



Sovini Limited Equality, Diversity and Inclusion Policy

Originator:	Regulatory Compliance Team
Approval date:	March 2026
Review date:	March 2029

1	Introduction
1.1	Sovini Limited 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 Limited will meet or exceed its legal requirements as outlined primarily in the Equality Act 2010 and Human Rights Act 1998.
1.3	The Equality, Diversity and Inclusion Policy also sets out how Sovini Limited will implement the Sovini Group's Equality, Diversity and Inclusion Strategy in compliance with legislative requirements.
1.4	As part of Sovini Limited's commitment to embed equality, diversity and inclusion in everything it does, each Sovini Limited Policy has standard clauses on 'access and communication' and 'equality, diversity and human rights' as set out below:
1.5	Access and Communication
1.5.1	Sovini Limited is committed to ensuring that our services are accessible to everyone. Sovini Limited 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 Sovini Limited or use its services.
1.6	Equality, Diversity and Human Rights
1.6.1	Sovini Limited is committed to fairness and equality for all customers, colleagues, and stakeholders.
1.6.2	Sovini Limited's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, Sovini Limited will meet or exceed its legal requirements as

	<p>outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how Sovini Limited will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.</p>
1.6.3	<p>Sovini Limited is fully committed to eliminating unfair and unlawful discrimination. Hate crime, harassment and bullying will also not be tolerated and Sovini Limited will take proactive steps to prevent such behaviours.</p>
1.6.4	<p>It is unlawful to discriminate directly or indirectly based on the following protected characteristics:</p> <ul style="list-style-type: none"> • Disability • Gender • Gender identity, or gender reassignment status • Race, racial group, ethnic or national origin, or nationality • Religion or belief • Sexual orientation • Age • Marriage or civil partnership status • Pregnancy or maternity
1.6.5	<p>Sovini Limited are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.</p>
1.6.6	<p>Sovini Limited regularly review policies and practices to ensure they reflect its commitment to equality and diversity.</p>
1.7	<p>This Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> • Sovini Limited Recruitment Policy • Sovini Limited Grievance, Bullying and Harassment Policy • Sovini Limited Attendance Policy • Sovini Group Equality, Diversity and Inclusion Strategy
2	Statement of Intent
2.1	<p>Sovini Limited 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>
2.2	<p>Sovini Limited takes a zero-tolerance approach to all forms of bullying and harassment in the workplace, including behaviour from or directed towards our staff.</p>
2.3	<p>Through staff training and awareness raising and close partnership working, Sovini Limited 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>

2.4	As a significant employer with presence in the local economies, Sovini Limited will endeavor to create local job opportunities, support apprenticeship schemes and make a positive contribution to the communities in which it operates.
2.5	Sovini Limited will ensure that others it works with, through selection, management of sub-contractors and supply chain adheres to sound equality, diversity and inclusion principles.
3	Policy
3.1	<u>Recruitment Practices</u>
3.1.1	<p>When new vacancies become available as part of the ‘review process’ for the post, Sovini Limited will assess all job descriptions and roles to ensure:</p> <ul style="list-style-type: none"> • 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 Equality 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 Limited 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 Limited 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	<p>As per the requirements of the Equality Act 2010, Sovini Limited 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:</p> <ul style="list-style-type: none"> • Monitoring the numbers of disabled applicants • To assist in the running of its ‘disability confident’ 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 Limited will monitor the profile of all job applicants to ensure there are no real or perceived barriers for any group with protected characteristics from working with Sovini Limited.
3.1.6	Sovini Limited will take ‘positive action’ where it is recognised that there is a lack of applicants from certain groups with protected characteristics. This includes reviewing 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	Sovini Limited will strive to provide training to 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 People and Learning Team) has been made to ensure objectivity.
3.1.10	Further details on the Sovini Limited recruitment process are available in the Sovini Limited Recruitment Policy.
3.2	<u>Working Practices</u>
3.2.1	Staff Profile Monitoring
3.2.1.1	<p>Sovini Limited requests that all employees provide ‘equality monitoring information’ on a voluntary basis. Sovini Limited uses this information to:</p> <ul style="list-style-type: none"> • 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 • Create a culture of openness and honesty enabling people to be their true selves at work
3.2.2	Human Resources Policies
3.2.2.1	<p>Sovini Limited values its staff as its greatest asset and strives to ensure that whilst working for Sovini Limited 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 Limited maintain the human resources Policies to:</p> <ul style="list-style-type: none"> • Ensure all staff, regardless of their identity and protected characteristics, are treated fairly and consistently • Ensure Sovini Limited 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 equality legislation)
3.2.2.2	<p>Whilst all of the Sovini Limited Human Resources Policies are designed to support our aim of being a fair and equitable employer, the following Policies have particular relevance in meeting equality duties:</p>

- Bullying, Grievance and Harassment Policy – setting out Sovini Limited’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 Limited’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 Limited has in place to facilitate maternity, paternity and adoption arrangements
- Special Leave and Flexible Working Policy – Including details of Sovini Limited’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 Limited will meet the requirements of the Equality Act 2010 when considering any ‘reasonable requests’ for adjustments to the workplace 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 Limited.

3.2.4 Provisions for Gender Identity / Expression Employees

3.2.4.1 Sovini Limited will ensure that it provides a working environment where trans status employees are supported and do not suffer any forms of bullying, harassment or detriment as a result of being gender status 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 Limited 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 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 Limited Attendance Policy and as appropriate, according to length of service.

3.2.4.7 Sovini Limited 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 Limited 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 Limited also advise all employees (including 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 Limited 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 Limited 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 situation 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 General Data Protection Regulation (GDPR, 2018). 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 Limited have signed up to the 'Make a Stand' pledge developed by the Chartered Institute of Housing and have appointed a Champion (Director of Housing and Customer Services) to ensure commitment to supporting victims of domestic abuse.

3.2.5.6 As part of this pledge, Sovini Limited 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 Limited 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

Menopause and menstruation

3.2.6.1.1

Sovini Limited is committed to developing a workplace culture that supports staff experiencing the menopause and menstrual health challenges, in order for them to feel confident to raise issues about their symptoms and ask for reasonable adjustments at work.

3.2.6.2

Support for employees experiencing the menopause and menstruation

3.2.6.2.1

Sovini Limited will provide appropriate information and an optional e-learning training to all staff and managers to enhance understanding on the effects of the menopause and also to make it comfortable for people to discuss and address the impacts that menopause can have on employees in carrying out their roles.

3.2.6.2.2

Sovini Limited recognises that menopause and menstruation, including bleeding, hot flushes and other related symptoms can affect wellbeing and workplace performance. Sovini Limited encourages employees to speak to their line manager or People and Learning Team to let them know if they are struggling with symptoms that may impact on their roles, so that appropriate support can be provided. Such information will be treated confidentially and in line with the Sovini Limited Data Protection Policy.

3.2.6.2.3

Managers will make allowances where there is an additional need for absence by employees experiencing the menopause and menstruation in order to manage their symptoms.

3.2.6.2.4

Sovini Limited recognises that employees experiencing the menopause and menstruation may find that their related symptoms may impact on their health and wellbeing, and PCHA will aim to provide as much support as is reasonably practicable for individuals.

3.2.6.2.5

Sovini Limited recognise that menopause and menstruation can affect all people who menstruate, including women, transgender men, non-binary and intersex staff. Experiences are not uniform and can be shaped by factors including disability, age and race. Sovini Limited is committed to providing flexible and inclusive support.

3.2.6.3

Agile Working Employees

3.2.6.3.1

Agile working employees will be assisted by flexibility of working arrangements which include, to work around symptoms to manage menopause symptoms that affect their work by exercising the following:

- Flexibility around the taking of breaks, longer or more breaks during the working day
- Adjust start and finish time, for example an employee who has had a sleepless night may attend work slightly later to help to make up for time that they have missed
- Flexibility around attending menopause or menstrual health related medical appointments

3.2.6.4

Office or Location Based Employees

3.2.6.4.1

Sovini Limited will provide the following reasonable adjustments to the office or location-based employees who are experiencing the menopause to support them in their roles:

- Environmental factors –Sovini Limited will:
 - Provide desk fans on request

- Review office seating plans so that affected employees can be near the window or open doors, or away from direct sources of heat such as radiators
- Fit blinds to windows
- Provide chilled drinking water

- Provide changing facilities for staff to change clothes during the working day
- Give employees time off to attend menopause or menstrual health related medical appointments
- Consider reducing the duration of travel and / or increase rest breaks for employees who are required to drive as part of their usual work pattern. This must be authorised by the relevant Director

3.2.6.4.2 Confidential support is available for individual employees from the Employee Assistance Programme, and this may include counselling where appropriate, in addition to practical information and advice.'

3.2.7 **Equality, Diversity and Inclusion Training**

3.2.7.1 To ensure all staff understand the importance of equality, diversity and inclusion to achieving Sovini Limited'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 workplace
- Dealing with conflicting views

3.2.8 **The role of Equality, Diversity and Inclusion Steering Group**

3.2.8.1 To ensure equality, diversity and inclusion remains central to strategic planning and operational delivery of services, Sovini Limited has established an Equality, Diversity and Inclusion Steering Group with staff representation from across the organisation. 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 Limited 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 equality training or requests for equality information

3.2.9 **Employee Assistance Programme**

3.2.9.1 In order to support staff in all aspects of their personal and working lives, Sovini Limited 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 or **0800 015 5630**.

3.2.9.2 In addition to the Employee Assistance Programme staff can also seek free and confidential support from the Maximus – work mental health support service by contacting atw@maximusuk.co.uk or **0300 456 8114**.

3.3 **Business Practices**

3.3.1 Sovini Limited 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 Limited will ensure others it chooses to work with meet the standards it expects in this area by:

- 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
- Ensuring organisations have their own policies and procedures for equality or are willing to abide by the principles outlined in Equality Act 2010

3.3.1.1 Sovini Limited expects all visitors to Sovini Limited 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.

3.3.2 **Modern Day Slavery Act**

3.3.2.1 Sovini Limited is committed to ensuring that all business activities are delivered in compliance with the Modern Slavery Act 2015. To achieve this, Sovini Limited 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 Limited 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 **Service Provision**

3.4.1 Sovini Limited has a proven track record of delivering excellent customer services that are tailored to individual needs. Where Sovini Limited provides services on behalf of a client, it will use customer profile information to deliver customer tailored services to meet individual needs i.e.

- Sending communications in alternative formats
- Provision of additional support where it is required e.g. for elderly or disabled customers
- Respect for religious customs when visiting properties

3.4.2	Sovini Limited will ensure that all Sovini Limited office locations are fully accessible to those with disabilities and will involve customer representatives or specialist user groups in carrying out accessibility audits.	
4	Implementation	
4.1	All Sovini Limited staff have a responsibility for the effective operation of the Sovini Limited Equality, Diversity and Inclusion Policy.	
5	Performance	
5.1	EMT will receive reports on staff training in equality, diversity and inclusion on annual basis.	
6	Consultation	
6.1	All Sovini Limited Group employees have been consulted in the development of this Policy.	
7	Review	
7.1	The Sovini Limited Equality, Diversity and Inclusion Policy will be reviewed every Three 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 Limited's obligations in regard to equality, diversity and inclusion, changes to Sovini Limited business practices or in the light of management system audits.	
8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	An EIA was undertaken by the Strategic Regulatory Compliance Manager and the Policy and Strategy Administrator in February 2026
8.3	Results of EIA	The measures that Sovini Limited has in place to ensure full compliance with the Equality Act, Human Rights Act and Regulatory Framework for Social Housing in England are sufficient to mitigate any risks of a differential or adverse impact on any groups with protected characteristics.

9			Scheme of Delegation		
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 Chief Operating Officer			
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Chief Operating Officer			

10 Amendment Log

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
15 th June 2022	in line with changes in business practices	See Section 6	<ul style="list-style-type: none"> Change at 3.2.6-Inclusion of the 'Menopause Section' Inclusion of the Sovini Group Equality, Diversity and Inclusion Strategy
6 th August 2024	Reviewed in line with Sovini Limited Review Schedule	See Section 6	<ul style="list-style-type: none"> Changes at 3.2.8 to reflect current business practice i.e. role of Equality, Diversity and Inclusion Steering Group Details of Maximus – work mental health support programme added at 3.2.9.2 Job Titles updated throughout EIA Information updated at Section 8
17 th March 2026	Reviewed to bring in line with Sovini Limited practice	See Section 6	<ul style="list-style-type: none"> Equality, Diversity and Human Rights statement updated Section 3.2.6 'Menopause' updated EIA information updated in Section 8