

The Accent logo is displayed in white, featuring a stylized 'A' with a triangular cutout on the left side, followed by the word 'Accent' in a sans-serif font. The background is dark blue with a large, bright pink abstract shape on the right side.

Accent

# Equity, Diversity and Inclusion Policy

Accent Housing: Equity, Diversity and Inclusion Policy 26/03/2025 v3.0

[ACCENTGROUP.ORG](https://www.accentgroup.org)

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**Purpose:** This policy sets out how Accent approaches its equity, diversity and inclusion (EDI) responsibilities.

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# 1. Introduction

Equity, diversity and inclusion (EDI) support the work we do; they enhance our impact, culture and reputation. We are committed to creating a dynamic and inclusive working environment – where all colleagues feel valued and accepted for who they are, enabling them to thrive at work. This enables us to benefit from a variety of perspectives to make smarter decisions, better support our customers and better reflect the diversity of our communities. We have an ethical and legal responsibility to champion EDI, and work to ensure that we are accessible to all.

All Accent colleagues are responsible for creating an inclusive culture in which everybody feels respected and able to give their best. We oppose unlawful discrimination at work and in our homes and strive to be representative of all sections of society. Through this we promote our corporate values of being driven, smart, inclusive and caring.

# 2. Responsibilities

This policy applies to all areas of our work, to all colleagues and to anyone who is subcontracted to carry out specific duties.

This policy is applicable irrespective of work location or role.

- All colleagues will:
  - Read this policy on joining Accent, familiarise themselves with the content and make sure their behaviour in the workplace and in interactions with customers adheres to it.
  - Complete mandatory EDI training as a part of their onboarding journey and take part in regular training updates as a part of continued organisational commitment or role-specific need.
  - Inform a member of the people team if they know or suspect discrimination or harassment is occurring ([peopleservices@accentgroup.org](mailto:peopleservices@accentgroup.org)).
  
- Managers will:
  - Ensure their teams understand this policy, and adhere to it in the workplace and in interactions with customers.
  - Exercise leadership by encouraging inclusivity, discouraging prejudice and modeling appropriate behaviour.
  - Take speedy and appropriate action to deal with any breaches of the policy, or behaviour that could lead to a breach of the policy.
  - Apply employment practices and procedures fairly and in line with this policy, seeking support from the people team where clarification or further understanding is needed.
  - Provide advice and guidance to colleagues regarding conduct, seeking support from the people team where relevant.
  - Undertake regular EDI training.

- Senior leadership will:
  - Champion this policy on behalf of the Accent Board.
  - Undertake regular EDI training.
  - Ensure compliance with policy and the effective development, implementation and monitoring of EDI objectives and related action.
  
- The People Team will:
  - Ensure this policy is implemented in a reasonable and fair manner.
  - Provide advice and guidance to individual colleagues and line managers.
  - Oversee the provision of any information required, including training oversight.

In addition to these responsibilities, all Boards and Committees will reflect the diversity of our colleagues and customers. The demographic breakdown of Boards and Committees will be reviewed regularly in line with our strategic goals and EDI commitments.

Our People Strategy and associated EDI plan set out objectives and specific actions that help give meaning to the principles and commitments laid down in this policy. This is managed by the EDI Lead (formerly Diversity & Inclusion Specialist), with oversight from the Director of People, the Director of Strategy & Insight (or equivalent), the relevant Executive Director and the Board.

### 3. Definitions

#### Diversity

**Accent celebrates diversity** – the differences in visible and non-visible characteristics. Differences include, but are not limited to, those characteristics protected by equalities law. A diverse environment is one with a wide range of backgrounds and views, allowing for an empowered culture of innovation. Section 5 references Accent’s organisational position relevant to specific protected characteristics.

#### Inclusion

**Accent enables inclusion** – the practice of creating a workplace in which everyone feels they can belong. Inclusion is achieved through positive action that generates psychological safety: the belief that it is safe to take risks and be your true self at work, without fear that this will lead to negative personal or professional consequences.

Psychological safety is accomplished by recognising and valuing identities, backgrounds, circumstances and contributions; ensuring policies and practices create equity (see definition below); and eliminating sources of exclusion (including unconscious and conscious biases). It is achieved through removing processes, expectations and attitudes that generate fear of personal or professional repercussions.

#### Equity

**Equity** refers to fair treatment for all people, so that the norms, practices, and policies in place ensure that someone’s identity does not determine the opportunities they have or the

outcomes at work. It is the treatment of people in a way that encourages and values diversity and promotes dignity in a culturally sensitive way.

While equality assumes that all people should be treated exactly the same (which can be discriminatory), **equity** considers a person's unique circumstances, reasonably adjusting treatment accordingly so that the end result is equal – that everyone has fair opportunity to succeed. This includes being applied to how our offices are designed, the ways that people are expected to work, how meetings are run, how conversations are managed, and challenging our own expectations about what is 'typical' or 'expected' (because 'typical' will vary between groups of identities).

Accent advances equity through an **intersectional** approach: we recognise that different identities come together in different ways to create varied experiences, skills, competencies and needs – and that appropriate and reasonable adjustments should be made accordingly. For example:

Two men may experience the world in a similar way compared to a woman: where the woman has to deal with regular sexism the men do not. However, one of the men may also have a disability, which influences how he experiences things and interacts with the world.

Each of these people have multiple intersecting identities: we are required to recognise this and flex our approaches where needed so as not to indirectly disadvantage someone on the basis of their identity.

To advance equity in an intersectional way we expect colleagues to adopt an approach of continuous improvement: to regularly evaluate what they do and expect from others. When implementing changes in teams, colleagues are expected to consider the impact of change in four key areas:

- **Procedural:** consider the formal and informal structures of decision-making. Seek a wide range of input and involvement where appropriate, and make a conscious and guided effort to consider how decisions may impact different identities or groups of people by asking relevant individuals.
- **Communicative:** consider the channels of communication. Be aware of how we are engaging with others and sharing information, and how we expect others to communicate back with us. Different people have different communication styles. This includes making sure any content is in accessible formats, being aware of the assumptions we may have about how others 'should' communicate, and always using inclusive language appropriate to the workplace.
- **Material:** consider the aspects of work that contribute to motivation and satisfaction and how this will vary across intersecting identities. This means that, when it comes to making changes, we should ensure clear and consistent management approaches; consciously avoid creating disparities in salary and compensation; actively foster job security; consider how benefits may be

equitable; and recognise personal circumstances that may be contributing to sick and annual leave.

- **Emotional:** recognise and work to understand the role of emotions at work, and how we are expected to regulate or manage these. Recognise how we may expect others to react, and that our expectations may not be typical for all groups of people. We should always facilitate psychological safety in ways that distribute emotional labour: for example, in general, men who express anger at work are often perceived as being effective leaders while women who express anger at work are perceived to be “too emotional” and less competent – often leading to women having to spend more energy on making sure they are rarely seen as angry rather than being able to express a full range of emotions. We should make sure these stereotypes are not perpetuated. All Accent colleagues should be aware of who they are expecting to carry the emotional burden of busy, intense or high-energy work, and recognise when these may disproportionately be falling to the same person or groups of people.

The achievement of equity at Accent involves:

- Enabling colleagues and customers to express their identities
- Ensuring that particular colleagues are not over proportionally burdened in any of the four dimensions above, thus contributing to the wellbeing of all
- Identifying barriers and biases, and taking targeted action to overcome specific systemic inequalities, discrimination, disadvantages and marginalisation experienced by certain groups and individuals, including those with protected characteristics – for colleagues and customers.

## 4. Scope of Policy

Accent will:

1. Adhere to our board-approved Corporate Strategy commitment to embedding EDI as a central component of Accent culture, business decisions and customer interactions. This includes ensuring effective leadership and governance arrangements are in place to scrutinise performance on EDI.
2. Train all colleagues about their responsibilities under the EDI policy.
3. Encourage and create an inclusive environment that provides equity for colleagues, regardless of contract type or term. This will be done through regularly reviewing procedural, communicative, material and emotional dimensions of employment. This includes a default position of fostering psychological safety, and taking discussions or reports of prejudice seriously and not dismissing the experiences of individuals with one or more protected characteristic.

4. Oppose, avoid and eliminate all forms of unlawful discrimination, with particular attention given to the protected characteristics identified in the Equality Act 2010 (Appendix 1). This includes in the procedural, communicative, material and emotional dimensions of the colleague lifecycle.
5. Regularly review employment practices and procedures to create equity and ensure fairness, updating them in line with changes in the law. This includes recruitment decisions at all levels that reflect the diversity of our communities.
6. Ensure respect, intersectional understanding and good relations in all interactions with customers, while opposing all forms of unlawful discrimination (and following reporting/escalation processes where unlawful discrimination is witnessed or perceived).
7. Oppose prejudice in the workplace and in our communities, including standing up against and reporting racism, sexism, homophobia, xenophobia, biphobia, transphobia, classism, socio-economic discrimination, ageism, ableism, discrimination against neurodiversity, and hatred based on religious identity. This list is not exhaustive. This includes being aware of inclusive language in casual conversations which may involve 'banter' or 'joking', and how these are not acceptable forms of behaviour.
8. Take a zero-tolerance approach to any form of discrimination on the grounds of any protected characteristic, except where a specific service may require us to recruit candidates of one particular characteristic to safeguard the users or colleagues of that particular service. (In this case, the hiring manager and People Team will explicitly set out why this focus exists)

Specifically:

- a) Take complaints of bullying, harassment (including sexual harassment), victimisation and unlawful discrimination by colleagues, customers, suppliers, visitors, the public and any others in the course of our work seriously. Such acts will be dealt with as misconduct under our Grievance Policy or Conduct Policy and supporting procedures, and proportional and appropriate action may be taken. These procedures can be found in the [Corporate Library](#).
  - b) Sexual harassment may amount to both an employment rights matter and a criminal matter. The Sexual Harassment Prevention Policy discusses this further.
  - c) Colleagues can be held personally liable for any act of unlawful discrimination, which could amount to legal claims being made against individuals.
9. Collect characteristic data about our workforce and customers to monitor compliance and strategic targets, including pay gap reporting and social mobility. This information will be collected and stored in line with the Data Protection Act 2018 (GDPR). The

information will be regularly analysed by the People team and/or the Data team, and statistically reported to the Executive and Board. This data will be used in conjunction with evolving best EDI practice to regularly improve policy, procedures, services and processes.

### **Raising concerns**

A colleague may use the grievance procedure to raise a concern. Alternatively, colleagues may raise issues with a member of the people team: [peopleservices@accentgroup.org](mailto:peopleservices@accentgroup.org).

A member of the public may use our complaints policy to raise a concern.

## **5. Organisational position on identities**

### **Age**

We are committed to being an age-friendly employer. We will: be flexible about ways of working; hire age positively; encourage career development at all ages; and create an age-positive culture.

### **Race and religion**

We do not tolerate any form of racism and will be an anti-racist organisation in all we do. Any behaviour or use of language that incites racism, targets or intimidates members of ethnic or religious communities, or reinforces prejudicial attitudes, processes or behaviours is unacceptable conduct.

### **Sexual orientation**

We believe everyone should be able to bring their whole selves to work and everyday life, without fear of it impacting or limiting their opportunities and experiences. We are committed to creating a safe environment in our offices and our homes where people can be open about their identities and orientations should they choose to be.

### **Gender and sex**

We are a trans-inclusive culture. We affirm self-identification, and support colleagues across the gender spectrum. We use inclusive language, and challenge decisions and ways of thinking that perpetuate a rigid and harmful gender binary.

### **Disability**

We support individuals in describing their own disability. We are committed to improving accessibility in all aspects of work and our homes, with a focus on trying to remove barriers that people face. At work, we ensure the recruitment process is inclusive and accessible, and are open to discussing reasonable adjustments as requested throughout the colleague journey at Accent.

### **Neurodiversity**

We value ongoing conversations about how best to make reasonable workplace adjustments for neurodivergent individuals. We recognise that self-diagnosis is valid within neurodivergent communities, and support individuals in describing their own

neurotype. We remain mindful in engaging with colleagues and customers that ways of working and communicating may vary.

## **Pregnancy and parental leave**

We support the bodily autonomy of pregnant people. Relevant policies in the corporate library provide further information about parental leave.

## **6. References**

This policy will be consistent with industry best practice, in line with [ENEI](#), [ACAS](#) and [EHRC](#) guidance. It is mindful of:

- Modern Slavery Statement
- Colleague Health and Safety and Wellbeing Policy
- Complaints and Compensation Policy
- Customer Safety Policy
- Fire and Building Safety Policy
- Data Protection Privacy Notices (Colleague/Customers)
- Domestic Abuse Policy
- Lone Working Policy
- Procurement Policy
- Safeguarding Policy
- Stress Mental Health and Wellbeing Policy
- Whistleblowing Policy
- Sexual Harassment Prevention Policy

Associated people team policies and procedures, including recruitment, onboarding and promotion:

- Conduct Policy
- Dignity at Work Procedure
- Grievance Policy
- Performance Improvement Policy
- Sexual Harassment Prevention Policy

Accent policies and procedures can be found in the [Corporate Library](#).

Key legislation:

- Human Rights Act 1998
- Equality Act 2010
- Modern Slavery Act 2015

## **7. Appendices**

### **Appendix 1 (Protected characteristics and discrimination)**

#### **Protected characteristics (Equality Act 2010):**

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

## Types of discrimination

*The information below is for general information purposes only. More detail can be found in the **Conduct Policy**. The People Team should be consulted for further clarification or action, as updates to the law and its application are regularly made. The Equality Act contains exceptions, or special provisions, that apply to particular protected characteristics.*

## Unlawful discrimination

When a person or group of people is treated less favourably than another person or group of people would be treated based on their protected characteristic.

- **Direct discrimination:** treating someone unfairly because of their protected characteristic.
- **Indirect discrimination:** a practice, policy or rule applied to everyone that may at first appear fair or neutral but puts people of a particular protected characteristic at a disadvantage.
- **Discrimination by association:** a person is treated unfavourably because of another person's protected characteristic.
- **Discrimination by perception:** when someone is treated unfairly because others believe they have a protected characteristic.
- **Victimisation:** a person is treated less favourably because they have complained, or is expected to complain, about discrimination.
- **Harassment:** unwanted conduct that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Bullying:** a persistent, offensive, abusive, intimidating or insulting behaviour, abuse of power, or unfair sanctions. This makes the recipient feel upset, threatened, humiliated or vulnerable.