



Diversity, Equity, & Inclusion

Considerations for
Compliance Professionals



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Introduction

In September 2020, SCCE & HCCA established a diversity, equity, and inclusion (DEI) working group to discuss ways to support the association and its members. Some ideas included having DEI topics at our conferences, articles in our magazines, conducting surveys, hosting roundtable discussions, and developing member resources.

In October 2022, a group of compliance professionals met at the Compliance and Ethics Institute to discuss activities to consider for supporting DEI initiatives. The intent of this exercise was to provide ideas to compliance professionals seeking to champion DEI initiatives at the organization, program, and department levels.

During the meeting, participants separated into three groups to discuss practical methods for compliance professionals implementing, assessing, or championing DEI initiatives at any size organization. Each group reflected on the opportunities and challenges facing programs with limited or significant leadership and financial support. This resource is the culmination of those discussions.

Thank you to the working group members and participants for their contributions to this important endeavor. Compliance professionals play a significant role in shaping organizational culture. The progression of our organizations, patients/customers and the communities we serve depend on our ability to include and value the voices of a diverse workforce. I believe that incorporating these elements will make a difference.

Sincerely,

A handwritten signature in black ink that reads "Walter E. Johnson". The signature is fluid and cursive, with a long horizontal flourish at the end.

Walter Johnson

Co-chair of the Working Group and
2022–2023 President of the SCCE & HCCA Board of Directors

ACKNOWLEDGMENTS

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corporatecompliance.org

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The Society of Corporate Compliance and Ethics & Health Care Compliance Association (SCCE & HCCA) was founded in 1996 to serve the health care compliance profession and expanded in 2004 to serve the global compliance and ethics community across all industries. With 20,000 members in 100 countries, SCCE & HCCA is the largest association furthering the interests of the profession. Headquartered in Minneapolis, Minn., SCCE & HCCA exists to champion ethical practice and compliance standards and to provide the necessary training, publications, certifications, and other resources for ethics and compliance professionals.



Diversity,

Equity,

+ Inclusion

= Belonging

**EMBRACE DIVERSITY,
EQUITY & INCLUSION**

● *Look beyond the protected classes when defining DEI; broaden the scope beyond race and gender to foster openness and inclusion.*

**ESTABLISH AN ORGANIZATION
WIDE PROGRAM**

● *DEI is a business strategy, not an HR strategy. Incorporate DEI as a business initiative to ensure success.*

ASSESS AND MONITOR

● *Without setting goals and measuring progress, it's hard to gauge your success in creating the desired inclusive environment.*

ACCOUNTABILITY

● *Incorporate DEI objectives into performance valuation and compensation to ensure accountability.*

EDUCATE

● *Provide the team with the necessary training and tools to both lead and work in an inclusive environment.*

ACT

● *Take action.*

EMBRACE DIVERSITY, EQUITY, AND INCLUSION

◆ Leadership Commitment

- Secure top leadership's commitment for DEI initiatives and lead by example.
- Ensure leaders communicate dedication to DEI throughout the organization.
- Form cross-functional DEI committee with reps from various departments for diverse perspectives.
- Involve employees at all levels in shaping inclusive initiatives.

◆ Define Core Values/Behaviors

- Establish concise DEI core values, reflecting commitment to diversity, equity, and inclusion.
- Look beyond the protected classes when defining DEI; broaden the scope beyond race and gender to foster openness and inclusion.
- Translate values into actionable behaviors guiding interactions and decisions.

◆ Assessment and Awareness

- Analyze current culture/practices for gaps and improvements. Consider third-party DEI assessment; see appendix for potential tools.
- Identify strengths, weaknesses, growth areas, and immediate priorities to shape DEI program.

ESTABLISH AN ORGANIZATION WIDE PROGRAM

◆ Leadership

- DEI is a business strategy, not an HR strategy.
- The DEI program should be led by a *leader* of the organization, which means that DEI—as a separate function from HR—should report directly to the CEO, executive director, or other more senior organizational leader. It belongs at the executive table, on par with other departments. Treat it with equal importance and respect.

◆ Outline Expectations

- Establish clear goals and scope of the role and define how will its impact be measured.
- Establish the role reporting to the CEO to provide the positioning, influence, and power needed to implement change effectively.
- Ensure the organization provides sufficient resources (people, data and funding) to accomplish the work.
- Set measures and metrics.

◆ Develop an Action Plan

- Create a one-, two-, and five-year plan.

◆ Policies

- Review your Code of Conduct, policies, training, websites, and other forms of communication.
 - ◆ *Inclusive language is about embracing everyone. It avoids offensive expressions that can be sexist, racist, or biased, showing respect to all.*
 - ◆ Ensure policies are written in plain language and avoid the use of jargon and acronyms.
 - ◆ Avoid potentially exclusive terms and stereotypes; both in writing and images.
 - ◆ Incorporate language to highlight the importance of taking action against inappropriate behavior.
 - ◆ Assess whether the impact of each policy is fair and equitable for all employees, or if they might disadvantage certain individuals.
 - ◆ Think about who could be affected and how, as well as who might gain from these rules.
- Issue clear leadership and guidelines about the use of gender pronouns to avoid instances of non-inclusive language, and use the proper pronouns that people select. for themselves.

◆ Website and Communications

- Review language and imagery in key materials for gender and cultural neutrality and translation.
- Ensure website content is diverse in images and representation.
- Prioritize “they or their” over “his or her” for inclusivity.
- Use plain language for easy understanding, especially for non-native English speakers.
- Incorporate preferred gender pronouns in email signatures.
- Ensure marketing materials reflect diverse identities.

ASSESS AND MONITOR

◆ Assess

- Start with an honest culture assessment.
- Pinpoint essential key performance indicators (KPIs) to monitor progress, such as selecting candidates and promoting employees based solely on their merit.
- Use HR data to find DEI opportunities.
- Without setting goals and measuring progress, it's hard to gauge your success in creating the desired inclusive environment.

◆ Monitor

- Evaluate diversity of candidate attraction, hiring, and retention.
- Analyze salary and promotion patterns for equity.
- Adjust and refine activities as necessary.

◆ Report

- Be transparent.
- Report DEI metrics to employees, whether legally required or not.

ACCOUNTABILITY

◆ Hold C-suite executives accountable by incorporating DEI into performance evaluations and compensation. For example:

- Assess executive team diversification efforts, considering factors like gender, ethnicity, and age.
- Check if diverse viewpoints are considered in discussions.
- Note executive team support for fostering and engaging employee resource groups (ERGs).
- Assess executive support for diverse talent acquisition and equitable promotions.
- Ensure executives undergo diversity training.
- Evaluate executive involvement in underrepresented individuals' growth.
- Observe if executives demonstrate commitment through communications.

◆ Hold employees accountable by clearly defining DEI goals and expected behaviors, for example:

- Participate in at least one professional development course or opportunity to enhance diversity awareness and/or cultural competency during the year.

ACTIONS

◆ DEI / Unconscious Bias/Workplace Civility

- Consider engaging a third party to help develop the program and train the trainers.
- Understanding our own unconscious bias (prejudice or judgement) is important if we want to increase diversity and be more inclusive in our practices. This increased self-awareness will help to identify where change needs to take place.
- Tailor training to specific audiences, i.e., leadership, middle management, individual contributors. The goal should be that they learn from and about each other and how unconscious bias works.
- Ensure that higher management not only takes part in training but actively and publicly promotes the importance of DEI.
- Training should include the tools and knowledge managers need to lead their team equitably and lead by example.

◆ Staff Training

- Training should be reviewed in the same way policies are to ensure that they are appropriate for all geographic regions and the various cultures of your employee population.
 - ◆ For example, referencing a Christmas exchange in a gift policy might not be appropriate.

◆ Translations

- Using universal language for domestic and international business communications is acceptable, but be mindful that comprehension varies among non-native speakers.
- Enhance comprehension by conducting native-language training; this eliminates the need for mental translation.
 - ◆ For example, complex topics like DEI, compliance, and ethics benefit from native-language training.
- Improved comprehension boosts productivity, compliance, and morale.

◆ Accessible Communication and Training

- Understand legal requirements. Many countries legally require companies to provide accessible training for all, including those with disabilities.
- Use effective communication by considering content, length, complexity, context, and the individual's preferred method.
- Visit <https://www.ada.gov/resources/effective-communication/> for accessible training ideas.

◆ Manager Feedback

- Train managers to avoid bias in the evaluation process.
 - ◆ Use multiple feedback sources to limit bias.
 - ◆ Adding 360-degree reviews to your performance management process ensures you include multiple sources (managers, colleagues, reports) and reduces the likeliness of biased reviews.
 - ◆ Remind staff to check their language when talking about other people's job performance. An easy way to embrace diversity and inclusion (D&I) through words is to include a helpful note in all performance review and peer feedback forms.

ACT

◆ Practice Inclusive Recruiting and Hiring

- Practicing equitable hiring ensures fair evaluation based on skills, fostering a diverse, inclusive workforce that values all abilities and backgrounds.
- Craft inclusive job descriptions that welcome candidates; be transparent about responsibilities, salary, requirements, etc.
- Conduct a thorough review of your company's minimum educational requirements to ensure they are not inadvertently excluding potential candidates.
- Source candidates from a broad selection of job sites, universities, and employee networks.
- Move from seeking mere "cultural fits" to embracing "cultural adds." A fit aligns values, while an add brings new perspectives, enhancing the team's creativity. Adds may differ in background yet contribute fresh insights.
- Have HR, prior to reviewing applicants, first remove any names and ethnic or religious identifiers.
- Design and implement strategies for attracting a more diverse pool of applicants for positions.
- Promote and/or develop professional development forums, initiatives, and/or events that enhance DEI.

◆ Attrition

- Consider using a third party to conduct exit interviews to get an unbiased result.
- Share third party interviews with DEI Lead and Compliance; collaborate on remediation where required.

◆ Supply Chain Diversity

- Create an equitable procurement process that strives to overcome barriers for minority businesses to participate fully in organizational procurement.
- Assess your supply chain to identify gaps and areas for improvement.
- Educate senior leadership and other stakeholders on the benefits of a diverse supply chain and secure their buy-in.
- Develop a Supplier Development Plan that ensures strong executive support, integration into sourcing practices, DEI efforts and alignment on a sustainable long-term growth plan with clear goals and metrics.
- Develop a supplier diversity policy that strengthens and increases business opportunities for minority, women, LBGTQIA+, and disability-owned business enterprises.
- Show progress and value by providing regular internal updates on the progress of the development initiative— Web site, newsletters and annual reports are some ways of achieving this.

THE ROLE OF COMPLIANCE AND ETHICS

- ◆ Ensure that compliance and ethics (C&E) is a full partner in DEI initiatives and programs.
- ◆ Provide frontline manager with training on receiving and escalating complaints.
- ◆ Incorporate the concepts of diversity, equity, and inclusiveness in C&E communications.
- ◆ Give employees multiple ways—and encourage them—to speak up when they feel something is not being managed properly. A culture that aims for transparency, openness, and mutual trust will ensure that employees are reporting diversity issues so that they can be addressed.
- ◆ Ensure that those charged with investigating DEI-related matters are appropriately trained and familiar with the local culture.

YOUR ROLE AS A MANAGER

- ◆ *Recognize your crucial role in diversity initiatives as a direct influencer on day-to-day operations and team dynamics.*
- ◆ Build an inclusive work environment by recognizing situations in which your biases are most likely to negatively impact your decision-making or judgment.
- ◆ Promoting open communication is a key part of inclusion. As a leader in meetings, ensure everyone's voice is heard. Some might be quieter but hold valuable ideas. Allow various ways to share, like private talks or emails.
- ◆ Encourage the uniqueness of your diverse workforce by having them work in diverse teams. Diverse working teams encourage workers to get to know each other and respect each other. Diversity, when used well, brings excitement and innovation!
- ◆ Support diverse individuals in getting involved in decision-making. Encourage those in decision-making roles to also promote inclusivity.
- ◆ Social gatherings ought to be inclusive, catering to all participants, rather than a select few. For instance, it's wise to avoid strenuous physical engagements. When dining out, practicing DEI involves accommodating various dietary requirements and preferences to ensure everyone's comfort.
- ◆ Discuss diversity, equity, and inclusion during 1:1 discussion with your team members. For example:
 - Do you feel you can be your authentic self at work?
 - Do you feel like people make assumptions about your strengths and weaknesses based on stereotypes?
 - Do you ever feel like you need to conform to be to fit in?

AT THE DEPARTMENT LEVEL

If your organization is not fully engaged (or engaged at all) in building an inclusive environment, that's okay. Start with your own department and lead by example. As you succeed, other groups within the organization will begin to mirror your efforts and before you know it, a grassroots efforts will motivate the C-suite to reconsider. Many of the helpful tips and suggestions presented above can be scaled to work for your department or team. Additionally, there are some steps you can take at any level to enhance an inclusive environment.

- Get the entire team involved.
- Assess your team and identify opportunities for improvement.
- In group meetings, don't open with, "Hey guys," say, "Hey team," or "Good morning, folks," to be more gender neutral and inclusive.
- Make sure everyone has a voice at the table. In 2016, a group of women in the White House instituted a practice they called amplification. What they did was: If a woman shares a good idea, another woman can repeat it and give credit. It works for anyone, not just women. This way, you're helping diverse voices be heard.
- Get to know your colleagues' preferred gender pronouns by including your personal pronouns in email, instant messaging, and social media profiles.
- Promote inclusivity by hosting events for your department or team, creating direct inclusion chances. Use a volunteer system. Teams will propose diversity events and interested members can sign up to plan them. This keeps events relevant and positive for all involved.
- Avoid cultural conflicts. For example, planning a group lunch on Ramadan; or a pizza lunch during Passover, etc.
- Broadcast your activities. Use company websites, blogs, and newsletters to talk about your team's efforts.

Inclusion is really nothing more than being kind and considerate to everyone—it's going out of your way to invite a new person to the lunch table; it's asking people about their day-to-day, their personal life, their future aspirations, and past experiences; it's making connections through your similarities and learning from your differences.

APPENDIX A – Assessment Tools to Explore

**These are not recommendations or reviews but provided as a resource. There are several hundred available options.*

Diversity and Inclusion Self-Assessment

A free tool from the National Association of Colleges and Employers (NACE) will help you gauge your operation's progress toward goals around diversity and inclusion. The tool helps you assess: (1) Commitment to diversity and inclusion; (2) institutional practices for hiring and employment; and (3) staff structure and outcomes.

<https://www.naceweb.org/diversity-equity-and-inclusion/resources/diversity-and-inclusion-self-assessment/>

Cultural Mapping Assessment by KnowledgeWorks

The Cultural Mapping Assessment tool examines intercultural dynamics in the work environment. It is a 72-question online inventory that creates a profile along 12 dimensions of culture and how those dimensions affect behavior. The assessment is embedded into a broad individual and organization development program. The program allows for inter-cultural intelligence (ICI) to be developed and applied on individual, team, and organizational levels in areas such as individual coaching, inter-cultural intelligence, inter-cultural team building interventions, inter-cultural team development and dynamics, inter-cultural conflict resolution, inter-cultural negotiations, and inter-cultural communication.

www.knowledgeworkx.com

Implicit Association Test

The Implicit Association Test (IAT) is a free tool for individuals to conduct a self-assessment. Developed at Harvard University, it measures attitudes and beliefs that people may be unwilling or unable to report. The IAT may be especially interesting if it shows that you have an implicit attitude that you did not know about. For example, you may believe that women and men should be equally associated with science, but your automatic associations could show that you (like many others) associate men with science more than you associate women with science.

<https://implicit.harvard.edu/implicit/takeatest.html>

Racial Equity Tools

Organizational assessments aim to understand internal processes as much as outcomes. For example, it is useful to look deeply at decision-making: What information do decision-makers get and from whom? Which voices or sources of information have credence? What gets discounted or devalued in the process? How are decisions communicated? What are the impacts of current decision-making processes on different racial/ethnic groups?

<https://www.racialequitytools.org/resources/plan/informing-the-plan/organizational-assessment-tools-and-resources>

Corporate Class Inc. – DEI Assessment

Examines six pillars to gain a greater sense of the current state of the organization: leadership learning; strong and transparent HR; quality of life and organization culture; measure and track diversity; integrate or mainstreaming diversity across the value chain; and developing the pipeline. It will identify areas for short-term improvement and work to identify key areas that require development for longer term sustainability of diversity, equity, and inclusion in the organization.

<https://centrefordiversityandinclusion.com/dei-assessments/>

SpectraDiversity Diversity and Inclusion Assessment

The Spectra Assessment enables D&I consultants and other professionals to evaluate both the “outer ring”—management, culture, and the “3Ps” of policies, practices, and procedures—as well as the “inner ring”—individual beliefs and interpersonal skills. By looking at both the inner and outer rings it is possible to see the entire D&I picture and understand what strategies may have the greatest impact.

<https://www.spectradiversity.com/spectra-assessment/diversity-and-inclusion-tool/>

Appendix B DEI Activity Ideas

Heritage Month Celebrations	Use official calendar events such as Black History Month, LBGTQIA+ History and others. See, https://www.state.gov/state-department-celebrates-heritage-and-history-months/ for additional ideas. Keep in mind, these are US-recognized, if you are a multinational organization you will want to be sensitive to employees in those geographic areas.
Cultural Holiday Celebrations	Encourage staff to share their cultural practices and plan events that allow everyone to explore their traditions, culinary staples, and so on. Not only does this foster a sense of community, but it allows every member of your team to explore various cultures from an insider's perspective.
Town Halls	Invite guest speakers to share their cultural experiences – employees/third parties/vendors
Publicize Global Holidays	Just a couple of clicks on Google will give you a list of Global Holidays. Share them on your intranet and ask employees to share their traditions and memories in the comment section.
Host Casual Chats	Use your café or a conference room, pick an interesting topic and once a month publicize that you're hosting a "Casual Chat" session to which anyone is invited to discuss that topic.