

Equality, Diversity and Inclusion Policy

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Contents

- 1. Scope..... 1
- 2. Purpose and objectives..... 1
- 3. Policy statement..... 2
- 4. Definitions 3
- 5. Policy 3
- 6. Compliance 8
- 7. Sustainability 9
- 8. Responsibilities 9
- 9. Equality, diversity and inclusion 10
- 10. Related documents 10
- 11. Legislation and regulation 11
- 12. Review 12

1. Scope

- This policy applies to all colleagues within Sovereign Network Group (SNG), including 'partners and suppliers,' who deliver services on behalf of SNG.
- The term 'partner/supplier' will be used to apply to all partners, suppliers, contractors, nominated subcontractors, consultants, volunteers and other relevant parties, delivering services on behalf of SNG.
- This policy applies to all customers who reside in properties owned or managed by SNG and the broader community, with whom SNG liaises.
- This policy is not contractual, and we may amend it at any time.

2. Purpose and objectives

- At SNG, we believe in 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 demonstrate our commitment to equality, diversity and inclusion (EDI) in employment and service delivery and our compliance with the Equality Act of 2010 and the wider regulatory framework governing social housing.

Our objectives are to:

- **Promote Equality, Diversity and Inclusion** by ensuring everyone has equal opportunities in all aspects of employment and service delivery, recognising the benefits of a diverse workforce and inclusive practices.
- **Create a truly inclusive environment** through cultivating a workplace where every colleague, customer, supplier, partner and the wider community feels valued, heard, safe and empowered to contribute.
- **Support individuals with 'protected characteristics'** and those with additional support needs, as outlined by the Equality Act 2010. 'Protected characteristics' encompass age; disability; gender re-assignment; religion or belief; race including colour, nationality, ethnic or national origin; gender reassignment; marriage and civil partnership; sex and sexual orientation; pregnancy and maternity leave.
- **Ensure fair and inclusive treatment** by treating all colleagues, customers, partners, suppliers and the broader community with respect and understanding, both as an employer and as a provider of social and affordable housing.

3. Policy statement

- At SNG, we are committed to equality, diversity and inclusion (EDI). These values are essential to our role as an employer and service provider, helping us achieve our business goals. Our approach supports our EDI strategic priorities in the following ways:
 - **Improving Workforce Representation** through working to establish diverse leadership pipelines, expanding early career opportunities and embedding accountability for inclusive hiring and succession planning, to reflect the diversity of the communities that SNG serves.

'We want more diversity at all levels, especially leadership. And we want our workforce to be representative of the communities we work with too. We want to see more people with different ages, religions, ethnic backgrounds and genders, as well as people with differing abilities. We'll be offering more early-career opportunities, making sure hiring and succession plans are fair and holding managers accountable for promoting EDI.'
 - **Building an Inclusive culture** through working to embed EDI into our behaviours, governance and performance indicators, to cultivate equity and belonging at all levels.

'It's all about us creating an inclusive "way we do things around here." We'll weave this into our values, behaviours, employee engagement and performance so that EDI is a part of how we work every day.'
 - **Enhancing Customer and Community Impact** through working to ensure equitable service delivery, strengthening community relationships, improving accessibility and aligning supplier partnerships with EDI principles.

'We're making sure that our services are accessible and meet the needs of diverse communities. We'll also be aligning our partnerships and procurement practices to EDI values.'
- We believe that a diverse workforce boosts innovation, decision making and representation, laying the foundation for sustainable EDI practices and success and positioning SNG as a sector leader in inclusivity.
- Our EDI policy helps us to meet and exceed our legal obligations, reducing risks such as reputational damage, financial penalties and negative impacts on those involved.
- Our EDI policy reflects our commitment to ensuring that no individual or group faces unfair treatment in recruitment, pay, promotion, housing, or any other services we provide, such as lettings, housing advice, repairs and income collection.

4. Definitions

Term	Definition
Equality, Diversity and Inclusion (EDI)	Whilst Equality, Diversity and Inclusion are different they work together. We can only reduce inequality by valuing differences and working together inclusively.
Equality	Equality - At SNG, equality is essentially about fairness. We want to make sure no one gets treated unfairly because of things like their age, gender, race, or any of the other characteristics that make them who they are. SNG recognises that treating people equally doesn't always mean treating them the same. Some people might need additional or different treatment to achieve the same outcomes.
Diversity	Diversity means recognising that every person is unique and valuing their differences. We seek to respect and embrace these differences to create a Great Place to Work and a Great Customer Experience. Differences may include but are not limited to differences protected by the Equality Act 2010.
Inclusion	Inclusion , at SNG, is about creating a place where everyone feels they belong, and their voice is heard. To do that, we need to be aware of our own biases and work on managing them so that everyone can feel comfortable and part of the team. Inclusion means accessible information and services for everyone and valuing diverse contributions.

5. Policy

5.1 SNG's EDI policy

- This policy sets out how SNG supports and promotes Equality, Diversity and Inclusion (EDI). At SNG, we aim to create an inclusive workplace for our colleagues and embrace the diversity of our customers, partners, suppliers and the broader community, to help achieve our strategic goals.
- We also appreciate that EDI requires both commitment and action. Therefore, every colleague and anyone delivering services on behalf of SNG, including partners and suppliers, is required to operate in an inclusive way, in line with this policy.

5.2 Our equality, diversity and inclusion priorities and underpinning principles

- Our EDI strategy outlines our ambitions in more detail, focusing on our three core priorities (outlined in Section 3):

- 1. Improving Workforce Representation**
- 2. Building an Inclusive Culture**
- 3. Enhancing Customer and Community Impact**

and supported by our 8 principles. These cover: -

- 1. Equitable Access and Opportunity** - We commit to creating fair and transparent pathways for career development, ensuring all employees, regardless of background, have the opportunity to progress and thrive.
- 2. Inclusive Leadership and Accountability** - Leaders at all levels will champion EDI by embedding inclusive practices into decision making, tracking progress through measurable KPIs and fostering a culture of shared responsibility.
- 3. Diverse Representation and Belonging** - We will actively support diverse talent pipelines, ensuring our workforce reflects the communities we serve and that individual feels valued, respected and included.
- 4. Empowered Employee Voice** - We will amplify the voices of employees through meaningful engagement with Employee Resource Groups (ERGs), surveys and forums, ensuring EDI is shaped by those it impacts most.
- 5. Systemic and Sustainable Change** - EDI is not a one-time initiative but an ongoing commitment to embedding inclusive policies, equitable processes and continuous learning across our organisation.
- 6. Customer and Community Centric Inclusion** - Our services will be designed with inclusion in mind, ensuring equitable access to housing and community engagement while meeting the diverse needs of our customers.
- 7. Data Driven Decision Making** - We will leverage workforce and customer insights to inform EDI strategies, track progress and adapt initiatives to ensure measurable and meaningful impact.
- 8. Collaboration and Cross Functional Integration** - EDI is a collective responsibility. We will integrate inclusive practices across teams, departments and leadership structures, recognising how different aspects of identity- such as race, gender, disability and socioeconomic status- intersect to influence experiences and outcomes.

5.3 Our Approach

5.3.1. Harassment, anti-social behaviour and domestic abuse

For colleagues

- SNG is committed to creating a safe, respectful and inclusive workplace for everyone. Bullying, discrimination and harassment of any kind will not be accepted. This includes any behaviour, spoken or physical, that is threatening, insulting, or makes the workplace feel unsafe or uncomfortable.
- SNG has a 'Code of Conduct' and a 'Bullying, Discrimination and Harassment' policy to help colleagues raise concerns. If you have a concern, you can speak to your line manager, someone in HR, or any other manager. See SNG's 'Bullying, Discrimination and Harassment Policy' and the 'Code of Conduct.'

For customers and communities

- SNG is committed to promptly and effectively addressing hate crimes, harassment (racial and on other grounds), anti-social behaviour and domestic violence affecting customers and communities. (See also section 5.3.7)
- Details of how customers can raise concerns are outlined in their Tenancy Agreement and in the Anti-Social Behaviour Policy. Concerns can be raised via the customer portal or through phone contact with SNG's Customer Contact Centre.

5.3.2 The need for positive action

- SNG recognises that not everyone is treated equally in society and there are individuals and groups that are often socially excluded. To overcome these barriers and ensure equal opportunities, SNG will identify and implement positive actions to remove barriers and align with the Equality Act 2010.

Examples of our positive actions include:

- Designing and implementing mentoring and leadership pathways with accountability at directorate level.
- Expanding early careers programmes and enhancing succession planning visibility for underrepresented groups.
- Strengthening partnerships with external parties and embedding accountability measures for inclusive hiring practices.
- Encouraging enhanced EDI data collection to improve data driven insights in recruitment, retention, progression and leadership diversity.
- Building an inclusive culture, integrating our Employee Resource Groups (ERGs) and developing EDI Ambassador Forums.
- Creating an EDI Scorecard, with Directorates integrating actionable goals into their People Plans.
- Developing a supplier engagement plan to embed EDI principles into the supply chain.

- Piloting initiatives to target accessibility and inclusivity improvements in housing and community services, informed by customer feedback.
- Collaborating with customer groups to co-design housing services and community initiatives.

5.3.3 Recruitment and employment

- SNG is a progressive employer and committed to inclusive recruitment, succession planning and pipeline development to reflect the diversity of communities that SNG serves. SNG will also strengthen partnerships with external agencies, schools, colleges and community groups to improve inclusive hiring practices and use data driven insights to ensure best practice.

See SNG's 'Recruitment Policy.'

5.3.4 Learning and development

- SNG will ensure that all colleagues receive core EDI training and awareness updates annually and where required, more developed and curated education, based on job roles and development needs. This includes developing and implementing 'Inclusive Culture' programmes for all managers and 'Customer Empathy and Trust' programmes, to help colleagues better support our diverse range of customers.
- We will also offer targeted mentoring, leadership pathways and career programmes to address barriers to progression.
- All managers are required to ensure that their team members complete relevant EDI training, work in an inclusive manner and have equitable opportunities for career development and lifelong learning.

5.3.5 Working with Employee Resource Groups (ERGs)

- SNG will work closely with Employee Resource Groups (ERGs) to create a best practice governance framework, establishing clear Terms of Reference (TOR), sponsorship, governance and specific areas of focus, in support of the overall aims of the EDI strategy. Going forward, ERGs will play a critical role in informing, supporting and leading SNG's EDI initiatives with guidance from dedicated senior leadership and an EDI Steering Committee responsible for overseeing the strategy's implementation and success.

5.3.6 Procurement and supply chain

- SNG is committed to equality, diversity and inclusion in respect of achieving best value in all our procurement activities and ensuring that our selection of third-party providers is fair and non-discriminatory.
- We will also ensure all external partners/suppliers working on behalf of SNG agree to reflect our values and support the principles of this policy in their dealings with SNG and our customers.

5.3.7 Supporting our customers and potential customers.

Meeting housing needs

SNG will collaborate with local government and statutory agencies to understand housing needs, especially for discriminated and marginalised groups and will partner with specialist agencies as required. When developing new homes, we will ensure accessibility will be considered at the earliest stages of product/service design. We will seek to ensure that housing meets the cultural and specific needs of households requiring rehousing, including disability guidelines (e.g. wheelchair accessible ground floor accommodation) and SNG quality standards.

Access to housing

- At SNG, we will support local communities by providing safe, affordable homes to vulnerable groups and low-income individuals. We will ensure fair, non-discriminatory access to housing in line with our allocation approach and monitor our practices to reflect our EDI principles.
- We will encourage all customers to participate in customer involvement activities and will actively challenge any discriminatory views or behaviours.

Managing tenancies

- We will consult all customers through a range of mechanisms such as surveys, focus groups, forums and our Customer Influence Panel and Scrutiny Panel, to ensure our housing service meets their needs. Any customer who feels unfairly treated can raise a concern via the Complaints Policy, available in various formats.
- SNG customers must adhere to our EDI policy and their tenancy agreement, supporting cohesion and respecting all cultures in our communities. We have specific policies for anti-social behaviour and hate crime, domestic abuse and safeguarding to ensure quick and transparent issue resolution. Our colleagues will receive ongoing support and training to handle such situations effectively.
- SNG's approach is victim/harm-centred, prioritising responses based on risk and delivering a reasonable and proportionate response with due regard to the vulnerabilities and particular circumstances of all involved. We will also work proactively with other agencies to address discrimination, hate incidents and crime, domestic abuse, safeguarding issues and participate in multi-agency meetings and strategic partnerships.
- SNG Customers can find relevant policies on the SNG website and incorporated within their tenancy agreement.

Additional support services

SNG offers a range of additional support services for customers. These include employment skills support, digital and financial inclusion support and debt and income advice.

6. Compliance

SNG's Equality, Diversity and Inclusion Strategy will provide the framework for integrating EDI into operational and strategic plans, creating accountability at directorate level and outlining actions and collective responsibilities for all managers and colleagues across the organisation. Overall accountability for implementing the strategy and all associated deliverables is held by the Corporate Strategy and People Director.

6.1 Training

- Whilst the Corporate Strategy and People Director has overall responsibility for implementing the strategy and all associated deliverables, all managers will be trained and have accountability for ensuring that EDI training and practices are embedded and managed within their teams.
- At an operational level, all colleagues will receive core EDI training as part of the induction process and through annual refresher training, with further training opportunities available for colleagues, managers and leaders to support their ongoing EDI awareness, education and cultural competence.
- EDI training needs across SNG, will be reviewed continually, leveraging and responding to best practice external and internal insights.

6.2 Communicating our policy

- This policy will be widely available and publicised, ensuring that our written and digital communications follow accessibility guidelines and communication accessibility standards. We will also provide information in alternative formats on request, such as signing and other translation services.
- All colleagues, customers, suppliers and partners will be advised of the policy through a range of media and channels including SNG's website, SNG advertising material, tendering and contractual documentation and the customer portal.
- The policy will be discussed with all new starters during their induction and onboarding programme and through meetings and reviews.

6.3 Monitoring

- We will collect, analyse and monitor EDI information in relation to recruitment and selection and our colleague and tenant populations to ensure that our policies, strategies and practices are fair, promote equity of opportunity and are updated as appropriate and required.

6.4 Measurement

- We will develop a range of measures to ensure sustainable inclusion efforts. The collation of these measures will create our EDI scorecard, informed by our EDI Index Survey, which will integrate workforce and customer focused metrics to ensure sustainable inclusion efforts.

- Going forward (2026/27) we will launch and publish an annual EDI Report with contributions from all Directorates highlighting progress in recruitment, retention and workforce diversity.

7. Sustainability

At Sovereign Network Group, we recognise the critical importance of sustainability in our operations and services. We are committed to embracing sustainable practices that contribute to environmental protection, economic viability and equitable outcomes, recognising the specific needs of vulnerable customer groups who may be particularly affected by environmental and climate changes.

This policy supports our sustainability goals by:

- **Building Social Equity**; ensuring complaint processes are accessible and responsive, aligning with Environmental and Social Governance (ESG) principles.
- **Enhancing Resilience**; streamlining operations with sustainable practices to achieve cost savings and improve long term efficiency.
- **Encouraging Community Engagement**; innovating and adapting our services in collaboration with customers, to support inclusive, sustainable solutions.

8. Responsibilities

Role	Responsibility
SNG Board and Chief Executive	The SNG 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 SNG's work.
Subsidiary Boards and the lead executives	Subsidiary Boards and the lead executive for each of SNG's Subsidiary companies are responsible for implementing this policy in relation to service delivery and monitoring compliance against objectives and targets.
Corporate Strategy and People Director	Overall accountability for implementing the strategy and all associated deliverables.
Head of Organisational Effectiveness	Overall responsibility for implementing the strategy and all associated deliverables.

Role	Responsibility
Organisational Development Team	The Organisational Development Team, working with the Head of Organisational Effectiveness, will provide organisational support for implementing the strategy and associated deliverables including overseeing EDI impact assessments.
Line Managers	All managers will be trained and have accountability for ensuring that EDI training and practices are embedded and managed within their teams.
All employees, partners and suppliers	All SNG employees, partners and suppliers are expected to maintain a respectful, inclusive environment, comply with relevant EDI legislation and SNG company standards including this policy and actively avoid discrimination, bullying or harassment. They must report any breaches of this policy and participate in required training or initiatives. Non-compliance may result in disciplinary action or termination of employment or business relationships.

9. Equality, diversity and inclusion

- We will apply this policy consistently and fairly and will not discriminate against anyone based on any protected characteristics, including those set out in the Equality Act 2010.
- We are committed to making all our policies, processes and practices accessible and easy to use for all our stakeholders, including our colleagues and customers in line with our statutory duties – as set out in the Equality Act 2010. An Equality Impact Assessment will be completed on all policies to ensure that the impact of the policy on individuals, different communities and groups is non-discriminatory.
- All requests from colleagues and customers to accommodate their needs e.g. providing information in alternative formats, adapting communication methods, should be considered and acted on where possible in accordance with the Equality Act 2010.

10. Related documents

- Our Equality, Diversity and Inclusion policy and approach influences all SNG policies (see Section 9 above)

SNG Related Policies

Internal

- SNG's Bullying, Discrimination and Harassment policy.
- SNG's Code of Conduct

External

- ASB and Hate Crime policy.
- Domestic Abuse policy

- Adult Safeguarding policy
- Children and Young People Safeguarding policy.
- Neighbourhood policy

11. Legislation and regulation

- The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, which requires adherence to all relevant law, SNG will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate. Any queries relating to the applicable legislation should be directed to the policy owner.

The Equality Act, 2010

- 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.

Public Sector Equality Duty

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

- eliminate discrimination, harassment and victimisation.
- advance equality of opportunity
- foster good relations (tackling prejudice and promoting understanding).

Whilst SNG is not a public body, we take our responsibility seriously to comply with the duty in the provision, allocation and management of social housing.

Regulator of Social Housing Equalities Objectives 2020

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

Data Protection Act 2018

- The use of personal information will be treated with appropriate levels of confidentiality and will be fair and lawful. SNG 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.

12. Review

- This document will be reviewed every three years, or sooner if significant changes occur in the relevant legal or operational landscape.