# How to Review Your Workplace DEI Policy 



The current backlash in the U.S. against Diversity, Equity, and Inclusion (DEI) has had less of an impact on this side of the border. While some have retreated, many Canadian companies remain steadfast in their commitment to workplace DEI, including powerful corporations like Scotiabank, Procter & Gamble, D2L Corporation, Air Canada, CBC/Radio Canada, and BC Hydro. To make good on this commitment, companies must implement a written policy explaining how they incorporate DEI principles into their actual business operations, including recruitment, hiring, promotion, discipline, training, and other Human Resource (HR) functions.

**Result:** The DEI policy has a direct impact on a company's compliance with human rights, pay equity, privacy, and other laws relating to those operations. That makes it imperative to periodically review the policy for both compliance and effectiveness in driving favourable DEI results. Here are six things to check when reviewing your company's DEI policy.

1. **Analysis of DEI Data**

As with most business operations, DEI effectiveness hinges on data. **Action Step:** Make sure your DEI policy includes:

- Clearly defined, measurable, and realistic objectives.
- Metrics you can use to measure progress toward achieving those objectives, such as turnover, promotion rates, complaints, etc.
- Methods for collecting the data you need, which may include employee surveys, exit interviews, and other feedback channels.
- Defined responsibilities for analyzing and reporting DEI data.

2. **Clear Distinction Between Value Statements & Promises**

The ultimate goal of DEI is a fully inclusive workplace that represents all sections of society, including but not limited to women, racial minorities, Indigenous peoples, and other historically disadvantaged groups who've faced systemic barriers. While rooted in aspiration, when articulated in an actual HR policy these aspirations may be misread as binding promises. Consequently, failure to achieve DEI goals may expose companies to potential liability risk under contract and other laws.

**Action Step:** Ensure that your DEI policy doesn't make promises that you can't keep. It's perfectly fine to use phrases like "totally inclusive culture" and "fully diverse workforce" as it's stated as a value or vision and not an operational commitment. Of course, the policy should also incorporate operational measures to translate DEI values into reality but without making any promises to which somebody may seek to hold you in a court of law.

3. **Consistency & Alignment**

Accomplishing DEI objectives relies on a host of business processes carried out by different managers for different purposes, which can lead to inconsistent, conflicting, and ultimately inequitable results. **Action Step:** Ensure that DEI protocols align not only with DEI but other key company policies and systems, including with regard to:

- Recruitment and hiring.
- Advancement and promotion.
- Performance management and review.
- Compensation and pay equity.
- Codes of conduct.

4. **Governance & Accountability**

Without provisions for practical governance and accountability, a DEI policy is just symbolic. **Action Step:** Ensure that your policy specifically addresses:

- Who at the company owns implementation of DEI initiatives.
- How those people or departments are held accountable for DEI outcomes.
- DEI reporting procedures.
- Frequency of review.

5. **PolicyClarity & Useability**

A DEI policy won't work if managers don't understand how to implement it. **Action Step:** When reviewing the policy:

- Remove jargon, "legalese", and academic terminology.
- Add practical examples.
- Include decision trees or guiding principles.
- Consider supplementing the policy with FAQs and/or guidance material.

**Best Practices:** Use simulation exercises requiring you to apply your DEI policy to realistic and potentially troublesome workplace scenarios involving, for example, telecommuting inequities, allegations of systemic bias in promotion, or employee complaints about reverse discrimination. Questions to ask:

- Does the policy provide actual guidance or just value statements?
- Would a manager facing the situation know what to do?

6. **Policy Review**

Like other HR policies, DEI policies must be continuously reviewed for effectiveness. **Action Point:** Ensure that your policy provides for:

- Formal regular review at least once a year.
- More frequent review, as needed, in response to major legal changes, DEI-related complaints or incidents, or other indications that the current policy requires updating, correction, or improvement.
- Board or executive sign-off on updates.

- Documentation of review and corrective actions taken.