
- Gender Reassignment
- Race

- Religion or Belief
- Sexual Orientation
- Marriage and Civil Partnership
- Pregnancy and Maternity

The term Black and Minority Ethnic (BAME) was deemed to be outdated and the world has changed. The term 'Ethnically Diverse' to be used going forward as inclusive language. It is felt that this is representative of the colleagues, customers and communities we serve.

In Appendix 1 - The table provides a further glossary of some helpful EDI terminology, (although it should be noted this is not exhaustive list).

3 Context

Whilst we are committed to creating a truly inclusive and diverse environment because we feel it is integral to our business and absolutely the right thing to do, we are also governed by legal and regulatory requirements. This strategy goes beyond fulfilling our legal and regulatory obligations and reflects the regional, national and social housing context as well as taking account of the diverse needs of our colleagues, customers and communities we serve.

3.1 Legal & Regulatory:

As a social landlord, service provider and an employer NLM has both legal and regulatory duties we must comply with. The Equality Act 2010 is the key piece of legislation and provides protection against discrimination due to characteristics that are protected by this Act.

The act also includes the Public Sector Equality duty which sets both general and specific duties to which public bodies (or those providing public services) means that NLM Housing, providing some public duties, must have due regard to the need to:

- Eliminate any form of unlawful discrimination.
- Advance equality of opportunity between people who share a relevant characteristic and people who do not.
- Foster good relationships between people who share a protected characteristic and people who do not.

The Regulator of Social Housing (RSH) sets standards with which we must comply, this includes the recently introduced Consumer Standards (1st April 2024), which states Registered providers must use relevant information and data to:

- Understand the diverse needs of tenants, including those arising from protected characteristics, language barriers and additional support needs; and
- Assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services.
- Ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

- Ensure that landlords services are accessible, and that accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.
- Allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.
- Treat tenants and prospective tenants with fairness and respect.

NLM is also required to comply with the Housing Ombudsman Service (HOS) new Complaint's Handling Code (introduced 1st April 2024) The code aims to achieve best practice in complaint handling and ultimately to provide a better service to residents.

The National Housing Federation's (NHF) Code of Governance 2020 also sets out standards which require us to embed resident focus, inclusion, integrity, openness, and accountability.

The Chartered Institute of Housing (CIH) professional standards include what an inclusive housing professional is:

- Unconscious bias – address own behaviours and assumptions.
- Perspective – recognise, value and draw on a wide range of perspectives to deliver best service.
- Inclusive – demonstrate sensitivity to customs, culture and beliefs of others.
- Collaboration – build collaborative relationships, challenge zero tolerance towards inappropriate, offensive, or discriminatory behaviour.
- Holistic – promote diversity of views and experiences, listen, and understand.

3.2 Regional, National and Social Housing:

At a national level, the economic crisis, reduction in public sector funding and services, the worsening housing and homelessness situation, the Awaab Ishak's tragic case, the COVID-19 pandemic, increasing health inequalities, Black Lives Matters movement, along with a number of other emerging challenges impacting on customers, colleagues and partners have quite rightly put the inequalities and discrimination that some minority groups experience at the forefront of agendas. Research demonstrates that some of these minority groups are likely to experience disadvantage in accessing suitable and safe accommodation, accessing the labour market, and accessing physical and mental health services.

The recent Housing Ombudsman Services spotlight report on attitudes, respect and rights assesses what it means to be vulnerable in social housing, what 'vulnerable' means and how social landlords can better respond to the needs of those residents.

3.3 What our own data tells us:

In developing this strategy and to enable us to make informed decisions we have considered what our own data tells us regarding the diversity profile of colleagues and residents. We have also used data from the NHF EDI Data Tool, which compares our workforce to our local communities, on the equality and diversity work and impact amongst our peer groups

4 What we have achieved so far:

Since NLM was established in 1988 we have made considerable progress in embedding our commitment to EDI, but we recognised that there is still much work that needs to be done...

Some of our achievements so far are summarised below:

- Developed close working partnerships with community organisations to help tackle a range of issues around equality, diversity, inclusion, hate crime and wider community safety.
- Acquired 55 plus homes to enable independent living for people.
- Dedicated support for tenancy sustainment and financial resilience.
- Established Positive Futures to support employment and training opportunities within the community.
- Active member of the local London Borough's strategic housing groups.
- Supporting social value and local employment opportunities
- Newsletters, estate based events for residents on range of EDI subjects
- Staff survey covering race and ethnicity
- Active member of BME national and supported Black Lives Matter movement.
- Review of various policies and procedures that impact on EDI.
- Holding 'Investors in People Gold – IIP' accreditation for many years
- Good Employment accreditation and Living Wage
- Taking lessons from the NHF Chair's Challenge, to create a vision for board to become more equal, diverse and inclusive.
- Reviewing and extending language translation service.
- Commenced monitoring customer satisfaction levels based on customer EDI profiles.

5 Where we want to be and how we will achieve this:

Moving forward we want to build on the progress we've achieved so far. Based on our strategic priority of creating a truly inclusive and diverse environment we have developed three goals to help us get there. These are:

Goal 1:

Understand better the diverse needs of customers to ensure our services reflect these needs

Goal 2:

Create a diverse and inclusive workplace culture that values colleagues

Goal 3:

Work proactively with communities and stakeholders to champion Equality, Diversity, and Inclusion.

Why are these goals important?

- By using data for purpose, it helps identify gaps and improve services for customers and colleague experience
- Identify disparities.
- Demonstrates our values and keeps customers at the heart of what we do.
- Helps us support customers and tailor services by understanding their needs better. Empowers residents' voices to help shape change.
- Involving and empowering diverse voice of colleagues helps shape an inclusive culture.
- We start to embed our inclusive values.
- We help people learn and develop and deliver best customer experience.
- Widens access to the best talent.
- Empowers colleagues to do things differently and think differently.
- Demonstrates our ambition to be proactive, innovate and lead EDI change.
- We set expectations for leaders.
- We improve some key processes and ways we think about EDI across the organisation.

To achieve these three goals, we have developed an action plan, which will help us to focus our efforts and drive change and improvements. The action plan is included in section 7.

6 Monitoring our progress:

Everyone has responsibility for EDI within NLM, from our frontline colleagues, through to senior leaders and board members. Appropriate resources to deliver our plans are in place.

Our Board has overall accountability for the delivery of this strategy, whilst the People & Remuneration Committee will monitor progress regularly. The Chief Executive will lead on the delivery of the strategy, and this will be overseen by NLM's People & Remuneration Committee, with regular progress reporting to the Board.

An annual summary will be produced to reflect on what has been achieved. Measuring EDI success will broadly be through qualitative and quantitative measures, including:

- Range of KPI data and demographics for colleagues and customers.
- Complaints satisfaction.
- Outputs and achievements from Staff meetings.
- Leadership, mentoring and learning & development delivered.
- Diversity Pay Reporting
- Trainee programme updates
- Partnerships and collaborations
- Accessibility

7 Summary Action Plan:

Understand the diverse needs of customers and ensure our services reflect these needs			
Specific Action			
Specific Action	Timescale		
	Year 1	Year 2	Year 3
Improve our use of data and insight to enable us to understand and anticipate resident needs, identify vulnerabilities and shape services appropriately			
Review and analyse customer data to identify and address any entrenched inequalities.			
Ensure residents from diverse backgrounds have greater awareness of services and opportunities available to them.			
Ensure our online services are accessible to all and easy to use (including interpretation and translation offer) ensure everyone aware of translations, interpreter use service (Colleague)			
Ensure our resident engagement services are accessible for all			
Involve a diverse range of residents in co-designing and scrutinising our services and performance.			
Support residents who may be struggling through our tenancy support services.			
Challenge discrimination and hate crime through resident engagement events and campaigns			
Continue to develop our employability advice and training services for the most disadvantaged.			
Review website and update to show NLM's commitment to EDI			
Incorporate EDI best practice and decision making into all NLM services			
Support Domestic Abuse victims to access NLM services			

Create a diverse and inclusive workplace culture that values all colleagues

Specific Action	Timeline		
	Year 1	Year 2	Year 3
Improve our use of data and insight to enable us to analyse, understand priorities and highlight any potential issues			
Review data at employee lifecycle touch points (recruitment, promotions, disciplinaries, leavers, grievance etc) to establish any impact of our approach.			
Develop our employer brand to ensure NLM is recognised as a diverse and inclusive organisation.			
Continue to implement changes to our recruitment and selection practices to attract and retain a diverse workforce that is representative of the communities we work in			
Develop our diversity pay gap reporting and seek to close any identified gaps			
Develop clear pathways to personal development for colleagues who represent our communities			
Improve our diversity at leadership levels and above to reflect our commitment to EDI			
Review our Equality Impact Assessment and ensure it is embedded across the organisation			
Become a culturally competent organisation			
Implement EDI training for Board and Committee Members			
Create an EDI Board Champion			
Ensure clear consequences for anti-inclusive behaviours through robust policies, procedures, actions and training protection from bullying, harassment and sexual misconduct			

**Work proactively with communities and partners to champion Equality, Diversity & Inclusion
Specific Action**

Specific Action	Timeline		
	Year 1	Year 2	Year 3
Develop a plan to engage with under engaged communities, to improve understanding of their needs			
Increase collaboration with regional and national partners to champion EDI good practice and improve outcomes.			
Ensure our Procurement Framework reflects our commitment to EDI.			
Ensure all contractors we work with understand our expectations in relation to EDI			
Developed Trainee placement opportunities to underrepresented groups			
Source other EDI partners to help support NLM's delivery of priorities and goals.			

This summary action plan will be developed internally with leads allocated and timescales agreed.

8 Appendix 1 – Glossary of EDI Terminology

Terminology	Explanation
Ally	Is someone who actively promotes the culture of inclusion. An ally, regardless of their own ethnicity, sexuality, religion, ability, etc. recognises that they can and want to make a concerted effort to understand obstacles marginalised groups face.
Bias	Is an inclination or prejudice for or against one person or group, especially in a way this is closed-minded or unfair.
Black, Asian and Minority Ethnic (BAME)	As referred to above we recognise the recent debates and different perspectives about the use and limitations of this term, specifically that it should not be taken as referring to a singular group or identify. NLM is an active member of BAME National but also exploring to go beyond this to embrace EDI.
Cultural Sensitivity	Means an ability to understand and interact with people in a way that recognises and respects diversity and cultural differences, including values, beliefs and behaviours.
Discrimination	Being unfair to someone or to behave badly towards people - In equality law, there is an important difference between what is described as 'lawful' and 'unlawful' discrimination. Unlawful discrimination means treating a person unfairly because of their protected characteristics. However, there are also circumstances when certain forms of discrimination are lawful under the Equality Act.
Ethnic Diverse	Is the existence of people from a variety of cultural and diverse backgrounds within a single area.
Ethnicity	This refers to a group's shared cultural norms
Equity	Where colleagues, customers and partners benefit equally from opportunities, regardless of their background, identity or experience.
Intersectionality	Is about recognising the fluid diversity of identities that a person can hold, such as gender, race, class, religion, etc.
Lived Experience	This is about personal knowledge gained through involvement or experience in everyday events. When we refer to this in our strategy it is about wanting personal and firsthand experiences of our customers, colleagues and partners to help guide and be reflected in our work.
Positive Action	This is permitted, voluntary measures under the Equality Act to remedy the disadvantages or underrepresentation experienced by people who share protected characteristics.