



STRAVICA

COMPANY POLICY | WATER HYGIENE & LEGIONELLA CONTROL

Equality & Diversity Policy

Safe Water For Everyone. Fair Work For Everyone.



Document Control

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Version	Date	Summary Of Change	Approved By
1.0	24 Oct 2026	Full rewrite for Stravica Ltd's specialist water hygiene and Legionella control services. Adds equitable water safety for higher-risk groups, inclusive delivery in homes and occupied premises, accessible resident communications including Welsh language, inclusive PPE and RPE adjustments for operatives, the preventative duty on sexual harassment, support for clients' equality and housing consumer duties, and water sector workforce diversity commitments.	A. Olanrewaju, Director

Related Stravica Policies

This policy should be read alongside the Health & Safety Policy (STR-POL-HS-001), the Environmental Policy (STR-POL-ENV-001), the Modern Slavery & Human Trafficking Policy (STR-POL-MS-001), the Data Protection & GDPR Policy (STR-POL-DP-001) and the Anti-Bribery & Corruption Policy.

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1. Introduction And Purpose

1.1 About Stravica Ltd

Stravica Ltd is a UK prime contractor specialising in water hygiene and Legionella control. We deliver Legionella risk assessments, water hygiene monitoring, Legionella and water sampling, water tank cleaning and disinfection, water system remedial works and planned water hygiene maintenance to housing, healthcare, education, local authority, transport and commercial clients. Operational delivery is carried out by vetted specialist delivery partners working under Stravica's contract management and assurance.

1.2 Purpose

This policy sets out Stravica Ltd's commitment to equality, diversity and inclusion in everything we do: how we employ people, how we select and manage our supply chain, and how we deliver services to the residents, patients, pupils and building users our work protects. It explains how we meet our duties under the Equality Act 2010 and how we support our public sector clients in meeting theirs.

1.3 Why Equality Matters In Water Hygiene

Legionella risk does not fall equally. People aged over 45, smokers, heavy drinkers, and people with chronic respiratory or kidney disease, diabetes or weakened immune systems are at greater risk of Legionnaires' disease. Older people, young children and people with certain disabilities are also at greater risk of scalding from hot water. Many of these people are protected by the Equality Act 2010 because of their age or disability, and many live in the social housing, care settings and healthcare premises where we work.

For Stravica, equality is therefore not only about fair treatment. It is about making sure our services reach and protect the people who need them most, in a way that respects their homes, their needs and their dignity.

1.4 Objectives

- Eliminate unlawful discrimination, harassment and victimisation in our business and supply chain.
- Deliver water hygiene services that actively protect people at higher risk, and adapt visits to residents' individual needs.
- Communicate with residents and building users in accessible formats and languages.
- Make sure that working in water hygiene on Stravica contracts is open, safe and fair for people of every background, including through inclusive PPE and RPE.
- Support clients in meeting their Public Sector Equality Duty, housing consumer standards and Welsh language duties.
- Measure progress and continually improve.

2. Scope

- All directors, employees, agency workers, applicants and consultants of Stravica Ltd.
- All delivery partners, their workforces and sub-tier suppliers on Stravica contracts.
- All interactions with clients, residents, patients, pupils, visitors and members of the public in connection with Stravica contracts.
- All activities, including recruitment, employment, procurement, bidding, contract management and service delivery, across England, Scotland and Wales.

Compliance with this policy is a condition of employment and of every delivery partner and supplier contract. Breaches may result in disciplinary action or termination of contract.

3. Legal And Regulatory Framework

Legislation Or Standard	Relevance
Equality Act 2010	Protects nine characteristics against discrimination, harassment and victimisation in employment and services. Requires reasonable adjustments for disabled people.
Equality Act 2010, section 149 (Public Sector Equality Duty)	Applies to public authorities and to those carrying out public functions. Stravica supports clients in meeting the duty through its contracts.
Worker Protection (Amendment of Equality Act 2010) Act 2023	Since 26 October 2024, employers must take reasonable steps to prevent sexual harassment of their employees, including harassment by third parties such as members of the public.
Human Rights Act 1998	Including Article 8 (respect for private and family life and home) and Article 14 (prohibition of discrimination).
Employment Rights Act 1996 and family-friendly legislation	Flexible working, maternity, paternity, adoption and shared parental leave, including the Carer's Leave Act 2023, the Neonatal Care (Leave and Pay) Act 2023 and the Protection from Redundancy (Pregnancy and Family Leave) Act 2023.
Protection from Harassment Act 1997	Criminal and civil remedies for harassment.
Welsh Language (Wales) Measure 2011	Public bodies in Wales must comply with Welsh Language Standards, which may apply to services Stravica delivers on their behalf.
Regulator of Social Housing Consumer Standards (2024)	Social landlords in England must treat tenants with fairness and respect, understand tenants' diverse needs and communicate accessibly. Stravica supports housing clients in meeting these standards.
Management of Health and Safety at Work Regulations 1999	Risk assessment for new and expectant mothers and young persons.
UK GDPR and Data Protection Act 2018	Lawful handling of equality monitoring and special category data.
EHRC Codes of Practice and ACAS guidance	Statutory guidance on employment, services and sexual harassment.
Web Content Accessibility Guidelines (WCAG) 2.2	Accessibility standard for Stravica's website and digital documents.

4. Definitions

Term	Meaning
Protected characteristics	Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, as defined by the Equality Act 2010.
Sex	Being a man or a woman. In April 2025, the Supreme Court confirmed that "sex" in the Equality Act 2010 refers to biological sex. Gender reassignment remains a separate protected characteristic.
Direct discrimination	Treating someone less favourably because of a protected characteristic, including because of their association with someone who has one or because they are perceived to have one.
Indirect discrimination	Applying a rule or practice to everyone that puts people with a protected characteristic at a particular disadvantage and cannot be objectively justified.
Discrimination arising from disability	Treating a disabled person unfavourably because of something arising from their disability, without justification.
Reasonable adjustments	Changes to practices, physical features or auxiliary aids that remove or reduce a substantial disadvantage experienced by a disabled person.
Harassment	Unwanted conduct related to a protected characteristic, or of a sexual nature, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation	Treating someone badly because they have made, or supported, a complaint or claim under the Equality Act 2010.
Positive action	Lawful steps to encourage or support people who share a protected characteristic and are under-represented or disadvantaged.
Inclusion	A culture in which everyone is respected, valued and able to contribute and to receive services on fair terms.

5. Statement Of Intent

Stravica Ltd is committed to equality of opportunity, the elimination of discrimination and the inclusion of everyone who works with us or relies on our services. We believe that safe water is a right for everyone, and that the people at greatest risk deserve the greatest care.

Stravica Ltd will:

- Treat every person with dignity and respect, regardless of any protected characteristic or background.
- Recruit, develop and reward people on merit, and make reasonable adjustments to remove barriers.
- Plan and adapt water hygiene services so that residents and building users at higher risk are protected, and so that visits respect individual needs, beliefs and homes.
- Communicate accessibly, in plain English, alternative formats and other languages, including Welsh where required.
- Provide PPE, RPE and working arrangements that are safe and suitable for every operative.
- Take reasonable steps to prevent sexual harassment, and tolerate no bullying, harassment or victimisation.

- Require our delivery partners and suppliers to meet the same standards.
- Support our clients in meeting their own equality duties.
- Monitor our performance and act on what we find.

Policy Approval

- Signed on behalf of Stravica Ltd by Adeola Olanrewaju, Director.
- Date of approval: 24 October 2026.
- This statement is issued to every delivery partner and published at www.stravica.uk.

6. Governance And Responsibilities

Role	Responsibilities
Director (EDI Lead)	Accountable for this policy and its implementation. Sets objectives and allocates resources. Approves equality impact assessments. Investigates or appoints an investigator for complaints. Reviews delivery partner equality performance. Leads annual review.
Compliance & Procurement Administration	Maintains supplier equality evidence, training records and monitoring data. Supports accessible communication requests.
Delivery Partner Contract Managers	Ensure their workforce complies with this policy. Plan visits to reflect resident needs. Provide inclusive PPE and RPE. Report complaints and incidents to Stravica.
Operatives and Risk Assessors	Treat residents and colleagues with respect. Follow visit adjustments. Report harassment, discrimination and safeguarding concerns.
All Persons	Comply with this policy, complete training and challenge or report unacceptable behaviour.

7. Supporting Clients' Equality Duties

7.1 Public Sector Equality Duty

Most of Stravica's clients are public authorities or bodies carrying out public functions. They must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. When we deliver services on their behalf, we help them meet this duty by:

- Using clients' vulnerability information to plan and prioritise visits for residents at higher risk, under the data protection controls in the Data Protection & GDPR Policy.
- Recording and passing on requests for adjustments, alternative formats or interpreters so that clients' records stay accurate.
- Providing equality information and complaint data that clients need for their own monitoring.
- Completing equality impact assessments for service changes where clients require them.

7.2 Social Housing Consumer Standards

Housing clients in England must meet the Regulator of Social Housing's Consumer Standards, including understanding and responding to tenants' diverse needs and treating tenants with fairness and respect. Stravica's resident communication, visit adjustment and complaints arrangements are designed to support those obligations.

7.3 Welsh Language

Where a client in Wales is subject to Welsh Language Standards, Stravica will provide resident-facing letters, notices and signage bilingually in Welsh and English, and will arrange Welsh-language communication on request in line with the client's requirements.

7.4 Scotland

In Scotland, Stravica supports clients in meeting the Scottish specific equality duties and any related contractual requirements.

8. Equitable Water Safety: Protecting Higher-Risk Groups

Treating everyone fairly sometimes means treating people differently according to their level of risk. Stravica's services are designed to give extra protection where it is needed most, in line with ACoP L8, HSG274 and HTM 04-01.

Group	Increased Risk	How Our Services Respond
Older people (age)	Legionnaires' disease; scalding	Risk assessments take account of the age profile of occupants. TMVs are checked where needed. Sheltered and extra care schemes receive appropriate monitoring and sampling frequencies.
People with weakened immune systems, chronic illness or certain disabilities	Legionnaires' disease; Pseudomonas aeruginosa	Vulnerability is reflected in risk ratings and recommendations. Augmented care protocols apply in healthcare. Point-of-use filtration or outlet restriction is recommended after adverse results.
Disabled people with reduced mobility or sensation	Scalding; difficulty managing water outages	TMV and outlet temperature checks. Alternative water supplies arranged during disruption. Extra time allowed for visits.
Young children (age)	Scalding	Thermal disinfection controls and warning signage in schools and family housing. TMVs checked at baths and sinks used by children.
Pregnant women (pregnancy and maternity)	Exposure during disinfection	Occupants are notified in advance of chemical disinfection. Outlets are isolated and signed. Water is restored only after verification.
People who do not read English well (race, which includes national origin)	May not understand notices about outages or outlet restrictions	Notices are provided in plain English, translated or pictorial formats, with interpreter support.

Our Principle

The residents least able to protect themselves from water-borne risk are the ones our service must protect best. Vulnerability information is used to protect people, never to exclude them or treat them less favourably.

9. Inclusive Service Delivery In Homes And Occupied Premises

Most of our visits happen in people's homes, care settings, hospitals and schools. Operatives are guests, and they must adapt to the needs of the people they visit. The following adjustments are made wherever they are reasonable and requested or known.

Need	Adjustments
Deaf or hard of hearing	Text or email appointment confirmation; knock and wait longer; written explanation on arrival; BSL interpreter arranged through the client where needed
Blind or partially sighted	Telephone confirmation; verbal identification with a password scheme where the client operates one; describe the work before starting; leave furniture and belongings exactly as found
Learning disabilities, autism or dementia	Easy Read appointment letters; consistent operative where possible; clear and calm explanation; allow a carer or support worker to be present; avoid unexpected changes
Mobility impairments	Allow extra time to answer the door; do not obstruct walking routes or aids; ensure the bathroom is usable before leaving
Mental health conditions	Patient, unhurried approach; respect requests to rearrange; follow client guidance for supported housing
Religion or belief	Avoid appointments at times of prayer or religious observance on request; respect requests to remove shoes or use shoe covers; ask before entering prayer rooms; respect modesty requirements
Requests relating to the sex of the operative	Where a resident asks, for reasons such as religion, trauma or personal safety, for an operative of a particular sex, Stravica and the delivery partner will accommodate this wherever reasonably practicable, or arrange for a second person to attend
Carers and parents	Flexible appointment windows; evening or weekend appointments where the contract allows
Language	Translated notices; telephone interpreting; use of family members as interpreters only where the resident prefers it and never for children
Healthcare and care settings	Respect patient privacy and dignity; follow ward and care home routines; never enter a room without permission from staff

Requested adjustments are recorded, with the resident's agreement, so that they are applied at every future visit and passed back to the client.

10. Accessible Communication

- All resident letters and notices use plain English, a minimum 12-point sans serif font, good colour contrast and no information shown by colour alone.
- Large print, Easy Read, audio and translated versions are provided on request, within five working days or within the client's service standard if shorter.
- Notices about water outages, outlet restrictions or disinfection use clear pictorial symbols, so that the safety message is understood by people who do not read English.
- Notices include a telephone number and an email address so that residents can ask questions or rearrange visits in the way that suits them.
- Stravica's website and PDF documents are designed to meet WCAG 2.2 AA, including tagged headings and readable text.
- Interpreting is arranged through the client's interpreting service or a professional provider.
- Welsh-language communications are provided in line with Section 7.3.

11. Employment Practice

11.1 Recruitment And Selection

- Job descriptions focus on genuine requirements. Qualifications are required only where they are needed for safety or competence, such as Legionella control training.
- Adverts state Stravica's commitment to equality and invite applicants to request adjustments.
- Shortlisting and interviews use structured, consistent criteria.
- Right to work checks are applied consistently to every applicant, without assumptions based on nationality, accent or appearance.
- Positive action may be used, where lawful, to encourage applications from groups that are under-represented in water hygiene and building services, including women.

11.2 Terms, Pay And Progression

- Equal pay for equal work, and equal access to benefits for part-time and full-time workers.
- Pay is at or above the National Living Wage.
- Flexible working requests are considered from day one of employment and are refused only for a lawful business reason.
- Statutory maternity, paternity, adoption, shared parental, carer's and neonatal leave are provided, with protection from redundancy during and after family leave.
- Training and progression opportunities are open to all and are offered on merit.

11.3 Gender Pay Gap Reporting

Stravica is below the 250-employee threshold for mandatory gender pay gap reporting. It will review pay equity annually and, as it grows, report voluntarily where meaningful data is available without identifying individuals.

12. Inclusive Safety: PPE, RPE And Adjustments For Operatives

Safe systems of work must be safe for everyone. Equipment and practices designed around one typical worker can put others at a disadvantage or at risk. Stravica requires delivery partners to make the following provisions on its contracts.

Situation	Barrier	Required Approach
Facial hair worn for religious or medical reasons	Tight-fitting RPE such as FFP3 masks cannot seal over a beard	Provide suitable loose-fitting powered respirator hoods or helmets that do not rely on a face seal, in line with HSE guidance. Do not exclude the worker from tasks that need RPE.
Women and smaller-framed workers	Standard PPE and RPE often designed for average male sizes	Provide correctly sized gloves, coveralls, footwear and RPE, with face-fit testing in a range of sizes and models.
Colour vision deficiency	Colour-comparator chlorine test kits rely on judging shades	Use digital photometers that give a numerical reading.
Dyslexia and other learning differences	Written tests and dense method statements	Provide verbal or practical competence assessment where permitted, visual method statements and extra time.
Pregnancy and new mothers	Exposure to chemicals, biological agents, confined spaces and manual handling	Specific risk assessment; alternative duties without loss of pay where risks cannot be controlled.
Menopause	Heat in plant rooms and roof spaces; RPE discomfort	Access to breaks, water and welfare facilities; scheduling flexibility.
Religious observance, including fasting	Heavy physical work in hot loft spaces; prayer times	Flexible scheduling and breaks; consider task allocation during fasting periods, with the worker's agreement.
Disability, including hidden conditions	Barriers vary by individual	Individual discussion and reasonable adjustments, with occupational health advice where needed, while maintaining safety for the worker and others.
Welfare facilities	Lack of suitable toilets and changing facilities on sites	Agree access to suitable welfare facilities with clients for all operatives, in line with the Workplace Regulations and current EHRC guidance.

13. Dignity At Work And Preventing Harassment

13.1 Zero Tolerance

Bullying, harassment, including sexual harassment, and victimisation are not tolerated by or towards anyone working on Stravica contracts. This includes offensive comments, jokes or messages, unwanted physical contact, exclusion, intimidation and any behaviour that undermines a person's dignity.

13.2 Preventative Duty On Sexual Harassment

Stravica takes reasonable steps to prevent sexual harassment of its workers, as required since 26 October 2024. These steps include assessing the risk, providing training, setting clear reporting routes and acting on concerns. Delivery partners must take equivalent steps for their workforces on Stravica contracts.

13.3 Harassment By Residents Or Members Of The Public

Operatives working alone in people's homes may face harassment from residents or others. Operatives may leave any situation in which they feel unsafe or are subjected to harassment, without penalty. Incidents are reported to Stravica and the client, who will act, which may include requiring a second operative or alternative arrangements for future visits.

13.4 Conduct Towards Residents

Any discriminatory, offensive or inappropriate behaviour by an operative towards a resident or building user is treated as serious misconduct. The operative will be removed from Stravica contracts pending investigation.

14. Delivery Partners And Supply Chain

- Delivery partners must have an equality policy, comply with the Equality Act 2010 and this policy, and cascade these requirements to their own suppliers.
- Due diligence before appointment covers equality policy, harassment prevention, inclusive PPE and RPE provision, complaints and training.
- Contracts include the clauses in Appendix E.
- Equality performance, including complaints from residents and workers, is reviewed at contract review meetings.
- Stravica welcomes bids from small businesses, social enterprises and businesses led by under-represented groups when selecting partners and suppliers, subject to competence and compliance requirements.

15. Building A Diverse Water Hygiene Workforce

Water hygiene and building services have historically drawn on a narrow workforce, and women are significantly under-represented. Stravica will work with its delivery partners to broaden access to the sector, including by:

- Encouraging delivery partners to offer apprenticeships and entry-level water hygiene operative roles in the communities served by each contract.
- Promoting the sector to groups that are under-represented, such as women, ex-armed forces personnel, care leavers and people returning to work.
- Supporting accredited water hygiene training for new entrants.
- Reporting these outcomes as social value, mapped to each client's framework and measured against agreed targets.

16. Reasonable Adjustments Procedure

Stravica has a duty to make reasonable adjustments for disabled applicants and workers, and expects delivery partners to do the same for their workforces on Stravica contracts. The procedure is designed to be simple, quick and respectful.

1. Request: anyone can ask for an adjustment at any time, in any way. No particular wording or diagnosis is needed.
2. Conversation: a confidential discussion takes place within five working days to understand the barrier and the options. The individual's own view of what would help is given significant weight.
3. Advice: occupational health or specialist advice is obtained where needed, for example on RPE, heat tolerance or manual handling.
4. Decision: the adjustment is agreed and recorded, with any interim measures. Where a request cannot be met, the reasons are explained in writing and alternatives are offered.
5. Implementation: equipment, schedules or duties are changed, and the people who need to know are told, with the individual's consent.
6. Review: adjustments are reviewed at least annually or when circumstances change.

The cost of an adjustment is not passed on to the individual. Funding through the Access to Work scheme is explored where it can help.

17. Recognising Vulnerability During Visits

Operatives may be among the few visitors to some homes. During a visit, they may notice that a resident is struggling in a way that affects their safety or the safety of the water system. Examples include:

- Signs of self-neglect or hoarding, which can make outlets unusable and increase stagnation.
- A resident with dementia or confusion who cannot safely manage hot water, or who does not recognise the operative.
- Outlets left unused because the resident is unable to reach or operate them.
- Signs that a resident is unwell, without heating or water, or at risk of harm.
- Indicators of abuse or exploitation, as described in the Modern Slavery & Human Trafficking Policy.

Operatives do not make judgements or diagnoses. They report what they have seen to their supervisor and to Stravica the same day. Stravica passes the concern to the client's safeguarding or tenancy team, who are best placed to support the resident. In an emergency, operatives call 999.

18. Positive Action And Its Limits

The Equality Act 2010 permits positive action to help people who share a protected characteristic overcome disadvantage, meet different needs or take part in activities where they are under-represented. Stravica may use positive action, for example targeted outreach to encourage women into water hygiene roles or supported training places for under-represented groups.

Positive action must be proportionate and supported by evidence. In recruitment, a protected characteristic may only be used to choose between candidates who are as qualified as each other, and never as an automatic preference. Positive discrimination, which means appointing someone because of a protected characteristic rather than merit, is unlawful and is not practised by Stravica.

19. Equality Monitoring And Data

Equality monitoring data from applicants, staff and, where clients provide it, service complaints is collected voluntarily, held separately from personnel files and used only to identify and address inequality. Data is processed in line with the Data Protection & GDPR Policy. Because Stravica's direct workforce is small, results are reported only in aggregated form that cannot identify any individual.

20. Equality Impact Assessment

An equality impact assessment is carried out when Stravica introduces or changes a policy, service method or contract arrangement that could affect people differently because of a protected characteristic. Examples include changes to appointment arrangements, resident communication methods or the introduction of digital-only reporting. The assessment follows the stages in Appendix A and is approved by the EDI Lead. Where a client requires its own equality impact assessment format, Stravica uses it.

21. Complaints, Grievances And Whistleblowing

- Staff and delivery partner operatives can raise discrimination or harassment concerns with their manager, with the Stravica EDI Lead at info@stravica.uk, or through the whistleblowing routes described in Stravica policies.
- Residents and members of the public can complain through the client's complaints procedure or directly to Stravica at info@stravica.uk. Stravica will cooperate fully with the client's procedure, including any Housing Ombudsman process.
- Complaints are acknowledged within two working days, investigated by someone not involved in the matter, and resolved within 20 working days where possible, with progress updates if more time is needed.
- No one will be victimised for raising a concern in good faith.
- Outcomes and trends are reviewed to prevent recurrence.

22. Training And Awareness

Audience	Content	Frequency
All Stravica personnel	This policy; protected characteristics; unconscious bias; harassment prevention and reporting	Induction and annually
Delivery partner operatives on Stravica contracts	Respectful conduct in homes; visit adjustments (Appendix D); vulnerability awareness; dealing with harassment; accessible communication	Contract induction and annual toolbox talk
Delivery partner supervisors and contract managers	Reasonable adjustments; inclusive PPE and RPE; preventative duty on sexual harassment; complaints handling	Induction and annually
EDI Lead	Legal and case law updates; equality impact assessment; investigations	Annually

23. Monitoring, KPIs And Review

KPI	Target
Stravica personnel completing EDI training	100%
Delivery partner operatives briefed on visit adjustments at contract induction	100%
Alternative format and interpreting requests met within timescale	100%
Requested resident adjustments recorded and applied at subsequent visits	100%
Discrimination or harassment complaints acknowledged within two working days	100%
Delivery partners with a current equality policy and harassment prevention measures	100%
Operatives requiring RPE provided with a suitable option, including loose-fitting RPE where needed	100%
Social value outcomes for workforce diversity delivered against client-agreed targets	As agreed per contract

The EDI Lead reviews these measures quarterly. This policy is reviewed annually and whenever legislation, case law, guidance or Stravica's services change significantly.

Appendix A – Equality Impact Assessment Stages

Stage	Content
1. Screening	Describe the proposed change and decide whether it could affect people differently because of a protected characteristic
2. Evidence	Gather relevant information, such as resident profile data from the client, complaints, accessibility requests and feedback
3. Assessment	Consider the likely impact on each protected characteristic, and on carers and people with limited English
4. Mitigation	Identify adjustments or alternatives that remove or reduce adverse impact
5. Decision	Record the decision and how equality considerations shaped it
6. Approval	EDI Lead sign-off, and client sign-off where required
7. Review	Review after implementation and at least annually

Appendix B – Inclusive Recruitment Checklist

1. Job description lists only genuine requirements, using neutral language.
2. Advert invites requests for adjustments and welcomes applicants from all backgrounds.
3. Advert is placed where it will reach a diverse pool of candidates.
4. Shortlisting uses written criteria applied consistently.
5. Interview questions relate to the role and are the same for each candidate.
6. Requested adjustments are provided at every stage.
7. Right to work checks are applied to every candidate in the same way.
8. Decisions and reasons are recorded.
9. Offer letters reference this policy and how to request workplace adjustments.

Appendix C – Accessible Communication Standard

Element	Standard
Language	Plain English; short sentences; no jargon; technical terms explained
Font and layout	Minimum 12-point sans serif; clear headings; left-aligned text; good spacing
Colour	High contrast; never rely on colour alone to convey meaning
Safety notices	Pictorial "Do Not Use" and "Hot Water" symbols alongside text
Contact options	Telephone, email and text options on every resident letter
Alternative formats	Large print, Easy Read, audio and translated versions on request
Digital documents	Tagged PDFs; alternative text for images; WCAG 2.2 AA

Element	Standard
Wales	Bilingual Welsh and English where the client's Welsh Language Standards apply

Appendix D – Visit Adjustments Checklist For Operatives

Before every visit to a home or occupied premises, operatives check the following.

1. Have I checked the job for any recorded adjustments or vulnerability flags?
2. Is extra time needed for the resident to answer the door or prepare?
3. Does the resident need communication in a particular way, such as written, text, slower speech or an interpreter?
4. Should I avoid a particular time for religious or other reasons?
5. Has the resident asked for an operative of a particular sex, or for a carer or support worker to be present?
6. If water will be interrupted, does the resident need an alternative supply?
7. Have I shown my ID and explained clearly what I am going to do?
8. Have I respected the home, including any request to remove shoes or not to enter certain rooms?
9. Have I left the home as I found it, with water and fittings restored?
10. Have I recorded any new adjustment the resident asked for, with their agreement?

Appendix E – Delivery Partner Equality Clauses

1. The supplier shall comply with the Equality Act 2010 and Stravica's Equality & Diversity Policy, and shall not unlawfully discriminate in employment or service delivery.
2. The supplier shall take reasonable steps to prevent sexual harassment of its workers, including harassment by third parties.
3. The supplier shall provide PPE and RPE suitable for each operative, including loose-fitting RPE where tight-fitting RPE cannot be worn.
4. The supplier shall apply resident visit adjustments and accessible communication standards on Stravica contracts.
5. The supplier shall ensure its operatives complete equality training appropriate to their role.
6. The supplier shall notify Stravica within two working days of any complaint of discrimination or harassment connected with Stravica contracts.
7. The supplier shall provide information and permit audits to demonstrate compliance.
8. Serious or repeated breach entitles Stravica to suspend or terminate the contract.

Appendix F – Dignity At Work Reporting Procedure

Stage	Action	Timescale
Raise	Report to a manager, the delivery partner contract manager or the Stravica EDI Lead at info@stravica.uk. Concerns can be raised informally or formally.	At any time
Acknowledge	The concern is acknowledged and the person raising it is told what will happen next and what support is available	Within two working days
Protect	Interim measures are put in place where needed, such as changing work allocation, without disadvantaging the person who raised the concern	Immediately where needed
Investigate	An impartial investigator gathers statements and evidence	Normally within 10 working days
Decide	The outcome is confirmed in writing, with any actions such as training, mediation or disciplinary proceedings	Normally within 20 working days
Appeal	The person raising the concern or the person accused may appeal to a manager not previously involved	Within 10 working days of the outcome
Learn	Themes are reviewed and preventive measures updated	Quarterly review

Appendix G – Equality Action Plan 2026 To 2027

Objective	Actions	Owner	Target Date	Measure
Embed this policy across all water contracts	Issue to all delivery partners; brief operatives at contract inductions	Director	December 2026	100% of delivery partners and operatives briefed
Inclusive RPE	Confirm each delivery partner has loose-fitting RPE available and face-fit testing in a range of sizes	Director	January 2027	100% of delivery partners confirmed
Accessible resident communications	Produce plain English, pictorial and Easy Read templates for visit and outage notices	Director	February 2027	Templates in use on all contracts
Welsh language readiness	Produce bilingual notice templates for contracts in Wales	Director	March 2027	Templates ready
Visit adjustments	Introduce the Appendix D checklist into delivery partner job workflows	Director	March 2027	Checklist used on all residential visits
Workforce diversity	Agree apprenticeship or new entrant commitments with delivery partners on new contracts	Director	October 2027	Commitments in place on each new contract
Review	Annual review of this policy and action plan	Director	October 2027	Review completed

Appendix H - Glossary

Term	Meaning
BSL	British Sign Language
EHRC	Equality and Human Rights Commission
Easy Read	Information presented in short, simple sentences supported by images
Loose-fitting RPE	Respiratory protection such as powered hoods or helmets that does not depend on a seal against the face
PSED	Public Sector Equality Duty under section 149 of the Equality Act 2010
TMV	Thermostatic mixing valve, which reduces scalding risk
WCAG	Web Content Accessibility Guidelines

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