



EQUALITY, DIVERSITY AND INCLUSION STRATEGY

2023-2028

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01 Foreword

Roy Williams - Sovini **Group CEO**

Since the time when we last reviewed our Equality, Diversity, and Inclusion Strategy we have adopted a new collective 'vision' for all of the companies that make up the Sovini Group to strive towards 'a better future'.

This applies to everything we work towards achieving in our collaborative business model but most importantly it also applies to 'everyone', no matter what their background or personal characteristics are.

This includes the great people that work for us and help deliver consistently excellent services. This includes each and every one of our customers and the communities in which they live, and it includes the partner agencies we work closely with.

Over the past year we have once again helped create 'a better future' by delivering on our strategic aims and objectives with a number of notable successes and achievements, including:

- Producing our first Equality, Diversity and Inclusion Annual Report – showcasing our activities throughout the year and clear commitments
- Achieving a 'Compliance Plus' recommendation for good practice for our 'Empower Campaign' – (to encourage women into traditionally roles dominated by men) during our Customer Service Excellence review
- Achieving first place for the fourth consecutive year as the Best UK Workplace for Women, as part of the Great Places to Work Awards
- Delivering a sustained campaign to support men's mental health in the workplace
- Supporting community initiatives that promote cultural cohesion and opportunity for minority or vulnerable groups, such as Wirral Chinese Association, New Horizons and the 'Keep warm / Keep well' initiative



All of the these, were factors in the Sovini Group being recognised as having the 'Best Approach to Diversity and Inclusion' at the Northern Housing Awards in 2023.

As ever within our Group, we are constantly stiving to improve and build on these successes and a major focus of this version of our Equality, Inclusion and Diversity Strategy is ensuring our services for our customers are fair and accessible for all.

Throughout the year there have been a number of reports released that raise concerns for how equality issues for customers are dealt with within our sector, including the Housing Ombudsman's special investigation into Rochdale Borough Housing (following the inquest findings into the tragic death of Awaab Ishak) and the Better Social Housing Review.

We are keen to learn from the findings of these reports and that is why throughout this version of our Equality, Diversity and Inclusion Strategy we will ensure we understand our customers' needs, understanding our silent customers, concentrating our efforts on customers we don't have regular contact with and removing any barriers to service that may exist for any group.

This will be a major undertaking for our business, but I am confident that we have the right people to achieve these aims, as our teams are motivated by wanting to do the right things that make a difference in people's lives and will help us work towards our vision of 'a better future' for all.

Roy Williams



02 SUMMARY OF AIMS **AND OBJECTIVES**

Overall aim	Ensure equality, diversity and inclusion is at the forefront of all business activities including strategic planning and service delivery across the Sovini Group			
Areas of focus	Customer Service Delivery	Role as Employer	Role as Business Entities	
What we want to achieve	Excellent and accessible customer services that are available to all groups regardless of protected characteristics	Promote a working environment where everyone feels welcome and is able to achieve their potential	Provision of equitable and ethical business activities that create a better future for all	
What we will do (objectives)	 Assess services for any barriers and reduce or remove where possible Work with customers to ensure we identify and meet support / communication requirements Promote cultural / characteristic inclusion activities 	 Promote staff-led engagement, inclusion and welfare activities Monitor and assess recruitment / development opportunities and ensure they are free of potential barriers Take a zero-tolerance stance to all forms of harassment, discrimination or unjust practices 	 Active participation in strategic equality, diversity and inclusion partnerships Promote ethical business practices through procurement and business relations Provide support for community-based equality, diversity and inclusion initiatives 	
Outcomes	Safe, sustainable and inclusive communities	Attract and retain an excellent and diverse workforce	 Sovini Group achieves social gain in areas of operation Sovini Group Strategic Plan, Sovini Value for Money Strategies, Sovini Procurement Strategy 	
Links to wider Sovini objectives / Strategies	Sovini Group Strategic Plan, Individual entity strategic plans	Sovini Group Strategic Plan, Sovini People Management Strategy	Environmental, Social, Equality reporting	
Monitoring and Measuring	Customer satisfaction, staff satisfaction, benchmarking, management information, awards and accreditations, attainment of standards, legal compliance			

INTRODUCTION AND OPERATIONAL CONTEXT

The Sovini Group was established to bring together a diverse range of entities that work in close collaboration for mutual benefit across a range of interlinked business areas. Listed below are the individual entities that make up the Sovini Group:

- Sovini Ltd
- One Vision Housing Ltd (OVH)
- Pine Court Housing Association Ltd (PCHA)
- Sovini Charities Ltd
- Pride of Sefton Registered Charity (PoS)
- Sovini Commercial Ltd
- Sovini Property Services Ltd (SPS)

- Sovini Trade Supplies Ltd (STS)
- Sovini Homes Ltd
- Sovini Construction Ltd
- Sovini Waste Solutions Ltd
- Amianto Services Ltd
- Teal Scaffold Ltd
- Sovini Land Acquisition Ltd



Whilst each entity has its own governance arrangements, management structures and clearly defined strategic aims and objectives, there is a common purpose of 'creating opportunities and changing lives'.

To support this common purpose, a number of cross-cutting strategies (such as this EDI Strategy) have been developed that outline expectations and commitments of the Group as a whole, regardless of the areas of specialism or service delivery, however, there is a key focus throughout this Strategy on the services to customers received by the Group's Registered Providers of Social Housing.

By giving support and endorsement for this Strategy each Sovini entity aims to promote equality, diversity and inclusion in everything that they do. To achieve this, the Strategy identifies three key provisions for action (see below on Page 8), monitoring and continuous improvement.

When viewed together these three areas cover the entirety of business operations both for the individual entities within the Sovini Group but also the collective strength of the Group structure and positive impacts that it has when working together to promote equality, diversity and inclusion.

In delivering this Strategy as it evolves and changes over time, the Sovini Group will always ensure it complies and where possible exceeds the prevailing legal and regulatory requirements.

This will include having due regard to 'Protected Characteristics' as defined in the Equality Act 2010, as set out below, meeting all other requirements of the Act and ensuring the relevant entities in the Sovini Group are compliant with the Charities Commission rules.

Protected Characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual orientation

STRATEGIC AIMS

- Provide strong leadership across all Boards and influence to promote equalities issues at the local, regional and national scale
- Provide accessible services free from any barriers, real or perceived, that are available for all groups, are tailored to individual needs and address inequalities
- Go beyond compliance with all legal and regulatory requirements by developing and adopting best practice
- Promote good relations between all groups with protected characteristics
- Maintain and develop strong working culture where there is equality of opportunity for all groups, everyone feels valued / included and diversity is actively encouraged and appreciated

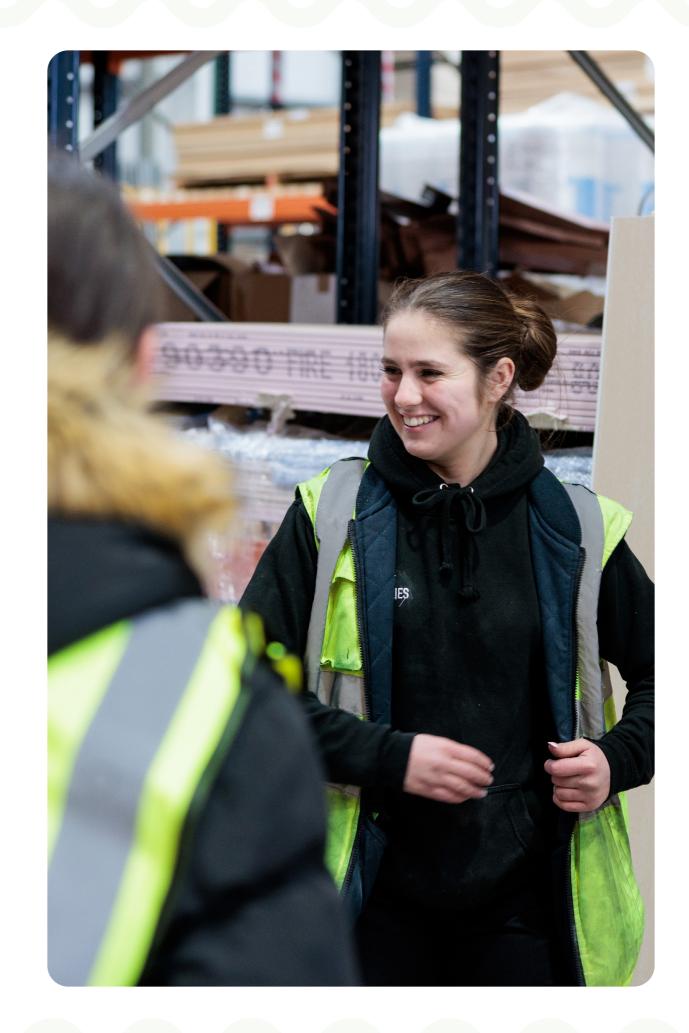
- Ensure equality, diversity and inclusion are embedded in all decision making, business practices, service delivery, relations (internally/externally) and through supply chain management
- Never ignore where we see discrimination, victimisation, harassment or differential treatment as a result of personal characteristics we take affirmative, corrective action
- Never stand still and seek year-on-year improvement and innovation

The above strategic aims will be incorporated into our Group-wide Performance Management System and their delivery will be supported by a number of 'objectives' or assigned as actions in team or individual Service Delivery Plans.

This will ensure we are able to monitor and report on progress and take

remedial steps if any areas of concern or anomalies are identified.

Within the last year we have produced our first Annual Report into our equality, diversity and inclusion activities / achievements which has improved our visibility and accountability for our Boards, our staff and our customers.



OS KEY PROVISIONS **FOR ACTION**

Customer Service Delivery

This will include services that are provided on a transactional or contractual basis e.g. services provided to tenants and leaseholders in rented accommodation or in the provision of internal business relationships between Sovini Group entities and those with external partners

Role as Employers

Recognising that the greatest asset of the Sovini Group are the circa 830 employees, all Sovini entities aim to promote fair recruitment / working practices and opportunities for progression that are available for all

Role as Business Entities

As a significant player in the regional economy, Sovini Group entities recognise their responsibility to promote good business practices internally, in the supply chain relationships they establish / maintain and for the benefit of the wider communities in which they operate

The Strategy projects forward on a rolling basis in five yearly timeframes to fit with the wider strategic planning framework within the Group and will be subject to an annual refresh and review.

Led by our multi-team Equalities Steering Group, the aim of this refresh will be to constantly improve and move our equalities agenda forward, recognising areas where we can do more or do things differently and ensuring the Group entities lead the way as champions of equality, diversity and inclusion.

In this refresh, a key area that we have identified for improvement is to ensure there are no barriers in accessing our services for all of our customers, in particular the tenants of our Registered Providers.

Over the next twelve months we will making a concerted effort to contact each customer to ensure:

- They know how to access our repairs services
- They know how to report issues that may be of concern to them
- They know how to access the complaints service for any areas of dissatisfaction
- We look to address any support needs they may have through direct means and partnership working with other agencies
- We ensure that we are using their preferred methods of communication
- We address any concerns they have about barriers to a fair service that may be related to a protected characteristic, in any way

We also want to work with new customers to see what their experience has been like in accessing our services and to improve the process for all groups.

In the previous version of this Strategy (2022-27) we stated we would make a concerted effort to improve our data collection and while good progress was made internally with our staff profiling information, we have identified that there is room for improvement with our customer base.

In 2023 and beyond we will continue our drive to ensure our customer profile information is up to date and we use this data intelligently to target communications and services by ensuring the customer voice is central to our strategic planning and in determining investment priorities.

This work will be vital as we roll out our High-Rise Fire and Buildings Safety Engagement Strategy, we analyse feedback from new Tenant Satisfaction Measures, and we improve our approach to dealing with damp and mould in properties.

We also seek greater involvement and input from our customers as we refresh and update our strategic plans, where possible seeking out the views of minority and under-represented groups.

The refresh process will also ensure there is appropriate read across and synchronicity with wider strategic planning across the Sovini Group and the aims outlined below pervade and guide other plans such as our People and Learning Strategies, Value for Money Strategies and individual entity Corporate Plans.

Through this strategic plan and the operational customs and practice it supports, all Sovini entities will work towards the following high level strategic aims:

WHERE ARE WE NOW?

The following section provides an overview of the Sovini Group's current position (June 2023) in relation to equality, diversity and inclusion provisions and achievements.

The overview is broken down across the three Key Provisions for action and is applicable to all Sovini Group entities unless there are specific issues that apply to one or more entities, in which case these will be identified separately.



Key Provisions and actions

Customer Service Delivery

- Good levels of 'customer profile' information available for registered providers existing customers - (equalities information provided on a voluntary basis relating to protected characteristics of lead household members). Ability to analyse information (using Power BI Reporting) per characteristic and finer level of detail e.g. by ethnic group, against customer satisfaction reporting to identify any anomalies or barriers to service, including complaints, lettings and transactional survey results. We are continuing to progress a number of initiatives to improve capture of customer profile information and ensure existing data is up-to-date including reminders to customers with call hold messages, on automatic email replies and through the functionality of the 'My Account' facility on websites (Registered Providers only). Our aim is to improve data held about whole households and ensure all communication needs are met
- Through collection of Tenant Satisfaction Measures on an ongoing basis, via structured perception surveys, we are able to identify quickly any areas of underperformance / dissatisfaction and put improvement plans in place including specific actions relating to customer characteristic

- A number of specialist support services are available to sustain tenancies for vulnerable groups e.g. comprehensive aids and adaptations service (assisting customers with disabilities – registered providers only) and furnished tenancies
- In 2023 we will be opening a homeless families unit offering support to vulnerable customers
- Safeguarding provisions in place to protect vulnerable groups – Sovini-wide, including policies, procedures, staff training and mobile reporting applications (includes areas where there are equalities implications concerns raised in regard to age, gender, race, modern slavery)
- No current or historic complaints / legal challenges against Sovini companies on equalities grounds and full compliance with Equalities Act and, where applicable, regulatory requirements e.g. Regulatory Framework for Social Housing Providers (applicable to registered providers only) and Charities Commission compliance (PoS)
- Effective policies and procedures in place for tackling hate crime (including Customer Access Team acting as hate crime reporting centres) and development of specialist roles within the Team e.g. safeguarding and support for those who experience domestic abuse

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Role as Employers

- Full suite of People and Learning Policies in operation to protect staff and ensure compliance with employment / equalities legislation. Most relevant Policies include:
 - Bullying, Grievance and Harassment
 Policy setting out Sovini Group'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 the Sovini
 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 entities have in place to facilitate maternity, paternity, adoption and surrogacy arrangements
 - Special Leave and Flexible Working Policy – Including details of Sovini entities response for dealing with flexible working requests (as outlined in the 'Children and Families Act 2014')
- High levels of staff profile information available which can be analysed against recruitment / promotion and staff satisfaction results for any anomalies, under-representation or potential barriers to progression. A campaign in 2022/23 has resulted in the highest ever percentage staff profiling data being complied across all Sovini businesses
- Mandatory equality diversity inclusion training via e-learning in place for existing staff and Board Members as part of induction / on-boarding which is regularly refreshed. In 2022/23 we have extended the range non-mandatory e-learning courses available for staff on equalities issues in support of awareness campaigns we have supported during the year e.g. fertility

- awareness and dealing with the menopause
- Free to access employee assistance scheme available – with referral to specialist support groups and advice for any member of staff that may be experiencing issues impacting on their wellbeing (either work related or in their personal life outside of the workplace)
- Internal staff surveys / feedback and those linked to external awards and accreditations e.g. Investors in People show high levels of satisfaction / perception with equalities provisions
- Multi-team staff Equality, Diversity and Inclusion Steering Group established to drive forward actions and agenda
- Regular 'E &D Focus-On' communications to all staff to raise awareness of equalities issues and start conversations at team meetings, with ability of staff to suggest topic areas
- The Group continues to buck the national trend on gender pay at Group level the mean pay gap for woman is -6.28% and median is -8.64%. On ethnicity pay in February 2023 the gap stood at 9.14% (mean) 12.15% (median) which is line with employee make-up
- The Sovini Group has been recognised as the 'UK's Best Workplace for Women' four years running in the UK Best Places to Work awards
- Strong culture and track record of promoting employee health and wellbeing including mental health as demonstrated by achievement of Investors in People – Platinum Standard
- Mental Health Awareness training rolled out to all managers and specialist training provided for aspiring managers / leaders

- Sovini Group members are recognised as being Disability Confident Employers (demonstrating an active commitment to employing and retaining disabled employees) and adopted the Mindful Employer Charter (outlining the commitment to promote better mental health at work)
- An Equalities Hub has been established on the employee engagement application providing access to a wealth of equalities information and the popular chat facility linked to the Equalities Staff Group

Role as Business Entities

- No legal or regulatory challenges or prosecutions for breach of equalities legislation on record
- Modern Slavery Act compliance actions and statements in place
- Chain of custody accreditations in place for timber imports (to ensure all timber products come from sustainable and ethical sources i.e. they are free from exploitative working practices such as forced child labour)
- Preferred supplier arrangements require proof of equality, diversity and inclusion commitments and prosecutions and these are monitored for compliance
- EDI Policies in place for individual entities and commitment backed by Group-wide Policy Statements
- Key partner in local strategic forums e.g. Adult Safeguarding Board in Sefton.

- Sefton Youth Justice Partnership Board, Sefton Domestic Abuse Partnership Board, Multi Agency Risk Assessment Conference (MARAC) etc.
- PCHA is a specialist BME housing provider for the Chinese and Southeast Asian communities in the Liverpool City Region and is a member of the BME National - (A national collective of housing associations promoting equality and diversity in the delivery of housing and support services)
- Provided sponsorship and wider financial support for cultural events and initiatives to promote racial harmony, cultural awareness, celebrating diversity e.g. Liverpool Pride, Community-led Chinese New Year Celebrations and support for vulnerable members of the Chinese community in food package distribution and partnership work with 'The Florrie' delivering Christmas pallets to the BME community



07 WHERE DO WE **WANT TO BE?**

As with everything we do in the Sovini Group we want to constantly improve and will strive to be the best that we can. The boxed section below highlights specific areas across our role as service providers, employers and business entities where we want to improve and will focus our efforts on, but we also believe it is important to highlight 'why' do this and what benefits it will bring.

Listed below is the 'rationale' or 'thinking' behind our support for promoting equality and diversity and inclusion in everything the Sovini Group does:

- We believe, as a Group built on sound ethical principles and commitment to excellent customer services, that promoting equality, celebrating diversity and facilitating inclusion are the right and just things to do
- We believe in diverse communities where everyone regardless of their personal characteristics, background or beliefs is treated fairly and given the same access to opportunities and services, tailored to individual needs
- We believe we can make a positive contribution in eliminating all forms of discrimination, victimisation and harassment

- We believe that diverse workforces with a wealth of cultural influence are more innovative, productive and lead to better decision making
- We believe in our role as influencers and leaders to drive positive change in the communities we represent and work in
- We believe that that promoting equality, celebrating diversity and facilitating inclusion makes good business sense

Key Provisions and actions

Customer Service Delivery

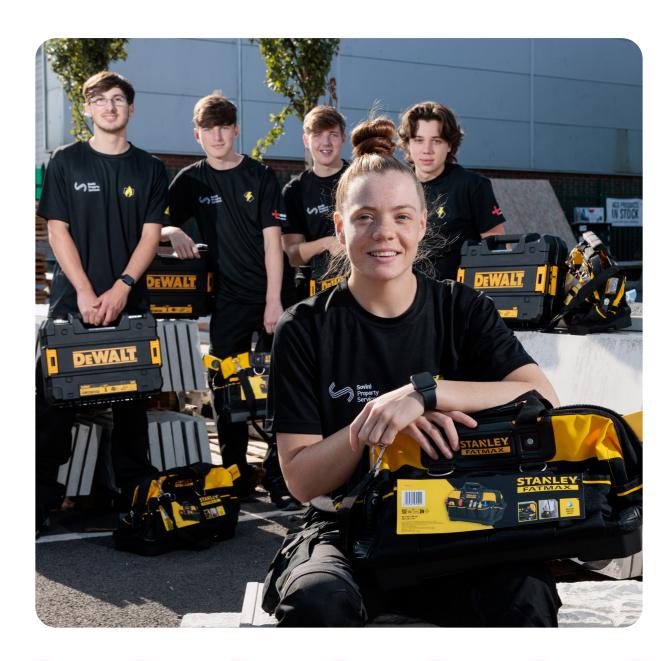
- Be recognised by customers as being fair and equitable service providers and attract new customers from diverse backgrounds
- Provide a range of services that have been tested and are regularly audited for ease of accessibility for all groups and needs (ensuring we assess accessibility issues through our transactional and perception surveys)
- Provide choice and support to customers who may be vulnerable in any way, helping them to live independent lives, sustain tenancies (registered providers only), take an active part in community lives and add value to those communities
- Go beyond legal and regulatory minimum requirements and develop and adopt best practice that is learnt from other providers and by working in partnership with representative groups and advocacy services
- Build upon existing customer engagement structures to ensure there are clear lines of influence and feedback between customers and governance arrangements / decision making for Sovini entities, taking lived experiences of equalities issues into consideration
- Demonstrate how the Sovini registered providers meet Public Sector Equality duties

Role as Employers

- Continue to meet all legislative and regulatory requirements (exceeding statutory minimums)
- Attract and retain the best people and increase the diversity of the workforce at all levels (reflecting the make-up of the communities in which we operate)
- Continue to narrow gaps and champion a 'levelling up agenda' e.g. our progress in gender pay gap reporting
- Increase staff satisfaction / perception of Sovini as a fair and equitable employer and address any areas of dissatisfaction or under-performance with guidance from the Sovini Staff Equalities Steering Group / Champions
- Retain / achieve awards and externally verified accreditations that demonstrate Sovini commitments to equality, diversity and inclusion provision and commitments and that act as driver of continuous improvement

Role as Business Entities

- Ensure strategic direction of the Sovini Group entities is informed by diverse opinion / lived experience (as more diverse teams are proven to add value to business decision making)
- Be a partner of choice for business activity based on our strong support for equality, diversity and inclusion with like-minded companies in supply chain management and any joint ventures
- Increase influence at local / regional strategic forums including statutory delivery partners such as local and combined authorities to champion equality agenda and support national campaigns, where applicable
- Provide support for initiatives / agencies within areas of operations that promote cultural cohesion and foster good relations between who share a protected characteristic and those who do not



O HOW ARE WE GOING TO GET THERE?

The following section considers the Strategic Aims outlined above on page 6, our assessment of 'where we want to be' and translates these into actions or 'objectives' that we intend to undertake over the next five years.

The high-level actions identified below will be incorporated into crossorganisational Service Delivery Plans for the period 2023-28.

Key Provisions and actions

Customer Service Delivery

- Build on the improved reporting capabilities / analytics of customer profile information established in 2021/22 across a wider range service of delivery areas and make results available for senior management teams, Boards of Sovini entities, EDI Steering Group and customer representation groups (where necessary working with external advocacy groups if any barriers or adverse / differential service provisions are identified)
- Continue campaign to complete datasets of customer profiling information where information is missing across certain categories and improve capture of whole household information beyond lead tenants (registered providers only)
- Carry out extensive equality impact assessment on access to all frontline services/ key decisions including customer journey mapping (registered providers only), identifying any potential barriers and delivering actions for improvement
- Establish customer-led equality, diversity and inclusion focus groups (with interest in specific protected characteristics where appropriate) or work with existing representative structure to incorporate equality aspects into their remit e.g. Tenant Scrutiny Groups. Work collaboratively with customer representative groups and Sovini Equalities Steering Group on problem solving where any discrepancies or potential barriers to service are identified and develop mitigation measures

- Provide equality, diversity and inclusion training for involved customers
- Develop greater customer involvement in Equality Impact Assessment process for changes to service provision -(Registered Providers Only) in line with the Customer Voice Strategy (OVH)
- Develop better signposting to support networks / partnership working with external agencies e.g. Victim Support in ASB cases (including Customer self-access directory available via websites - Registered Providers only)
- Through marketing and website promote awareness and participation in local cultural events

- Provide dedicated funding and administration support for customers to hold their own cultural enrichment and awareness raising events (with support from central Stakeholder Engagement and Marketing and Communications Teams)
- Ensure customer satisfaction and perception monitoring captures customer opinions on equality, diversity and inclusion performance and benchmark results with peer providers to set targets for improvement
- Explore options to develop a 'good neighbourhood management standard' (registered providers only) in conjunction with customers that promotes inclusive communities

Role as Employers

- Continue to develop staff led equality, diversity and inclusion support networks and initiatives (including 'lunch and learn' events and quest speakers)
- Retain / achieve awards and externally verified accreditations e.g. Navajo and fulfil all action plan requirements
- Maintain campaign to capture complete datasets on staff profiling information (demonstrating why this is important, ensuring it is up-to-date and analysing information to identify any areas for further action)
- Amend internal staff satisfaction monitoring to ensure it fully captures perception of equality diversity provisions
- Continue to produce regular equality, diversity and inclusion broadcasts via Executive Management Team Vlog and Equalities Steering Group
- Build on established links with local equality, diversity and inclusion networks and advocacy groups and use to broaden appeal / coverage of vacancies
- Review recruitment pages on website to ensure there is clear support / encouragement of more diverse range of applicants (include testimonies from existing staff)

- Maintain online diversity forum via internal communication channels (OurSpace and Microsoft Teams)
- Capture equalities information at all stages of job application and monitor for any potential barriers to employment
- Deliver manager recruitment training to include awareness of unconscious bias in shortlisting and selection
- Establish links with local training colleges to promote 'Women into trades' campaign and develop guaranteed interview scheme for female applicants for trade vacancies
- Ensure EDI monitoring as a standard agenda item at team meetings
- Continue to facilitate equality, diversity and inclusion awareness raising campaigns and participation events
- Contribute to sector wide reporting being developed by National Housing Federation on equalities monitoring
- Encourage staff to access optional EDI training available via 'My Learning'
- Examine succession and development opportunities within the Group to ensure no barriers exist for any group with protected characteristics

Role as Business Entities

- Continue partnership working with fellow housing providers as part of Liverpool City Region Housing Association Group to share best practice / benchmarking information / promotion of events on equality, diversity and inclusion issues
- Increase active membership of local strategic forums to influence equality issues
- Improved marketing of Sovini Group offer with stance on equality, diversity and inclusion as a selling point for like-minded companies
- Demonstrate strong performance and track record on equality, diversity and inclusion provisions as part of Environment Social Governance (ESG) reporting and in market opportunities with funding providers

- Develop sponsorship opportunities to promote local equality advocacy groups and events
- Work with advocacy and support groups to review service literature to ensure it is accessible to all groups
- Provide analysis of known profile information (customers and staff) including any remedial actions to Registered Provider and Sovini Group Boards – annually
- Provide EDI training to Boards
- Ensure the composition of Boards are reflective of the communities in which the Sovini Group operates
- Improve equality impact assessment processes to capture any planned changes to frontline service



UY HOW ARE WE **GOING TO MEASURE IT?**

We know that there will be wider business benefits from delivering on the actions outlined above and additional improvements we identify as this Strategy evolves and progresses. Promoting equality, celebrating diversity and facilitating inclusion will enrich the communities we operate in, make working for the Sovini Group a better all-round experience and will improve performance and profitability.

It may be difficult to attribute some of these wider benefits directly to the actions outlined above although we will monitor the overall impacts over time. Listed overleaf, however,

are the ways in which we will be able to assess the direct effectiveness / impacts of our equality, diversity and inclusion actions:

Key Provisions and actions

Customer Service Delivery

- Transactional surveys and satisfaction monitoring
- Tenant Satisfaction Measures and reporting requirements
- Focus Group feedback (internal and customer-led)
- Benchmarking
- EIA actions

Role as Employers

- Staff survey results
- Diversified workforce as evidenced by staff profiling information
- Collated feedback from job applicants (both successful and unsuccessful)
- Quarterly report on EDI activity made available to all staff
- Report of staff / customer profiling data and analysis provided to Boards on an annual basis

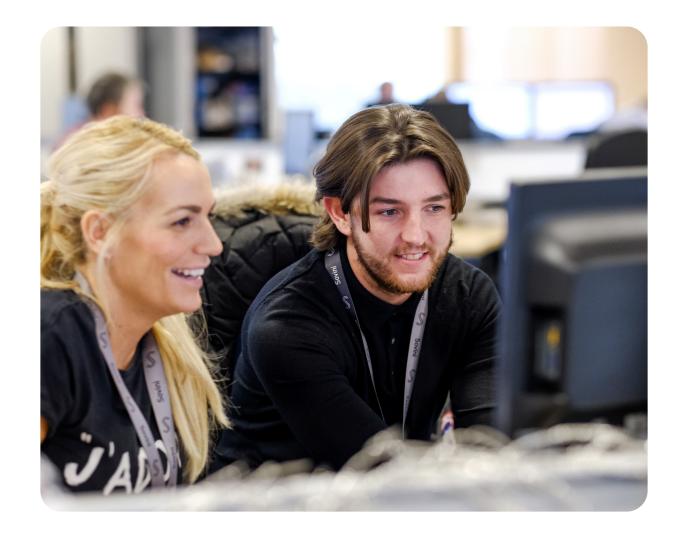
Role as Business Entities

• Legal / regulatory compliance

10 REVIEWING **OUR APPROACH**

Whilst this a five-year strategy, it is scheduled to be reviewed on an annual basis, with the next scheduled review to take place in July 2024. However, any changes in relevant legislation will be considered throughout the year.

The EDI Steering Group will be responsible for undertaking a review of progress in delivering the strategy and this progress will be reported to Board as part of the annual review.







- sovini.co.uk
- info@sovini.co.uk
- **Q** 03337 331 200