30% Club Financial Services Sub-committee
Sample Policies
Open Source Policy Bank

This bank serves to act as a reference point for 30% Club members when forming their Diversity & Inclusion policies.

We have a number of policies from companies within the financial services industry. Within the policy bank, we have divided these policies into similar themes.

From these policies, we have identified the key themes included within each policy topic.

This section includes 4 sample policies on Diversity themes.
Top 5 things to include in company policies

Agile / Flexible hours working policy (we are providing 3 policy examples)
1. To whom it applies
2. What is included as agile / flexible working e.g. hours, location,
3. Process for applying or agreeing new arrangements
4. Limitations / restrictions to the policy
5. Legal and other company requirements

Diversity / Equality policy (we are providing 4 policy examples)
1. To whom it applies
2. Ways in which the company offers equal opportunities for all
3. Merit based progression opportunities
4. Support of those with disability
5. Company response to reported discrimination

Maternity Leave policy (we are providing 3 policy examples)
1. Doctor appointments, antenatal class and post natal support
2. Paid and unpaid leave timeframes
3. Annual leave and public holiday entitlements
4. Legal entitlements
5. Early births, deaths and other considerations during leave
Top 5 things to include in company policies

Paternity leave policy (we are providing 3 policy examples)
1. Qualifying for leave
2. Leave Entitlements
3. Applications to the Department of Social Protection
4. Stipulations of the leave policy
5. Early births, deaths and other considerations during leave

Parental leave policies (we are providing 3 policy examples)
1. Qualifying for leave
2. Statutory entitlements
3. Public holidays and annual leave
4. Application procedure
5. Illness and other reasons for suspension or postponement of leave

Other policy examples available
1. Compassionate / Force Majeure / Emergency Family Leave
2. Well Being Policy
3. Dignity Policy

Additional Case Studies available
1. Flexible working
2. Gender balance
3. Equal opportunities
Introduction:

Diversity is about what makes each of us unique and includes our origins, backgrounds, personality, life experiences and beliefs. It is a combination of the visible and invisible differences that shape our view of the world, our perspectives and our approach in all aspects of our lives. It is strongly grounded in individual respect and links very closely to our brand values.

Inclusion is the extent to which we feel valued and included. It links very strongly to our engagement themes and reflects our brand values.

Our Statement:
Embedding diversity across our organisation helps us to be the best that we can be in our thinking, our decisions and our outcomes. It is fundamental to our aim to be a successful organisation that all of our customers and our people can believe in.

By respecting, developing and harnessing the talents of all our employees, we commit to creating an inclusive and supportive organisation that delivers a superior experience for all our customers, provides an extraordinary place to work for our employees, and brings an appropriate financial return for our shareholders and the economies within which we operate.

Scope:
This policy applies to all our employees

- **Our Standards-**
  
  As an organisation we aim to ensure that:
  
  - All employees are treated fairly, and decisions on recruitment, pay, terms & conditions, training & development and performance appraisal are based solely on objective and job related criteria
  - Career progression is based on merit and objective assessment of performance and suitability.
  - Working practices reflect the needs of a modern and agile workforce and our policies support the achievement of a work life balance and the caring needs of parents and those with other caring responsibilities
  - Periods of absence for maternity and paternity leave are supported and fully integrated into normal career planning
Diversity and Inclusion Code – Sample 1

• **Our Standards contd**
  Talent investment is inclusive and promotes the availability of a range of pipeline talent and skills for all roles, particularly at senior levels
  Team and committee structures include a diverse range of skills and representative voices, to support inputs, decisions and more comprehensive outcomes
  We make every effort to accommodate those with any special needs, such as those with either mental or physical disabilities
  We raise awareness of our own unconscious biases and challenge communications, policies, advertisements, practices and procedures in terms of fairness and equality for all
  We respect everyone’s ideas and work together to develop and support open communication and feedback mechanisms
  We respond quickly and responsibly to any complaints of discrimination, victimisation, intimidation, harassment, bullying or misconduct

**As an employee I can expect to:**
• Be treated with dignity and respect.
• Work in an environment that actively promotes inclusion and makes me feel valued, where I can express my opinions and have the opportunity to be heard
• Have support from my manager and colleagues in accessing agile & smart working arrangements appropriate to my business area
• Have access to continuous development and new career opportunities based on my personal merit and skills
• Feel supported in times of difficulty such as bereavement, illness, physical or mental difficulties or changes in personal circumstances.
• Be protected from any form of discrimination and never to be treated less favourably or disadvantaged in any way based on gender, gender re-assignment, age, civil status, family status, marital status, sexual orientation, disability, race, religion, membership of the traveller community or membership of a trade union.

**Policy Implementation**

This policy is effective from dd/mm/yyyy.
It replaces any previous policies/statements on Diversity or Equality and complies with legislative and regulatory requirements in all the jurisdictions in which we operate. This code operates as part of a suite of standards that support our Code of Conduct.
The Company is committed to policies and practices that provide equality of opportunity for every employee; protect the dignity of employees; promote respect for others at work. All employees are required to take personal and individual responsibility to comply with these policies and behave in a non-discriminatory way and not to participate in any acts of inappropriate behaviour, harassment or bullying.

As regards Diversity this is a broader concept that builds upon the progress made through equal opportunities. Everyone is different and diversity is about recognising, respecting and valuing the differences we each bring to work.

Equal opportunities and diversity work together by addressing the inequalities and barriers faced by people in under-represented groups and by valuing, learning and benefiting from the diverse cultures in society and our employees.

**PROCEDURE**

The Company is committed to a policy of equal opportunities and diversity in employment. All employment decisions in the Company are based on merit, abilities, suitability, and qualifications. The Company will not tolerate discrimination, bullying, harassment or sexual harassment by one employee or group of employees against another or others for any reason. Discrimination is defined as the treatment of a person in a less favourable manner than another person is, has or would have been treated, on any of the nine grounds listed below.

Discrimination can also be taken to have occurred, when a person is treated less favourably by virtue of their association with a person who is a member of one of these nine groups subject to applicable legislation, no employment practices, treatment or decisions will be influenced or affected by an employee’s:

1. Gender
2. Marital Status
3. Family Status
4. Sexual Orientation
5. Religious belief or lack of religious belief
6. Age
7. Disability or the nature of disability
8. Race, colour, nationality or ethnic or national origin
9. Membership of the Traveller community
Equal Opportunities and Diversity Policy – Sample 2

The Company is committed to promoting a good and harmonious working environment where every employee is treated with respect and dignity, and in which no employee feels threatened or intimidated. Implied in all the Company’s contracts of employment is a commitment to equal pay for equal work. Training and promotion are open to all employees of the Company. Decisions are based on the existing skills, knowledge and behaviour required to perform a job to Company standards, and those required in the future. Any employees with questions or concerns about any type of discrimination in the workplace are requested to bring these issues to the attention of their immediate manager or any other manager for resolution. Employees can raise concerns and make reports without fear of reprisal. All complaints will be treated confidentially as far as practicable.

All employees are required to take personal and individual responsibility to comply with this and related policies, and behave in a non-discriminatory way and any employee contravening this policy and unlawfully discriminating against another employee or potential employee will render himself or herself liable for disciplinary action, up to and including termination of employment.

STATEMENT ON DIVERSITY
- The Company is committed to creating a culture in which diversity is promoted actively and in which unlawful discrimination will not be tolerated.
- The Company recognises the business benefits of having a diverse community of employees and to this end, is working towards building and maintaining an environment which values diversity.
- The Company appreciates that all employees are different and that these differences can bring about business advantage to the Company. Diversity management incorporates the following principles:
  - Diversity refers to any factor that makes people different, both visible for example race and invisible for example communication style.
  - It involves attracting the people the Company needs into the future thereby preventing skill shortages.
  - It requires the involvement of all employees of the Company, especially managers to manage well and to reflect the principle of respecting differences among employees. It promotes an environment within the Company where differences are recognised and valued among employees.
  - It creates an environment where employees will work more effectively and efficiently to the benefit of the Company and the employee.
Equal Opportunities and Diversity Policy – Sample 2

STATEMENT ON DIVERSITY contd

- The aim of diversity is to ensure that in carrying out its business activities, The Company will have due regard to:
- Promoting good relations between people of a diverse background.
- Eliminating unlawful discrimination between people of a diverse background.
- Ensure that all employees should participate fully in the work of The Company and embrace its diversity.
- Employees should reflect the diversity of talent, experience and skills of employees of a diverse background and acknowledge the contributions and efforts that a diverse workforce achieve and therefore contributing to the success of The Company.

RESPONSIBILITIES FOR DIVERSITY

STATEMENT

All employees are responsible for promoting this diversity statement, HR will review regularly. Employees should familiarise themselves with this diversity statement and thus ensure that employees of a diverse background are recruited, promoted and recognised in all their achievements towards the success of Canada Life. Where an employee feels he or she is being discriminated against or not being afforded equal opportunity during the course of their work he or she should bring this to the attention of HR.

For the successful implementation of this diversity statement Canada Life will seek to access the impact of this statement on employees to ensure that real improvements are being made in promoting diversity throughout the Company and employees are encouraged to provide feedback to Human Resources periodically.
Group Policy on Equality through Diversity – Sample 3

This document outlines our policy on equal opportunities in the workplace for all employees. The aim of the policy is to provide equal opportunities by managing diversity. The idea of diversity is based on recognising that a modern workforce is made up of people with different characteristics such as gender, civil status, family status, sexual orientation, religion, age, disability, race and membership of the Traveller community.

As a group, we believe that by valuing and promoting diversity, we are providing a workplace where people enjoy work because of the challenges and personal development they will receive.

Managing diversity

To achieve equal opportunities, we need to prevent discrimination in the workplace. As a group, we do not treat employees differently because of their gender, civil status, family status, sexual orientation, religion, age, disability, race and membership of the Traveller community. We value diversity by encouraging individual contributions and the development of employees so that they can meet their potential and make a bigger contribution to the organisation.

Workplace discrimination and the law

We are fully committed to meeting the Employment Equality Act, 1998, 2004. In line with the act, we will not treat anyone unfairly because of their gender, civil status, family status, sexual orientation, religion, age, disability, race and membership of the Traveller community.

Harassment on each of the nine grounds is also banned under the act.

Recruiting, selecting and promoting staff

The aim of any selection process is to find the right person for the job. It is our policy to make sure that this process is fair and professional. This means that the selection process must provide equal opportunities for everyone who meets the selection conditions, and that we will not discriminate - directly or indirectly - for any of the reasons set out in the Employment Equality Act 1998, 2004 and referred to above. When advertising vacancies, we will be careful to use language that does not discriminate so that everyone who meets the selection conditions is clear that they have equal opportunities in the selection process.
Recruiting, selecting and promoting staff cont’d
Part of the selection process (for internal vacancies as well as external recruitment) usually includes interviews. When assessing candidates, interviewers will not ask questions about personal, family or other circumstances which are unrelated to the candidate’s ability to do the job. We will make sure that everyone involved in holding interviews will be briefed thoroughly on meeting this policy.
If we need to assess whether personal or family circumstances will affect a candidate’s ability to do a job effectively, for example, whether they are willing to transfer, the interviewer should discuss this fairly and in a similar way with all candidates.
We know that, while not being willing to move from one working location to another may be a problem at a certain point in a person’s career, we should not assume that this will always be the case.
We will regularly review our selection conditions to make sure that we are not discriminating against any group of employees.
All staff are entitled to discussions about their career prospects and advancement and encouragement for their future development.

Career and personal development
We aim to provide a workplace which promotes equal opportunities to all employees.
We will encourage all employees equally to take part in self-development and training so they can compete for promotion. We will assume that all employees are interested in progressing their careers or receiving opportunities to do so unless they tell us otherwise.
It is important that nominations for training courses reflect the appropriate development of skills for all categories of employees covered by the policy.

Performance review and feedback
The performance review and feedback (appraisal) process will be fair. This means that:
• we will plan all performance review meetings to follow the structured guidelines on carrying out the review process;
• discussions should not discriminate against anyone;
• the documents to support the process should focus on your ability to do your job, your performance, your career and your development;
• we will encourage all staff to consider themselves for jobs and promotions which they have the relevant experience and ability for;
• we should not assume that family commitments lead to limited career goals; and
• we will give staff equal access to training which is relevant to their job.
Language and illustrations in internal and external group documents
We want to promote our philosophy of equality generally through all our publicity and marketing material and internal forms and documents, for example, training literature and application forms. These documents should not discriminate against anyone either directly or indirectly.

Combining work and life responsibilities
We know that staff with responsibilities outside work may, at certain times in their careers, find it more difficult to combine work with these commitments. With this in mind, we will continue to look at schemes which will make this easier.

Collective agreements
Any collective agreements which we and the trade unions representing staff enter into should take account of this policy and promote equal opportunities.

Not keeping to the policy
If you feel that we are not keeping to this policy, you should tell either your manager or the Human Resources Department. If you believe that you have been, or are being, discriminated against, you can follow the grievance procedure.
INTRODUCTION
The document sets out the Company policy in relation to workplace equality in accordance with the Employment Equality Act 1998 - 2011. The Company is committed to ensuring equality of opportunity in all employment related matters and to providing a workplace that is free from discrimination in the areas of gender, marital civil status, family status, sexual orientation, religious belief, age, disability, race, or membership of the traveller community, harassment, sexual harassment, and/or victimisation. The Company reserves the right to review, revise, amend, or replace the contents of this policy and to introduce new policies and procedures from time to time to reflect the changing needs of the Agency. In cases where policies and procedures may be out of line with relevant legislation, the relevant legislation always takes precedence.

SCOPE
This policy applies to all employees of the Company. An employee of the Company is defined as any person who has a contract of employment with the Company (including without limitation a fixed term or specified purpose contract) regardless of the entity or Business Unit to which they are assigned to work and regardless of the hours they work.

POLICY
6.1. GENERAL POLICY
The Company is committed to equal opportunity of employment and all employment decisions will be based on merit, qualifications and abilities. Employment related decisions will not be influenced or affected by an employee’s gender, civil status, family status, sexual orientation, religious belief, age, disability, race, or membership of the traveller community. Through the Company’s Dignity at Work policy, the Company fully endorses a working environment free from discrimination, harassment, sexual harassment, workplace bullying and/or victimisation.

6.2. SHARED RESPONSIBILITY
The Company is committed to recruitment, employment, training and promotion practices and policies that are free from barriers, both systemic and deliberate, that discriminate against any person on any of the grounds above. All recruitment, employment, training and promotion decisions made will be based on employees’ abilities and qualifications required to perform the job effectively, to the standards required by the Company both now and in the future. It is the responsibility of every manager to support and communicate the Workplace Equality policy. All employees must be familiar with and act in accordance with the requirements of this policy and must accept their personal responsibility to comply with this policy including maintaining acceptable standards of behaviour at all times towards all colleagues.
6.3. EQUALITY
The Company is committed to ensuring equality of opportunity in all areas of employment and will not discriminate in employment related matters on any grounds in the areas of;
access to employment or recruitment;
equal pay or terms and conditions of employment, social and recreational programmes;
Company sponsored training, experience opportunities, or vocational training;
promotion, re-grading or classification of jobs;
dismissals, lay-offs, transfers or references.

6.4. DISABILITY
The Company recognises that employees with a disability may require reasonable accommodation or equipment, or modifications to the work environment.
Appropriate measures that may be considered by the Company include adaptation of:
premises and equipment;
patterns of working time;
distributions of tasks;
the provision of training or integration resources.
The requirements of job applicants and existing members of staff who have or have had a disability will be reviewed to ensure that whatever possible reasonable accommodation is made to enable them to enter into or remain in employment with us, within the parameters of the Employment Equality Acts 1998-2011. The Company will consider any appropriate measures in consultation with the employee in an attempt to make such reasonable accommodations within the parameters of the legislation.
6.5. GENERAL PRINCIPLES
The Company will always state ‘The Company is an Equal Opportunities Employer. Appropriate measures can be taken at interview stage to accommodate the needs of candidates with disabilities.’ in any form of advertising for a job either internally or externally.
Any employee who feels that they have been treated unfairly in terms of access to employment, conditions of employment, training, work experience, promotion or reclassification of posts should follow the Company’s Grievance Procedure.
Employees who act or behave in a manner contrary to the spirit of this policy may be subject to disciplinary action, up to and including dismissal.
The Company will endeavour to ensure that all employees involved in making employment related decisions will be provided with training and guidance to ensure that they understand their position, the Company policy and legal requirements.
When recruiting, full job descriptions will be prepared, outlining requirements that are essential for the job in questions. Non-essential qualifications/ skills/ knowledge will be described as ‘desirable’.

BREACH OF POLICY
Breach of this policy will be taken seriously by the Company and may be dealt with in accordance with the Company Disciplinary Procedures. Disciplinary action up to and including dismissal may be taken.

QUERIES
Any queries in relation to this policy should be raised with the Head of HR.