

PAS 1948:2023

Diversity, equity and inclusion in the workplace – Code of practice



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Contents

Foreword	ii
Introduction.....	iv
1 Scope.....	1
2 Normative references	3
3 Terms and definitions	4
4 Implementing an effective strategy and framework for supporting diversity, equity and inclusion across single and multi-jurisdictional workplaces	9
5 Policies, processes and practices for promoting and supporting diversity, equity and inclusion in the workplace	16
6 Assessing the impact of diversity, equity and inclusion on organizational performance	31
7 Engaging and supporting underrepresented groups	33
8 Implementing the concept of “diversity of thought” and “intercultural competence”	35
9 Measuring progress and developing a strategy for continuous improvement.....	37
Annexes	
Annex A (informative) Self-assessment and strategy	38
Annex B (informative) Workplace toolkit.....	43
Annex C (informative) Role play and interactive exercises	49
Annex D (informative) Sample stakeholder surveys	50
Annex E (informative) Glossary	55
Bibliography	56
List of figures	
Figure 1 – Simple five step approach [© All-in Diversity Project (2021)].....	iv
Figure 2 – Policy to performance	16
Figure 3 – The recruitment cycle	22
List of tables	
Table A.1 – Self-assessment questionnaire	38
Table A.2 – Example of a simple five step plan	42
Table B.1 – Action plan template	43

Foreword

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Presentational conventions

The provisions of this document are presented in roman (i.e. upright) type. Its recommendations are expressed in sentences in which the principal auxiliary verb is "should".

Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.

Where words have alternative spellings, the preferred spelling of the *Shorter Oxford English Dictionary* is used (e.g. "organization" rather than "organisation").

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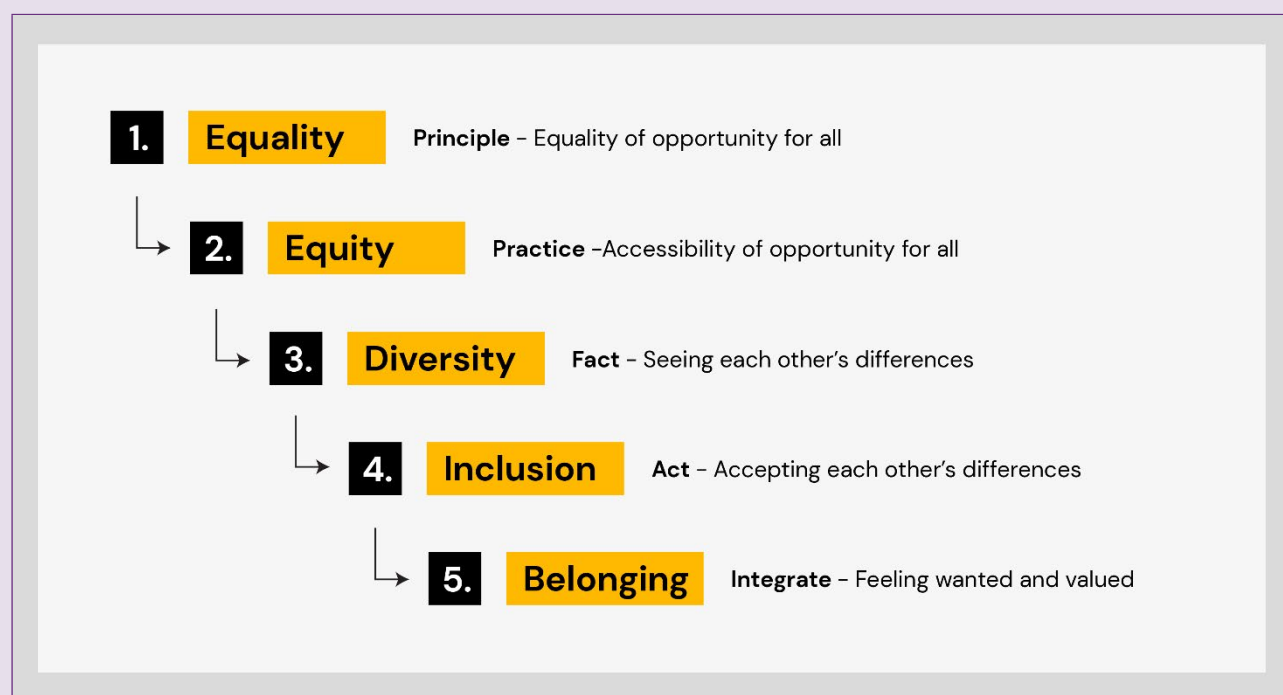
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Introduction

This PAS provides practical guidance and a number of workplace tools (Annex A, Annex B, Annex C, Annex D and Annex E) for organizations seeking to develop and implement a framework and culture that encourages, promotes, and supports diversity, equity and inclusion in the workplace.

The PAS aims to break down a topic that some might see as a complicated or costly concept into five simple steps, shown in Figure 1, that are clear, easy to understand and translate into action.

Figure 1 – Simple five step approach [© All-in Diversity Project (2021)]



This PAS is applicable to, and can be used by any organization of any size, in any sector, anywhere in the world.

The standard is not based upon and does not include any reference to any specific laws or regulations. Organizations are responsible for checking that any practices they choose to adopt or implement, are compatible with the laws and regulations of the locations and environment(s) in which they operate or are based.

In recent years, academic and vocational research and data-driven analysis of organizational practices from world-leading institutions has established a clear link showing the growing importance between diversity, equity and inclusion and organizational and commercial performance.

The World Economic Forum publication *The Case for Diversity, Equity and Inclusion 4.0* [1] cites three key reasons why diversity, equity and inclusion is a greater imperative than ever before for any business.

- a) Moral imperative: Giving equal access and opportunities to all people to work under fair and equitable conditions is simply the right thing to do.
- b) Legal imperative: The International Labour Organization has put into action a range of conventions to eliminate discrimination from all aspects of work.
- c) Economic imperative: To reap the full competitive advantages of diversity, equity and inclusion, some initial learning effort by managers, employees and the whole organization might be required – but a wide range of research conclusively documents that well managed diverse teams significantly outperform well-managed homogenous ones over time.

The business case for diversity has also been researched and evaluated by a number of established authorities.

The Gartner CIO *Executive Communication Guide* [2] concluded that “75% of organizations with frontline decision-making teams that reflect a diverse and inclusive culture will exceed their financial targets. The impact of diversity, equity and inclusion is highly positive. Gender-diverse and inclusive teams outperformed gender-homogeneous, less inclusive teams by 50%”.

The report states that “the difference in employee performance between nondiverse and diverse organizations is 12%” and the application of cognitive diversity “can be what saves the team from ‘groupthink’ and allows them to achieve better outcomes”.

NOTE 1 “Groupthink” is a phenomenon where the desire for harmony or conformity results in irrational, dysfunctional, or poor-quality decision-making. This stems from the desire to minimize conflict and reach a consensus by actively discouraging challenges, dissenting viewpoints or allowing any influences or views from outside of the immediate group. This results in decisions being made without any critical evaluation of the alternatives.

Research undertaken in the McKinsey publication *Delivering Through Diversity* [3] tracked over a 5-year period and updated in their more recent report *Diversity Wins: How inclusion matters* [4]. This identifies a statistically significant correlation between diverse workforces and the ability to out-perform competitors and increase profitability.

The recent McKinsey report [4] indicates that “Companies in the top-quartile by gender diversity were now 25% more likely to outperform financially, whilst top-quartile companies with greater ethnic diversity were 36% more likely to outperform on profitability”.

Whilst the research based upon commercial metrics and profitability might not be applicable to non-commercial organizations, the need to make effective and impactful decisions applies to all organizations.

This is especially true for those organizations either developing or dependent upon emerging technologies.

In 2021, Forbes published an article [5] exploring the relationship between artificial intelligence (AI) and diversity, commenting that “AI systems are built on learning from data, and if the data is skewed as per the view of the person building it, it can have major consequences. Furthermore, AI is already around us in places you might not be aware of. For instance, the surveillance cameras in many countries already have sophisticated AI technology that evaluates every second of the movement of the citizens. If there is implicit bias in the system, it can be unjust to some people. Diversity holds great importance because we want to make sure that when an AI system makes a call, it will be able to make accurate decisions.”

However, a 2019 study by the AI Now Institute entitled *Discriminating Systems* [6] shared that women make up only 15% of AI researchers at Facebook and just 10% at Google. The study also found that less than 5% of the staff at Facebook, Google and Microsoft are black, while black workers in the U.S. as a whole represent roughly 12% of the workforce. Due to the lack of diverse engineers and researchers, the products that are developed and used by billions of users can result in the propagation of bias on a large scale. Consequently, inclusion and diversity in AI are crucial.

NOTE 2 While the impact of gender and race bias in business is now well established, recent research is now helping to raise awareness of the impact of bias towards other under-represented groups.

NOTE 3 Research from Purple¹⁾ states that, “The spending power of disabled people and their household worldwide is currently estimated to be worth \$8 trillion, increasing by 14% per annum. Only 10% of businesses have a targeted strategy for this huge market”. It was indicated that “more than 4 million people in the UK abandoned a retail website because of the barriers they found, taking with them an estimated spend of £11.75 billion. In 2019, that lost business, the ‘Click-Away Pound’, has grown to £17.1 billion”. With the advent of Web 3.0 and an even greater shift towards technology as enabler and it is vital that organizations understand the impact of bias at even stage of the development to delivery lifecycle.

The business and organizational case for diversity, equity and inclusion has been established against a background of statistical data analysis, performance measures and metrics. This PAS is designed to enable organizations to develop policy and practices that help them to:

- engage with and educate organizations on the benefits of diversity, equality/equity and inclusion;
- emphasize the increasing importance of social responsibility, sustainability (Environmental and Social Governance), ethical practices and “doing the right thing” to investors, employees, and customers;
- benchmark levels of diversity, equality/equity and inclusion across organizations and industries;
- highlight the importance of diversity, equality/equity and inclusion on innovation, technology and product development;
- understand the impact of flexible, virtual and remote working practices on employee demographics, perception and sense of belonging;
- consider how organizations can build diversity, equity and inclusion into existing procurement processes and supply chains;
- identify and develop diversity, equality and inclusion strategies for different categories of stakeholder, from investors and shareholders, to employees, customers, suppliers and providers;
- expanding perceptions and definitions of talent and ensuring they are reflected in leadership positions and roles;

- emphasize the relationship between diversity and commercial and non-commercial performance; and
- help organizations develop a framework for promoting and supporting diversity, equality and inclusion in the workplace through standards such as this PAS.

Diversity, equity and inclusion are complex concepts. Our interpretation of these concepts is influenced by who we are and where we come from. Our perceptions and attitudes, including those about other people, are often based on a combination of our cultural, social, educational, religious and environmental backgrounds.

The established views and attitudes of the individuals in an organization, or the attitudes of individuals leading an organization can often become the culture for that organization. This can be the views of leaders, managers, key decision makers or others with influence within the organization.

Some organizations might be based in jurisdictions where laws and regulations or religious beliefs, customs or practice could have a direct impact on their approach to diversity, equity and inclusion in the workplace.

Some organizations such as front-line emergency services, might insist on certain physical requirements as a pre-requisite for particular posts.

In such cases, organizations should clearly communicate the reason and rationale for their position, including any legal, regulatory, health and safety, cultural, religious or other factors that the decision is based upon.

NOTE 4 This does not prevent the organization from considering adjustments to the requirements of the role, the environment, or through use of equipment or technology, to make it more accessible to a wider group of individuals. A rationale might be a minimum level of physical ability or mobility in order to fulfil a necessary aspect of the role, such as lifting physical objects.

¹⁾ Available at: <https://wearepurple.org.uk/business/>

Some organizations might be located in geographical areas which have varying levels of representation from different cultural and social groups.

NOTE 5 *For example, it is not uncommon for capital cities or urban areas located close to national borders to have a greater level of representation from a wider range of different cultural or social groups compared to smaller towns in more provincial areas. In such cases organizations might seek to have a workforce that is as representative of the local population as possible in terms of gender, all faiths or none, ethnicity, abilities or any other characteristic or trait. Where employees are required to be based at a specific location(s), organizations can also consider factors such as commute time and cost, including access and availability of public transport. Where employees are not required to be based at a specific location, remote or flexible working could allow organizations to have employees from a much wider geographical area and increase levels of representation from different groups and backgrounds.*

Changing workplace culture can be disruptive and have a negative impact on an organization if it is not done in a thoughtful and structured way.

While this PAS gives recommendations and guidance on policies, practices, and approaches, organizations can select and implement the recommendations and guidance which is most appropriate to them and at their own pace and budget.

The recommendations do not have to be implemented in any particular order, but a phased approach that allows the organization to measure progress and results against its aims and objectives is often the most successful.

Organizations can start with the recommendations that are likely to deliver change quickly and with minimal disruption to the organization. This could be setting up a Diversity Board or Committee or having a set of HR and people management policies that help support diversity, equity and inclusion. They can then work towards developing a clear plan of action with a defined timetable for implementing other recommendations and changes to working practices.

When agreeing actions, organizations can benefit from considering the activities that might be pre-requisites for achieving a specific goal or objective.

NOTE 6 *For example, if the goal is to collect data on levels of diversity, the organization needs to decide what data they want to collect and how it is collected, and how it is communicated across the organization, including what they are doing, why they are doing it and how.*

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1 Scope

This PAS gives recommendations for practical steps that organizations can take to help them develop and implement an effective framework to support diversity, equity and inclusion in their workplace(s). The PAS shows organizations how to develop and implement policies and practices to support their diversity, equity and inclusion aims and objectives in keeping with their existing principles and framework.

It is intended to be used as a practical implementation guide for other framework standards, such as BS ISO 30415, BS 76000:2015 and BS ISO 45003:2021.

This PAS includes recommendations and guidance as well as standards and principles statements issued by diversity, equity and inclusion organizations, research institutes, government agencies, and other bodies.

It covers practical measures for:

- a) demonstrating leadership buy-in and commitment to diversity, equity and inclusion at all levels of the organization;
- b) incorporating diversity, equity and inclusion principles and objectives into an organization's internal policies, practices, processes and procedures;
- c) establishing the organizational and business benefits of creating and maintaining an effective culture of diversity, equity and inclusion;
- d) recruitment and retention strategies that enhance diversity, equity and inclusion;
- e) addressing behaviour which is inconsistent with diversity, equity and inclusion principles through education, understanding and awareness, and supporting people who challenge such behaviour;
- f) identifying appropriate diversity, equity and inclusion learning and development needs at all levels within an organization;
- g) enabling peer networks to support underrepresented social and cultural groups;

- h) recognizing, engaging and supporting underrepresented social and cultural groups;
- i) creating inclusive brands, customer engagement and workplace culture, through adapting change management strategies for diversity, equity and inclusion;
- j) understanding and implementing concepts such as "diversity of thought", "dimensions of diversity", "intercultural competence" and "cognitive diversity";
- k) incorporating the principles of "inclusive innovation" and "inclusive by design" into services, business models, business processes, technology and product development cycle;
- l) setting achievable targets and objectives with clear Key Performance Indicators (KPIs) and data analytics to support continuous improvement; and
- m) measuring the progress of the organization in creating and maintaining an effective culture of diversity, equity and inclusion.

NOTE 1 *While this is a comprehensive list it is not a definitive one; organizations can add measures and actions as applicable to their evolving aims and objectives.*

It is applicable to any organization of any size, description, sector, industry or location.

It can be applied across all aspects of an organization's operations including but not limited to:

- 1) board governance;
- 2) internal and external stakeholder engagement;
- 3) human resources and people management;
- 4) communications, marketing and branding;
- 5) technology (including new and emerging technologies); and
- 6) design and development of products and services.

It is intended for use by decision-makers and influencers including, but not limited to:

- i) board members and organizational leaders;
- ii) operational and management teams;
- iii) HR and people professionals;
- iv) trade union and employee association representatives;
- v) advisors, auditors and investors; and
- vi) any individual within the organization looking to promote diversity, equity and inclusion.

This PAS does not cover existing local, national, or international employment law, regulation or policy.

***NOTE 2** It might not be appropriate or legal for an organization to implement one consistent policy across all of its operations due to local laws and regulations, religion or local custom, culture and value and beliefs. For example, it might be possible to apply policy and practice to gender equality, sexual orientation or same sex/gender relationships in some locations but not in others.*

2 Normative references

There are no normative references in this document.²⁾

²⁾ Documents that are referred to solely in an informative manner are listed in the Bibliography.

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

3.1 audit

systematic, independent, documented process for obtaining documented information, statements of fact or other relevant information and assessing them objectively to determine the extent to which the audit criteria are fulfilled

NOTE An audit can be an internal audit (first party) or an external audit (second party or third party), and it can be a combined audit (combining two or more disciplines).

[SOURCE: BS 76000:2015, 3.1]

3.2 belonging

sense, knowledge or feeling of fitting in and being accepted unconditionally in a way that creates a feeling of being safe, valued, with a sense of place and purpose, allowing individuals to participate in the same way as others without any conscious awareness of being different

3.3 bullying

conduct or behaviour intended to cause fear, humiliation, embarrassment or loss of dignity or to intimidate, coerce, or apply emotional or physical pressure as a means of wielding or showing power over another

NOTE 1 Bullying is not punishable by law. See also “harassment” (3.13).

NOTE 2 A bully is someone who engages in bullying behaviour.

NOTE 3 Bullying behaviour can also be linked to or be similar to harassment but is not the same.

3.4 cognitive diversity

mix of different intellectual styles, methods or approaches to processing information and solving problems that can result in different and unique perspectives, conclusions or outcomes

NOTE Cognitive diversity is also linked to “diversity of thought” (3.8) and innovation.

3.5 cultural groups

group(s) of people connected or related by one or more common or shared physiological or psychological trait, characteristic, geography, behaviour, belief, idea, custom, attitude, value

NOTE 1 Common cultural groups include, but are not limited to:

- gender;
- race;
- religion;
- ethnicity;
- parental status;
- sexual orientation;
- age or generation;
- visible or invisible conditions – including physical, neurological, mental or other atypical experience; and
- any trait or characteristic that allows an individual or group to identify themselves as an underrepresented group compared to other cultural or social groups.

NOTE 2 Individuals can identify with more than one cultural or social group at any given time. This might lead to experiences that are different to those experienced by the majority in a cultural or social grouping.

NOTE 3 The terms race and ethnicity are often confused. The term race is most commonly used to describe a group of individuals sharing similar physical and biological traits and/or characteristics, whereas “ethnicity” refers to broader cultural expression and identification.

3.6 discrimination

treating an individual or a group of individuals in a way that puts them at a disadvantage or at an advantage compared to others

NOTE 1 Some local laws and regulations permit the treatment of individuals and groups to be different based on their characteristics (“protected group”, see 3.22) as a means of overcoming past or current disadvantages. This practice is known as “positive action” or “affirmative action” and seeks to overcome disadvantages experienced by certain groups, and address the under-representation of those groups by actively seeking to appoint candidates from under-represented groups. This is not to be confused

with the term “positive discrimination” which is a deliberate and intentional action designed to exclude or treat someone in a manner that would result in a disadvantage to them compared to others.

NOTE 2 Organizations might use “positive or affirmative action” (also referred to as “positive discrimination” or “local content” dependent upon where it is used in the world), sometimes in association with quota-based systems to increase the number of employees from underrepresented or specific groups where this is allowed or permitted by appropriate local laws and regulations. Positive or affirmative action is most often used in relation to “protected groups” where social or cultural traits and characteristics can be applied in addition to skills, experience and ability to meet the requirements of a role.

NOTE 3 Characteristics associated with “protected groups”, such as age, gender, race, and so forth can be specific to, and vary across different jurisdictions.

NOTE 4 Treating all individuals in the same way (equally) is not the same as treating all individuals fairly (equitably), as applying the same practices to all, irrespective of differences may result in some individuals being placed at a disadvantage. For example, offering a bonus to all employees which in reality may only be attainable by some would give some an unfair advantage over others.

3.7 diversity

state not dominated by any one social or cultural group but which also includes representatives from a number of different social and cultural groups

NOTE 1 A diverse organization (reflective of both internal and external stakeholders) includes factors that influence the identities and perspectives that people bring when interacting at work.

NOTE 2 A diverse organization (reflective of both internal and external stakeholders) can foster learning from others who are not the same, about dignity, respect and inclusiveness for everyone, and about creating workplace environments and practices that foster learning from others to gain advantages of diverse perspectives.

3.8 diversity of thought

where individuals in a group think, behave and process information differently from each other, allowing them to bring a range of different perspectives and opinions to an idea, problem or discussion often due to their different social or culture backgrounds

NOTE 1 See also “cognitive diversity” (3.4).

NOTE 2 Social or cultural groups might be identified based upon one or a combination of characteristics or traits such as gender, race, ethnicity, sexual orientation, condition, age, religion, socio-economic background, education, geography, neurology, physiology.

NOTE 3 Bringing together a number of different experiences, perspectives and insights results in different ways of looking at something which can lead to new ideas, initiatives and innovation.

3.9 documented information

information required to be controlled and maintained by an organization and the medium on which it is contained

NOTE 1 Documented information can be in any format and media and from any source, subject to applicable data management and data protection laws and regulations.

NOTE 2 Documented information can refer to:

- the management system, including related processes;
- information created in order for the organization to operate (documentation); and
- evidence of results achieved (records).

3.10 equality

state where everyone is granted the same rights and responsibilities, where everyone has been offered the same opportunities and has been treated without regard to their own individual or group needs

3.11 equity

system of justice and fairness designed to give everyone the same opportunities by acknowledging and making allowances for differences that would otherwise place them at a disadvantage compared to others

NOTE 1 For example if a role required individuals to access stock on a high shelf, the organization needs to make allowance for the individual differences in height by providing steps or ladders to give equal accessibility to all.

NOTE 2 Equity demands fairness in every situation. Individuals are treated fairly but differently as their circumstances are given weight. It aims to provide all the individuals with an equal opportunity, to let them attain their maximum potential. Equity makes sure that all the individuals are provided with the specific resources they need (not just the same resources as everyone else) to have access to the same opportunities.

NOTE 3 An example of equity might be allowing an individual with dyslexia more time for a written test or providing them with a verbal version of the test.

NOTE 4 Not all situations can support equity. For example, a role which requires an individual to engage in physical activity such as running or climbing a ladder, such as a firefighter, is by its very nature limited to those who are able to meet a set of minimum requirements relating to physical ability, and to make changes would introduce unacceptable risk to others. An organization is expected to apply appropriate judgment in determining whether to apply the concept of equality or equity in any specific situation.

3.12 flexible and remote working

adjustment to established working practices and patterns, including changes made to how, when and where a person undertakes the duties of their role

NOTE 1 Flexible working is as much about the individual as it is the requirement of the role, such as some individuals preferring to work remotely or from home, whereas others might prefer an office environment due to their personal circumstances of living arrangements not easily supporting working from home.

NOTE 2 This includes changes to the time, location and working arrangements to support the needs of the individual. For example, allowing parents flexible start or finish times to be able to work around school drop-off/pick-up times, or child-care arrangements.

NOTE 3 Flexible working can also be referred to as “smart working” or “agile working”. Where organizations choose to use these newer terms, a distinction needs to be drawn between “smart or agile working” as a reference to flexible working, and not as applied to the use of technologies, project management and efficiency driven work process.

3.13 harassment

conduct or behaviour that is unwanted, uninvited, unsolicited, or perceived by the recipient, to cause annoyance, offense, insult, fear, humiliation, embarrassment, discomfort, distress or loss of dignity

NOTE The key difference between bullying and harassment is that harassment is linked to discrimination and is punishable by law. Bullying is not punishable by law.

3.14 inclusion

allowing or inviting participation for all irrespective of differences

NOTE 1 Inclusion (also known as inclusivity) is more than just including individuals from different groups; it is being made to feel welcome and accepted as having worth and value. See “belonging” (3.2).

NOTE 2 Commitment to the valuing and inclusion of all the ways people are different requires a transparent approach that goes beyond legal compliance and embeds and sustains wider cultural change, and demonstrates that everybody is welcome, valued and respected, feels safe and without fear of being judged within the team and the wider organization.

3.15 intercultural competence

ability to understand how something is interpreted, viewed or perceived by a different cultural or social group and adapting communication and behaviour based upon that understanding

3.16 intersectionality

combination of one or more cultural or social characteristics or traits that form part of a person’s identity

NOTE 1 People can identify with more than one characteristic, or social grouping, and might have intersecting identities. This can lead to experiences that are different to those experienced by the majority of a social grouping. For example, two environmentalists might identify with an environmental social group, but each identify with a different cultural group.

NOTE 2 A failure to recognize and understand intersectionality can result in an organization identifying individuals by just one characteristic with the result that some challenges, issues or inequalities remain hidden. For example, if an individual is identified only by gender or ethnicity and not the fact that gender and ethnicity combined is a challenge in its own right.

NOTE 3 The theory of “intersectionality” was first publicly laid out by Kimberlé Williams Crenshaw in 1989 in a paper titled *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Anti-discrimination Doctrine, Feminist Theory and Antiracist Politics*, published in the *University of Chicago Legal Forum* [7].

3.17 mentoring

act or process of transferring knowledge, supporting learning and development, or providing help and advice to another in order to enhance their skills, experience as part of their on-going development and ability to access new opportunities

NOTE See “reverse mentoring” (3.25).

3.18 micro-aggression

statement, action or incident regarded as an instance of indirect, subtle, or unintentional bias, prejudice, or discrimination against an individual from a marginalized or under-represented group, such as an off-hand comment or remark, a joke, or insult

NOTE For example, deliberately and repeatedly mis-pronouncing an individual's name or making a verbal assumption about an individual's skill or ability based upon a cultural stereotype such as "You must be good at this" based on a stereotype that people of a similar cultural background are good at something such as math or technology.

3.19 neurodiversity

differences in individual brain function and/or behavioural traits

NOTE 1 The term is most often used in the context of conditions, such as Asperger's syndrome or autistic spectrum disorders, but is not limited to them.

NOTE 2 Neurodiversity is a collective noun applied to groups. Neurodivergence or neurodivergent is the adjective used to describe individuals.

3.20 organization

person or group of people that has employees or customers and a set of functions with responsibilities, authorities and relationships to achieve its objectives

NOTE The concept of "organization" includes, but is not limited to, a small/micro and medium business, company, corporation, firm, enterprise, government body, authority, partnership, charity, institution or association, or part or combination thereof, whether incorporated or not, public or private.

[SOURCE: ISO/IEC Annex SL:2012, 3.01, modified]

3.21 policy

intentions and direction of an organization as formally expressed by its top management

[SOURCE: ISO/IEC Annex SL:2012, 3.07]

3.22 protected group

group of people that qualify for protection by law, regulation, policy or similar directive based upon a specific or set of specific cultural or social characteristics or traits

3.23 psychosocial

combined influence of psychological factors and surrounding social environment on an individual's physical and mental wellness and their ability to function

3.24 psychosocial risk

combination of the likelihood of occurrence of exposure to work-related hazard(s) of a psychosocial nature and the severity of injury and ill-health that can be caused by these hazards

NOTE Hazards of a psychosocial nature include aspects of work organization, social factors at work, work environment, equipment and hazardous tasks.

3.23 reverse mentoring

practice where the traditional roles of mentor and mentee are reversed

NOTE 1 An example of reverse mentoring might be an employee who is more adapt with social media, who is younger or more junior, supporting and educating an employee with lesser experience, awareness, familiarity or knowledge.

NOTE 2 Reverse mentoring can also be referred to as upward mentoring.

3.24 risk

effect of uncertainty on objectives

NOTE 1 An effect is a deviation from the expected – positive and/or negative.

NOTE 2 Objectives can have different aspects, such as financial, health and safety, and environmental goals and can apply at different levels, such as strategic, organization-wide, project, product and process.

NOTE 3 Risk is often characterized by reference to potential events and consequences, or a combination of these.

NOTE 4 Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence.

NOTE 5 Uncertainty is the state, even partial, of deficiency of information related to, understanding or knowledge of an event, its consequence, or likelihood.

[SOURCE: PD ISO Guide 73:2009, 1.1]

3.25 social groups

groups of individuals recognized by law, or by self-identification or self-organization, that share a set of similar characteristics, traits, views, values, interests

[SOURCE: BS 76005:2017, 3.11 modified]

3.26 stakeholder

person or an organization that has an interest or an affect, is affected by, or perceive themselves to be affected by a decision or activity

[SOURCE: BS 76000:2015, 3.24, modified]

3.27 unconscious bias

unintended or unintentional assumption, bias or prejudice applied to decision-making and other processes that the decision maker is not consciously aware of

NOTE *Unconscious bias may be based upon social or cultural traits, but also on the basis of social stereotypes about certain groups of people that individuals form, and often apply, outside conscious awareness.*

[SOURCE: BS 76005:2017, 3.14 modified]

3.28 underrepresented

absence or recognition of people in terms of representation or possession of power

NOTE 1 *Underrepresentation of cultural or social groups can be an indication of exclusion and could lead to subsequent disadvantage.*

NOTE 2 *Some cultural or social groups are protected by laws, regulation or policy or equivalent (protected groups).*

NOTE 3 *Some jurisdictions may have laws, regulation, policy or equivalent which might prevent an organization from openly recognizing some cultural or social groups.*

3.29 value

merit and worth of people due to their unique knowledge, skills and abilities

NOTE *In this PAS, "inherent value" refers to the principle that people are valued for who they are, not just because they deliver monetary value or money equivalents to their organization.*

[SOURCE: BS 76000:2015, 3.26, modified]

3.32 workplace well-being

fulfilment of the physical, mental, social and cognitive needs and expectations of an employee related to their work

NOTE *Well-being at work relates to all aspects of working life, including work organization, social factors at work, work environment, equipment and hazardous tasks, and can also contribute to the quality of life outside of work.*

[SOURCE: BS ISO 45003: 2021. 3.2, modified]

3.30 workplace

environment in which an individual performs an agreed set of tasks, actions or obligations in accordance with their job description or accepted definition of "work" in exchange for payment or other reward or remuneration

NOTE 1 *A workplace may be a physical or a remote location or environment, or a combination of the two.*

NOTE 2 *Workplace environments can differ across sectors and industries based upon role and duties. For example, the workplace for a bus driver might include the bus they drive and the bus terminal or transport offices, whereas the workplace for an actor or musician might be the studio, theatre, stage or environment in which they give interviews. In the case of a professional athlete or sportsperson the workplace might be a stadium, pitch, court, arena or field, whereas a tour-guide might have a number of varied working environments ranging from open public spaces to a formal office space.*

4 Implementing an effective strategy and framework for supporting diversity, equity and inclusion across single and multi-jurisdictional workplaces

4.1 DEI strategy

COMMENTARY ON 4.1

It is useful for an organization to establish why a diversity, equity and inclusion (DEI) strategy is of benefit to them and what they hope to gain from implementing one.

The most effective way of doing this is to have a clear starting point or benchmark which helps the organization to understand the following.

- *Where is the organization today?*
- *Where does it want to be?*
- *What does it need to do to get to where it wants to be?*
- *What are the key challenges and how will it address them?*
- *How will it measure and track progress along the way?*

This PAS includes a number of simple to use tools such as a self-assessment questionnaire and employee survey templates that organizations can use to assist in developing a framework and setting a benchmark.

Organizations should assess the impact of diversity, equity and inclusion in relation to the following:

- a) commercial/business case for diversity;
- b) moral and ethical case for diversity, equity and inclusion;
- c) organizational values and mission statement;
- d) organizational performance;
- e) political, economic and social influences;
- f) shareholders and investor relations including ESG (environmental, social and governance) considerations;
- g) sustainability and ethics;
- h) employer value proposition (EVP);
- i) psychological health and safety;
- j) workplace well-being;
- k) social and corporate responsibility;
- l) brand and market position;
- m) product development and innovation;
- n) geography (international or national);
- o) stakeholders (customers, clients, suppliers and providers);

- p) laws, regulations, customs and practices;
- q) environmental factors;
- r) compatibility of the proposed strategy with other organizational strategies and initiatives;
- s) budget and resource;
- t) disaster recovery and business continuity;
- u) risks of inaction or doing nothing; and
- v) anything else that an organization considers to be of impact or relevance to their operations.

NOTE 1 *When developing a strategy, organizations are encouraged to take into account the moral and ethical rights of individuals as human beings as set out in the United Nations Universal Declaration of Human Rights 1948 [8].*

As part of the strategy planning process organizations should conduct a mapping exercise that identifies key relationships and areas of importance and focus, including related activities such as psychological health and safety management and well-being programmes, and the relationships and integration of different stakeholder and employee forums and groups.

The mapping exercise should explore:

- 1) links and associations between the organization and stakeholders, and the relative importance of each;
 - 2) geographical proximity of stakeholders;
 - 3) nature and importance of stakeholder relationship;
 - 4) engagement with stakeholders and aligning stakeholder values and principles to the values and principles of the organization;
 - 5) impact or importance of a stakeholder or value or principle;
 - 6) impact assessment of changes to existing relationships or values or principles; context and impact of future events;
- NOTE 2** *This includes economic and environmental changes, technology, future markets and changing customer demographics.*
- 7) cost of changes to stakeholder relationships;
- NOTE 3** *This includes technology, resource and time.*
- 8) health and safety management; and

- 9) disaster recovery, business continuity procedures in the event of an incident or emergency.

NOTE 4 *Although this PAS does not provide provisions based upon any laws, regulations, policies or other directive, attention is drawn to any laws, regulations, policies or other directives that might impact their ability to implement or act on the recommendations given in this PAS in any jurisdiction(s).*

NOTE 5 *Different jurisdictions have different laws, regulations, policies and directives relating to the management or recognition and status of different cultural or social groups which might impact upon an organization's definition or scope of diversity, equity and inclusion.*

NOTE 6 *When considering a strategy and framework for diversity, equity and inclusion, organizations can take into account factors such as local practice, social mores and attitudes or new trends which might not be supported by law, regulation or similar but which could have an impact.*

NOTE 7 *Organizations are encouraged to be open to and understand the benefits of seeking out and learning from best practice(s) and any new initiatives, even where such practice(s) cannot be immediately adapted or applied to their current operations, due to legal, regulatory, cultural, social or other restrictions.*

4.2 Demonstrating commitment to diversity, equity and inclusion

Organizations should agree the best way of demonstrating:

- a) that the strategy is practiced by senior management and organization leaders throughout the organization; and
- b) their commitment to diversity, equity and inclusion to stakeholders:
 - 1) inside (employees) the organization; and
 - 2) outside (prospective employees, customers, clients and suppliers/providers) the organization.

Organizations should adopt measures to demonstrate a commitment to diversity, equity and inclusion, taking into account the following options.

- 1) Planning a diversity, equity and inclusion strategy that outlines what the organization is doing, why it is doing it, how it will do it, and when it will do it, including:
 - incorporating strategy in design and research and development projects so that new innovations, products, services, processes and business models deliver positive outcomes and mitigate any potential bias in the development process;

- a governance structure and policy with a clearly defined purpose, mandate and accountability for delivering the organization's strategy; and
 - a designated budget and sufficient on-going resource (people and technology) for the delivery of the organization's short-, mid- and long-term goals and objectives and overall strategy.
- 2) Having a set of policies that communicate the strategy, aims and objectives to stakeholders a mission or diversity statement, including:
 - policies, processes, practices and procedures that are transparently just and fair;
 - reflecting diversity, equity and inclusion in all people management processes from recruitment through to end of employment; and
 - bonus, incentive and reward programmes reflecting diversity, equity and inclusion targets and Key Performance Indicators (KPIs).
 - 3) Verifying that operational practices reflect the strategy and communicate clearly how the organization expects its policies to be implemented and actioned, including:
 - including diversity, equity and inclusion as a standing agenda point to general/team meetings where appropriate; marketing membership or support of organizations that support or promote diversity, equity and inclusion;
 - implementing a framework that requires decision makers to demonstrate adherence to the organization's, diversity, equity and inclusion strategy;
 - sponsorship of events that support or promote diversity, equity and inclusion;
 - commitment to supporting or working with third party organizations focused on diversity, equity and inclusion such as organizations owned by women or other under-represented groups; and
 - support charitable and community initiatives, projects events relating to diversity, equity and inclusion and underrepresented groups.
 - 4) Placing people at the centre of their strategy to support accountability and engagement at every level within the organization, including:
 - a designated individual responsible for overseeing, executing, reporting measuring and reporting on the organization's strategy and strategic initiatives for diversity, equity and inclusion, such as a Head of Diversity (and Inclusion), or equivalent;
 - visible diversity among board, non-executive, and senior appointments;
 - hold networking events and support groups for underrepresented groups;

- training and development programmes for underrepresented groups specifically, including for leadership roles; and
 - actively engaging with under-represented groups such as employees or customers to encourage their involvement and input into the organization's future plans and strategies.
- 5) Measuring performance and tracking progress against the organization's stated aims and objectives through:
- annual and interim reporting against agreed objectives and Key Performance Indicators (KPIs);
 - external branding through certification and accreditation to indicate commitment and achievements;
 - data collection and analysis to help benchmark and measure on-going progress;
 - providing updates on the organization's performance in relation to legal obligations such as gender, ethnicity and other pay gap reporting;
 - annual audit of the diversity, equity and inclusion strategy to measure progress and impact on the organization's performance;
 - formal certification and accreditation and use of a mark or badge to demonstrate commitment; and
 - sharing best practice and benchmarking progress with other groups and organizations.

NOTE 1 Diversity, equity and inclusion is about culture and cultural change. When selecting representatives for diversity related roles or functions consider all parts of the organization so that responsibility does not ultimately rest with those functions traditionally responsible for managing people, such as HR. Organizations may identify individuals and allocate leadership responsibilities in accordance with its diversity, equity and inclusion strategy and aims and objectives. For example, if the aim is to engage with a more diverse customer base then an organization might allocate the role of diversity lead to an individual within the customer engagement or marketing team.

NOTE 2 See Clause 6 for more information and guidance.

Organizations should adopt as many of the option(s) as are appropriate to them and their operating circumstances and resources.

NOTE 3 For example, a new organization might start with a diversity policy and add other options as they grow, whilst an established organization might consider a policy, stating their commitment in their annual report and by making senior appointments with diversity in mind.

Organizations should make changes to their brand or marketing to promote their commitment to diversity, equity and inclusion.

Commercial or consumer facing businesses should assess how their products and services are presented and represented to consumers and service users.

NOTE 4 For example, the presentation or representation of a product or service might suggest that it is only available or applicable to some social or cultural groups rather than all social and cultural groups; literature might not be accessible to those with visual conditions; premises or services might not be easily accessible to all.

4.3 Diversity, equity and inclusion policy

COMMENTARY ON 4.3

Social, political and economic changes mean that twenty-first century working environments are multi-generational. Higher or no mandatory retirement age, the rise and fall of different industries/sectors and advances in technology have resulted in people working for longer, having multiple careers, and younger senior executives managing mature teams.

As a result, organizations need to be aware of the possible impact of multiple generations working together and how this could result in a clash of conflicting values, attitudes, and expectations of what might be considered acceptable conduct or behaviour. This can include, but is not limited to, things such as the style, tone and language used in work communications, personal appearance and generational attitudes to dress, hairstyle or body art in the workplace.

Current broad generational groups within the workplace, together with approximate time ranges, are as follows:

- Baby Boomer: born 1946-1964;
- Generation X: born 1965-1980;
- Millennial Generation: born 1981-1996;
- Generation Z: born 1997-2012; and
- Generation Alpha: born 2013-present.

Organizations need to take generational differences into account within cultural and social groups and gender related topics as well as providing appropriate training and learning to create a fully inclusive working environment which reduces the risk of generational based stereotyping.

The following characteristics, traits, values and attitudes might differ from generation to generation when developing short-, mid-, and long-term strategies for a multi-generational workforce.

a) *World views, including:*

- *gender classification, expression and identification including stereotyping, multiple or gender neutrality and gender fluidity;*
- *race relations and ethnicity including racial stereotyping and cultural misappropriation;*
- *visible and invisible physical and neurological conditions including mental health and wellbeing;*
- *sexual orientation including expressions and displays of identity; and*
- *approaches to parenting, including co-parenting and same sex/gender parents.*

Characteristics and traits include but are not limited to: age; physical, mental and development abilities; marital or civil partnership status; pregnancy, maternity and paternity; having or not having dependants; race; ethnic origin; skin colour; social or economic class; education; military service; caste; language; religious beliefs or non-belief; political opinion; work pattern (part-time working, fixed term contract, flexible working, etc.); gender, sexual and romantic orientation; gender identity or affirmation; or individual's personality, personal interests, lifestyle choices or any other characteristics that make someone unique.

b) *Workplace views, including:*

- *working patterns including working from home, re-definition of 'working day' and work-life balance;*
- *promotion, career progression, personal development and measures of professional and personal success;*
- *manager as mentor or equal and reverse mentoring;*
- *frequent feedback on performance and accelerated personal development and career progression;*
- *level of loyalty to a brand or employer and willingness to move if expectations are not met;*
- *workplace well-being, including physical, mental and cognitive health and safety*
- *entrepreneurial spirit and desire to be recognized as a subject matter expert or specialist in field*
- *colleagues and co-workers as family and friends;*
- *dress code (including the impact of a dress code on expressions of religious and cultural identity) and acceptable/appropriate language, behaviour and conduct in the workplace;*
- *personal circumstances and situational considerations, such as carer responsibilities or women in menopause; and*

- *value and contribution to the business or team.*

c) *World and workplace values, including:*

- *social awareness and expectation of business for good, corporate social responsibility and recognition of ethical and environmental values;*
- *willingness to take a lower salary for opportunity to work for an organization that shares their attitudes, views and values, or expectations that any contribution (including work experience or internships) is remunerated; and*
- *multi-tasking and multiple careers in a lifetime, and/or balancing multiple jobs simultaneously.*

In the case of mixed multi-generational teams, organizations should provide key managers and leaders with conflict management training to assist in the effective and constructive management of generational differences.

Organizations should implement a high-level policy which outlines the organization's approach to diversity, equity and inclusion and is made available to all employees.

NOTE 1 *A high-level policy is applicable at the highest level in an organization and sets out the general principles and plan of action to be implemented by the organization. It is the first, or starting, point from which other mid- and lower-level policies applicable to other levels within the organization can be generated.*

NOTE 2 *Early research indicates that the attitudes, values and expectations of Generation Z are significantly different to those of previous generations within the workplace including but not limited to attitudes to salary, opportunities to enhance and develop skills and knowledge, management, multi-skill and long-term aspirations and ambitions.*

The policy should include the following:

- vision or mission statement;
- aims and objectives;
- commitment of senior management and leadership teams;
- clear expectations and requirements to support a shared vision across the organization;
- recruitment, selection and appointment;
- references to other applicable policies such as those that outline how to report grievances; discrimination, harassment or bullying;
- relationships with, and applicability to, external stakeholders (including customers, suppliers and providers);
- brand and marketing guidelines;

- i) support for underrepresented groups and initiatives, including Employee Assistance Programmes (EAP), “Allies” or “Buddy” programmes and employee networks;
- j) references to other policies where applicable, such as HR or employment policies, or advertising and brand guidelines;
- k) tracking and measuring progress such as commitment to making reasonable adjustments to provide fair physical access to all;
- l) listing employee and leaders’ responsibilities and expected behaviours; and
- m) consequences of non-compliance.

Organizations should review and maintain the policy in accordance with the organization’s policy management process and/or the organization’s diversity, equity and inclusion strategy.

As part of the review process, organizations should take into account employees’ perceptions on which policies they feel should be implemented, how and by whom.

Organizations should make the policy accessible to all employees and stakeholders by providing different language, braille and audio versions, as well as links to other relevant or companion policies and documents such as the employee handbook and grievance policy, brand and marketing and procurement and supplier/provider guidelines.

Organizations should assess whether different versions of the policy are needed for use in different jurisdictions or whether this can be supported by one global policy and a series of supplementary jurisdictional specific versions.

4.4 DEI training, learning and development plan

The organization should assess the need for additional training, learning and development so that employees have the appropriate knowledge and skills to be able to implement the requirements of the policy and the organization’s aims and objectives.

The organization should provide appropriate training on the strategy and how to implement it for leaders and managers.

NOTE 1 *Implementation might include training or re-training in areas such as interview skills and techniques, media training, providing feedback or conflict management for key groups such as:*

- a) *boards, senior management and leadership teams;*

- b) *HR and personnel and people development teams;*
- c) *communications, marketing, branding and PR teams;*
- d) *individuals and teams responsible or involved in the recruitment/hiring process;*
- e) *individuals and teams responsible for health and safety;*
- f) *individuals and teams responsible for workplace well-being;*
- g) *individuals responsible for managing individuals or teams; and*
- h) *individuals and teams responsible for product development and design and delivery of support services.*

The organization should identify other teams or groups which might benefit from the training, such as those whose role includes interaction with customers or the public, or teams where there is a lack of diversity or higher rates of employee or staff turnover.

NOTE 2 *Training and awareness for individuals and teams responsible for the product design and development lifecycle supports the organization’s DEI strategy implementation through-out the supply chain. For example, how well will a product or application designed by right-handed or sighted individuals work for those who are left-handed or partially sighted?*

NOTE 3 *Organizations with diverse customers can offer targeted inclusive customer care/support training for customer facing teams focusing on areas such as language. For example, the use of terms such as “normal skin” as applied to a specific demographic.*

Effective training, learning and development helps employees understand the impact of diversity, equity and inclusion on organizational performance and should cover:

- managing revenue, risk and reputation;
- conscious and unconscious bias (see 3.27);
- relationship between diversity, inclusion and innovation;
- recruitment, selection and retention;
- inclusive behaviours;
- cultural awareness (including cultural competence and concepts of privilege);
- managing diverse teams
- brand image and marketing;
- inclusive customer practices;
- health and safety and psychosocial considerations;
- appropriate case studies and competitor comparisons; and

- measures of success.

Organizations with high-profile brands should assess whether to invest in specialized intercultural competence and media training to avoid the risk of a product development or marketing that is culturally inappropriate or insensitive.

NOTE 4 *The concept of privilege is the assumption that some individuals or groups of individuals might have automatic advantages and opportunities not automatically or easily available to others based upon one or more characteristics or traits such as gender, education, ethnicity, heritage and so forth.*

NOTE 5 *A high-profile brand is a brand which is easily recognized by the public and/or is able to attract a lot of attention or interest from the public or the media. There is no one single solution for achieving diversity, equity and inclusion goals.*

In order to meet their aims and objectives, organizations should adopt an approach that combines a blend of the following:

- targeted training;
- practical initiatives designed to build and increase awareness;
- personal and professional development ;
- performance management to track progress and provide support as and where required; and
- a process of continuous learning and development by offering individuals the opportunity to share and learn from each other's experiences in a supportive environment.

Organizations should keep their training and other learning initiatives up to date and reflect ongoing changes to laws and regulations, as well as on-going changes in social and cultural attitudes both locally and globally.

Employee records should include any further or future opportunities for additional awareness training and education that might have been identified through observation, or as a result of an incident, event or direct request.

Organizations should report training completion rates and progress against training targets to senior teams and/or the Board in accordance with the agreed strategy for communication evaluation and review.

Organizations should be aware of the risks of training becoming, or being seen as, just an administrative chore or tick-box exercise, with the result that those attendees who would benefit the most, are also the ones who are the least interested or engaged. To mitigate against this and find a balance, organizations should select training and learning that includes post training action points and outcomes linked to the roles and responsibilities of attendees.

NOTE 6 *For example, a technical manager introducing a DEI evaluation to code reviews or someone responsible for marketing amending brand guidelines to reflect based on the training.*

Impact and impact assessments should be designed and adjusted to reflect the objectives of the training, learning and development plan, and include feedback from employees on what they found or consider to be effective and impactful.

Records of training and learning provided should be documented and included in any measure of success or progress.

4.5 Bonus, incentive and reward programmes

Organizations that operate an employee bonus or reward programme as part of the overall remuneration package based upon organizational, team or person objectives should take into account diversity, equity and inclusion performance to underline the importance of the strategy and keep it a priority.

NOTE 1 *Organizations can associate a portion or percentage of the bonus to goals and targets relating to specifically to diversity, equity and inclusion.*

The objectives, goals or targets of the bonus or reward programme should be transparent and measurable and relate to organizational and personal performance, covering a combination of hard measures.

NOTE 2 *Examples are levels of diversity in the organization or team, and an assessment/appraisal of soft skills and behaviours such as leadership skills, training, and employee initiatives that support diversity, equity and inclusion.*

Organizations that incentivize diversity, equity and inclusion should take into account teams where levels are already in line with, or ahead of goals, or where implementing targets is not possible and design measures which do not demotivate or discriminate against those teams.

NOTE 3 *An organization might have an incentive scheme linked to labour cost or productivity which could influence recruitment in a way that has an adverse impact on diversity, equity or inclusion.*

NOTE 4 *A team within an organization might not be able to implement some aspects of the organization's overall strategy due to local laws or religious or cultural customs and practices.*

Organizations that have existing bonus and rewards programmes should monitor and review them so that they do not conflict with, or adversely impact, the organization's diversity, equity and inclusion strategy.

Information relating to bonus, incentive and rewards programmes should be included in annual pay gap reporting (both internal and external) to prevent a pay differential in favour of a specific group or groups.

NOTE 5 *For example, males receiving a higher annual bonus than their non-male counterparts, despite all receiving the same basic salary.*

NOTE 6 *EDI activities is recognized within workload models and is as important (e.g. for promotions) as other areas of work.*

5 Policies, processes and practices for promoting and supporting diversity, equity and inclusion in the workplace

5.1 General principles

Organizations should have a set of policies and practices in place to help promote, support and manage diversity, equity and inclusion in the organization.

NOTE 1 Figure 2 provides a high-level overview which can be helpful to organizations.

Figure 2 – Policy to performance

	Policy	Process	Procedure	Performance
Purpose	Define the organization's position What are we doing? Why are we doing it? Who does it apply to?	Define roles and responsibilities Who is doing it? What are they doing?	Define actions and outcomes When are they doing it? How are they doing it?	Definitions and measures of success How will we check the policy is being adhered to? How will we check the policy is effective?
Ownership	Organization	Individual(s) described in the policy	Individual(s) described in the policy	Organization
Key Info	1. Aim & Objectives 2. Compliance 3. Consequences	Steps required to implement the policy	Breakdown of steps required to implement process	What do we want to measure? When will we measure it? Who will measure it? How will we measure it?
Communication	Organization	Individuals	Individuals	Organization and Individuals
Review Cycle	Every 6 to 12 months	Every 6 months	As required	After each cycle

All policies and guidance documents should:

- a) be drafted using clear and simple language that avoids jargon, abbreviations, and technical language. Where such terms are included, they should be supported by a note or explanation;
- b) include links to anonymized case studies or examples that show the intention and purpose of the policy;
- c) include references to support mechanisms such as union organizations, employee networks and external support bodies;
- d) be issued and/or clearly signposted at the start of the relationship such as part of an employee or new starter induction programme or on-boarding of new customer or supplier/provider;
- e) be available in different formats such as physical and digital format, different languages including braille and audio versions, and compatible with accessibility software;
- f) be stored in a location or locations that are easily accessible to all at any time;
- g) be integrated with other policies and practices to avoid conflict and any unintended consequences or impact; and

NOTE 2 For example, a *Recommend or Refer a Friend* policy could result in a team that is even less diverse than it started due to individuals recommending those similar to them and precluding the introduction of individuals outside of existing social and cultural groups.

- h) be reviewed and reissued in accordance with the organization's usual policy management process.

NOTE 3 Organizations might find it beneficial to conduct an exercise to check employees' and other stake-holders interpretation and understanding of the purpose of the policy as part of the review process.

5.2 Policies

5.2.1 General

Organizations should have in place policies which promote and support diversity, equity and inclusion.

When producing a policy, organizations should include the following:

- a) who the policy relates to;
- b) what the policy is about and if applicable how it relates to other policies or the organization's diversity, equity and inclusion strategy;
- c) the organization's formal position on the matter or issue that the policy relates to, for example "the organization does not tolerate bullying or harassment";
- d) how the organization expects the policy to be implemented;
- e) who the policy is applicable to and why;
- f) the organization's expectation of behaviour and conduct in relation to the policy;
- g) how the organization intends to monitor that the policy is adhered to and enforced;
- h) the consequences of a policy breach;
- i) the appeal process where a policy includes a right of appeal against a decision or action taken as a result of the policy;
- j) where to find, or who to approach in the organization for further information or clarification;
- k) who is responsible for maintaining the policy; and
- l) version control indicating when the policy was issued and became applicable.

5.2.2 Types of policies

5.2.2.1 General

The organization should review the types of policies it should have in place and who they should apply to.

NOTE 1 Examples of the types of policies organizations can implement are provided in 5.2.2.2 to 5.2.2.11.

NOTE 2 Organizations might choose to have policies that cover a number of areas, instead of several individual policies. For example, an organization might choose to have an Equal Opportunities Policy that also includes information about accessibility or flexible working.

Organizations should add new policies or amend existing ones as appropriate to their operating circumstances and environment.

NOTE 3 Some policies may be a legal requirement of the jurisdiction in which the organization is based on operates.

NOTE 4 Some policies which relate to employment laws may only apply to some teams such as HR, Personnel or People team, whilst other policies which relate to conduct and behaviour, such as bullying, harassment or dignity in the workplace, will apply to all employees.

NOTE 5 Organization policies in relation to diversity, equity and inclusion may include conduct and behaviour both in and outside the workplace and also extend to external stakeholders, such as suppliers, providers, customers and others who engage or interact with the organization.

5.2.2.2 Equal opportunities and anti-discrimination:

COMMENTARY ON 5.2.2.2

The purpose of this policy is to create awareness amongst all prospective and existing employees and make stakeholders aware of the organization's intention and expectation that all individuals are treated the same, or allowances made to provide everyone with the same opportunities and without bias or disadvantage or advantage.

This policy should include:

- a) organizational commitment to equity and equity, covering;
 - references to applicable laws and regulations;
 - what areas and aspects of the business the policy relates to and why;
 - the circumstances under which the policy applies (such as making reasonable adjustments to support employee needs) as well as the circumstances where it might not apply (if applicable);
 - the processes and practices employed to support equal opportunities and prevent discrimination;
 - how employees can raise a concern or issue;
 - an appeal process if the request is refused; and
- b) where to find further guidance and support.

5.2.2.3 Accessibility

COMMENTARY ON 5.2.2.3

The purpose of this policy is to make sure that individuals who require additional or reasonable adjustments to working practices and environments to be able to perform in the same way as everyone else are appropriately supported.

This policy should include:

- a) the organization's commitment to accessibility;
- b) accessibility for those with visible or invisible conditions (employees, customers, providers);
- c) changes to physical environment or access to assistive technology and tools and support for those with conditions;
- d) changes to working practices (for example holding meetings at times or using media such as video conferencing that work for all such as parents, carers); and
- e) Employee Assistance programmes and initiatives to support accessibility to tools and support as well as general well-being.

NOTE *This would be expected to include provision of health and safety controls and psychosocial risks (for example, gender specific work equipment or clothing, fire alarm systems that support those with hearing impairments, nursing mothers, adaptive work stations, etc.)*

5.2.2.4 Harassment, bullying and victimization

COMMENTARY ON 5.2.2.4

The purpose of this policy is to outline the organization's position and approach to any form of harassment, bullying or victimization.

This policy should include:

- a) the organization's position on an employee's right to dignity and respect at work;
- b) the expected standard of conduct and behaviour;
- c) definition of discrimination, victimization, harassment and bullying;
- d) what an employee should do if they are feel they are a victim of harassment or bullying, or if they see someone else being harassed or bullied;
- e) how to report harassment and bullying;
- f) what happens once a report has been made; and
- g) the right of appeal process.

NOTE 1 *Some organizations refer to this policy as a "Dignity at Work" policy.*

NOTE 2 *Victimization can be as a result of being the target of harassment or bullying, or as a result of raising a complaint (or grievance) about harassment, bullying or other concern relating to conduct, behaviour or treatment.*

NOTE 3 *In some jurisdictions, such as the United Kingdom, harassment is associated with protected groups and included in laws and regulations and needs to be reflected in the policy, whereas other jurisdictions have specific laws and regulations that cover training or processes and practices for some forms of harassment such as mandatory sexual harassment training and awareness in some US states or investigative committees in India.*

5.2.2.5 Grievance policy

COMMENTARY ON 5.2.2.5

The purpose of this policy is to allow any individual who feels that they might have been treated unfairly or as a result of a breach of the organization's policies and practices is able to raise their concern and that it will be investigated in an appropriate manner by the organization.

This policy should include:

- a) a definition of the term "grievance";
- b) when an employee should raise a grievance;
- c) how to raise a grievance;
- d) what happens once the report has been made; and
- e) the right of appeal process.

Organizations should provide training on performance management, including understanding how individual and team performance can be impacted by poor or unfair treatment by those around them, to those responsible for managing and supervising the performance of others.

NOTE 1 *A grievance policy is a formal way for raising a concern relating to discrimination, unfair treatment, harassment, bullying or circumstances in which an employee has observed, or been the victim of conduct or behaviour which is abusive, insulting or offensive.*

Organizations should create a simple process for an individual to raise a grievance by identifying and removing any perceived or actual barriers or obstacles to reporting or raising a concern. This should also apply to whistleblowing.

NOTE 2 *It is common for someone who is the victim of harassment, bullying or undignified behaviour or conduct to talk to a friend or colleague about it first.*

The organization should consider how it can provide ways to support the friend or colleague to raise their concerns without breaching confidence or trust, such as providing information on "What to do if your friend or colleague is being bullied".

Where possible, where a grievance is about or relates to a specific group, characteristic or trait, any appeal process or panel reviewing the outcome should have individuals who are representative of the issue (for example, if the grievance relates to female discrimination, the appeal or review panel should include female), including independent external individuals.

5.2.2.6 Disciplinary policy

All organizations should communicate the conduct and behaviour considered to be unacceptable (misconduct or gross misconduct).

NOTE 1 *This can result in a warning or dismissal gross, depending on the severity of the offence at the start of their employment.*

NOTE 2 *Most organizations have a disciplinary policy or process.*

The types of conduct and behaviour that are contrary to an organization's position on diversity, equity and inclusion should be included in the disciplinary policy together with the level of severity.

NOTE 3 *Conduct and behaviour linked to laws and regulations are usually considered to be more severe.*

Conduct and behaviours which the organization should cover in its disciplinary policy are:

- a) harassment;
- b) bullying;
- c) discrimination;
- d) victimization;
- e) conduct or behaviour that is offensive, abusive or insulting; and
- f) conduct and behaviour which is considered a breach of the organization's position on diversity, equity and inclusion.

The disciplinary policy should state whether the policy applies to the workplace or is also be applied to conduct and behaviour outside of the workplace.

Organizations that interact with the public should also have customer facing policies supporting diversity, equity and inclusion which are designed to protect employees from abuse and harassment from customers.

5.2.2.7 Flexible, hybrid and remote working:

COMMENTARY ON 5.2.2.7

The purpose of this policy is to provide individuals in an organization the opportunity to request a change to their normal working patterns to support changes in personal circumstances or events outside of the

workplace, such as a change in working hours to better support childcare responsibilities.

This policy should include:

- a) the circumstances under which an employee can raise a request for flexible working (including working from home);
- b) how to raise and request; and
- c) the right of appeal process.

NOTE 1 *In some jurisdictions, employees might have a legal right to request flexible working.*

Health and safety policies and management of psychosocial risks should extend to all aspects of flexible and remote working.

Where flexibility is offered organizations should take care that this is applied to all.

NOTE 2 *For example, flexibility for parents is applied to all parents and not just mothers.*

Organizations should also apply this to business continuity and disaster recovery processes which require a change or deviation to normal or established working practices are as inclusive as possible providing additional support and/or equipment for those who need it, such as employees whose domestic arrangements or circumstances do not easily support working from home.

5.2.2.8 Parental and adoption leave

COMMENTARY ON 5.2.2.8

The purpose of this policy is to give all parents irrespective of gender or role the same rights, irrespective of biological considerations.

This policy should include:

- a) the legal rights of parents in the workplace;
- b) additional rights and benefits provided by the organization;
- c) the practical application of rights and benefits;
- d) how the employee should raise any issue(s);
- e) what support and assistance the employee can expect from the organization; and
- f) the right of appeal process.

Parental and adoption leave should be offered on equal terms to parents of all genders.

5.2.2.9 Health, safety and wellbeing

COMMENTARY ON 5.2.2.9

The purpose of this policy is to show an organization's commitment to safeguarding the mental health and wellbeing of employees and stakeholders.

This policy should include:

- a) what the policy covers;
- b) how the employee raises an issue;
- c) what support and assistance the employee should expect;
- d) information about employee assistance programmes; and
- e) information about external organizations and support agencies.

Health, safety and well-being policies should be reviewed and updated as necessary to verify that the physical, mental and cognitive health and well-being of employees is effectively covered.

NOTE 1 Organizations need to be aware of the ways in which they can impact on the mental, emotional, physical, financial and/or social wellbeing of an individual and reflect this in their practices and processes. This includes but is not limited to stress and pressure caused by deadlines or targets, working long hours or a lack of reasonable breaks, workload and duties in excess of the role or job description, pressure to conform and factors outside of the organization.

NOTE 2 Organizations might also need to consider health and mental wellbeing awareness training to help managers identify employees who might need additional help or support.

NOTE 3 Organizations have a responsibility to be aware of any laws and regulations applicable to the jurisdiction(s) in which they operate or have operations, including the requirement to consult with employees or stakeholders.

5.2.2.10 Whistleblowing

COMMENTARY ON 5.2.2.10

The purpose of this policy is to inform employees and stakeholders who speak out about wrongdoing, either by an individual linked to the organization, or by the organization itself can do so safe in the knowledge that they will be protected.

This policy should include:

- a) how any employee can raise a concern about wrong-doing or inappropriate, illicit or illegal behaviour or conduct of an individual, team or the organization;
- b) the right to confidentiality and anonymity and how the whistle-blower's identity is protected;

- c) how the concern is investigated and what action might be taken;
- d) how the employee raising the concern is protected from any negative action or consequence as a result of raising the concern.

NOTE In some jurisdictions raising a concern about wrongdoing (especially any action which might be considered illegal or in breach of laws or regulations) can also be referred to as a "protected disclosure".

5.2.2.11 Brand/marketing guidelines

Organizations should assess how their diversity, equity and inclusion strategy impacts their brand and issue guidance to marketing and advertising teams.

Existing brand and marketing guidelines should be updated to reflect the organization's approach to diversity, equity and inclusion to include guidance on:

- a) the use of language or terminology;
- b) the use of images and other visual representations;
- c) marketing and advertising that is accessible to all including those with conditions;
- d) organizational and corporate communications to promote and highlight diversity, equity and inclusion initiatives both internally and externally;
- e) the use of employee success stories subject to employee consent process; and
- f) a review and sign-off process.

NOTE Use language that is appropriate and best suited to the organization and its operations. For example, in some locations the term "disability" might be used, but in others the more common or acceptable term may be "impairment" or "condition".

5.2.3 Monitoring and audit of policies

Organizations should establish a process for monitoring and auditing its policies against its stated aims and objectives for diversity, equity and inclusion, and make recommendations for improvement.

The monitoring and audit process should cover:

- a) employee awareness of and access to the policies;
- b) how different employees interpret the same policy;
- c) if any employee has raised a request, issue or concern and what how it was managed; and
- d) whether policies are applied fairly and consistently across the organization.

NOTE 1 The audit aims to understand the effectiveness of the policy, including whether employees are reluctant to raise issues or concerns. For example, if there has been no request for flexible working, is this because employees are not aware of the policy, because no-one wants flexible working or because employees are reluctant to raise a request.

NOTE 2 The audit also aims to identify any common trends or patterns. For example, exit interviews all stating similar reasons for leaving, or some leavers giving no reason at all; a higher number of performance management concerns in relation to a specific group of employees, or a lower number of requests for flexible working from one team compared to others in the organization.

Organizations should determine how best to apply the practices and policies implemented or mandated in one location across all of their locations to maintain global uniformity. For example, if gender pay gap reporting is applied in one location it should be applied to all locations (where laws and regulations permit, or do not prohibit).

5.3 Processes and practices

5.3.1 General principles

Organizations should have processes and practices in place to monitor that policies are implemented and enforced consistently throughout the organization, and at all times.

Guidance should be provided to individuals and teams responsible and accountable for the approval, communication, implementation and enforcement of the processes and practices.

NOTE For example senior management teams, non-executive directors, risk and compliance, marketing, company secretaries, investor relations, HR and heads of departments.

Wherever possible processes and practices should be:

- a) formalized and available in a variety of formats such as print media, audio, screen readers, large typeface, etc.;
- b) transparent, fair and easy to understand;
- c) in language that is inclusive and does not favour or appear to favour any particular social or cultural group;
- d) available to all employees;
- e) applied consistently across the whole organization;
- f) supported by additional awareness, training, learning and development, as required;
- g) monitored to check that they are implemented properly and as intended;
- h) measured to track results and outcomes;
- i) communicated to external stakeholders using appropriate methods such as via the organization's website; and

- j) regularly reviewed and amended.

5.3.2 Monitoring and auditing of processes and practices

Organizations should develop a process for monitoring and auditing its processes and practices against its stated aims and objectives for diversity, equity and inclusion.

Monitoring should be undertaken by an independent assessment such as internal audit or risk and compliance and by personnel who have received appropriate training including identifying conscious and unconscious bias.

Processes and practices should be assessed at every stage for effectiveness at least once a year to support ongoing and continuous improvement and delivery against objectives.

The monitoring and audit process should assess the following:

- a) accuracy and adaptability of job descriptions;
- b) impact of advertising and recruitment methods;
- c) source and quality of applicants;
- d) evidence of bias in the applicant screening process;
- e) evidence of bias in the interview process;
- f) measure success against internal targets;
- g) track internal progression and development of employees; and
- h) make recommendations for improvements as applicable.

Organizations should apply the same monitoring and auditing to the promotions and internal transfer process to confirm that diversity, equity and inclusion is also reflected in the internal recruitment process, tracking progress by comparing promotion metrics with other comparable teams and departments rates levels of diversity.

Organizations should include the following metrics and data points as part of their monitoring and auditing measures:

- 1) career progression and development:
 - promotion rates by characteristics and traits;
 - pay gaps (including averages and bonus, benefits, and rewards);
 - career development programmes as applicable to different groups ;
 - diversity of colleagues undertaking different types of training, learning and development;

- diversity of colleagues being sponsored to do further education courses;
- 2) recruitment and selection:
- application;
 - shortlist;
 - offer;
 - acceptance;
- 3) culture:
- diversity data by role, location, pay band, business area;
 - attrition (turnover) including rates and numbers of leavers and reasons;
 - diversity data – workforce engagement survey;
- 4) equity:
- flexible working (requests made, granted, and denied);
 - diversity data of colleagues requesting reasonable adjustments (requests made, granted, denied);

- rate of return from parental leave;
- take up of shared parental leave; and
- grievance data by diversity (including numbers of reports, reasons and outcomes/decisions).

5.3.3 Recruitment

5.3.3.1 General

Organizations should include processes and practices that support diversity, equity and inclusion at all stages of the recruitment and selection cycle, as demonstrated in Figure 3. Organizations should assign individuals within the recruitment and selection process performance related objectives that support the organization's diversity, equity and inclusion goals and objectives.

NOTE 1 This includes collecting and sharing anonymized demographic data at every stage of the process from numbers of applicants from different groups to selection, interview, offer and appointment.

Figure 3 – The recruitment cycle



Available roles should be communicated and be open to all suitably skilled and qualified individuals.

The recruitment process should be accessible, and support applications from candidates who have medical conditions.

NOTE 2 *This can be achieved by considering alternatives to traditional interview techniques, such as written or verbal assessments and skills tests, short presentations or environmental assessment where candidates spend time with the team they would be working with and both parties provide feedback to the interviewer.*

Organizations should analyse the demographic representation within their organization and compare it to that of the wider locations in which they operate to check that the demographic make-up of their employees reflects that of the locations in which they operate.

Where an organization is applying a strategy of quotas or positive discrimination or action the reasons for this should be clearly communicated. Where this is applied candidates should be asked to provide their consent to being a part of such an initiative.

NOTE 3 *Organizations can voluntarily publish data or information in relation to equal pay where they are not compelled to do so by law or regulation. For example, where an organization is encouraging applications from specific social or cultural groups with appropriate skills and experience in order to increase the number of applications and appointments from underrepresented groups.*

NOTE 4 *Some jurisdictions have laws and regulations that require organizations to actively encourage applications from under-represented groups. This could be through direct laws and regulations such as equal opportunity and anti-discrimination laws, or indirectly, such as gender or race pay gap reporting which would help highlight existing biases in an organization that require attention.*

5.3.3.2 Job descriptions

Each role should have a formal description stating the duties, responsibilities, qualifications, skills and experience required for the role, working terms and conditions, remuneration package (if included) and reporting structure.

Job descriptions should focus on the competencies required for the role and be clear and objective and not open to interpretation.

Where there is no requirement for any previous experience or specific qualification, such as entry-level roles or where training is provided following appointment, organizations should recruit on the basis of a candidate's potential to increase levels of diversity and inclusion.

NOTE 1 *When writing job descriptions and role requirements, avoid broad terms that rely on the applicant or interviewer to make a subjective assessment based on their personal interpretation based on existing biases. For example, "desirable skills" can be interpreted as essential or a key requirement, resulting in good candidates being disregarded or choosing not to apply. "Personality fit" could imply or include cultural or social characteristics or traits. "Required to travel" as a general term might deter candidates with domestic commitments, but "required to travel to Munich office twice a year" might allow those same candidates to consider the role differently.*

NOTE 2 *Unless specifically required by law or regulation, avoid phrases in role requirements that introduce biases. For example, linking experience to time, "must have at least five years' experience", which introduces a bias of quantity over quality and automatically disqualifies suitably skilled applicants.*

NOTE 3 *Review job descriptions for signs of bias, such as use of language or imagery that might appeal to only some social or cultural groups. For example, "would suit mother returning to work", or "retired person".*

NOTE 4 *Use gender neutral language and review job descriptions for signs of bias. For example, use of language or imagery that might appeal to only some social or cultural groups, or terms such as "team player" or "good communication skills" where these are not a requirement of the role.*

Organizations should review:

- whether a job description can be adapted to support flexible working or job sharing between individuals with complimentary skills that meet the requirements of the role without any negative impact;
- whether a job description or the physical environment can be adapted to support an individual with a condition without any negative impact; and
- any financial or other support such as subsidised travel, availability of equipment or an allowance to assist with the cost of remote working from a personal or non-organizational location.

Where possible, organizations should make reasonable adjustments and assess the possibility of job sharing to support medical conditions and neurodiversity.

In addition to making adjustments to the interview process, organizations should assess if making adjustments can be made to the physical work environment where it is reasonable to do so.

NOTE 5 Annual workplace risk assessments allow organizations to monitor the ongoing impact on employees and make adjustments as required such as filter screens for computer monitors or assistive technology.

5.3.3.3 Advertising

Organizations should have a plan for advertising roles in such a way to attract a more diverse range of applicants.

The following areas should be taken into account.

- a) Where roles are advertised, including information around accessibility and the target audience for that resource.

NOTE 1 For example, advertising a role in a publication or marketplace where the target audience is a specific gender or ethnicity has an impact on the gender and ethnicity of the applicants, or ensuring that information is easily accessible to a visually or otherwise impaired applicant.

NOTE 2 Information can be included about financial support such as subsidized travel to and from work, or supply of equipment or allowances to support costs related to remote working such as internet provider or increased energy usage.

- b) The language and tone of voice used in advertising and whether it communicates a bias or leaning to specific social or cultural groups.

NOTE 3 For example, phrases such as “regular overseas travel” or “required to be on-call” might deter applicants who are parents and are to be avoided (unless they are a true requirement of the role), compared to more inclusive phrases such as “opportunity to work from home” or “flexible hours” or “flexible working”.

- c) Imagery used alongside any role should reflect and reinforce the organization’s position on diversity, equity and inclusion.

NOTE 4 Organizations can consider the use of language or imagery which could be perceived to be targeting or excluding a specific social or cultural group or could be seen as being intercultural inappropriate or insensitive to any social or cultural group. For example, an image showing mainly or only men might give the impression that the role is for men only, or an image showing a cross section of the workforce where the senior employees are represented by one social or cultural group, and more junior employees represented by a different social or cultural group might give the impression that role and seniority is linked to a candidate’s social or cultural background.

- d) A statement can be made that the organization welcomes applications from underrepresented groups, and affirming its commitment to promoting and supporting diversity, equity and inclusion.
- e) Any affiliation, sponsorship or support of any charities, organizations, events or initiatives in relation to diversity, equity and inclusion.

NOTE 5 For example Women in Tech initiatives or Pride (an annual event in support of LGBTQIA+ communities).

Organizations should assess the benefits of recruitment initiatives which target specific under-represented cultural or social groups such as:

- employee referral programmes such as “Recommend a friend or candidate”;
- **NOTE 6** “Recommend a friend” programmes can carry the risk of disproportionately increasing the representation from an existing group or demographic unless appropriate monitoring controls are applied. For example, a RAF scheme applied to a team or department made up of mainly veterans is likely to result in the recommendation of other veterans rather than younger candidates.
- open days (where prospective applicants are invited to visit the organization to learn more about how it works and the opportunities it offers) in collaboration with charities or community groups;
- work experience and internships which allow individuals to gain (paid or unpaid) experience of working in the organization for a period of time;
- apprenticeships and opportunities for those returning to work after a period of time away due to personal or other circumstances such as injury;
- short-term placements or secondments which allow an individual the opportunity to undertake another role within the organization for a period of time; and
- recruitment fairs which are linked to cultural celebrations and gatherings.

Those responsible for recruiting (including interview and selection processes) should be representative of different groups within the organization. They should make recommendations for additional support in the workplace for successful candidates.

NOTE 7 Organizations can consider how they offer underrepresented groups the opportunity to acquire skills, knowledge and experience within the workplace or for specific roles using internships or short-term placements. This could apply to existing employees within the organization or through partnerships with community, government or charity associations, rehabilitation/back to work programmes and initiatives that seek to promote, support, re-skill or re-train and place individuals from underrepresented groups as well as individuals such as veterans and armed

forces personnel, obsolete trades and professions, individuals with disabilities, older employees and those formerly incarcerated in rehabilitation and recovery programmes.

Organizations that outsource recruitment to external agencies should share their aims and objectives with the agency and provide clear instruction and guidance as to how they expect the recruitment process to be managed.

NOTE 8 *For example, stating that they would like to see a gender balanced mix of applicants, or that they would like an agency to work with specific charities or community grounds to increase levels of underrepresented groups.*

5.3.3.4 Employer review websites/forums

Organizations should use employer review websites and forums that allow employees to share information and post reviews about their employer/organization as a way of promoting and showing their commitment to diversity, equity and inclusion.

NOTE 1 *Examples include www.workology.com, www.glassdoor.com and www.fairygodboss.com.*

Organizations should encourage employees to share their views so that prospective applicants are able to see what previous and current employees think about the organization, how they treat employees and the workplace culture and environment.

Organizations should monitor such sites to measure and assess employee perceptions and views regarding the organization as a place of work with a view to investigating and taking appropriate action to address any trends or issues.

NOTE 2 *Organizations need to be cautious of addressing negative comments or reviews by posting their own positive comments or reviews as this rarely works other than to show the organization in an even worse light. Where sites allow an employer to respond they need to do so professionally and in accordance with the site rules.*

5.3.3.5 Anonymized screening of applications

Organizations should apply anonymized screening.

NOTE 1 *This is also referred to as “blind” screening. This technique involves removing any personal information that might give insight into an applicant’s gender or cultural or social background, so that any assessment of their suitability is made solely against their skills, experience and qualifications.*

NOTE 2 *This could take the form of a technical test such as asking a candidate for a developer role to complete a code review, or a candidate for a customer support role to respond to a dummy customer complaint.*

Unless required as part of the referencing or due diligence process, organizations should also remove information relating to educational institution(s) to reduce the risk of bias, focusing solely on the qualifications required for the role.

NOTE 3 *Anonymized (or blind) screening is not a fail-proof method. For example, previous role descriptions, or names and locations of previous employers or educational institution(s) attended might provide an insight into the cultural background of the applicant, or introduce new bias based on the assessor’s personal views about employers or educational institutions.*

5.3.3.6 Evaluation of applicants

Organizations should create a scorecard that evaluates each applicant against a consistent set of criteria.

The score system should allocate points based on how the applicant matches the requirements of the job description.

NOTE 1 *One approach is to assign a point to each requirement within the job description. Each time the applicant meets a requirement they are awarded a point. The applicants with the greatest number of points are the ones that are the closest match to the job description and therefore the ones most suitable for the role and the first to move to the next stage of the recruitment process. For example, if the requirement is “must have experience developing invoices”, every applicant who indicates experience developing invoices is awarded a point.*

NOTE 2 *Some requirements might carry a range of points depending on the degree to which the applicant meets that requirement. For example, the requirement “must have experience of managing teams” might be broken down into a range of points based on the size or location of teams and an applicant that has managed large or multiple teams might score higher than a candidate that has managed small or fewer teams.*

This scoring system should be used to produce a shortlist.

Applicants should be scored anonymously based on how they compare to the job description, so that where positive discrimination or action is applied, only those candidates whose scores are at least the same as those of candidates not recruited by positive action are shortlisted.

5.3.3.7 Structured interview process

Organizations should have in place processes which support an objective and transparent interview process that limits the risk of bias.

To achieve this, organizations should:

- a) conduct interviews with suitably qualified and trained employees;
- b) support an untrained or inexperienced employee conducting an interview by providing a suitably qualified/experienced colleague or a member of the HR/People team;
- c) where possible, use at least two interviewers, each representing different cultural and/or social groups for balance; and
- d) follow a pre-defined score-based interview structure, where all candidates are presented with the same set of questions in the same way and their answers documented accurately.

Each question should carry an objective score based upon the expected answer(s) to that question.

Organizations should:

- 1) clearly document questions or responses that do not form part of the score, together with the reason for the question; and
- 2) where possible, use, at a minimum, a two-stage interview process. Where a two-stage process is in place the first set of interviews should be based on the applicants who scored highest during the applicant screening process. The second set of interviews should be based on the applicants who scored highest in the first set of interviews.

NOTE 1 Organizations can make reasonable adjustments for candidates who need questions to be provided in a different format, such as written or with the aid of a translation, or in advance where they might need more time to prepare compared to other candidates.

NOTE 2 There is no limit to how many stages an organization can apply to an interview process; however, it is good practice for organizations to consider how an interview process which requires a candidate to make themselves available for a prolonged period of time or on a number of occasions might impact on candidates with personal or caring responsibilities.

Where the process has a number of stages, the process and timings should be communicated at the start as well as after each stage to provide assurance and minimize any undue stress or anxiety.

Organizations should:

- i) complete interview notes that state the reasons for why a candidate was suitable or unsuitable, or why one candidate is preferred for a role over another;
- ii) incorporate questions relating to diversity, equity and inclusion in interviews for senior and managerial roles;
- iii) offer flexibility when scheduling date and times for interviews to accommodate parental or other commitments, and offer, if appropriate, financial assistance for, or reimbursement of, travel costs for in-person interviews;
- iv) provide sufficient notice and any other material information such as how to get to the location, who to ask for on arrival and what to expect; and
- v) use methods such as assessments, round table discussions, and the submission of a written paper or presentation using screen readers, audio recordings and other alternatives, to allow applicants to demonstrate their competencies.

5.3.3.8 Employee induction and onboarding

Organizations should use a structured induction and onboarding process for employees that are new to the organization.

This process should be applied to employees changing roles or locations in the organization.

An employee induction programme should include:

- a) the organization's vision, strategy, aims and objectives;
- b) why diversity matters in the organization and how it fits into the overall corporate strategy if not already included in a);
- c) the role and responsibilities relating to the employee, including contributing to the organization's vision and how to get involved;
- d) copies of, or access to, employee policies and procedures, including the right to membership of external associations or organizations such as trade unions;
- e) training and personal development opportunities;
- f) information about support and network groups, and other initiatives designed to support underrepresented groups; and
- g) any other information that supports diversity, equity and inclusion, including confidential helplines, counselling, flexible working, and other support mechanisms.

Employee induction/onboarding programmes should be reviewed annually to keep them up to date with, and relevant to, the organization and its aims and objectives.

NOTE *When developing induction and onboarding programmes, organizations should take into account different delivery styles and techniques, formats and language so that they are as inclusive as possible.*

5.3.3.9 Exit interviews

Organizations should use structured exit interviews as a means of recording levels of employee turnover and the reasons for leaving, allowing organizations to:

- a) identify the policies, processes and procedures that are working or not, and those that require future development;
- b) investigate and address any underlying concerns or issues not raised in the workplace;
- c) identify trends or patterns (positive and negative);
- d) understand what needs to be done to support ongoing improvement; and
- e) identify specific social or cultural groups where levels of turnover are above average and the reason(s) for this.

NOTE *Organizations can use a variety of objective and subjective open-ended questions relating to diversity, equity and Inclusion, such as “Do you think the organization treats all employees fairly or in the same way?”, or “When was the last time you felt excluded?”.*

To maintain the integrity of the process and encourage honesty, exit interviews should:

- 1) be confidential, and employees should be made aware of this before the interview;
- 2) be conducted by the HR team or third-party vendor; and
- 3) have the option to be completed anonymously and/or after leaving the organization to minimize any potential for retaliation.

The content of interviews should be shared in an anonymized way with only those who require the information.

Exit interviews should be maintained and used as part of the monitoring and audit process in accordance with 5.3.2.

5.4 Addressing behaviour inconsistent with DEI

5.4.1 General

Organizations should use employee personal development plans to support their diversity, equity and inclusion objectives.

Personal development plans should communicate that the responsibility for achieving the organization's goals applies to all employees within the organization.

Performance objectives should be constructed to reflect organizational, team and individual contributions to the overall diversity, equity and inclusion strategy, and include but are not limited to:

- a) recruiting against diversity, equity and inclusion targets;
- b) secondments, work experience, internships, apprenticeships and return-ships;
- c) job shadowing opportunities and reverse mentoring programmes;
- d) supporting internal or external diversity, equity and inclusion initiatives;
- e) keeping internal and external contact details current, and accessible;
- f) attending or implementing training, learning and development;
- g) providing feedback and coaching;
- h) evaluating and assessing progress to understand the reasons for any under or over performance;
- i) agreeing a plan of action to address any issues or concerns; and
- j) assessing the risks and unintended consequences of quotas/positive discrimination or action.

NOTE 1 *This could be as result of training, skills or ability, or as a result of targets or objectives being too ambitious or too simple;*

NOTE 2 *Individual personal development plans can include performance targets but also actions for future development including, but not limited to:*

- *arranging appropriate secondments, work experience and internships for individuals looking to develop their career;*
- *becoming a mentor or assigning a mentor to support career development; and*
- *attending training or providing additional learning and development opportunities.*

NOTE 3 *Personal development plans for individuals responsible for managing or leading teams may include specific performance measures relating to diversity, equity and inclusion.*

NOTE 4 *Where personal development plans include such performance measures and targets, organizations can provide guidance and additional training and ask about adjustments or changes that might help to verify that they have the appropriate skills to be able to support their peers to identify objectives relating to diversity, equity and inclusion.*

5.4.2 Developing and procuring training, learning and development programmes

Before investing in brand new training programmes, organizations should first assess their existing training, learning and development offering to adapt them to support diversity, equity and inclusion.

NOTE 1 *Examples of existing training offerings that might be adapted to include training about diversity, equity and inclusion are:*

- recruitment and selection;
- interview skills;
- customer engagement and customer relationship management;
- disciplinary and grievance;
- conflict management;
- health and safety;
- mental health and well-being;
- employee coaching and development;
- inclusive leadership and management skills;
- focus groups, where employees are invited to share their experiences and learn from each other;
- interpersonal skills, providing guidance on how to create a safe and open environment;
- inclusive interaction, conduct and behaviour in the workplace including informal conversation, office “banter” and jokes;
- procurement and commissioning and third-party relationships;
- media training for individuals who might be required to communicate, represent or speak on behalf of the organization in public or through the media, such as newspapers, radio or television; and
- supporting external initiatives such as “Women/Girls in Tech” or organizations seeking to place ex-offenders or impaired individuals into the workplace through training, work experience, internships or apprenticeships.

Organizations should provide diversity, equity and inclusion awareness training and learning and development opportunities for all employees.

Organizations should also assess the benefits of training, learning and development relating specifically to diversity, equity and inclusion which would be of benefit to everyone in the organization.

NOTE 2 *Examples of training, learning and development courses include but are not limited to:*

- conscious and unconscious bias;
- intercultural competence;
- intercultural team building; and
- education about specific dimensions of diversity (e.g. people with disabilities, LGBTQIA+, etc.).

5.4.3 Mentoring and reverse mentoring

In addition to traditional mentoring techniques, organizations should introduce the concept of “reverse mentoring”, where an employee who is a subject matter expert (SME) but is in a more junior role or position shares their knowledge and skills with those in more senior roles in areas such as:

- a) new and emerging technology and its uses;
- b) current attitudes, values and views;
- c) language, conduct and behaviour traits;
- d) social media and interactions; and
- e) social characteristics and emerging trends.

5.4.4 Integration and support networks

COMMENTARY ON 5.4.4

Organizations are advised to have initiatives in place for ensuring that individuals from underrepresented groups are fully included in the organization and are encouraged to provide feedback and speak up about inequality and inequity in a supportive way. The organization has a responsibility to monitor that no employees feel less valuable, less included or disadvantaged because of social or cultural differences.

5.4.4.1 Inclusion

5.4.4.1.1 Work-based events

Organizations should take into account the benefit of organizational events that bring everyone in the organization, or large groups of employees, together in one place.

Underrepresented groups should be asked to provide feedback about what the organization can do to support them, including recommending the types of initiatives, events and employee groups they feel would be most beneficial or appropriate.

NOTE 1 *Such events can be used to communicate:*

- *organizational performance;*
- *organizational strategy and future plans;*
- *celebrate champions (both teams and individuals); and*
- *highlight success stories.*

Organizations should use times and locations that are as inclusive as possible, with travel to and from the event if outside of the workplace and normal working times supported by the organization.

NOTE 2 *Events can be physical, virtual or a combination so that they are as inclusive as possible.*

In the case of a physical event, venues should be assessed for physical and cultural accessibility, so that employees with physical access needs, such as wheelchair users, or employees who would not normally visit venues that serve alcohol for religious or cultural reasons, are not excluded.

NOTE 3 *For example, checking that facilities support those with conditions and schedule timings allowing for breaks for prayers.*

Speaker and presenter lists should be reviewed to assess the level of diversity reflected and any possible impact in relation to this on the audience.

5.4.4.1.2 Social events

Organizations should take into account the role of social events as a means of helping to break down cultural and social barriers, increasing understanding and acceptance of differences and supporting integration of underrepresented groups, on a team, site or organization basis.

Social events should take place both inside and outside of the workplace and where possible during normal work hours to provide access to employees with various personal circumstances.

Organizations should include employees from all groups in the decision-making process for social and team activity.

Organizations should take into account using social activities as a way of bringing together teams from different business functions to broaden the reach of diversity and promoting inclusion across the whole organization.

Social events should not draw attention to underrepresented groups in such a way as to highlight them as a minority or marginal part of the workforce.

Organizations should focus on events that relate to general or popular themes such as:

- a) organizational anniversaries;
- b) UN International Days;
- c) cross-cultural and religious celebrations;
- d) charity initiatives such as dress-down or themed days;
- e) local and community events;
- f) popular and sporting events; and
- g) team building days and events.

The event venue should be assessed for physical and cultural accessibility, so that employees with physical access needs, such as wheelchair users, or employees who would not normally visit venues that serve alcohol for religious or cultural reasons, are not excluded.

5.4.4.2 Support groups and networks

COMMENTARY ON 5.4.4.2

Organizations are advised to establish or allow employees to establish support groups and networks for different social and cultural groups within the organization.

Where there is no tradition or historical precedent for such groups and networks within the organization, clear communication that the organization is open to and willing to support the establishment of such groups in accordance with its diversity, equity and inclusion strategy is necessary.

This is especially the case in circumstances where there might be hostility or suspicion towards a group due to wider political, social, religious or cultural issues beyond the immediate control of the organization.

In establishing such groups and networks the organization can allow those for whom the group is being established to be consulted in identifying the need or needs to be addressed.

Organizations should support the effectiveness of support groups and networks by:

- a) maintaining a clear purpose and role that relates to the organization's vision for diversity, equity and inclusion;
- b) offering financial and administrative support to the launch and maintain on-going development of the group(s);
- c) offering training and development to those co-ordinating, leading or chairing group(s);
NOTE 1 Training such as negotiation skills or conflict management could be helpful if facilitating discussions involving emotions and differing personal perspectives and experiences.
- d) making it clear that employees have the right to attend such groups and networks, and that their managers should support them in doing so (if groups meet during work time);
- e) requiring that they remain part of the wider organization and are inclusive and open to all;
- f) agreeing the scope, role and activities of the group and the mandate that the group holds.
NOTE 2 For example, whether they are permitted to speak to the media on behalf of the group and/or the organization.
- g) requiring that group members engage with wider improvement initiatives relating to diversity, equity and inclusion, so that a wide range of diverse perspectives contribute to work in these areas;
- h) requiring feedback from each group, outlining how their activities have supported the organization's ambitions around diversity, equity and inclusion;
- i) providing feedback and recommendations for changes to the organization's existing policies, practices and processes to better support diversity, equity and inclusion; and
- j) allowing or enabling recommendations made by such groups to be communicated, reviewed and actioned, for example by a diversity, equity and inclusion committee or employee council.

Organizations should be equally supportive of all such groups to avoid any accusation of bias or risk alienating those who do not identify with a specific group, or any group at all.

NOTE 3 Groups with only a few members might need wider support or resource to be able to perform the same role as groups with more members.

Participation in employee groups should be based upon individuals volunteering or self-electing to become involved rather than being selected or nominated by managers or business leaders, unless nomination is as a result of election or selection by peer groups.

6 Assessing the impact of diversity, equity and inclusion on organizational performance

6.1 General principles

COMMENTARY ON 6.1

Organizations are advised to assess the impact of adopting a façade of supporting diversity, equity and inclusion because it believes that is what is expected of it (a practice referred to as a “badging exercise” or “purpose washing”) and the damage that a lack of authenticity could have on its reputation or brand. When conducting an impact assessment, organizations may find it helpful to refer to the mapping exercise in 4.1. as a starting point.

NOTE Internal stakeholders may include:

- employees and employee representative groups;
- shareholders and investors;
- talent acquisition and retention; and
- product development technology and innovation.

External stakeholders may include:

- consumer and customer engagement;
- suppliers and providers;
- communities; and
- new markets.

Diversity, equity and inclusion impact internal and external stakeholders, and organizations should be able to demonstrate that this has been taken into account when assessing organizational performance.

6.2 Technology

COMMENTARY ON 6.2

Whilst 6.2 focuses on technology, the principles apply to all forms of product development and design, both technical and non-technical.

6.2.1 General principles

Organizations should take into account both the positive and the negative impact of technology on internal and external stakeholders when developing a diversity, equity and inclusion strategy.

Organizations should take into account how:

- a) technology can impact diversity, equity and inclusion in the workplace;
- b) technology can remove barriers and support accessibility; and
- c) diversity, equity and inclusion can impact new and emerging technology.

Organizations that develop, use or invest in technology should take into account the impact of a lack of diversity, equity and inclusion in the product conception, development and testing stages.

6.2.2 How technology can impact diversity, equity and inclusion in the workplace

Organizations should assess the types of technology used within the workplace and its impact and influence on different social, cultural and underrepresented groups.

Organizations should make all employees aware of available technology and the way in which it can help them to address any concerns which are a barrier to inclusion for:

- a) employees who are less comfortable with technology and less willing to apply for roles which they believe require a greater reliance of technology or technical skills;
- b) economic or educational backgrounds that mean some employees are less familiar with some forms of technology and equally less willing to apply for roles where technical skills may be needed;
- c) the use of assistive technology to support those with conditions, such as text to voice applications or subtitling software; or providing digital accessibility to those on lower incomes or limited data connectivity; and
- d) employees limited in their use of technology due to medical or other conditions.

Organizations should assess the different forms of communication used in the workplace and its impact on different groups of employees.

NOTE 1 *Whilst remote and distance working can support greater diversity and equity by providing opportunities to a larger pool of employees, without regular social interaction, it can also lead to a sense of isolation, exclusion and a feeling of being left out or an outsider.*

Examples of communication technology include:

- generational preferences for communication, such as instant messaging or text style communications instead of face-to-face;

- *internal and inter-office communication tools and applications, such as Skype, Slack, Google Hangouts, Yammer, etc;*
- *use of remotel/interactive communication, such as video-conferencing; and*
- *websites and digital applications that support accessibility or software that supports accessibility, such as text to audio or multi-language options.*

NOTE 2 *Not all employees are familiar with slang or casual terms due to generational, cultural or geographical differences.*

NOTE 3 *Some employees might be less comfortable or more self-conscious when using applications such as video-conferencing so it is advised also make audio-only options available.*

NOTE 4 *Organizations can consider ways in which they can bring individuals who work remotely together through things such as regular team meetings in a physical location where it is possible or appropriate, team catch-ups and updates or the use of video-conferencing and instant messaging tools to support continuous engagement and inclusion with other team members and managers.*

6.2.3 How diversity, equity and inclusion can impact new and emerging technology

6.2.3.1 Machine learning and Artificial Intelligence (A.I.)

COMMENTARY ON 6.2.3.1

Machine learning and A.I. are applications designed by humans to replicate the way humans think and react when presented with specific information. Unless the A.I. development process has checks and balances in place to check for and to prevent unconscious and conscious bias, the final programme or application could be an extension of or include elements of the programmer/developer's bias. Failure to carry out these checks can mean that an application which has been designed to be used in a number of different situations and circumstances might only produce expected results in some situations and circumstances.

For example, if an employer regularly selected younger candidates after screening candidates using A.I. the applications might "learn" that younger candidates are more desirable than older candidates. It can then add age as a component to its screening process and eliminate older candidates. If A.I. is taught through data on existing and past employees in a workforce predominantly composed of a particular ethnicity, then A.I. might learn bias against candidates with different ethnicities, or during interviewing that a candidate's slow or slurred speech or atypical facial expression(s) do not conform to previous candidates and screen out otherwise qualified candidates with neurodivergence or disability.

Any applications designed to emulate human thought processes and behaviours, including but not limited to Artificial Intelligence (A.I.), sentient and predictive technology and biometrics such as facial recognition, should be developed in a manner which eliminates any specific character and personality traits or biases, unless recognition of a specific characteristic or trait is a key or necessary aspect of the application.

Where programmes are developed with specific user groups in mind, organizations should include end user groups in the development cycle from the outset.

6.2.3.2 Development of products and services

Organizations should assess how the use of a product or service is impacted by:

- a) physical ability;
- b) cognitive ability;
- c) neurodivergence;
- d) physical environment;
- e) language and culture;
- f) accessibility (physical and/or psychological); and
- g) social, political and environmental attitudes, views and values.

NOTE 1 *An example of non-inclusive product design is where something designed by a right-handed user does not create the same experience or result for left-handed users.*

NOTE 2 *By including the principles of diversity, equity and inclusion at every stage of the product development cycle, organizations are better able to create products which can be used by the widest possible range of users.*

7 Engaging and supporting underrepresented groups

COMMENTARY ON CLAUSE 7

The key to an effective diversity, equity and inclusion strategy is the ability to engage, retain and develop employees and customers from a wide range of social and cultural groups, including underrepresented groups.

An organization's reputation and public perception might influence how it engages with underrepresented groups.

When seeking to engage underrepresented groups, organizations are advised to take a realistic approach based upon prevailing social and cultural norms and customs which might prevent some groups from engaging with them.

Where an organization is unable or unsuccessful in engaging effectively with a particular group, they can consider engaging with organizations that already have a relationship with the group and who may be able to act as an intermediary or support and assist in other ways.

For example, if an organization operates in a sector which is not considered to be acceptable to a particular social or cultural group, such as alcohol or gambling, attempting to engage with individuals from that group might be met with limited success. Where a group is unwilling to engage for reasons of religion, on-going efforts to engage could be perceived as insulting or offensive.

Quota systems and positive discrimination or action used to increase levels of underrepresented groups in a homogenous group with little or no diversity can be met with a challenge and the false perception that an individual might be appointed in order to meet targets.

To prevent this, it is important to clearly communicate that these systems are a means of increasing participation of protected groups from a pool of equally qualified candidates, and take appropriate action to prevent:

- *low morale, lack of motivation and departure of employees who also applied but were unsuccessful by providing constructive feedback;*
- *resentment, negativity and unspoken refusal to properly support the appointee because they are perceived as an outsider;*

- *actions and behaviour on the part of existing employees which is designed to cause the new appointee to fail or to make them feel uncomfortable or excluded;*
- *the newcomer becoming isolated and unsupported; and*
- *encourage the formation of employee resource groups (ERG) to drive the conversation around diversity, equity and inclusion.*

7.1 Engaging underrepresented groups

In addition to the recommendations in 5.4, organizations looking to engage with specific groups should also take into account the following as a means of engagement:

- a) public meetings;
- b) roadshows and focus groups;
- c) individual workforce activity;

***NOTE 1** For example, charity fundraising or volunteering days.*
- d) publications, leaflets and letters;
- e) open days, exhibitions and drop-in sessions;
- f) surveys and questionnaires;

***NOTE 2** For example, online, text or by post.*
- g) social media opportunities;
- h) site or place visits;

***NOTE 3** For example, schools or colleges to promote careers.*
- i) charities and community groups; and
- j) specialist recruitment agencies.

In the case of customer engagement, organizations should offer, when deemed appropriate:

- 1) free giveaways;
- 2) customer events, reviews and endorsements;
- 3) user group testing and feedback;
- 4) reimbursing people's time for contributing;
- 5) loyalty and rewards programmes; and
- 6) branding or marketing.

7.2 Supporting underrepresented groups

COMMENTARY ON 7.2

Individuals appointed as a result of a quota requirement or positive affirmative action might become the focus of resentment from others in the team or organization.

This resentment could take the form of both passive and active actions and range from doing nothing such as withdrawing or failing to provide basic support or assistance provided automatically to others and an unwillingness to engage or communicate unless required to do so; to actively conspiring to cause issues and problems, such as failing to pass on information or invites to meetings, or behaviours designed to undermine, exclude or isolate.

Where organizations have chosen to implement quota-based systems and positive discrimination or action for protected groups, they should also implement a framework for ongoing support and assistance in addition to the recommendations in 5.4.

NOTE *This includes training and awareness as to why the organization has chosen to take this approach to address any potential areas of conflict, dissent or negativity before implementing and thereafter on an ongoing basis as required.*

Organizations should provide such employees with a buddy or mentor either inside or outside of the organization to identify such incidents and provide support in addressing them.

8 Implementing the concept of “diversity of thought” and “intercultural competence”

8.1 Diversity of thought

COMMENTARY ON 8.1

Innovation and development depend on the ability of individuals within a group to think differently from one another.

The ability of a group to see something from different sides, angles, and perspectives, especially where the difference relates to people who identify with different social, cultural, or other underrepresented groups, is improved when groups have greater diversity.

When attempting to identify with other perspectives, empathy, placing oneself in someone else’s shoes and imagining their experience, is not the same as experience. For example, a man can empathize with the pain of childbirth because he knows, understands and can relate to the experiences relating to physical pain, but this is not the same as actually experiencing childbirth. The man is imagining what it would be like based on his idea of a similar experience.

Diversity of thought can be achieved through an organizational strategy that actively encourages, promotes and supports diversity, equity and inclusion.

Organizations should encourage individuals to:

- a) embrace, champion and celebrate difference;
- b) respectfully share conflicting and contrasting views that support positive progress;
- c) see difference as a route to innovation and success;
- d) ask difficult questions that provoke thought and challenge existing views and opinions that allow individuals to learn from each other;
- e) reward honesty and openness that supports positive and constructive progression;
- f) introduce new perspectives and different ways of thinking;
- g) consider the impact of social and cultural history and its current impact on society and the workplace; and
- h) review past actions and decisions and take appropriate positive action.

Organizations should include diversity of thought within their overall strategy and take steps to encourage and support its adoption throughout the organization.

Organizations should provide guidance as to how views and opinions should be shared in a manner that is respectful and encourages understanding and constructive progress and without causing offence, ridicule, or disparagement.

8.2 Intercultural competence

COMMENTARY ON 8.2

Culture is defined and influenced by many things, either individually or in combination with one or more factors.

Intercultural competence is the ability to understand cultural and social differences and adapt communication and actions accordingly.

Competent intercultural communication includes language, tone, actions, behaviour and conduct that is appropriate to the expectations of the social or cultural group, the circumstances, the situation, and the relationship between the parties involved.

Examples of intercultural incompetence or insensitivity might include the use of a specific word or term without understanding its impact within the context of a specific culture, the use of a religious symbol as a fashion accessory, or gestures and behaviours which might be acceptable to one group but not another.

A lack of intercultural competence can result in an organization acting in a manner that could be considered as insensitive, inappropriate, offensive, insulting, lacking awareness or misappropriation of a trait or characteristic specific to, or widely accepted as being associated with a cultural or social group.

This is viewed as offensive or insulting because the culture of origin rarely receives the same support or praise for this characteristic or trait as those who misappropriate it.

Cultural misappropriation is adopting or copying a characteristic, trait or manner of speaking most commonly associated with a different social or cultural group.

Cultural misrepresentations, which may be based on outdated or inaccurate views and opinions, or a lack of knowledge or understanding, might be perceived as a micro-aggression.

Microaggressions occur on a systemic level; for example, unequal pay or benefits, treatment or conditions based on traits or characteristics such as age, gender or ethnicity.

Organizations should take into account the ways and areas in which a lack of cultural competence impacts them, including but not limited to:

- a) product development;
- b) marketing and advertising;
- c) sponsoring events or individuals;
- d) take up of products and services;
- e) brand ambassadors and spokespeople;
- f) press statements and social media posts;
- g) humour or jokes in the workplace; and
- h) employee conduct and behaviour away from the workplace.

9 Measuring progress and developing a strategy for continuous improvement

9.1 General principles

Organizations should have a mechanism in place for measuring progress and a strategy for continuous improvement.

Before agreeing targets, indicators and measures of performance, organizations should:

- a) establish who is responsible for the execution and success of the diversity strategy (see Clause 4.2);
- b) agree a process that is transparent and supports accountability;
- c) establish current/existing levels of diversity, equity and inclusion in the organization and the data and information required to measure progress;
- d) designate the individual or team responsible for measuring and reporting on progress; and
- e) agree how progress is to be tracked and measured.

9.2 Measuring progress

Organizations should measure the success of their diversity, equity and inclusion strategy in other areas such as employee demographics, external stakeholders and commercial performance.

***NOTE 1** Recommendations for monitoring and auditing internal policies, processes and procedures are included in 5.2 and 5.3.*

Method(s) of measuring progress should include:

- a) analysis of customer demographics;
- b) audit conducted by accredited external auditor;
- c) audit conducted by the internal audit function;
- d) awards and recognition;
- e) benchmarking surveys;
- f) customer acquisition, retention and revenue;
- g) employee acquisition and retention statistics;
- h) employee demographic statistics;
- i) employee posts and ratings on employer review sites;
- j) gender and ethnicity pay gap reports;
- k) impact of sponsoring and supporting events;
- l) innovation and product development as linked to diversity; and
- m) levels of brand recognition, association and awareness;

- n) monitoring career progression of under-represented groups;
- o) relationship between diversity and overall commercial performance and profit/loss.

***NOTE 2** Annex A and Annex D give examples of self-assessment and employee questionnaires.*

9.3 Continuous improvement

Organizations should have a strategy in place for continuous improvement.

Targets for continuous improvement should be based upon the needs of the organization in the short-, mid- and long-term and in accordance with their usual operating needs and requirements to minimize disruption to the organization.

Targets should take into account factors which have an impact on the organization, including but not limited to:

- a) organization size and future growth plans;
- b) location and demographics of available workforce;
- c) employee turnover and attrition rates;
- d) organization type and attractiveness to potential employees;
- e) sector or industry and attractiveness to potential employees;
- f) types of roles available and appeal to potential employees;
- g) market expansion and new jurisdictions;
- h) product development, research and development (R&D) strategy and innovation;
- i) investor relations and corporate social responsibility;
- j) strategic partnerships, mergers and acquisitions;
- k) generational trends and changes in social attitudes and customs; and
- l) benchmarking continuous improvement.

While there are a number of ways in which organizations can measure progress, the method used should be based upon a clear and objective set of measures or metrics that allow the organization to see what changes have taken place and the reason for those changes.

Annex A (informative)

Self-assessment and strategy

A.1 General

Before developing a strategy and a set of objectives an organization is advised to conduct an initial evaluation and basic benchmarking exercise.

The self assessment questionnaire (Table A.1) is a tool intended to help an organization start thinking about what diversity and inclusion means to them, what it looks like in their organization and how it applies to them.

It can be used to identify what an organization does, what it does not do, where it could do more, and apply timescales and develop an action plan for implementation, assessment and review.

This will help an organization understand where it is now, identify any immediate opportunities and challenges, the costs associated with such opportunities and challenges and then develop a strategy and set of objectives that are clear, achievable and measurable.

Organizations may use the template below to conduct an initial evaluation.

Table A.1 – Self-assessment questionnaire

Area	Description	Considerations
Organization		
Purpose and scope	What is the purpose and scope of the organization?	<ul style="list-style-type: none"> • If the organization is a producer of products and services, is there a potential to make these more inclusive? If the product or service is intended for specific social or cultural group does it require specific knowledge of that group or groups, and if so are they represented within the organization? • Does the organization operate in a sector or industry, or engage in activities, which may not be acceptable to all social or cultural groups?
Operating environment	What environment does the organization operate in and how could this impact on any diversity, equity and inclusion strategy?	<ul style="list-style-type: none"> • What pre-existing laws, regulations or religious, social or cultural customs and practice are there that the organization needs to take into consideration? • How does geographical location have an impact upon the types of individuals it might attract? • Is the environment inclusive and accessible to all; for example, wheelchair access, ear defenders, prayer room or provision of support for individual needs relating to conditions or neurodiversity?

Table A.1 – Self-assessment questionnaire (continued)

Area	Description	Considerations
People		
Benchmarking ³⁾	Has the organization conducted initial benchmarking to assess current levels of measurable diversity and established a starting point?	<ul style="list-style-type: none"> Does the organization hold basic demographic information such as the ratio of male to female employees, ethnicity, age, disabilities and other key characteristics or traits? How does this information relate to things such as salary, roles, location or opportunities in the organization?
Underrepresented groups	Are there trends and patterns which indicate low levels of diversity in some teams or levels in the organization?	<ul style="list-style-type: none"> Has the benchmarking highlighted trends and patterns which indicate low levels of diversity in some teams, or that whilst levels of diversity within the organization are acceptable overall, the levels of diversity within senior teams are low? Are underrepresented groups encouraged to provide open and honest feedback as a means of identifying challenges/barriers to increased levels of diversity and ways to address them?
Key stakeholders	Who are the organization's key stakeholders that need to be involved in developing the organization's strategy and setting its objectives?	<ul style="list-style-type: none"> Who are the individuals responsible for developing and implementing the strategy and do they have the knowledge, skills training and support within the organization to be able to do this?
Environment		
Location	Where are the organization's operations and workplaces located and how easy is it for all stakeholders (employees, customers, suppliers/providers) to access them?	<ul style="list-style-type: none"> Is the organization or its operations located in places that are easy to get to and if not does it provide transport for individuals who cannot travel there? Are there concerns relating to personal safety for some groups of employees, such as female employees coming to or leaving work during the evening?
Physical access	Is it possible for all employees to access all areas of the workplace?	<ul style="list-style-type: none"> Does the physical environment restrict access to some areas of the workplace for some individuals or groups?
Environment	Are there private areas within the workplace environment to support social or cultural needs?	<ul style="list-style-type: none"> Are there private areas within the workplace environment to support physical, social, or cultural needs such as prayer rooms, gender segregated areas in some global locations, areas where employees can attend to personal needs such as weaning mothers pumping breastmilk, or attending to medical or other conditions in private?

³⁾ Basic benchmarking is statistical and relates to the demographic breakdown of the individuals in the organization.

Table A.1 – Self-assessment questionnaire (*continued*)

Area	Description	Considerations
Communication		
Communication	<p>Are there any barriers to effective communication, such as language?</p> <p>How could this impact the effectiveness of any diversity, equity and inclusion strategy?</p> <p>How will communication strategies support invitations with visual and hearing conditions?</p>	<ul style="list-style-type: none"> • Has the organization identified any language barriers and if so, how will these be addressed, for example the use of translators or interpreters? • Will all information be provided using a number of different media formats so that it is accessible to individuals with visual or hearing conditions? • How does the organization support individuals with oral conditions?
Intercultural competence	<p>Has the organization evaluated the intercultural competence of those responsible for communication, and the risks of communication which could be perceived as interculturally incompetent or insensitive?</p> <p>What support will be provided to improve intercultural competence?</p>	<ul style="list-style-type: none"> • Are those responsible for communication (internal and external) aware of the concept of intercultural competence?
Impact assessment		
Challenges and barriers	<p>What are the challenges and barriers to an effective diversity, equity and inclusion strategy?</p> <p>What are the impacts of these challenges and barriers?</p>	<ul style="list-style-type: none"> • Before starting to develop a strategy and set of objectives, organizations are encouraged to clearly and objectively identify the challenges and barriers – some of which will be outside of its control.
Goals and objectives	<p>Has the organization identified and agreed a set of clear goals and objectives to support its diversity, equity and inclusion strategy?</p>	<ul style="list-style-type: none"> • Are goals and objectives realistic and achievable? • Does each goal have an owner, a clear action plan, and implementation date? • Can the goals and objectives be measured to assess effectiveness and impact on the organization?
Cost	<p>What is the estimated cost of implementing the proposed strategy?</p>	<ul style="list-style-type: none"> • Have organizations objectively evaluated the costs of implementing the strategy? • Does this cost include training, changes to the physical environment, operating practices, hours and mechanisms for additional support such as transport, etc.?

Table A.1 – Self-assessment questionnaire (*continued*)

Area	Description	Considerations
Implementation		
Action plan	<p>Once the organization agrees upon an action plan, consider the following for each goal or objective:</p> <ul style="list-style-type: none"> • What is the goal or objective(s)? • Why is it relevant to the strategy? • Who is responsible for the goal or objective? • How will the goal or objective be met? • When will the goal or objective be actioned? • How will the organization measure the success of the goal or objective? 	<ul style="list-style-type: none"> • All goals and targets do not need to be met at the same time. Organizations can consider a phased approach based upon short-, medium- and long-term goals. • Have periodic reviews of the strategy against the action plan been scheduled to monitor progress? • Does the action plan allow for and accommodate any changes to the organization, people or environment?
Monitoring and assessment	<p>Has a mechanism for monitoring and assessing progress against the action plan and against the organization's strategy and aims and objectives been established?</p> <p>This can be done by the key stakeholders, a designated individual or an existing function in the organization such as an internal audit or risk team.</p> <p>Where monitoring and assessment indicates that the aims or the targets are unrealistic, the organization can establish why, and then reassess and re-issue the action plan accordingly.</p>	<p>Examples of monitoring and assessment against targets might include the following.</p> <ul style="list-style-type: none"> • If the aim is to have 50% women in a team by a particular target date the organization can monitor progress at agreed points to check the plan is on track. If there is no change from one point to the next, the organization can review the strategy to understand where improvements need to be made and reassess the aim and the target date as appropriate. • If the organization includes diversity related targets in its employee bonus or incentive programmes, the organization can monitor pay-out and conduct a review to establish whether meeting targets has resulted in a decrease in the quality of appointments, performance or had an impact in any other areas.

A.2 Five-step plan

Organizations may use a simple five-step plan to help identify and organize actions, an example of which is given in Table A.2.

Organizations are encouraged to start with high level actions and activities that are realistic and achievable.

Once completed they can then add in additional more detailed activities and actions for future versions.

For example, for an organization just starting on the journey, commitment might not include the whole organization, it might just be the HR or people management function and the first action might be a diversity policy.

Once completed, additional actions might be the production of new policies that sit below the diversity policy targeting specific areas such as flexible or remote working, dignity at work or recruitment policy.

These policies might also lead to additional activities and actions. For example, the recruitment policy might have a number of individual tasks such as developing guidelines for how roles are advertised, engagement of recruitment partners, positive or affirmative action, applicant screening, induction policy and so forth.

Table A.2 – Example of a simple five step plan

1. Commitment	<ul style="list-style-type: none"> Secure the engagement and support of the right individuals in the organization or leadership team(s). Not everyone will be supportive, so it is important to identify the individuals who can influence others or who are able to provide practical support at other levels. Examples of individuals who can help influence or provide support include non-executive directors and board members, HR and people leaders, employee representatives, team and divisional managers, external stakeholders.
2. Action	<ul style="list-style-type: none"> Agree action points. Actions should be realistic, achievable and appropriate to the organization. Each action should have clear answers to the questions: What? Why? Who? How? When? Examples of actions might include producing a diversity and inclusion policy hiring individuals from underrepresented groups, auditing existing practices, targeted training, establishing employee support groups, etc.
3. Responsibility	<ul style="list-style-type: none"> Assign clear roles and responsibilities to individual(s) and team(s) responsible for delivery. This could be collective responsibility, such as the Board or senior team, or a committee, specific individuals (DEI lead, team leaders and managers), or a combination. Defined roles and include responsibilities for communication, resourcing, training, support, evaluating and providing updates on progress.
4. Measure	<ul style="list-style-type: none"> Tracking progress confirms that agreed actions are being implemented. Effective measurement needs a starting point and an end point: What do things look like now vs what do we want them to look like? Tracking progress helps to identify any challenges or barriers, such as low numbers of applications for specific roles or resistance from stakeholders, as well as understanding what is working well.
5. Success	<ul style="list-style-type: none"> What does success look like? It is important to acknowledge success. Success could be completing all of the agreed actions, or it could be completing each individual action in its own right, such as completing awareness training, receiving more application forms, hiring someone from an underrepresented group, the completion of an audit or the impact of DEI on revenue. Success can be acknowledged in many ways, from congratulatory communications and public recognition to celebratory events, financial or non- financial team or individual rewards, such as performance bonuses. Acknowledging success supports motivation, engagement and commitment.

Annex B (informative)

Workplace toolkit

B.1 Self-assessment questionnaire (SAQ)

Organizations can use the self-assessment questionnaire template in Table B.1 to:

- help create a new strategy or assess the effectiveness of an existing strategy;
- identify gaps, challenges and address areas of improvement;
- monitor and assess the effectiveness of their policies and practices;
- develop tools to assess the impact of the strategy on workplace culture and environment;
- measure progress against the strategy and stated aims and objectives;
- support continuous evolution, development and improvement by adding new or expanding on existing requirements; and
- track year-on-year progress by conducting an annual assessment of the diversity, equity and inclusion strategy.

The questionnaire in Table B.1 can also be used to develop a more detailed internal audit document or incorporated into existing audit documents.

Table B.1 – Action plan template

Recommendation	Considerations	Action
A. Organization commitment to diversity, equity and inclusion		
Diversity, equity and inclusion committee, board or similar	Does the organization have a committee, board (or similar) whose role is to define the organization's diversity, equity and inclusion strategy and objectives?	e.g. Add DEI as an agenda item to next board meeting
Diversity, equity and inclusion policy	Does the organization have a high-level policy statement outlining its commitment to diversity, equity and inclusion?	
Strategy, objectives and action-plan	Does the organization have a clearly defined strategy, objectives and action plan for implementing diversity, equity and inclusion?	
Challenges	Has the organization identified challenges to the successful implementation of its strategy or objectives? <i>NOTE 1 Challenges might be local laws and regulations, geographical location or religious, social or cultural practices, an existing workplace culture or environment which is resistant to change, or where changes to practices and levels of diversity will take longer due to operational constraints such as time required to complete training.</i>	
Owners and key stakeholders	Has the organization identified the owners and key stakeholders who will help the organization meet its strategic objectives? Has the organization identified or engaged in partnerships with external local, national and international organizations that support diversity, equity and inclusion?	

Table B.1 – Action plan template (*continued*)

Recommendation	Considerations	Action
Communication	Has the organization communicated its objectives to owners and key stakeholders and allocated roles and responsibilities for development and implementation of the strategy?	
Measurement and assessment	How will the organization measure and assess the successful implementation of its strategy and specific objectives and targets	
B. Policies, processes, practices and procedures		
Policies	What policies does the organization have in place to support diversity, equity and inclusion? Who is responsible for maintaining and updating the policy (policy owner)?	
Process	What process does the organization have in place to verify that policies are effectively communicated throughout the organization? NOTE 2 For example: <ul style="list-style-type: none"> • <i>Does the organization have a staff or employee handbook which is issued to everyone?</i> • <i>Does the organization make new starters aware of its commitment to diversity, equity and inclusion as part of its induction and new starter process?</i> • <i>Does everyone in the organization comply with the recruitment and selection process or do some teams apply a different approach?</i> • <i>Is there a process for ensuring that all individuals responsible for recruitment and selection have received appropriate training including interview skills and bias training?</i> 	
Practices and procedures	How does the organization monitor that practices and procedures are applied consistently across all applicable teams/functions in practice? NOTE 3 For example: <ul style="list-style-type: none"> • <i>Are there job descriptions for everyone in the organization and are they reviewed and updated to remain relevant?</i> • <i>Do all teams apply blind screening to the applicant process?</i> 	

Table B.1 – Action plan template (continued)

Recommendation	Considerations	Action
Monitoring and assessment	<p>How does the organization measure the monitor and assess the effectiveness of its policies, processes, practices and procedures?</p> <p>NOTE 4 For example:</p> <ul style="list-style-type: none"> • If the organization offers flexible working but there is no record of anyone making a request for flexible working, or requests from a particular team or department are noticeably lower, does the organization investigate to understand the reason for this? • If after implementing changes to the recruitment strategy, there are noticeable differences in levels of diversity across different teams/functions, does the organization investigate to understand why? 	
Review	<p>Does the organization have a process for reviewing its policies, processes, practices and procedures?</p> <p>NOTE 5 For example, organizations may conduct reviews on an annual basis as standard, based upon changes to laws and regulations, based upon the recommendations or findings of an external auditor, or based upon its own internal monitoring and assessment evaluations.</p>	
C. Training and development		
Training – role based	<p>What training does the organization provide and who is it available to?</p> <p>NOTE 6 For example, is training provided only on a per role basis (technical or IT training is only available to those working in that area) or to specific groups of employees (external academic courses are only available to senior employees) or are opportunities also made available to others?</p>	
Training – diversity and inclusion	<p>Does the organization provide specific training to support diversity, equity and inclusion?</p> <p>NOTE 7 For example:</p> <ul style="list-style-type: none"> • Are all individuals or individuals with specific roles or areas of responsibility required to attend or offered the opportunity to attend training relating to conscious and unconscious bias or intercultural competence? • Where individuals are required to conduct interviews, assessments, reviews or appraisals, are they provided with specific training and tools relating to equity. This can include compensating measures and making allowances for differences between candidates, such as allowing an applicant with dyslexia or visual condition additional time or support, or allowing a candidate with aural or oral condition the opportunity to respond in writing? 	

Table B.1 – Action plan template (*continued*)

Recommendation	Considerations	Action
Development	<p>Does the organization conduct personal performance reviews (appraisals) and support diversity, equity and inclusion?</p> <p>NOTE 8 For example:</p> <ul style="list-style-type: none"> • Are individuals from underrepresented groups encouraged to consider applying for roles within the organization or provided with additional training to support career progression? • Does the organization have a fast-track system for underrepresented groups and what is the impact of this programme on individuals who are excluded from applying? 	
Monitoring and assessment	<p>How does the organization monitor and assess the effectiveness of its training and development strategy?</p> <p>NOTE 9 For example:</p> <ul style="list-style-type: none"> • Does the evidence show a year-on-year change in the levels of underrepresented groups within the organization or of those being promoted? • What impact has this had on the organization and has this been positive, negative or neutral? (Positive could be that the organization is now able to engage with new customers or suppliers, negative could be that individuals from non-underrepresented groups have departed due to a lack of career progression, and neutral could be no obvious change or impact). 	
D. Culture and Environment		
Culture	<p>Does the organization promote a culture and environment that supports diversity, equity and inclusion?</p> <p>NOTE 10 For example:</p> <ul style="list-style-type: none"> • Is the message of diversity, equity and inclusion actively promoted and supported by the leaders of the organization? This could be in a number of ways, including but not limited to, internal and external statements, supporting or sponsoring events, taking part in initiatives and programmes, or promoting itself as an organization that supports diversity, equity and inclusion. • Are successes and achievements relating to diversity, equity and inclusion recognized? • Are teams and individuals encouraged to think differently and see difference as a positive advantage (diversity of thought)? • Is integration and acceptance of underrepresented groups supported through social, sports or other events and initiatives which encourage employees to come together as equals? 	

Table B.1 – Action plan template (continued)

Recommendation	Considerations	Action
Environment	<p>Does the organization promote an environment that supports diversity, equity and inclusion?</p> <p>NOTE 11 For example:</p> <ul style="list-style-type: none"> • <i>Is additional support provided for underrepresented social and cultural groups? This could be in the form of access to internal or external support groups, resources and training, adaptations to the workplace and working practices.</i> • <i>Are different departments, teams and individuals encouraged to work together as teams rather than individual functions?</i> • <i>Are there common areas such as a staff canteen or chill-out area where employees from different teams can spend time together and interact?</i> 	
E. Measuring Progress		
Policies and practices	<p>Does the organization have a framework for monitoring, assessing and reviewing the effectiveness of its diversity, equity and inclusion policies and practices?</p> <p>NOTE 12 For example:</p> <ul style="list-style-type: none"> • <i>Have changes to policies and practices supported the organization's aims and objectives and helped achieve targets?</i> • <i>Are employees aware of the organization's policies? This can be measured by looking at how many have enquired about them or raised an issue as a result of them.</i> • <i>Has there been an increase in the number of applications from underrepresented social or cultural groups?</i> • <i>Have DEI policies, or changes to DEI policies, impacted employee retention?</i> 	
Workplace culture	<p>Does the organization have a framework for monitoring, assessing, reviewing and measuring the workplace culture?</p> <p>NOTE 13 For example:</p> <ul style="list-style-type: none"> • <i>How many employees use common and shared spaces and is there visible integration and interaction?</i> • <i>Is there an employee survey which asks respondents to share their views on the organization's approach to diversity, equity and inclusion?</i> • <i>Are workplace review websites and social media sites monitored to assess how current and past employees view the organization?</i> • <i>Are social and other initiatives well attended and supported?</i> 	

Table B.1 – Action plan template (*continued*)

Recommendation	Considerations	Action
Other	<p>Does the organization monitor and measure the effectiveness of its diversity, equity and inclusion strategy outside of the organization?</p> <p>NOTE 14 For example:</p> <ul style="list-style-type: none"> • <i>Is diversity, equity and inclusion included in the organization's annual report?</i> • <i>Does the organization support, sponsor, attend or speak at diversity, equity and inclusion events?</i> • <i>Is the organization part of any diversity, equity and inclusion initiatives and programmes?</i> • <i>Has the organization won an award or been recognized as a leader in diversity, equity and inclusion?</i> 	
Tracking progress	<p>Does the organization track progress to support continuous improvement and against the overall strategy and aims and objectives?</p> <p>NOTE 15 For example:</p> <ul style="list-style-type: none"> • <i>Is there statistical information measuring the levels of diversity in the organization and is this information recorded at the same time and in the same way every year to allow for year-on-year comparison?</i> • <i>Are changes to policies and practices recorded and the impact of the change monitored?</i> • <i>Is there an annual progress report which provides an update on how the organization is performing against the diversity, equity and inclusion strategy and the aims and objectives?</i> • <i>Is there a framework for reviewing the organization's strategy on an annual basis to assess progress against stated aims and objectives?</i> • <i>Is there a framework for assessing the impact of diversity on the performance of the organization and teams within the organization?</i> • <i>Is the organization's progress shared with internal and external stakeholders?</i> 	

Annex C (informative)

Role play and interactive exercises

C.1 General

There are a number of simple roleplay and interactive exercises organizations can include in their internal processes and existing training and awareness programmes to help support diversity, equity and inclusion.

C.2 Exercise 1: Stakeholders

Props needed: images of a diverse range of people.

Steps:

- a) Give each team member a selection of newspapers, magazines or similar and ask each to select five different images of people they think best look like their past, current and future stakeholders (stakeholders could be customers, employees, stakeholders, investors based on the context of the exercise).
- b) Bring the team together and ask each member to explain their reasons for the images they selected.

Discussion points:

- 1) Why did different people choose or not chose different types of stakeholders?

NOTE 1 Consider biases and blind spots.

- 2) How have stakeholders changed from past to future and in what ways does this impact the organization?

NOTE 2 Consider changing stakeholders' demographics, locations, culture and social impacts.

- 3) Does the make-up of people in the organization look like the organization's stakeholders (internal and external) and how does this impact the organization (both positive and negative)?

NOTE 3 Consider impact of not understanding or meeting needs of future stakeholders.

C.3 Exercise 2: Accessibility

Props needed: blindfold, earplugs, wheelchair, other props to help explore visible and non-visible conditions, such as restricting movement, or altered documents to replicate the experience of dyslexia or colour-blindness.

Steps:

- a) Ask able-bodied employees to spend a working week as an impaired employee or customer using the props provided.
- b) No change to their normal routine is made.
- c) A daily video or audio diary of their experiences is created.
- d) The experiences and diary then form the basis of a feedback session to the appropriate team for example experiences navigating premises, accessing or using products.

NOTE It is advised that feedback includes both physical and emotional experiences.

C.4 Exercise 3: Bias

Props needed: sample of job applications or customer queries with all personally identifiable data such as name, address, age and email address removed; a wide selection of images showing different people from different social and cultural groups.

Steps:

- a) Give each delegate a copy of the application or query. Based on the information ask them to build an image of the sender.
- b) Give them five minutes to consider the information and then ask them to select an image that they think best represents the sender.

Discussion points:

- 1) Everyone has biases (positive or negative).
- 2) Biases are related to personal and past experience.
- 3) Everyone may interpret information differently.
- 4) Human instinct is to try to fill in gaps where information is missing or incomplete.
- 5) Visualization, perception and assumption plays a key part in decision making.

Annex D (informative)

Sample stakeholder surveys

COMMENTARY ON ANNEX D

Employee surveys can include questions relating to employee satisfaction levels with the role and the way in which they are managed, their commitment to the organization or belief in the organization's stated aims and objectives. Responses may be analysed to understand overall responses but also any trends relating to specific cultural, social or other employee demographic group. This annex contains sample questions that organizations can use in surveys designed to benchmark and measure diversity, equity and inclusion from both an organization and employee perspective.

Organizations may also choose to adapt and use the sample questions shown below to create surveys for other stakeholders such as customers or external suppliers and providers. These questions have been taken from the All-Index® survey⁴⁾.

Organization survey sample questions

Sample questions include the following.

- How many locations does the organization have nationally or internationally?
- Where are the employees located?
- How many employees does the organization have?

Understanding levels of demographic diversity

The following questions can be asked to assess levels of gender or other forms of diversity by asking participants to report on numbers of employees in relation to different groups, such as gender, age, ethnicity, and so on, based on age, role or type of role.

- How many employees are male/female?
- Does the organization record any of the following employee demographic information such as gender, age, ethnicity, religion, and so forth?
- Please indicate the number of employees identifying as a member of a social or cultural group based on role.

Most common role types/categories are listed below:

- executive board (an executive board has active management responsibilities);
- non-executive board (a non-executive board is a board without responsibilities for daily management or operations of the company or organization);
- data (including analytics, insight and strategy but not database admin);
- design and creative (including digital, non-digital and web);
- marketing (including advertising, affiliates, search engine optimization, customer relationship management, VIP and loyalty);
- media (including PR and media relations);
- sales and business development;
- product development and innovation;
- trading and markets (odds compilers, risk/liability management);
- finance, accounting and budgetary control;
- operations (including customer support, payments, fraud/security and responsible gambling);
- human resources (including recruitment, people management, learning and development, corporate social responsibility and diversity and inclusion);
- technical (including network and infrastructure, sys admin, hardware/software development and testing/quality assurance);
- legal and regulatory compliance; and
- hospitality (including food and beverage, front of house, service/janitorial).

Salary ranges

Typical salary ranges cover the:

- number of employees earning: UNDER 25,000;
- number of employees earning: 25,000 – 49,999;
- number of employees earning: 50,000 – 74,999;
- number of employees earning: 75,000 – 99,999;
- number of employees earning: 100,000 – 149,999;
- number of employees earning: 150,000 – 199,999; and
- number of employees earning: 200,000+.

⁴⁾ The All-Index® is an annual benchmarking survey used by organizations in various sectors. All-Index® is the registered trademark of a product supplied by the All-In Diversity Project Limited. This information is given for the convenience of users of this document and does not constitute an endorsement by BSI of the product named. Equivalent products may be used if they can be shown to lead to the same results.

Age ranges

Age ranges cover:

- 18 – 25;
- 26 – 35;
- 36 – 45;
- 46 – 55;
- 47 – 65; and
- 66 – 75.
- Above statutory/legal retirement age.

Recruitment methods

The aim of this question is to understand whether some recruitment methods are more effective at increasing levels of diversity than others.

How many appointments linked to diversity were made and through which recruitment methods?

Methods can include:

- internal promotion and development;
- careers fairs;
- graduate programme;
- employee referrals and recommendation scheme;
- recruitment and search firms;
- external advertisements and job postings (print/online);
- social media (i.e. LinkedIn, Facebook, etc.);
- speculative approach (employee approached you); and
- others as used by the organization.

Common employee contract types

Contract types include the following:

- permanent employees;
- temporary, contracted, seasonal or fixed-term employees;
- zero-hours', "At will", "no work guarantee" contracts;
- freelance;
- other.

Level of seniority

Levels of seniority include the following:

- entry level/new starter up to team leader or supervisor;
- team leader or supervisor;
- manager (oversees Team Leader or Supervisor);
- head of department (oversees manager);
- director/VP/partner or "C"-level (oversees manager and/or head of department); and
- CEO or MD.

Policies

These questions consider the policies that an organization has in place and how they are applied.

Common people related policies include:

- equal opportunities policy;
- anti-discrimination policy;
- anti-bullying and harassment policy;
- right to dignity at work;
- mental health and wellbeing;
- whistle-blowing policy;
- grievance policy/procedure;
- diversity and Inclusion policy;
- flexible working;
- career break (sabbatical) arrangements;
- adoption leave;*
- maternity leave;*
- paternity leave;*
- shared parental leave;*
- company paid sick leave;
- private healthcare;
- childcare, eldercare or other family care; and
- support for childcare such as nursery vouchers or a creche.

**as per the organization's policy and practices*

Do policies and benefits to everyone in the organization in the same way or does it vary based on things such as role, location and so on?

Training and support

What training does the organization provide in relation to diversity, equity and inclusion practices?

Examples of training can include:

- dealing with harassment, bullying and dignity at work;
- dealing with discrimination (gender/sex, racial, religious, physical capability, or other);
- how to report discrimination, bullying and harassment;
- organizational policy and legislation – diversity, equity and inclusion;
- conscious and unconscious bias;
- language, stereotypes and intercultural competence;
- challenging inappropriate behaviour;
- leading managing and/or engaging with diverse groups;
- other (please specify); and

- does the organization provide additional training, development or support for specific groups, such as women, LGBTQ+ and/or non-binary, ethnic, minority or other under-represented groups?

Recordkeeping and analysis

Examples include:

- maintaining effective records can help organizations monitor the effectiveness of their policies and practices;
- keeping records on staff turn-over levels (attrition or churn);
- reasons for leaving (exit interviews/reports);
- equality of pay and bonuses;
- job applications by gender, ethnicity, sexuality, disability or other;
- harassment, bullying or discrimination claims received;
- outcome of harassment, bullying or discrimination claims;
- promotion by gender, ethnicity, sexuality, disability or other;
- returners from maternity/parental leave; and
- other (please specify).

Diversity, equity and inclusion

Does the organization actively promote diversity, equity and inclusion, and if so, who is responsible for doing it?

Does the organization have any of the following practices in place to support diversity, equity and inclusion?

- advertisement:
 - inclusion of a statement around valuing diversity in job packs;
 - reviews of job descriptions for visual or textual bias (relating to age, gender, ethnic group etc.).
- talent search:
 - advertising and recruitment using diverse websites, recruitment fairs, events, etc;
 - explicitly request diverse candidates when using recruitment agencies or executive search firms;
- selection:
 - training on bias and reducing discrimination for those involved in recruitment;
 - transparent and consistent criteria for evaluating candidates;
 - diverse representation on interview panels;
- induction:
 - provision of information about diversity and inclusion policies on joining;
 - information on employee networks or other support initiatives for diverse groups;

- explicit messages from a senior leader on diversity and inclusion when joining;
- performance review:
 - clear and consistently applied criteria for performance reviews;
 - third-party review of performance to check for fairness;
 - exit interviews or exit surveys.

Support from organization leaders

Has a representative from the board or the senior management team done any of the following:

- communicated an organization-wide message on diversity, equity and inclusion;
- communicated a strong message on gender equality;
- had meetings with women's, minority, LGBTQIA+ or other employee network or staff group;
- reviewed and/or approved an diversity, equity and inclusion strategy;
- reviewed and/or approved monitoring reports and action;
- spoken at an internal event(s) about diversity, equity and inclusion;
- spoken at an external event(s) about diversity, equity and inclusion; or
- been seen as a visible role model for women, LGBTQIA+, ethnic, disability or other group(s)?

External stakeholders

Does the organization have a policy of actively engaging with suppliers/providers which are owned by under-represented minorities and groups?

Employee survey sample questions

Organizations can select questions based on what they wish to evaluate, learn or benchmark.

For an employee profile.

- How long have you worked here?
- What attracted you to the organization?
- What is your main reason for staying with the organization?

Examples of answer options include:

- pay and benefits;
- location;
- the role and career opportunities;
- knew someone who already worked here/ recommendation;
- needed a job;

- wanted to work in the sector/industry; and
- which best describes the team or function you work in?

Employee sentiments

For these questions employees are asked to indicate how much they agree or disagree with the following statements.

- The organization understands and supports my needs.
- The organization has created an open and trusting environment where people feel safe and encouraged to share their views/opinions.
- The organization recognises and rewards individual and team performance. The organization inspires people to be the best they can.
- I feel valued by the organization.
- The organization has a culture where everyone supports and respects everyone else.
- The organization encourages a culture where different teams work together to achieve common goals.
- There is some internal conflict and competition between teams in the organization.
- The organization communicates key messages consistently, clearly and openly.
- I think the organization offers the same benefits to all employees.
- My manager is supportive and trusts me to do my job.
- My manager recognises and rewards performance and achievements.
- My manager treats everyone in the team equally and respectfully.
- My manager motivates me and encourages me to succeed.
- I trust and respect my manager.
- I trust and respect the people I work with.
- I get most of my knowledge and information about the organization from my manager.
- I get most of my knowledge and information about the organization from my colleagues and people outside my team.
- Employees can be asked which of the following are the biggest factors when implementing an effective diversity, equity and inclusion strategy? Possible answer choices might include:
 - leadership/board commitment to supporting diversity, equity and inclusion;
 - having a mix of employees from many countries and backgrounds;
 - policies and practices that support diversity, equity and inclusion;
 - employee resource groups (ERGs) that provide support to minority groups in the business;
 - unconscious bias and anti-discrimination training for employees;
 - women or minorities on the Board;
 - HR practices that support diversity, equity and inclusion such as screening CVs, exit interviews, etc;
 - employee surveys measuring diversity, equity and inclusion;
 - role models and mentors;
 - designated team/individuals responsible for managing diversity, equity and inclusion;

Employees can be asked which one of the following best describes inclusion. Possible answer choices might include:

- feeling like you belong;
- not being treated differently to everyone else;
- feeling valued.
- being accepted for who you are.
- having the same opportunities as everyone else.
- being seen as part of the team.
- not being the only one who looks or behaves like you.
- not feeling like you have to change to fit in or be accepted.
- feeling like a part of the team.
- having the same views, opinions and outlook as others.
- feeling comfortable enough to say what you really think/disagree with others.
- on a scale of 1 to 10 (with 1 being “not very” and 10 being “very”) how inclusive would you say your organization is?
- which one of the following would you say best describes diversity in an organization?

Response ranges can include:

- strongly agree;
- agree;
- somewhat agree;
- neither agree nor disagree;
- somewhat disagree;
- disagree; and
- strongly disagree.

Employees can be asked which one of the following best describes diversity in an organization. Possible answer choices might include:

- range of nationalities;
- range of ages and cultural backgrounds;
- range of skills and experiences;
- range of abilities;
- having different views, opinions or outlooks to others;
- being able to challenge the norm;
- being able to think differently to everyone else; and
- on a scale of 1 to 10 (with 1 being “not very” and 10 being “very”) how would you rate the level of diversity in your organization?

Annex E (informative)

Glossary

Organizations are encouraged to develop a “Glossary of Terms” to support their overall diversity, equity and inclusion strategy.

This includes the terms, terminology, words, language and expressions they consider to be acceptable or unacceptable within the organization based upon their operations.

Some common examples are provided below:

- “queer” – to describe an individual that identifies as a member of the LGBTQIA+ community is acceptable in some countries but seen as unacceptable in others;
- “queer as folk” – a term historically used to describe the fact that human beings can often behave or act in a way that is odd, strange, unpredictable or illogical may continue to be used and accepted in some places but not in others;
- “Chinese whispers” – a parlour game known in some parts of the world as Telephone, where a message is whispered from one individual to another in a chain with the last announcing the message as received by them. Inevitably the passing of the message will result in inaccuracies along the way so that the message announced by the last individual is almost always slightly different from the original message. The term is often used in the workplace to suggest rumours and gossip. The term, however, has its historic origins in the colonial past and as a result, many now find this phrase unacceptable;
- “Ladies and gentlemen” – a long established salutation to acknowledge members of an audience, and is now viewed by many as being outdated due to it conveying a rigid expectation of gender and excluding those who identify as non-binary, gender fluid or multi or trans gender.

NOTE *This salutation is often replaced with more inclusive salutations such as “honoured guests” or in the case of written communications “Dear everyone” or “Dear all”.*

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Further reading

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BSI, 389 Chiswick High Road
London W4 4AL
United Kingdom
www.bsigroup.com

