

Equality, diversity and inclusion policy

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Why we have this policy

At Sovereign we are firmly committed to promoting equality of opportunity and creating a working environment that is inclusive and free from discrimination or harassment. The purpose of this policy is to confirm our commitment to equality, diversity and inclusion in employment and service delivery.

We are serious about equality and treat people fairly. We value diversity, and recognise the benefits of employing a diverse workforce. Through our work in providing affordable housing and as an employer, we will help ensure fair treatment for all members of the community, regardless of race, ethnic origin or nationality; gender; disability, whether mental or physical; religion; marital or family status; sexuality or sexual orientation; age or physical appearance.

Our commitment

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Promoting inclusive working environments for our employees and valuing the diversity of our residents and communities is essential to delivering our vision.

We recognise that there are many barriers to achieving true equality of opportunity, ranging from overt prejudice in favour of, or against, particular groups or individuals to unwitting ignorance of different lifestyles and needs. On whatever level it exists, discrimination is neither acceptable nor tolerable.

Our commitment is to make sure that no individual or group experiences unfair treatment in recruitment, pay or promotions or housing and any other services we provide, such as lettings, housing advice, repairs and rent collection.

Our equality, diversity and inclusion principles

Sovereign wants to be an open, inclusive and diverse organisation and these ten principles guide our work.

- Everyone has a right to be treated with dignity, fairness and respect.
- Value the diversity and talents of all individuals.
- Support, develop and empower people to succeed.
- Understand the diverse needs of our residents and communities.
- Promote equality of opportunity in employment and service provision.
- Deliver appropriate, accessible and flexible services.
- Create a diverse workforce and inclusive workplaces.
- Be tolerant, understanding and not judging others or their lifestyle choices.
- Challenge prejudice, discrimination and harassment.
- Promote equality, diversity and inclusion with our residents, communities, partners, stakeholders and our supply chain.

Equality, diversity and inclusion at Sovereign

At Sovereign we are firmly committed to the principles of equality, diversity and inclusion that will help us to be a better employer and service provider.

- **Moral case** - the principles of equality and diversity are about social justice, fairness, human rights, equal access to opportunities and are simply the right thing to do.
- **Customer Care** – it's about knowing and understanding our customers and tailoring our services to meet their diverse needs.
- **Diverse workforce** – a workplace that embraces diversity is more likely to help us to attract and retain talented people and reduce turnover.
- **Competitive edge** – diverse teams bring different ideas, innovation and creativity and will help us to better understand the needs of our customers and communities. Our approach to diversity will give us an economic edge in new market opportunities.
- **Reputation** – inclusive work environments encourage loyalty and teamwork; and enhance our reputation as an employer of choice and a housing provider that puts residents at the heart of what we do.
- **Legal obligations** – we want to meet and exceed our legal responsibilities to minimise any impact to our reputation, financial cost or adverse impact on our employees, residents or communities.
- **Risk management** – we recognise there are risks associated with non compliance. These risks include the effect on our reputation, financial implications and the impact on those involved.

Equality legislation and regulations

Equality legislation

As an employer and housing provider, we seek to ensure that people have equal access to services and employment opportunities.

As a social housing provider, we have certain responsibilities under the Equality Act 2010 to promote equality of opportunity. The Equality Act 2010 makes discrimination unlawful in relation to nine 'protected characteristics'.

Equality Duty

The Public Sector Equality Duty requires Housing Associations delivering public services to give 'due regard' to the need:

- To eliminate discrimination, harassment and victimisation

- To advance equality of opportunity
- To foster good relations (tackling prejudice and promoting understanding)

Sovereign is not a public body but is required to comply with the duty in the provision, allocation and management of social housing.

Regulatory requirement

This policy meets the requirement of the regulatory framework which requires registered housing providers to respond to the needs of diverse residents. Registered providers are required: to treat all residents and tenants with fairness and respect including protected characteristics and those with additional support needs.

Protected characteristics

- Age
- Disability
- Gender
- Religion/belief
- Race
- Gender re-assignment
- Marriage (civil/same sex)
- Sexual orientation
- Pregnancy/maternity

Governance



Equality Governance

- The Sovereign Board and Chief Executive have overall responsibility for the implementation of this policy and compliance with the equality legislation. They have corporate responsibility to provide leadership for ensuring that this policy is reflected in all aspects of Sovereign's work.
- Sovereign has established a Equalities Forum which promotes equality, diversity and inclusion across the business and oversees the implementation of the equality, diversity and inclusion strategy. It monitors targets and action plans and provides leadership to embed equality, diversity and inclusion across all Boards and business activities.
- The board meets on a quarterly basis and will produce and communicate an annual report on its performance and achievements.
- Subsidiary Boards and the lead executive for each of Sovereign's Subsidiary companies are responsible for the operational delivery of the policy in relation to service delivery including monitoring of compliance against objectives and targets.
- The equality, diversity and inclusion strategy will set out detailed actions and collective responsibilities for all managers and employees at all levels of the organisation.
- The Executive Director People and Change has responsibility for delivering the strategy and is the equality, diversity and inclusion champion for the business.

Our approach

Harassment, anti-social behaviour and domestic violence

Sovereign is committed to dealing promptly and effectively with all aspects of hate related crime, harassment (racial and on other grounds), anti-social behaviour and domestic violence as it impacts on customers and communities as well as employees.

We have specific HR policies for employees on how to raise issues of harassment, bullying and whistle blowing. Employees may raise the issue directly with their line manager, a member of the HR team, any other manager or a member of an employee form.

Residents

Specific anti-social behaviour, domestic violence and harassment policies have been developed to ensure that we have an adequate, transparent and fast method of dealing with issues. Our employees will be fully trained on a on-going basis to make sure that they are sufficiently knowledgeable to deal with such

situations. Our approach is victim-centred and absolute priority is given to investigating any such report.

The need for positive action

We recognise that in society not everyone is treated equally and there are individuals and groups that are also socially excluded. To overcome barriers to fairness and to give equal opportunity, Sovereign will consider positive action measures, as appropriate.

Examples of our approach are:

- Setting of targets to encourage the recruitment of women in trade roles, an area of work that traditionally attracts more men;
- Improving BME representation among our Boards or Resident Involvement Groups relative to the balance in the community.
- And as a 'Two Ticks' disability employer we offer interviews to all disabled people who meet the basic job criteria.

Recruitment and employment

We are a progressive employer and committed to creating positive and inclusive workplaces with a well trained workforce. To help us achieve a representative workforce we will monitor our recruitment and promotion activities against the protected characteristics.

Learning and development

All employees, managers and boards will complete EDI e-learning and be given appropriate training on equal opportunities awareness and diversity best practice appropriate to their role.

The Executive Director People and Change has overall responsibility for equal opportunities training.

Procurement and supply chain

Sovereign is committed to equality, diversity and inclusion in respect of achieving best value in all our procurement activities. We will make sure that our values are reflected by all external suppliers working on behalf of Sovereign and that they uphold the principles of this policy in all their dealings with our customers.

Communication and monitoring

Communicating our policy

We will make sure that this policy is made available and publicised on a widespread basis:

1. The policy will be made available on our website.
2. All employees, board members, applicants for jobs and contractors and consultants working for Sovereign will be advised of the policy.
3. Customers will be advised of the policy through their Resident Handbook.
4. The policy will be included in the employee handbook and discussed with all new starters during their induction.
5. Contractors, bidders and suppliers will be advised of the policy through the tendering and contract review processes and will be expected to uphold the standards of this policy in everything they do.

Monitoring

We monitor and review our policy, strategy, employment practices, procedures and services to ensure fairness for all. We will make any changes to our policies and strategies as necessary, if, there are any significant changes to legislation, policy or practice.

All divisions will conduct an Annual Diversity Audit and Equality Impact Assessment of performance and compliance with this policy and report this to the Diversity Board, and Sovereign Board.

Data protection and confidentiality

The use of personal information will be treated with appropriate levels of confidentiality and will be fair and lawful. Sovereign will ensure that personal information is accurate; not kept for longer than is necessary; secure; and adequate, relevant and not excessive. All information will be processed in accordance with the data protection rights of the individual.