



# Equity, Diversity and Inclusion Policy



**ACCENTGROUP.ORG**

# Equity, Diversity and Inclusion (EDI) Policy

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Version History					
Version No	2.0	Doc ID (if applicable):			
<b>Date Produced:</b> 3 April 2023					
<b>Audience:</b> Customers/colleagues/auditors/homeowners					
<b>Strategic Theme:</b> Inspirational Workplace, Underpinning Strategies					
<b>Approval Route:</b> People Committee					
<b>Policy Key Controls</b> (These are key controls relevant to this policy that must always be adhered to):					
1. All colleagues and managers must familiarise themselves with their responsibilities as outlined under Section 2.					
VERSION	APPROVED BY	REVISION DATE	NEXT REVIEW DATE	DESCRIPTION OF CHANGE	AUTHOR
1.1	Rachael Walsh	31/01/15	31/01/17	Update	
2.0	People Committee 27/04/23	03/04/23	03/04/24	Major rewrite – new template/owner/format and content	Matt Beetar

**Purpose:** This policy sets out how Accent approaches its equity, diversity and inclusion 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. Scope

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 (peopleteam@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 staff regarding conduct, seeking support from the people team where relevant.

- Undertake regular EDI training (minimum every year).
- **Senior leadership** will:
  - Champion this policy on behalf of the Accent Board.
  - Undertake regular EDI training (minimum every year).
  - 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 EDI strategy sets out objectives that help give meaning to the principles and commitments laid down in this policy. This is managed by the **EDI Specialist** (formerly Diversity & Inclusion Specialist), with oversight from the **Director of People**, the relevant executive director and the people committee.

### 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. Appendix 3 contains affirmations 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. We work towards creating an environment in which colleagues are able to ask questions, share concerns, ask for help, take calculated risks and admit mistakes without fear that others will think less of them, that their opportunities or reputation will be negatively impacted, or that they will be punished. This is achieved through trust and mutual respect.

## Equity

**Equity** refers to fair treatment for all people, so that the norms, practices, and policies in place ensure identity is not predictive of opportunities or workplace outcomes. 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 the same (which can be discriminatory), **equity** considers a person's unique circumstances, adjusting treatment accordingly so the end result is equal – everyone has the same fair opportunities.

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

Advancing equity relies on continually evaluating and implementing changes in four areas:

- **Procedural:** the formal and informal structures of decision-making – seeking a wide range of input and involvement where appropriate and making a conscious and guided effort to consider the impact of decisions on a range of identities.
- **Communicative:** channels of communication – collectively creating the Accent culture through the ways we engage and share information, the content, and how we expect others to communicate.
- **Material:** the aspects of work that contribute to motivation and satisfaction – including dismantling disparities in salary and compensation; job security; benefits; sick leave; annual leave; and consistency of management approaches.
- **Emotional:** the understanding of the role of emotions at work, and how we are expected to regulate or manage these. We facilitate psychological safety in ways that constructively distribute emotional labour, (for example, recognising that, in general, men who express anger at work are perceived as being effective leaders while women who express anger at work are perceived to be “too emotional” and less competent – and making sure these stereotypes are not perpetuated).

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. Application

Accent will:

1. 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 (see Appendix 1)
2. Oppose, avoid and eliminate all forms of unlawful discrimination, with particular attention given to the protected characteristics identified in the Equality Act 2010 (Appendix 2). This includes in the procedural, communicative, material and emotional dimensions of employment such as:
  - recruitment and onboarding
  - pay and benefits
  - terms and conditions of employment
  - dealing with grievances and discipline
  - dismissal
  - redundancy
  - leave
  - agile working
  - selection for employment, promotion, training or other development opportunities
3. Implement a **Rooney Rule** in hiring practices where possible – making sure that candidates with protected characteristics who meet the selection criteria for a given role are shortlisted for the next stage of the hiring process.
4. Adhere to our published Publicly Visible Commitments and ensure that representation on all Boards and Committees align with strategic EDI goals and reflect the demographic diversity of our customers and colleagues.
5. Ensure respect and intersectional understanding in all interactions with customers, while opposing all forms of unlawful discrimination.

6. Oppose prejudice in the workplace and in our communities, including standing up against 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.
7. Collect characteristic data about our workforce and customers to monitor compliance and strategic targets. This supports the implementation of a Rooney Rule where possible, and to report on pay gaps.

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 statistically reported to the people committee and Accent Group Board. This data will be used in conjunction with evolving best EDI practice to regularly improve policy, procedures, services and processes.

Further points are outlined in Appendix 1, which steer the EDI Strategy.

### 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: [peopleteam@accentgroup.org](mailto:peopleteam@accentgroup.org).

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

## 5. References

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

- Accent Housing Modern Slavery Statement
- Colleague Health and Safety and Wellbeing Policy
- Complaints Policy
- Customer Satisfaction Policy
- Customer and Building Safety Policy
- Data Protection Privacy Notice
- Domestic Abuse Policy
- Lone Working Policy
- Procurement Policy
- Safeguarding Policy
- Stress at Work Policy
- Whistleblowing Policy
- Associated people team policies and procedures, including recruitment, onboarding and promotion
  
- Code of Conduct



- Dignity at Work Procedure
- Grievance Procedure
- Performance Improvement Procedure

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

Key legislation:

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

## 6. Appendices

### Appendix 1 (Application of policy in more detail)

In addition to those applications highlighted in S4.1-5, Accent will:

1. Encourage equity, diversity and inclusion in the workplace. This includes fairly balancing the procedural, communicative, material and emotional elements of work.
2. Facilitate the creation of a culture that promotes dignity, respect and psychological security, where individual differences and contributions are intersectionally recognised and valued. This includes celebrating individuals and creating awareness through relevant internal and external communication channels.
3. Ensure effective leadership and governance arrangements are in place to scrutinise performance on EDI.
4. Train all managers and colleagues about their rights and responsibilities under the EDI policies.
5. Make opportunities for training, development and progress available to all colleagues, who will be helped and encouraged to develop.
6. 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.
7. Foster good relations between those who share a protected characteristic and those who do not.

8. Foster good business relations between colleagues and customers, rooted in training and understanding of EDI principles. This includes dealing equitably with all customers.
9. 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 staff of that particular service. In this case, the hiring manager and people team will explicitly set out why this focus exists.
10. Take complaints of bullying, 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 or disciplinary procedures, and proportional and appropriate action may be taken. These procedures can be found in the [Corporate Library](#).

Sexual harassment may amount to both an employment rights matter and a criminal matter.

Colleagues can be held personally liable for any act of unlawful discrimination, which could amount to legal claims being made against individuals.

11. Meet our Publicly Visible Commitments, as outlined on our website.

## Appendix 2 (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. 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.

## Appendix 3 (Statements of affirmation)

### Age

We are committed to being an age-friendly employer. We will: be flexible about agile 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 anticipate and provide reasonable adjustments as required throughout the colleague journey at Accent.

### **Neurodiversity**

We value ongoing conversations about how best to make reasonable workplace adjustments for neurodiverse individuals. 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.