



The
Sovini
Group

EQUALITY, *DIVERSITY* **AND INCLUSION** *STRATEGY*

2025-30



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01

Foreword

*Roy Williams-
Sovini Group CEO*



I am proud to say that, despite the worrying trends we have witnessed recently in the arena of global politics, and many leading companies following suit in deciding to scale back their commitments to equality, diversity and inclusion, it remains a key priority for all companies in The Sovini Group.

At the Group, we realise that promoting equality, diversity and inclusion is the right thing to do for our ongoing business success. It is the right thing to do for our employees that value a welcoming working environment where they can fulfil their career goals, and it is the right thing to do for our customers and the neighbourhoods in which we operate.

This is why our actions and plans to continuously improve our provisions for promoting equality, diversity and inclusion are prominent, not only in this strategy, but also across a number of our other strategic plans, including our 'People Management', 'Customer Voice' and 'Neighbourhoods and Communities' strategies.

I am immensely proud that our progress in this area over recent times has been driven by the passion, hard work and vision of our staff-led 'Equality, Diversity and Inclusion Steering Group', our 'Diversity Leaders' and the contributions of all that have attended the numerous events and initiatives that we have facilitated.

Over the period of the last twelve months alone, since this Strategy was last refreshed, this has been instrumental to a number of achievements.

Amongst many others, we have:

- Improved our collection rate of staff equalities monitoring information to 97% and 100% for staff available to complete equality diversity and inclusion training

- Established new and effective partnerships with the Care Leavers Hub in Sefton and the Liverpool City Region Race Equality Hub
- Added markers to customer data records so that we can provide tailored services to vulnerable customers according to their individual needs
- Completed over 100 'fair access to service surveys' with customers
- Added a comprehensive 'Accessibility Tool' to the One Vison Housing and Pine Court Housing Association websites
- Encouraged colleagues to sign the 'Women in Construction Allegiance Pledge,' pledging to promote gender equality / dismantle barriers faced and celebrated our 35th student onto our Pathway into Construction initiative, offering female higher education students meaningful work placements
- We were awarded the 'Best Purpose-Driven People Community Award' at the 'Investors in People Awards 2024' for our 'Discover Our Purpose' campaign, which was designed to:
 - Boost employee engagement
 - Foster a sense of belonging
 - Provide a clear understanding of how each employee and role contributes to our purpose
 - Ensure that colleagues understand the value of their work and how it contributes to our vision of 'a better future'

As with everything we do at The Sovini Group, we are consistently looking to improve and we will look to build upon these and many more successes over the period covered by this Strategy.

As we look forward, a key theme for this Strategy and weaving its way through all our Strategic documents is our cast iron commitment to ensure our services are equitable and accessible to all groups of people regardless of their characteristics, background or circumstances.

We know that there will be challenges to realising this ambition, not least of which will be making improvements to ways in which we capture data and the analysis of this information to ensure we identify any areas where there are potential barriers or issues that we need to address.

Over the course of this Strategy, we will also be keeping a close watching brief on legislative changes that are either in progress or are planned that will impact on our responsibilities in the area of equality, diversity and inclusion, including the 'Employment Rights Bill' and the 'Race and Disability Bill'.

Having witnessed the year-on-year progress that has been made since we first introduced our Group-wide Equality, Diversity and Inclusion Strategy four years ago, I have every confidence that we will once again rise to these challenges and will continue to work towards our shared vision of 'a better future' for all.

Dr Roy Williams

Group Chief Executive Officer

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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	<ul style="list-style-type: none">• Excellent and accessible customer services that are available to all groups regardless of protected characteristics	<ul style="list-style-type: none">• Promote a working environment where everyone feels welcome and is able to achieve their potential	<ul style="list-style-type: none">• Provision of equitable and ethical business activities that create a better future for all
What we will do (objectives)	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Safe, sustainable and inclusive communities	<ul style="list-style-type: none">• Attract and retain an excellent and diverse workforce	<ul style="list-style-type: none">• Sovini Group achieves social gain in areas of operation
Links to wider Sovini objectives / Strategies	<ul style="list-style-type: none">• Sovini Group Strategic Plan, Individual entity strategic plans	<ul style="list-style-type: none">• Sovini Group Strategic Plan, Sovini People Management Strategy, Sovini Health and Wellbeing Strategy	<ul style="list-style-type: none">• Sovini Group Strategic Plan, Sovini Value for Money Strategies, Sovini Procurement Strategy• Environmental, Social, Equality reporting
Monitoring and Measuring	Customer satisfaction, staff satisfaction, benchmarking, management information, awards and accreditations, attainment of standards, legal compliance		



03 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
- 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 mission of 'creating opportunities and changing lives' and a shared vision for 'a better future'. All entities also share common values, as follows:



To support this common mission, a number of cross-cutting strategies (such as this Equality, Diversity and Inclusion 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.

Customer representatives were consulted in the Strategy review process for this iteration, are integral to on-going monitoring and will be included in all future reviews. This included presentations and feedback at the One Vision Housing 'Policy and Strategy Review Group' and the Pine Court Housing Association 'Customer Empowerment Panel'.

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 areas for action**, 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
- gender reassignment (gender identity / expression)
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation



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Strategic Aims

- Provide strong leadership and influence across all Boards 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
- 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
- Promote good relations between all groups with protected characteristics
- Ensure equality, diversity and inclusion are embedded in all decision making, business practices, service delivery, relations (internally/externally) and through supply chain management
- Take positive action – 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. We will also provide half-yearly updates of our progress against identified actions to our involved customers and Boards (of the registered providers).

We produce an 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.

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Key areas 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 The Sovini Group entities and those with external partners
- **Role as Employers**
Recognising that the greatest asset of The Sovini Group are the circa 800 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, The 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

This Strategy, projects forward on a rolling basis in five yearly timeframe 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 Equality, Diversity and Inclusion 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.

We will look to build on many of the initiatives commenced in the last iteration of the strategy to ensure there are no barriers in accessing our services for all of our customers, in particular the tenants of our Registered Providers.

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

06 Where Are We Now?

The following section provides an overview of The Sovini Group's current position (June 2025) in relation to equality, diversity and inclusion provisions and achievements.

The overview is broken down across the three key areas for action and is applicable to all The 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 / Fabric 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 the capture of customer profile information and ensure existing data is accurate, 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
- To supplement the above data capture mechanisms, we have also conducted over 100 'fair access to service surveys' with customers with known vulnerabilities and this has resulted in a detailed action plan to improve service delivery
- We have carried out a 'data cleansing exercise' and made contact with every customer who had previously stated that English was not their first language to ensure communication needs are addressed in the best way possible

- We have established a cross-team 'Knowing our Homes and Customers' working group to ensure better use of data from all angles e.g. linking asset management information with customer data for proactive maintenance and investment prioritisation
- Linked to above we have established a customer 360° and segmentation project ensuring there is better data capture of customer information, improved analysis of the information held and better synchronicity between systems
- 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 characteristics
- We have established a Customer Equality, Diversity and inclusion group to assist in action planning and continuous improvement activity
- We have established (for registered providers) a customer 'wellbeing promise' outlining service standards we will adhere to
- 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
- Working in partnership with specialist service providers we have established a refuge facility for families fleeing domestic violence. We are working with local authority partners on specialist services for care experienced young people and are exploring possibilities for other forms of specialist housing provision to address unmet needs for vulnerable groups
- We have carried out a comprehensive review of customer communications methodology to ensure inclusivity for customers who do not or cannot access information digitally. As a result, we have improved the number of communications that are sent automatically in customers preferred format e.g. by hard copy, large print or with coloured paper
- 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)
- 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

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 The 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 to 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 (with affirmative answers in all information fields) increasing from 40% completion to rates to 97% over recent times. We have also increased the range of questions to ensure we capture data on issues that may require additional support e.g. caring responsibilities and neurodiversity
- 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. We have extended the range of non-mandatory e-learning courses available for staff on equalities issues in support of awareness campaigns we have supported during the year e.g. 'ADHD' and 'Autism Awareness'
- 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 and specific EDI survey / feedback and those linked to external awards and accreditations e.g. Investors in People show high levels of satisfaction / perception with equalities provisions including an inclusive culture, a supportive working environment and no barriers to career progression
- 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
- Regular open access 'Lived Experience' talks to provide first-hand knowledge and to raise awareness of equalities issues

- We chair the EDI forum for the Northwest where likeminded Housing Associations come together to review and benchmark data and initiatives
- Sovini Group members have attained or retained the following Charter-marks:
 - Mindful Employer (demonstrating the organisations commitment to better mental health at work)
 - Navajo Charter Mark (Sponsored by In-Trust Merseyside and supported by the LGBTQI+ community)
 - Disability Confident Employer (demonstrating a commitment to inclusive recruitment practices and positive workplace cultures)
 - Fair Employer Charter (recognising employers who promote fair working practices e.g. payment of real living wage)
 - Menopause Workplace Pledge (encouraging a supportive environment for colleagues experiencing the menopause)
- Caring Business Charter (awarded to businesses who offer high quality employment opportunities to young people who have experience of the care system or are ex-forces) The Group continues to buck the national trend on gender pay at Group level the mean pay gap being 2.7% and median is -1.11% in

favour of women. We have also carried out voluntary analysis of our ethnicity pay gap which stood at 10.6% (mean) 10.3% (median) in favour of non-BME employees, which is largely reflective of lower numbers of ethnic minority groups being employed but also the population within the Liverpool City Region

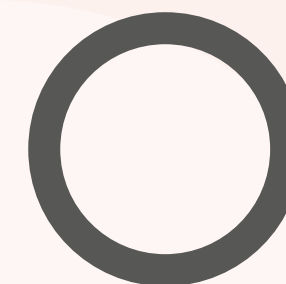
- Strong culture and track record of promoting employee health and wellbeing including mental health as demonstrated by achievement of Investors in People – Platinum Standard and Investors in Wellbeing Gold Standard
- An Equalities Hub has been established on the employee engagement application (Ourspace) providing access to a wealth of equalities information and the popular chat facility linked to the Equalities Staff Group
- We have continued support for our 'Pathway into construction' initiative providing work placements for female higher education students and encouraging female entrants into the construction industry

We have revised our annual staff appraisal process to include an assessment of all leaning support needs e.g. Dyslexia and visual impairments so these can be addressed when providing training materials / most appropriate learning methods



Role as Business Entities

- 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
- Modern Slavery Act compliance actions and statements in place, alongside a number of Group Champions to drive continuous improvement
- 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 / 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. Sefton Adult Safeguarding Board (and sub-groups), Sefton Children's Safeguarding Board, MAPPA, MARAC, Sefton Domestic Abuse Partnership, Sefton Children and Young People's Partnership Board
- 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. support for Chung Hok House residents (providing a range of wellbeing initiatives for those experiencing social isolation), support for the Pagoda Arts project (providing funding for English for Speakers of other Languages – ESOL training) for the Chinese community in Liverpool



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)
- Ensure all customers:
 - Know how to access our repairs services
 - Know how to report issues that may be of concern to them
 - Know how to access the complaints service for any areas of dissatisfaction
 - Have appropriate opportunities to influence service delivery
- Through better data capture, ensure our service offer is tailored to individual customer's needs, including:
 - Addressing any support needs they may have through direct means and partnership working with other agencies
 - Ensuring we are using their preferred methods of communication
- Making reasonable adjustments to our service provision to take account of any vulnerabilities – either enduring or due to specific circumstances helping them to live independent lives, sustain tenancies (registered providers only), play an active role in community life and add value to those communities
- Addressing any concerns they have about barriers to a fair service that may be related to a protected characteristic, in any way
- 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 Group 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 The Sovini Group as a fair and equitable employer and address any areas of dissatisfaction or under-performance with guidance from the Sovini Staff Equality Diversity and Inclusion Steering Group / Inclusion Squad
- Retain / achieve awards and externally verified accreditations that demonstrate Sovini commitments to equality, diversity and inclusion provision and that act as driver of continuous improvement
- Mental Health Awareness training to be rolled out to all managers and specialist training provided for aspiring managers / leaders
- Promote diversity in recruitment and hiring by reviewing all job descriptions and person specifications to attract a broader candidate pool
- Encourage diverse interview panels to bring different perspectives

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 those who share a protected characteristic and those who do not



08 How Are We Going To Get There?

The following section considers the Strategic Aims outlined above on page 5, 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 cross-organisational Service Delivery Plans for the period 2025-2030.



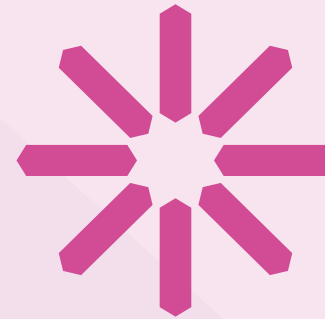
Key provisions and actions

Customer Service Delivery

- Build on the improved reporting capabilities / analytics of customer profile information across a wider range of service 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 a campaign to obtain definitive answers on customer profile information rather than 'prefer not to say' option to improve data quality and to use to drive service improvement
- 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
- 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 anti-social behaviour or domestic abuse 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

Role as Employers

- Continue to develop staff-led equality, diversity and inclusion support networks and initiatives (including 'lunch and learn' events and 'lived experience' guest 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)
- Prepare for the possibility of disability pay gap reporting across the business and other potential impacts of the Employers Rights Bill and Race and Disability Bill
- Continue to produce regular equality, diversity and inclusion broadcasts via Executive Management Team Vlog and Equalities Steering Group
- Explore possibilities to add accessibility tools to the 'Our Space' employee application
- Build on established links with local equality, diversity and inclusion networks and advocacy groups and use to broaden appeal / coverage of vacancies including Liverpool City Region Race Equality Hub
- Review recruitment pages on website to ensure there is clear support / encouragement of more diverse range of applicants (include testimonies from existing staff)
- Introduce 'value only based recruitment' and easier application processes across a range of job roles to make it easier for certain groups of people (with limited previous employment experience) to gain employment (as a result of feedback from care experienced young people)
- Complete a recruitment journey mapping exercise to help address any potential barriers for under-represented groups
- 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 including comparison against population statistics in areas of operation to ensure staff make up is representative
- Having assessed current staff data against local population statistics – take action to address under-representation from disabled and BAME employees in the workforce
- Deliver manager recruitment training to include awareness of unconscious bias in shortlisting and selection
- Over the course of this Strategy aim for all people managers across all Sovini to undertake training in mental health awareness / mental health first aid
- Build on links established 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
- Achieve 'Pioneer Status' as part of our commitment to the House-Proud Pledge for LGBTQ+ colleagues and communities
- Over 2025/26 we will bring together in one forum all internal people focused networks to ensure activities and initiatives remain inclusive
- Explore options for developing employment assistance programme
- (work experience or supported scholarships) with local colleges for students with special education needs
- 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
- Expanding the training provided to frontline staff to ensure they understand how to support specific customer needs (in line with recommendations from the Housing Ombudsman Spotlight Report – 'relationship of equals') e.g. including cultural and ritual awareness

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 The 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 with funding providers and as part of marketing opportunities
- Develop sponsorship opportunities to promote local equality / advocacy groups and events (linked to revised internal approach to maximising the benefits of supply chain relationships and achieving value for money)
- Work with advocacy and support groups to review service literature to ensure it is accessible to all groups
- 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 and involve a wider group of employees
- Improve auditing processes to ensure supply chain partners are delivering on equality promises and good practice



09 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 below, 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
- Benchmarking
- EIA actions
- Focus Group feedback (internal and customer-led)

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 Board on an annual basis

Role as Business Entities

- Legal / regulatory compliance



10

Risk Management

Sovini operates a number of detailed processes to identify, manage and mitigate risk at The Group and individual entity level. This risk management framework includes:

- A comprehensive set of Risk Registers that are maintained within The Group-wide integrated performance management system
- Individual 'Risk Owners' who are assigned responsibility for managing and reporting on specific risks from the Registers and for instigating any remedial actions, where required
- Deployment of the 'Three Lines of Defence' model that includes Risk Identification / Internal Controls / Sources of Assurance for all existing and emerging risks
- Verification of the effectiveness of risk management via a programme of Internal Audits (that will review all identified risks on a cyclical basis - applicable to the Sovini Registered Providers and Sovini Ltd)
- A review of risk management at each meeting of the Group-wide Executive Management Team
- A report on risk management at every Board meeting

Through the above controls and checking mechanisms all Sovini entities monitor and manage the following Risk Register entry in regard to equality, diversity and inclusion:

- Breach of Employment, Human rights or Equality and Diversity Law

In addition, The Sovini Group registered providers also monitor and manage the following risk which has implications for their provisions around equality, diversity and inclusion:

- Failure to ensure customer data and information is captured, analysed and controlled in accordance with and adherence to regulatory and legislative requirements

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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 2026. 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 Sovini Boards at the half year point and this information will

be shared with involved customers. A full refresh of the Strategy will be undertaken on annual basis and will be approved by the Sovini parent Board.





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