



STRAVICA

# Equality & Diversity Policy

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## 1. Introduction and Purpose

**1.1 Stravica Ltd recognises that equality, diversity and inclusion are central to the delivery of our mission:**

“Delivering Excellence in Government Contracting and Facilities Solutions.”

This Policy provides the framework for eliminating discrimination, promoting fairness and embedding inclusion across all aspects of our work—covering facilities management, cleaning, refurbishment, maintenance and compliance services delivered to public- and private-sector clients.

**1.2 Its purpose is to ensure that:**

- Stravica Ltd complies with all equality-related legislation and Crown Commercial Service (CCS) supplier standards;
- all employees, applicants, contractors, and clients are treated with dignity and respect;
- equal opportunity is integral to every business decision; and
- measurable outcomes demonstrate continual improvement.

**1.3 This Policy aligns with the company’s Corporate Governance Framework, the Modern Slavery Policy, Health & Safety Policy, Data Protection Policy, and Supplier Code of Conduct.**

## 2. Scope and Application

**2.1 Applies to:**

- All employees (temporary, fixed-term, permanent, or agency);
- Subcontractors, consultants, and suppliers acting on behalf of Stravica;
- Applicants for employment or contract work;
- Visitors and service users engaging with Stravica personnel.

**2.2 Covers:**

Recruitment, employment, pay, learning and development, grievance and discipline, procurement and supply-chain operations, and the design and delivery of client-facing services at offices, depots and operational sites.

2.3 All staff and contractors must comply with this Policy as a contractual condition. Failure to do so may result in disciplinary or contractual sanctions.

### 3. Legal and Regulatory Framework

#### 3.1 Primary Legislation

- Equality Act 2010 (including the Public Sector Equality Duty, s.149)
- Human Rights Act 1998
- Equal Pay Act 1970 (now subsumed within the Equality Act 2010, Part 5)
- Protection from Harassment Act 1997
- Employment Rights Act 1996
- Civil Partnerships Act 2005
- Gender Recognition Act 2004
- Data Protection Act 2018 and UK GDPR
- Modern Slavery Act 2015
- Public Interest Disclosure Act 1998
- Domestic Abuse Act 2021

#### 3.2 Regulatory and Best-Practice Frameworks

- Crown Commercial Service Supplier Standards (2024 Edition)
- ISO 30415: 2021 – Human Resource Management — Diversity & Inclusion
- ACAS Equality and Discrimination Guidance
- EHRC Code of Practice on Employment
- Government Social Value Model (2022)
- Regulator of Social Housing Consumer Standards (where contractually relevant)

#### 3.3 Legal Consequences

Non-compliance with this Policy may expose Stravica Ltd or its employees to

enforcement action, tribunal claims or loss of government-framework eligibility. The Managing Director retains ultimate accountability for compliance.

#### 4. Definitions and Key Concepts

| Term                      | Definition   |
|---------------------------|--|
| Equality                  | Ensuring individuals are treated fairly and given equal access to opportunity, resources and services.   |
| Equity                    | Providing proportional support or adjustments so that outcomes—not only opportunities—are fair.  |
| Diversity                 | Recognition and valuing of differences including but not limited to age, disability, ethnicity, gender identity, sexual orientation, religion, culture, and socio-economic background. |
| Inclusion                 | A culture and working environment where everyone feels respected, listened to and empowered to contribute.   |
| Protected Characteristics | As defined in s.4 Equality Act 2010 — Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity, Race, Religion or Belief, Sex, Sexual Orientation.    |
| Reasonable Adjustments    | Modifications to working arrangements or environments to reduce disadvantage experienced by disabled individuals.  |
| Harassment                | Unwanted conduct related to a protected characteristic which violates a person's dignity or creates an intimidating, hostile, degrading or offensive environment.                      |
| Victimisation             | Subjecting someone to detriment because they have made or supported a complaint about discrimination.  |

#### 5. Policy Statement

5.1 Stravica Ltd is committed to promoting equality of opportunity, preventing discrimination and fostering an inclusive culture that respects and values diversity.

##### 5.2 We will:

- treat all individuals with dignity and fairness;

- recruit, develop and retain talent based on merit;
- ensure services and workplaces are accessible and inclusive;
- implement proportionate adjustments to remove barriers;
- ensure zero-tolerance toward bullying, harassment and victimisation; and
- monitor, evaluate and continuously improve performance in equality and inclusion.

5.3 This Policy applies to all business activities, including those delivered through subcontractors or supply chains.

## 6. Strategic Commitments

### 6.1 Corporate Objectives

1. Achieve a representative workforce that reflects the communities served by Stravica's contracts.
2. Integrate equality and inclusion into strategic decision-making, operational planning and risk management.
3. Ensure all services are accessible and responsive to diverse user needs.
4. Build supplier and subcontractor capability to meet EDI standards.
5. Report annually to the Managing Director on progress against EDI Key Performance Indicators (KPIs).

### 6.2 Business Rationale

A diverse and inclusive organisation enhances creativity, productivity and reputation. Evidence shows that inclusive companies outperform peers in retention, innovation and client satisfaction—factors critical to Stravica's competitive advantage in government contracting.

### 6.3 Cultural Commitment

We will create an environment in which every individual can safely express their identity and ideas without fear of discrimination or reprisal. Managers are required to demonstrate inclusive leadership behaviours and to challenge exclusionary conduct wherever it arises.

## 7. Governance and Accountability

| Level                        | Responsibilities  |
|------------------------------|---|
| Board / Managing Director    | Endorses and owns the EDI Policy; allocates resources; reviews annual EDI performance report; ensures compliance with legislation and CCS frameworks. |
| Senior Leadership Team (SLT) | Embeds EDI objectives within business plans, audits departmental compliance, and champions inclusive decision-making.                                 |
| EDI Lead Officer (appointed) | Maintains policy currency; coordinates Equality Impact Assessments; manages workforce and service EDI data; prepares annual improvement plan.         |
| Managers and Supervisors     | Communicate policy to teams; ensure fair recruitment and management; support staff requiring adjustments; handle grievances promptly.                 |
| All Employees and Workers    | Demonstrate inclusive behaviour; complete mandatory EDI training; report concerns in good faith.  |
| Contractors and Suppliers    | Comply with this Policy and cascade obligations to their subcontractors; cooperate with audits; address non-conformances.                             |

## 8. Employment Practice Standards

### 8.1 Recruitment and Selection

- Recruitment advertising will reflect Stravica's commitment to diversity and will be placed to reach under-represented groups.
- Job descriptions and person specifications will focus on essential skills, knowledge and behaviours; unnecessary qualifications or criteria that could disadvantage protected groups are prohibited.
- All short-listing and interviewing panels will use structured scoring frameworks to ensure consistency and minimise bias.
- Candidates requiring reasonable adjustments (e.g. accessible venues, interpreters, additional time) will be accommodated wherever practicable.
- The Right-to-Work Checks Policy will be applied uniformly and lawfully.

- Recruitment data will be anonymised and analysed quarterly for diversity trends.

## 8.2 Induction and Probation

- All new employees receive an induction that covers EDI principles, anti-harassment, whistleblowing, safeguarding and modern slavery.
- Managers review adjustment needs within the first month of employment.
- Probation reviews include discussion of inclusive behaviour and respect for Stravica's values.

## 8.3 Employment Terms and Conditions

- Equal pay for equal work and equal access to benefits.
- Flexible working, parental leave, adoption, and carer arrangements offered in accordance with statutory and company provisions.
- Uniform/PPE, facilities and welfare areas designed to accommodate gender, cultural and disability needs.

## 8.4 Performance Management and Promotion

- Assessments will focus on competence and achievement of objectives, not protected characteristics.
- Development and progression opportunities are open to all, with targeted support for under-represented groups.
- Mentoring and coaching schemes will be promoted to support career advancement.

## 8.5 Exit and Post-Employment

- Exit interviews include questions on fairness, inclusion and discrimination experiences.
- Trends from exit data inform improvement actions and future training.

## 9. Training, Learning and Development

### 9.1 Mandatory Training

All staff, including agency and site-based personnel, must complete EDI awareness and anti-harassment training within 30 days of joining and refresh it annually.

### 9.2 Manager Training

Managers and supervisors receive enhanced training on:

- Inclusive leadership and unconscious bias;
- Conducting and documenting Equality Impact Assessments;
- Handling discrimination complaints;
- Supporting staff through reasonable adjustments, pregnancy, menopause, or neurodivergence.

### 9.3 Specialist Modules

Refresher workshops and toolbox talks will be held on:

- Inclusive communication and accessible customer service;
- Cultural awareness for front-line cleaning, maintenance and refurbishment teams;
- Mental-health first aid and psychological safety.

### 9.4 Records and Evaluation

Training completion rates are logged in the Learning Management System (LMS) and reported quarterly. Effectiveness is evaluated through employee-survey feedback, incident reduction and audit results.

## 10. Pay, Reward and Progression

**10.1 Stravica Ltd operates a transparent pay framework ensuring equity across comparable roles. Pay structures are benchmarked annually against industry standards.**

## 10.2 Equal Pay Analysis

- Conducted annually by HR and verified by the EDI Lead.
- Investigates variances by gender, ethnicity and disability (subject to lawful data availability).
- Action plans created to correct unjustifiable differences within six months.

## 10.3 Reward and Recognition

- Reward schemes (bonuses, recognition awards) are designed and monitored to ensure inclusivity.
- Part-time and flexible-working staff are equally eligible for all benefits.

## 10.4 Career Progression

- Employees are supported to apply for promotion or cross-functional assignments.
- Stravica will track promotion data to identify any disproportional outcomes and take corrective action.

# 11. Accessible and Inclusive Service Delivery

## 11.1 Principles

Stravica Ltd will design, deliver and evaluate every contract so that services are accessible, safe and inclusive for all users, residents and occupiers.

## 11.2 Accessibility Commitments

- Premises and welfare areas shall comply with the Equality Act 2010 (reasonable-adjustment duty).
- Written and digital communications will follow plain-English and Web Content Accessibility Guidelines (WCAG 2.2).
- Alternative formats (large print, audio, translated versions) provided within 10 working days of request.
- On-site signage uses clear symbols, high contrast, and bilingual or pictorial formats where relevant.

### **11.3 Inclusive Customer Interaction**

- Employees and contractors must treat every resident and client representative respectfully regardless of background.
- Any derogatory language or behaviour constitutes misconduct.
- Customer-service scripts and training include awareness of cultural norms and disability-etiquette guidance.

### **11.4 Monitoring and Feedback**

- Satisfaction and complaints data are disaggregated (where lawful) by age, disability, ethnicity and gender to identify trends.
- Improvement actions are recorded in the EDI Action Plan and reviewed quarterly.

## **12. Procurement, Supply Chain and Contractor Compliance**

### **12.1 Ethical Procurement Principle**

All suppliers and subcontractors must uphold the same standards of equality, diversity, human-rights protection and anti-discrimination that Stravica applies internally.

### **12.2 Pre-Qualification Due Diligence**

The Procurement Team will obtain and assess:

- Supplier EDI and anti-harassment policies;
- Workforce diversity metrics;
- Evidence of training and inclusive recruitment;
- Confirmation of compliance with Equality Act 2010, Modern Slavery Act 2015, and Human Rights Act 1998.

### **12.3 Contractual Clauses**

All supplier contracts shall include:

- A binding requirement to comply with this Policy;

- Audit and information-sharing rights;
- Corrective-action obligations within 30 days of any breach;
- Termination rights for serious or repeated non-conformance.

## 12.4 Ongoing Monitoring

- Supplier audits conducted at least annually or per client requirement.
- Site Managers will verify on-site agency staff are employed on lawful terms, paid at or above national minimum wage and have safe welfare conditions.
- Non-compliance reported to the Procurement Director and EDI Lead for escalation.

## 13. Data Management, Monitoring and Key Performance Indicators (KPIs)

### 13.1 Data Collection

Stravica Ltd will collect workforce- and service-level diversity data voluntarily and confidentially, ensuring lawful processing under UK GDPR. Data categories may include age, sex, ethnicity, disability, religion or belief and sexual orientation.

### 13.2 Performance Monitoring

| Domain                | Indicator  | Frequency | Responsible        |
|-----------------------|--|-----------|--------------------|
| Recruitment           | % shortlists including $\geq 1$ candidate from under-represented group | Quarterly | HR Manager         |
| Training              | % of staff completing mandatory EDI modules                            | Quarterly | EDI Lead           |
| Pay Equity            | Average gender/ethnicity pay gap (%)                                   | Annual    | Finance Director   |
| Service Accessibility | Accessibility requests met within SLA                                  | Quarterly | Operations Manager |
| Complaints            | Number of discrimination grievances resolved within 30 days            | Quarterly | HR Manager         |

|              |  |        |                      |
|--------------|--|--------|----------------------|
| Supply Chain | % suppliers audited for EDI compliance | Annual | Procurement Director |
|--------------|--|--------|----------------------|

### 13.3 Reporting and Review

Quarterly KPI reports will feed into the Management Review Meeting and annual Board EDI Report. Corrective actions are logged and tracked until closure.

## 14. Equality Impact Assessment (EIA) Framework

### 14.1 Requirement

EIAs must be undertaken for any policy, project, or service change likely to affect employees, contractors or service users.

### 14.2 Stages

1. Screening: Identify whether the change could affect protected groups.
2. Scoping: Collect evidence (data, consultation results).
3. Assessment: Evaluate potential adverse impact and identify mitigations.
4. Decision: Record how equality considerations shaped the outcome.
5. Publication: Store centrally; share with clients where required.
6. Review: Re-assess after 12 months or upon material change.

### 14.3 Responsibility

Managers proposing a change must complete the EIA template (Appendix A) and obtain sign-off from the EDI Lead before implementation.

## 15. Complaints, Grievance and Whistleblowing

15.1 Employees may raise discrimination or harassment concerns through the Grievance Procedure or the Whistleblowing Policy without fear of retaliation.

15.2 All complaints will be investigated promptly, confidentially and fairly by a trained manager not involved in the allegation.

15.3 Findings and actions will be recorded; patterns will inform policy reviews.

15.4 External complainants (clients, residents, contractors) may use Stravica's published feedback channels; serious allegations are escalated to the Managing Director.

## 16. Communication and Implementation

### 16.1 The Policy will be:

- Published on the company intranet, website and tender document library;
- Included in employee induction packs and supplier onboarding;
- Re-circulated following each annual review.

### 16.2 Manager Briefings

Quarterly "Inclusion Moments" sessions reinforce good practice, new legal updates, and share real-world examples from sites and client feedback.

### 16.3 Cultural Engagement

- Observe UK Equality and Diversity Calendar events (e.g., International Women's Day, Black History Month).
- Encourage voluntary employee inclusion networks (faith, neurodiversity, gender).
- Celebrate achievements via internal communications.

## 17. Review and Continuous Improvement

17.1 This Policy is reviewed triennially or earlier if legislation, case-law or business scope changes.

17.2 The EDI Lead will produce an Annual EDI Improvement Plan including:

- Audit outcomes;
- KPI progress;
- Training updates;
- Identified risks and mitigations.

17.3 The Board will review progress, endorse targets for the following year and allocate resources accordingly.

## 18. Approval and Version Control

| Version | Date        | Change Summary                       | Approved By       |
|---------|-------------|--------------------------------------|-------------------|
| 1.0     | 23 Oct 2025 | Initial issue for DPS/CCS compliance | Adeola Olanrewaju |

## APPENDICES

### Appendix A – Equality Impact Assessment Template

(condensed for clarity; replicate full table in policy file)

Section 1: Project details, owner, purpose

Section 2: Stakeholders affected

Section 3: Evidence base (data, consultation)

Section 4: Assessment of impact by protected characteristic – mitigations & residual risk

Section 5: Action plan (owner, timescale)

Section 6: Sign-off by EDI Lead and Managing Director

### Appendix B – Inclusive Recruitment Checklist

1. Job description uses gender-neutral language.
2. Advert states commitment to reasonable adjustments and welcomes diverse applicants.
3. Shortlisting uses structured criteria and blind review where feasible.
4. Interview questions link to competencies; panel diversity where possible.
5. Candidate adjustments recorded and implemented.

6. Offer letter includes reference to EDI Policy and access to support resources.

## Appendix C – Accessible Communication Standard

- Font  $\geq$  12 pt, sans serif; sufficient contrast; avoid colour-only distinctions.
- Provide digital content in screen-reader compatible formats (PDF/HTML tags).
- Maintain translation register and interpreting framework.
- On-site noticeboards include pictograms and QR codes to multilingual versions.

## Appendix D – EDI Data and KPI Framework

Workforce Data Sets: headcount, recruitment, retention, promotion, training, pay.

Service Data Sets: complaints, satisfaction, access requests.

KPI Examples:

- $\geq$  95 % mandatory training completion.
- $\leq$  5 % unexplained gender pay variance.
- 100 % EIAs for policy changes.
- $\geq$  90 % supplier compliance on audit.

Reports submitted to the Board annually and to clients as contractually required.

## Appendix E – Anti-Harassment and Dignity at Work Guide

Examples: offensive remarks, exclusion, unwanted touching, derogatory emails.

How to Report: line manager  $\rightarrow$  HR  $\rightarrow$  EDI Lead  $\rightarrow$  Whistleblowing channel.

Timescales: acknowledge within 2 days, investigate within 10 days, decision

within 30 days.

Possible outcomes: training, mediation, disciplinary action (up to dismissal).

## Appendix F – Supplier and Contractor EDI Clause (Example)

1. The Supplier shall comply with the Equality Act 2010 and Stravica Ltd's EDI Policy.
2. The Supplier shall not discriminate against any person in employment or service delivery.
3. The Supplier shall ensure its employees receive EDI training appropriate to their duties.
4. The Supplier shall permit Stravica Ltd to audit compliance and provide data evidence.
5. Breach of this clause constitutes a material breach entitling Stravica Ltd to terminate the contract.

## Appendix G – Manager Toolkit for Inclusive Practice

1. Inclusive Conversations: how to ask about reasonable adjustments confidentially.
2. Faith and Cultural Observance: guidance on prayer space, dietary needs, fasting.
3. Neurodiversity: tips for communication clarity and workspace adaptation.
4. Menopause Support: temperature control, hydration, PPE fit, breaks.
5. Conflict Resolution: mediation steps and when to refer to HR.

## Appendix H – Annual EDI Action Plan Template

| Objective   | Key Actions  | Owner                | Target Date | KPI/Outcome              | Status      |
|---|--|----------------------|-------------|--------------------------|-------------|
| Improve representation of women in management roles | Mentoring programme & inclusive recruitment review | HR Manager           | Jun 2026    | % female managers ↑ 10 % | In progress |
| Supplier audits for EDI                             | Audit top 20 suppliers                             | Procurement Director | Dec 2025    | ≥ 90 % compliance        | Planned     |
| Inclusive communications                            | Roll-out WCAG training                             | Comms Lead           | Mar 2026    | Staff trained 100 %      | Ongoing     |