



# Sovini Ltd Equality, Diversity and Inclusion Policy

<b>Originator:</b>	Policy and Strategy Team
<b>Approval date:</b>	July 2018
<b>Review date:</b>	July 2020

1	Introduction
1.1	Sovini Ltd is committed to promoting equality, diversity and inclusion in everything it does from its employment practices through to the services it provides to its clients and customers.
1.2	This Policy sets out how Sovini Ltd will meet or exceed its legal requirements as outlined primarily in the Equalities Act 2010 and the Human Rights Act 1998.
1.3	Application of the Policy also supports the delivery of the Sovini Corporate Strategy, including the Groups corporate principles: <ul style="list-style-type: none"> <li>• <b>Collaboration:</b> Sovini Ltd will work in true partnership to share knowledge and skills aimed at improving efficiency, effectiveness and value for money.</li> <li>• <b>Innovation: Sovini Ltd</b> aims to create an environment that encourages shared innovation and aspiration, and where employees thrive and realise their potential.</li> <li>• <b>Motivation:</b> Sovini Ltd does the right things for right the reasons – based on an ethical and honest approach to business. Sovini Ltd.’s motivation is excellence and the ambition to continuously improve what we do and how we do it</li> </ul>
1.4	As part of Sovini Ltd.’s commitment to embed equality, diversity and inclusion in everything it does, each Sovini Ltd Policy has standard clauses on ‘access and communication’ and ‘equality, diversity and human rights’ as set out below:
1.4.1	<b>Access and Communication</b>
1.4.1.1	Sovini Ltd is committed to ensuring that our services are accessible to everyone. Sovini Ltd will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for the organisation or use its services.

<p>1.4.1</p> <p>1.4.2.1</p> <p>1.4.2.2</p> <p>1.4.2.2</p> <p>1.4.2.3</p>	<p><b>Equality, Diversity and Human Rights</b></p> <p>Sovini Ltd is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Transgender, Sexual Orientation, Religion and/or Belief, Civil Partnership and Marriage, Pregnancy and Maternity.</p> <p>Sovini Ltd also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>Sovini Ltd will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom we work, will adhere to the central principles of the Human Rights Act (1998).</p> <p>This Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> <li>• Sovini Ltd Recruitment Policy</li> <li>• Sovini Ltd Grievance, Bullying and Harassment Policy</li> <li>• Sovini Ltd Attendance Policy</li> </ul>
<p><b>2</b></p>	<p><b>Statement of Intent</b></p>
<p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p> <p>2.5</p>	<p>Sovini Ltd aims to attract and retain the best staff and will achieve this by being fair and consistent in its recruitment and employment practices, ensuring there are no real or perceived barriers that would prevent or deter any group with protected characteristics from working with it.</p> <p>Sovini Ltd takes a zero tolerance approach to all forms of bullying and harassment in the workplace including behaviour from or directed towards our staff.</p> <p>Through staff training and awareness raising and close partnership working, Sovini Ltd will ensure the services it delivers to its clients and customers is equitable, fair and meets the needs of individuals as far as is reasonably practical.</p> <p>As a significant employer with presence in the local economies, Sovini Ltd will endeavor to create local job opportunities, support apprenticeship schemes and make a positive contribution to the communities in which it operates.</p> <p>Sovini Ltd will ensure that others it works with, through selection, management of sub-contractors and supply chain adheres to sound equality, diversity and inclusion principles.</p>
<p><b>3</b></p>	<p><b>Policy</b></p>
<p>3.1</p> <p>3.1.1</p>	<p><b><u>Recruitment Practices</u></b></p> <p>When new vacancies become available as part of the ‘review process’ for the post, Sovini Ltd will assess all job descriptions and roles to ensure:</p>

- The role does not lead to direct or in direct discrimination (whereby a person is treated less favourably than another person because of a protected characteristic – as defined by the Equalities Act 2010)
- The job descriptions, personal specifications and adverts do not contain any language or inferences that would put a person with a protected characteristic at a disadvantage
- Job descriptions and personal specifications accurately reflect the requirements of the role

3.1.2 At the point of this Policy review, Sovini Ltd did not have any job roles whereby it would be 'objectively justified' to favour a person with a protected characteristic over another who does not share that characteristic.

3.1.3 Sovini Ltd will, however, consider the need to objectively justify roles on a case-by-case basis and will amend its recruitment practices accordingly.

3.1.4 As per the requirements of the Equalities Act 2010, Sovini Ltd will not ask any pre-employment health questions on any 'on-line' or 'hard copy' application forms. It will, however, ask disability related questions for the purposes of:

- Monitoring the numbers of disabled applicants
- To assist in the running of its 'disability confidence' scheme, whereby all disabled applicants that meet the minimum job criteria will be guaranteed an interview
- To make 'reasonable adjustments' to the recruitment process at assessment centre and / or interview where these are requested in advance

3.1.5 Sovini Ltd will monitor the profile of all job applicants to ensure there are no real or previewed barriers for any group with protected characteristics from working with Sovini Ltd.

3.1.6 Where it is recognised that there is a lack of applicants from certain groups with protected characteristics, Sovini Ltd will review its job advertising procedures to ensure greater take up of applications from under-represented groups. This may include targeted advertising in specialist publications or making support and advocacy groups aware of vacancies.

3.1.7 All Sovini Ltd will strive to provide training to all managers and other staff who are involved in recruitment practices to ensure they have due regard for equalities considerations when interviewing and selecting prospective candidates.

3.1.8 This will include being mindful of not using any discriminatory language or lines of questioning whilst interviewing or undertaking assessment centres and ensuring all decisions on successful candidates are consistent and are recorded.

3.1.9 Any request for references will only be made once a decision by the recruitment panel (which will always include a representative from the Human Resources Team) has been made to ensure objectivity.

3.1.10 Further details on the Sovini Ltd recruitment process are available in the Sovini Ltd Recruitment Policy.

3.2

**Working Practices**

3.2.1

**Staff Profile Monitoring**

3.2.1.1

Sovini requests that all employees provide 'equalities monitoring information' on a voluntary basis. Sovini Ltd uses this information to:

- To gain an understanding of the 'make-up' of its workforce
- Identify any under-represented groups and to inform actions to improve expressions of interest from these groups
- Ensure all support needs are being met
- Ensure recruitment and selection processes are fair and effective

3.2.2

**Human Resources Policies**

3.2.2.1

Sovini Ltd value its staff as its greatest asset and strives to ensure that whilst working for Sovini Ltd they obtain job satisfaction and reach their full potential. Central to achieving this aim is a comprehensive suite of human resources Policies which are regularly reviewed with staff input. Sovini Ltd maintain the human resources Policies to:

- Ensure all staff, regardless of protected characteristics are treated fairly and consistently
- Ensure Sovini Ltd meets all legal requirements in employment practices
- Ensure staff are aware of their employment rights including any company enhancements that exist with improved terms and conditions
- Ensure staff know the options that are available to them to take remedial action and receive support if they believe any of their employment rights have been breached in any way (including those relating to equalities legislation)

3.2.2.2

Whilst all of the Sovini Ltd People and Learning Policies are designed to support our aim of being a fair and equitable employer the following Policies have particular relevance in meeting equalities duties:

- Bullying, Grievance and Harassment Policy – setting out Sovini Ltd.'s zero tolerance stance to all forms of harassment in the workplace or associated with work related activities. This Policy has close links with the Disciplinary Policy and Sovini Ltd.'s commitment to fully investigate any allegations of harassment on any grounds and take action where staff are found to be responsible for these types of behaviour
- Family Friendly Policy – setting out the provisions Sovini Ltd has in place to facilitate maternity, paternity and adoption arrangements
- Special Leave and Flexible Working Policy – Including details of Sovini Ltd.'s response for dealing with flexible working requests (as outlined in the 'Children and Families Act 2014')

3.2.3

**Reasonable Adjustments**

3.2.3.1

Sovini Ltd will meet the requirements of the Equalities Act 2010 when considering any 'reasonable requests' for adjustments to the work place or working practices to ensure disabled staff are not put at a substantial disadvantage. This may include:

- Removing or altering physical features of the workplace

- Providing auxiliary aids and equipment
- Altering working practices or the location where work takes place

3.2.3.2 Making reasonable adjustments will apply to any new member of staff with a disability but will also apply to any existing member of staff that develops a disability during the course of their employment with Sovini Ltd.

### 3.2.4 Provisions for Transgender Employees

3.2.4.1 Sovini Ltd will ensure that it provides a working environment where transgender employees are supported and do not suffer any forms of bullying, harassment or detriment as a result of being transgender or the transitioning process (where steps are taken by an individual in order to live in the gender they identify as).

3.2.4.2 Sovini Ltd appreciate there are many different routes that individuals may take in order to transition and will offer support to all staff undergoing or considering this process (both those that choose to undergo medical procedures and treatments and those that do not).

3.2.4.3 In order to provide the most appropriate form of support it will ne be necessary for the individual to inform their line manager of their intentions. This is so support can be offered prior, during and after a transition process.

3.2.4.4 The line manager will keep the staff members trans status confidential and will work with the individual and the People and Learning Team on developing a personalised plan, outlining a pathway for how the individual wants the process to be handled.

3.2.4.5 This plan will set out key milestones and timescales including how and when colleagues are to be informed of the individual's decision and implementation of practical arrangements, including system updates, name change, facility use etc.

3.2.4.6 Where individuals require time off during the transitioning process e.g. to attend medical appointments they will be entitled to company and / or statutory sick pay and leave provisions, as outlined in the Sovini Ltd Attendance Policy and as appropriate, according to length of service.

3.2.4.7 Sovini Ltd will monitor any absence periods associated with the transitioning process and require staff to comply with the normal reporting requirements. This type of absence will be recorded separately from normal absence monitoring and will not be used as trigger points for disciplinary action (although all other absence monitoring requirements will still apply).

3.2.4.8 Sovini Ltd will provide specialist training for any line manager whose reportees are transitioning, so that they can provide the most appropriate support to individuals and will ensure general awareness raising is available to wider colleagues.

3.2.4.9 Sovini Ltd also advise new employees that have previously transitioned to inform their line manager and the People and Learning Team at the point of recruitment so on-going support can be offered.

3.2.5 **Support for Victims of Domestic Abuse**

3.2.5.1 In addition to the support that Sovini Ltd provides to its customers that may be experiencing domestic abuse through the provisions set out in the 'Anti-Social Behaviour, Domestic Abuse and Harassment', 'Allocations' and 'Safeguarding' Policies, Sovini Ltd also supports staff members that may be in this situation.

3.2.5.2 If employees feel able to, they should make their line manager aware of any situations where they believe they are suffering domestic abuse, so that the appropriate support can be offered.

3.2.5.3 This may include consideration for reasonable adjustments in duties, hours of work or work location and approval of unpaid leave on a discretionary basis.

3.2.5.4 Line managers will work with staff that are victims of domestic abuse and will endeavour to uphold confidentiality at all times when dealing with wider team members in line with GDPR. With the support of the People and Learning Team personalised plans for dealing with the domestic abuse will be developed with the staff member.

3.2.5.5 Sovini Ltd have signed-up to the 'Make a Stand' pledge developed by the Chartered Institute of Housing and have appointed a Champion (Operations Director Support Services) to ensure commitment to supporting victims of domestic abuse.

3.2.5.6 As part of this pledge, Sovini Ltd will ensure it works in partnership with local, external advocacy groups that provide support for victims of domestic abuse and will make referrals to these agencies in consent with staff members, where appropriate.

3.2.5.7 If Sovini Ltd believes a staff member is a victim of domestic abuse and has experienced or is at a risk of harm but has not disclosed the issue to the organisation (and is working on a managed response) it may be duty bound to make safeguarding alerts, as appropriate, following the procedures outlined in the Safeguarding Adults Policy.

3.2.6 **Equality, Diversity and Inclusion Responsibility**

3.2.6.1 To ensure all staff understand the importance of equality, diversity and inclusion to achieving Sovini Ltd.'s vision, mission and that it is in keeping with its values, a comprehensive and mandatory programme of equality training will be provided. The interactive training will cover:

- Exploring personal understanding of equality and diversity
- Effects of unfair treatment
- Exploring perceptions and stereotyping
- Challenging inappropriate behaviours
- Behaviour and language in the work place
- Dealing with conflicting views

3.2.7 **Links to Corporate Social Responsibility**

3.2.7.1 To ensure equality, diversity and inclusion remains central to strategic planning and operational delivery of services, Sovini Ltd has established an Equality, Diversity and Inclusion Steering Group with staff representation from all teams. The remit of the Group includes:

- Reviewing customer insight information and exceptions reporting on any issues that impact on groups with protected characteristics in differential and adverse ways and suggesting remedial actions
- Planning and organising equality, diversity and inclusion events and activities including cultural awareness raising
- Review the impact of new legislation on Sovini Ltd activities
- Set and review progress on achieving equality, diversity and inclusion objectives
- Drive external equality, diversity and inclusion accreditations
- Give feedback on team requests for additional equalities training or requests for equalities information

### 3.2.8 **Employee Assistance Programme**

3.2.8.1 In order to support staff in all aspects of their personal and working lives, Sovini Ltd have developed an 'Employee Assistance Programme' whereby staff can seek confidential advice provided by an independent expert advisor, including any issues that may be related to a protected characteristic. Staff wanting to access the service can do so anonymously by contacting [www.workplaceoptions.co.uk](http://www.workplaceoptions.co.uk) or **0800 015 5630**.

### 3.3 **Business Practices**

3.3.1 Sovini Ltd are keen to work with 'like-minded businesses' and to spread good practice in equality, diversity and inclusion throughout its supply chain and in sub-contractor selection. Through its procurement and contractor selection processes, Sovini Ltd will ensure others it chooses to work with meet the standards it expects in this area by:

3.3.1.1 Giving preferential weighting in procurement selection procedures to organisations that can demonstrate a strong commitment to equality and diversity in their employment and service delivery practices.

3.3.1.2 Ensuring organisations have their own policies and procedures for equality or are willing to abide by the principles outlined in Sovini Ltd documents.

3.3.1.3 Sovini Ltd expects all visitors to Sovini Ltd offices to demonstrate appropriate behaviours and to show respect for others and will not tolerate any behaviour which could be interpreted as being discriminatory, causes harassment or offence in any way.

3.3.1.4 To reinforce this message Sovini Ltd have a small disclaimer on the back of visitor Identification badges outlining the behaviours Sovini Ltd will expect. Failure to adhere to this expected code of behaviour may result in, warnings being given, expulsion from Sovini Ltd premises, restrictions on future contacts or civil actions depending on the severity of each incident, on a case by case basis.

### 3.3.2 **Modern Day Slavery Act**

3.3.2.1 Sovini Ltd is committed to ensuring that all business activities are delivered in compliance with the Modern Slavery Act 2015. To achieve this, Sovini Ltd has put provisions in place to tackle modern day slavery, which include ensuring that staff are protected and treated fairly during their time of employment with the organisation.

3.3.2.2	Sovini Ltd will continuously monitor any arrangements it has with contractors and supply chains to ensure they act in accordance with the Modern Slavery Act when doing business with us.
3.4	<b><u>Service Provision</u></b>
3.4.1	<p>Sovini Ltd has a proud track record of delivering excellent customer services that are tailored to individual needs. Where Sovini Ltd provides services on behalf of a client, it will use customer profile information to deliver customer tailored services to meet individual needs i.e.</p> <ul style="list-style-type: none"> <li>• Sending communications in preferred formats</li> <li>• Provision of additional support where it is required e.g. for elderly or disabled customers</li> <li>• Respect for religious customs when visiting properties</li> </ul>
3.4.2	Sovini Ltd will ensure that all Sovini Ltd office locations are fully accessible to those with disabilities and will involve customer representatives or specialist user groups in carrying out accessibility audits.
3.4.3	Where Sovini Ltd provides services on behalf of a public body, it will adhere to the client's principles of Corporate Social Responsibility to support them comply with the public duty (i.e. Registered Providers and Local authorities).
<b>4</b>	<b>Implementation</b>
4.1	All Sovini Ltd staff have a responsibility for the effective operation of the Sovini Ltd Equality, Diversity and Inclusion Policy.
4.2	The Equality, Diversity and Inclusion Steering Group will have responsibility for reviewing the Policy and for setting and monitoring progress against equality objectives.
<b>5</b>	<b>Performance</b>
5.1	Performance against the equality objectives will be monitored by the Equality, Diversity and Inclusion Steering Group.
5.2	<p>Sovini Ltd Board will receive performance reports on the following equality, diversity and inclusion issues:</p> <ul style="list-style-type: none"> <li>• Any breaches of equality legislation</li> </ul>
<b>6</b>	<b>Consultation</b>
6.1	All Sovini Ltd Group employees have been consulted in the development of this Policy.



<b>7</b>	<b>Review</b>		
7.1	The Sovini Ltd Equality, Diversity and Inclusion Policy will be reviewed every two years (from the date of last approval) by the EMT. The review process will ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on Sovini Ltd.'s obligations in regard to equality, diversity and inclusion, changes to STS business practices or in the light of management system audits.		
<b>8</b>	<b>Equality Impact Assessment</b>		
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes	
8.2	When was EIA conducted and by who?	The EIA conducted by the Policy Writer and Policy and Strategy Manager in May 2015 is still relevant to this Policy review.	
8.3	Results of EIA	<p>The measurement that Sovini Ltd has in place to ensure compliance with the Equality Act, 2010 and Humanity Rights Act, 1998 are sufficient to mitigate the risks of differential impact on any group with protected characteristics. The EIA contain the following recommendations to continue:</p> <ul style="list-style-type: none"> <li>• Promoting the equality, diversity and inclusion to all staff and partners</li> <li>• Providing E&amp;D training to all staff</li> </ul>	
<b>9</b>	<b>Scheme of Delegation</b>		
9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	EMT	
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Group Director-Governance and Compliance	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Director-Governance and Compliance	
<b>10</b>	<b>Amendment Log</b>		
<b>Date of revision:</b>	<b>Reason for revision:</b>	<b>Consultation record:</b>	<b>Record of amendments:</b>
20 <sup>th</sup> March 2018	In line with the Review Schedule	See section 6	Inclusion of provisions for Transgender Employees.

24 <sup>th</sup> July 2018	Reviewed in line with changes to Sovini Ltd' business practices	See Section 6	<ul style="list-style-type: none"><li>• Inclusion of provisions for supporting employees who are victims of domestic abuse</li></ul>
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