30% Club Financial Services Sub-committee
Policy Document
You’ve drafted your Diversity Strategy, it’s been approved and you have been given the go-ahead to introduce Diversity & Inclusion into your organisation. What do you need to do next? The first step is to draft a Diversity & Inclusion policy which will set out in concrete terms what is expected of your workforce in terms of Diversity and Inclusion.

Our aim, as members of the 30% Club, is to promote the representation of women at senior decision making levels in organisations. We recognise that this is more readily achievable where an organisation takes a position on Diversity in general. Therefore this framework focuses on all aspects of Diversity, including gender, and while we believe every organisation should craft and own their own version, we hope it will help you to get started.

Tips on how to structure your policy and what to include

Introduction

You might use your introduction to define what you mean by Diversity and Inclusion. You can talk about why Diversity and Inclusion is important to your organisation and summarise what diversity and inclusion in the workplace means to your employees and stakeholders. Consider the benefits of Diversity & Inclusion from business, social and ethical, employment and legal perspectives e.g. attracting and retaining diverse talent, promote inclusion, enhanced morale, and compliance. Look at organisations which you admire for their ethics and inclusion and see what they provide under their Diversity & Inclusion Policy.

Examples:

- Workplace Diversity refers to the variety of difference between people in an organisation. Diversity encompasses acceptance and respect. It is an understanding that each individual is unique and a recognition of our individual differences. These can include ethnicity, gender, sexual orientation, age, physical abilities, family status, religious beliefs, perspective, experience or other ideologies – Commonwealth Group

- Having a diversity of perspectives leads to better decision-making, more relevant products, and makes us stronger and produce better more innovative work - Google

- IBM’s enduring commitment to diversity is one of the reasons we can credibly say that IBM is one of the world’s leading globally integrated enterprises. We also understand that diversity goes beyond fair hiring practices and protection for all employees. It also includes a focus on how those disparate pieces fit together to create an innovative integrated whole. We call this approach ‘inclusion’. While our differences shape who we are as individual IBMers, our share corporate culture and values remain central to our mutual success - IBM
Examples continued
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. - AIB

Policy Statement
The policy statement is very powerful as it outlines your organisation’s commitment to diversity and inclusion.
Explain your aims – for example, to create a workforce that is diverse, promotes positivity, and instils a can-do attitude in everyone, irrespective of their differences.
State that you are opposed to all forms of unlawful and unfair discrimination.
Think about the language you are using – make sure it is inclusive

Examples:
Diversity is increasingly seen as an asset to organisations and linked to better economic performance. It is an integral part of how we do business and imperative to our commercial success. The Group recognises that our people need to reflect our customers and local communities. We understand that building a diverse and inclusive workforce will result in improved service for our customers and return for our shareholders. Additional research shows that the most engaged employees are those working in an open, fair and diverse environment - Commonwealth Group

Google is committed to bringing together people – in our workforce, our industry and on the web – who have a broad range of attributes, experiences and points of view. We believe our differences make us stronger, and produce better more innovative work - Google

IBM thinks about diversity the way we think about innovation – both are essential to the success of our business. When we innovate, technology becomes smarter for clients and creates new opportunities for growth. When we incorporate diversity into our business, we create better innovations and outcomes. IBM has embraced diversity and it gives opportunities for IBMers and our clients to achieve their full potential - IBM

We recognise that each employee brings their own unique capabilities, experiences and characteristics to their work. We understand that building a diverse and inclusive workforce will result in improved service for our customers and return for our shareholders. Diversity is increasingly seen as an asset to organisations and linked to better economic performance. In addition, research shows that the most engaged employees are those working in an open, fair and diverse environment – AIB
To promote commitment to Diversity and Inclusion, many organisations have used their Policy Statement as a stand-alone document which is signed by senior management and is displayed on noticeboards, in reception areas and on websites.

**Scope**
State who the policy refers to e.g. all employees (current and former and employed in parent company, various subsidiaries and divisions if appropriate), contractors, suppliers, customers and other people who come into contact with the organisation etc.

**Standards**
These standards or principles are what your organisation totally commits to. They can be looked at from a company and employee point of view or some organisations call them out as Employer and Employee Responsibilities – with the Employee having to take ownership of becoming familiar with the policy and adhering to the standards. As part of the Standards, you should:

- Outline the type of work environment your organisation aims to create, i.e. one free of discrimination and prejudice.
- Make it clear that everyone will be treated fairly, with respect, and will be given equal opportunity in every aspect of their working role.
- State what the organisation is promising in terms of pay, recruitment, progression, special needs etc. For example, when selecting for employment, promotion, training, or anything of this nature, it will be based on the individual’s own merits. Their aptitude and ability will determine their suitability for the role; it will not be affected by their gender, age, status (civil, family, marital), sexual orientation, disability, race, religion, membership of the traveller community or membership of a trade union.
- Provide a list of points that summarise your main attitudes, values and aims where diversity and inclusion are concerned, such as you aim to create an environment in which individual differences and the ways in which everyone contributes is recognised and valued.
- Reinforce your sentiments and intolerance towards discrimination - including the fact that disciplinary action will be taken against those that breach your policy.

**Implementation & Review**
Indicate when the policy will be implemented and the timelines for review e.g. annually or if legislative change requires a review. Communication and promotion of policy – internal e-mail/mailshot with information about where the policy can be found e.g. staff website, employee handbook.

Staff Training – indicate the types of training which will encompass Diversity and Inclusion elements, for example, Leadership Development Programmes, Induction Programmes, Unconscious Bias Training,

Expectations of key people or groups – it’s important to be clear about who is responsible for the policy and your expectations of stakeholders such as D&I Board, managers, staff, unions etc. to uphold the policy and act within the standards and principles.
**Sponsors & Owners**
Includes names and titles of policy sponsors and owners.

**How to monitor and measure progress**
There’s no use in writing up your policy and then forgetting about it! Achieving diversity and inclusion in your workplace requires keeping an ear to the ground and nipping discrimination in the bud before it surfaces. That means taking action to ensure your policy is adhered to. Some of these actions can include:

- A commitment to the policy at every level of the organisation, including at the very top e.g. displaying a signed copy of the Policy Statement in prominent positions
- Diversity and inclusion training provided to all staff – build diversity into management programmes, team building exercises and induction courses to increase awareness of the need to handle different views, perceptions and ideas in positive ways.
- An agreement, understanding and support from all your employees for the policy’s implementation – for example, the induction programme can educate your new employees about the organisation’s values and policies.
- Embed Diversity & Inclusion into Communications for example, internal internet sites, email, townhall meetings, newsletters, news-shots etc.
- An explicit willingness to challenge and, where necessary, discipline those who do not follow the policy – introduce mechanisms to deal with all forms of harassment, bullying and intimidating behaviour making clear that such behaviour will not be tolerated and setting out the consequences of breaking the organisations behaviour code.

Although it can be easier to track activities and numbers, it is more compelling to measure impacts or outcomes. How have attitudes, perceptions or behaviours changed after the introduction of your policy. Suggestions for tracking measures include:-

- Employee Demographics gathered through staff survey
- Hiring rates vs objectives per group
- Employee Engagement by demographic and specific D&I question in employee surveys
- Tracking of D&I training for managers and employees
- Impact of D&I training on attitude and behaviour change
Monitoring will also involve looking for significant differences between certain groups in your workplace and thinking about why they may exist. It will not always be down to discrimination, however; there will be plenty of non-discriminatory reasons for difference.

In order to deliver on your D&I policy, you should think carefully and consistently about providing equal opportunities. It is within the best interest of everyone in the workplace, and it will enable you to live up to your word and make the workplace and enriching and multi-skilled environment.

In the instance that you identify areas of your organisation where diversity and inclusion is not being upheld, don’t have a knee-jerk reaction to change things – it’s not about enrolling people to purely increase the company’s diversity and inclusion, that’s not what diversity and inclusion is about, it’s about providing opportunity for them, not favouring them.

Take a look at your recruitment process. Is one group benefitting over another? Are there certain groups of people that seem disadvantaged in one way or another that you could rectify? Examples of actions you might take in such instances include:

- Encouraging more people to apply for positions by considering job-sharing and part-time work for those unable to work full-time.
- Advertising more widely to attract diverse candidates.
- Publishing recruitment results internally – this will help promote transparency so that you can try to determine where there may be diversity and inclusion issues.
- Offering work experience, training or mentoring to those who would benefit from building their skills.

**Some innovative ideas to start taking action...**
- Global Mentoring Programmes
- Employee Resource Groups
- Multicultural Talent Management – robust recruitment process, training hiring managers to ensure hiring criteria and process is inclusive
- Strategic Partnership development
- E-Learning modules
- Bring awareness to unconscious bias
- Change the culture
- Sponsorship of external events and organisations focused on D&I
- Recognition programmes for employees who display best-practice inclusion behaviour
Resources that you can tap into
https://www.ibec.ie/
https://www.teni.ie/
http://www.seechange.ie/
http://www.ihrec.ie/

Legislation that you need to be aware of

Equal Status Act 2000-2015
Non-discrimination is a principle in the primary law of the EU (Articles 18 and 19 of the Treaty on the Functioning of the EU (TFEU) and Title III of the Charter of Fundamental Rights of the EU).
Directive 2000/43/EC prohibits direct and indirect discrimination based on racial or ethnic origin
Directive 2000/78/EU prohibits direct and indirect discrimination based on religion or belief, disability, age and sexual orientation
Directive 2004/113/EC implements the principle of equal treatment between women and men in the access to and supply of goods and services
Directive 2006/54/EC implements the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation
Directive 2014/95/EU requires companies with more than 500 employees to publish information relating to their diversity policy

Ireland’s Diversity Charter
http://www.diversity-charter.com/diversity-charter-ireland-charter.php
Diversity & Inclusion
Building your Strategy for Change

A sample policy to get you started
(Faculty of Business & Economics, University of Melbourne)
Below is a sample Diversity and Inclusion policy. Firms wishing to establish a Diversity and Inclusion policy are invited to use the ideas contained in this template and modify them to suit the individual character of their organisation.

Diversity vision
[ ] recognises its talented and diverse workforce as a key competitive advantage. Our business success is a reflection of the quality and skill of our people. [ ] is committed to seeking out and retaining the finest human talent to ensure top business growth and performance. Diversity management benefits individuals, teams, our company as a whole, and our customers. We recognise that each employee brings their own unique capabilities, experiences and characteristics to their work. We value such diversity at all levels of the company in all that we do.
[ ] believes in treating all people with respect and dignity. We strive to create and foster a supportive and understanding environment in which all individuals realise their maximum potential within the company, regardless of their differences. We are committed to employing the best people to do the best job possible. We recognise the importance of reflecting the diversity of our customers and markets in our workforce. The diverse capabilities that reside within our talented workforce, positions [ ] to anticipate and fulfil the needs of our diverse customers, both domestically and internationally, providing high quality products/services.
[ ] is diverse along many dimensions. Our diversity encompasses differences in ethnicity, gender, language, age, sexual orientation, religion, socio-economic status, physical and mental ability, thinking styles, experience, and education. We believe that the wide array of perspectives that results from such diversity promotes innovation and business success. Managing diversity makes us more creative, flexible, productive and competitive.

Recruitment
[ ] recruits people from all .....
Community programmes
[ ] recognises that there are distinct demographic groups that have long been disadvantaged. We recognise that racism, ageism, sexism and other forms of discrimination are problems both for our organisation and society as a whole. [ ] is committed to tackling cultural stereotypes both within and outside our organisation. We have clear reporting procedures for any type of discrimination or harassment combined with follow-up procedures to prevent future incidents. [ ] combats discrimination in the wider community through...

Diversity bodies
Our commitment to diversity is led by our diversity champions who come from all levels of the company, from top management to the shop floor. The diversity champions make up a diversity committee, which is responsible for ensuring that our diversity policy is articulated in the day to day running and the strategic direction of the company.

Diversity practices
All employees undergo diversity training. Diversity training encompasses raising awareness about issues surrounding diversity and developing diversity management skills.
[ ] provides a safe and pleasant environment for our employees. We offer:
Flexible working time arrangements
Employee education assistance
Employee network and support groups
Open communications
Mentor programmes