



# Beyond diversity:

Equity and inclusion as an overlooked  
opportunity for investors

Regnan thematic research insights  
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This research highlights the need for company leaders and investors to focus on:

- The opportunity cost associated with equity and inclusion deficits (assessed against “what good looks like”)
- Coherent action from companies on equity and inclusion improvements
- Equity and inclusion (versus diversity) as leading indicators of both business and social performance

## Executive summary

In a business environment, where ingenuity and quality decisions are critical, it is imperative for companies to maximise the contributions that people make at work.

**Diversity** can bring broader talent into an organisation. But Regnan’s research shows **equity and inclusion** are critical factors in realising the performance potential of a diverse workforce.

The research – including a review of academic and industry literature, interviews with practitioners and analysis of leading organisations – identifies a number of organisational conditions capable of supporting better performance.

The challenge? This requires a greater focus on the organisation itself, rather than on the candidates it seeks to appoint and retain.

It is imperative – for both performance and social equity reasons – that organisations rise to this challenge. A focus on diversity without equity and inclusion can hinder contributions from people in non-dominant groups and undermine future diversity efforts.

Our research highlights:

- A need to re-examine priorities in Diversity, Equity and Inclusion (**DEI**)
- Organisational levers **companies** can use to enable diverse talent to flourish
- DEI issues **investors** should seek from the companies they hold – whether for performance or equity reasons

For investors and companies alike, the goal should be organisational settings that allow all talent to flourish – including talent that is traditionally under-represented.

### Non-dominant vs minority groups

Diversity, Equity and Inclusion often focuses on the needs of minority groups. We prefer the term “**non-dominant groups**” for two reasons.

It recognises that majorities are not always advantaged relative to others (for example a majority black, female workforce in a company where that is not reflected in senior management).

It also accommodates intersectionality. Demographically similar people may differ in ways that are relevant to their workplace contributions, regardless of whether they are in a majority or minority. Examples may include family responsibilities, sexuality, language/cultural background and confidence (whether innate or shaped by life or workplace experiences).

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## Reframing the business case: from diversity to equity and inclusion

The business and investment case for diversity is often expressed as a causal relationship between diversity and business performance. But evidence for this is limited.<sup>1</sup> In contrast, there is well-established evidence showing the impact of organisational conditions on both diversity and performance.<sup>2</sup> Our analysis suggests that greater observable diversity and stronger performance both result from more equitable and inclusive organisations.<sup>3</sup>

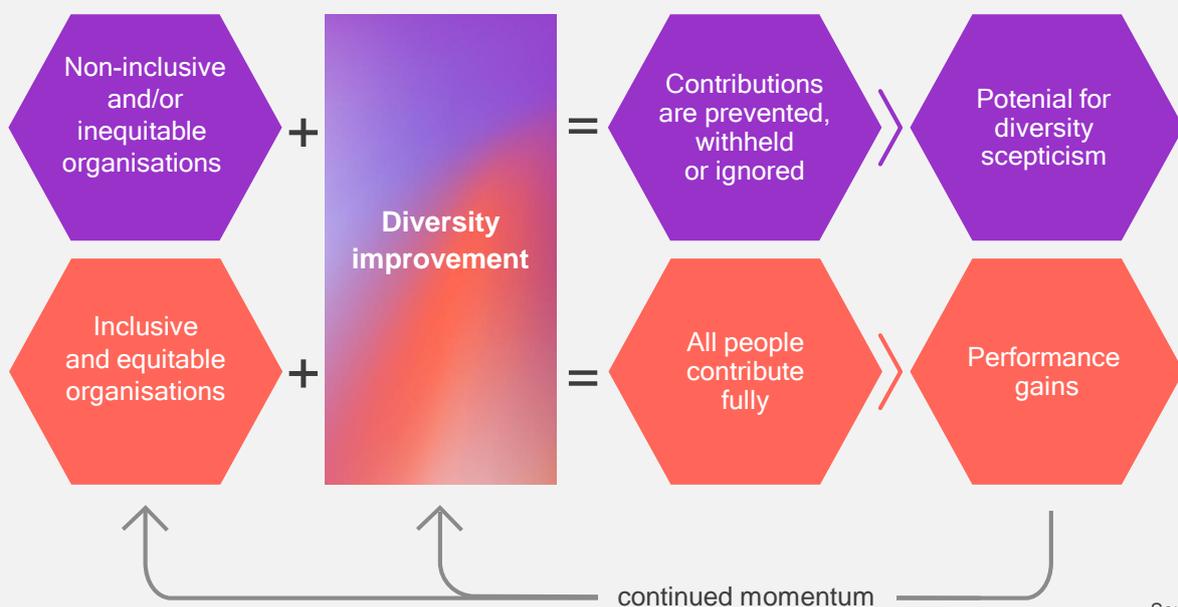
If equity and inclusion are greater performance drivers than diversity, then targeting diversity alone is sub-optimal and even counterproductive – both for a business and for members of under-represented groups. In non-inclusive workplaces, members of non-dominant groups are burdened with behaving in inauthentic ways<sup>4</sup> just to conform in environments that are indifferent or even hostile.<sup>5</sup> If they cannot contribute fully – and the business benefits of diversity fail to materialise – this can unfairly undermine confidence in those individuals and the groups they represent. This may also harm the general case for diversity, fuelling cynicism towards future efforts.

**In a US study, "37% of African-Americans and Hispanics and 45% of Asians reported needing to compromise their authenticity to conform to their company's standards of demeanour or style."<sup>6</sup>**

A more effective approach prioritises organisational conditions needed to more fully realise the potential of the workforce. This can be achieved by ensuring due attention to the contributions of those whose potential is least likely to be realised under the status quo.

This upends the conventional framing of diversity as an “extra”. It positions diversity, equity and inclusion as essential to maximising business performance. Achieving this requires a redirection of focus from diversity to equity and inclusion.

### Equity and inclusion as the pathway to performance gains



Source: Regnan

## Our model for effective Diversity, Equity and Inclusion

Formal and informal organisational processes affect equity and inclusion. Touchpoints span the full range of employee experiences from recruitment for entry-level positions and team dynamics to leadership behaviour and HR.

**Inclusive organisations have been found to deal with performance issues 3.6 times better.<sup>8</sup>**

Adapting a model developed by Cornell University Associate Professor Lisa Nishi,<sup>7</sup> we highlight three areas of focus for equity and inclusion that, in our view, warrant greater investor attention: equitable employment practices, supportive culture, and inclusive decision-making.

### Essential pre-requisites for effective Diversity, Equity and Inclusion (DEI):

1  
**Equitable employment practices**  
**FAIR**

**Equitable employment practices** eliminate bias throughout formal processes that govern the employment relationship at all stages: recruitment, remuneration, development and progression. The best responses take a proactive approach, for instance correcting power imbalances that skew a group's confidence in pay negotiations and may perpetuate inequitable pay outcomes. This also addresses bias that occurs through uneven distribution of other resources within the organisation, such as access to opportunities for development or recognition.

2  
**Supportive culture**  
**SAFE**

A **supportive culture** empowers all employees to perform at their best. This includes informal norms, interpersonal behaviours and organisational resources deployed to support work-life balance (regardless of reason), accommodating individual differences (for instance in physical changes to the workplace) and ensuring psychological safety, trust and respect within and across teams (including via effective conflict resolution mechanisms).

3  
**De-biased decision-making**  
**OPEN**

**De-biased decision-making** focuses on an organisation's ability to elicit, understand and adapt itself to feedback from its people. This can be explicit feedback (for example through self-reporting tools) or observed (for example via regrettable turnover). Supporting all people to fulfil their potential requires perspectives beyond those that shape the status quo. The richest insights may come from people within an organisation who lack positional authority or membership of the dominant group.

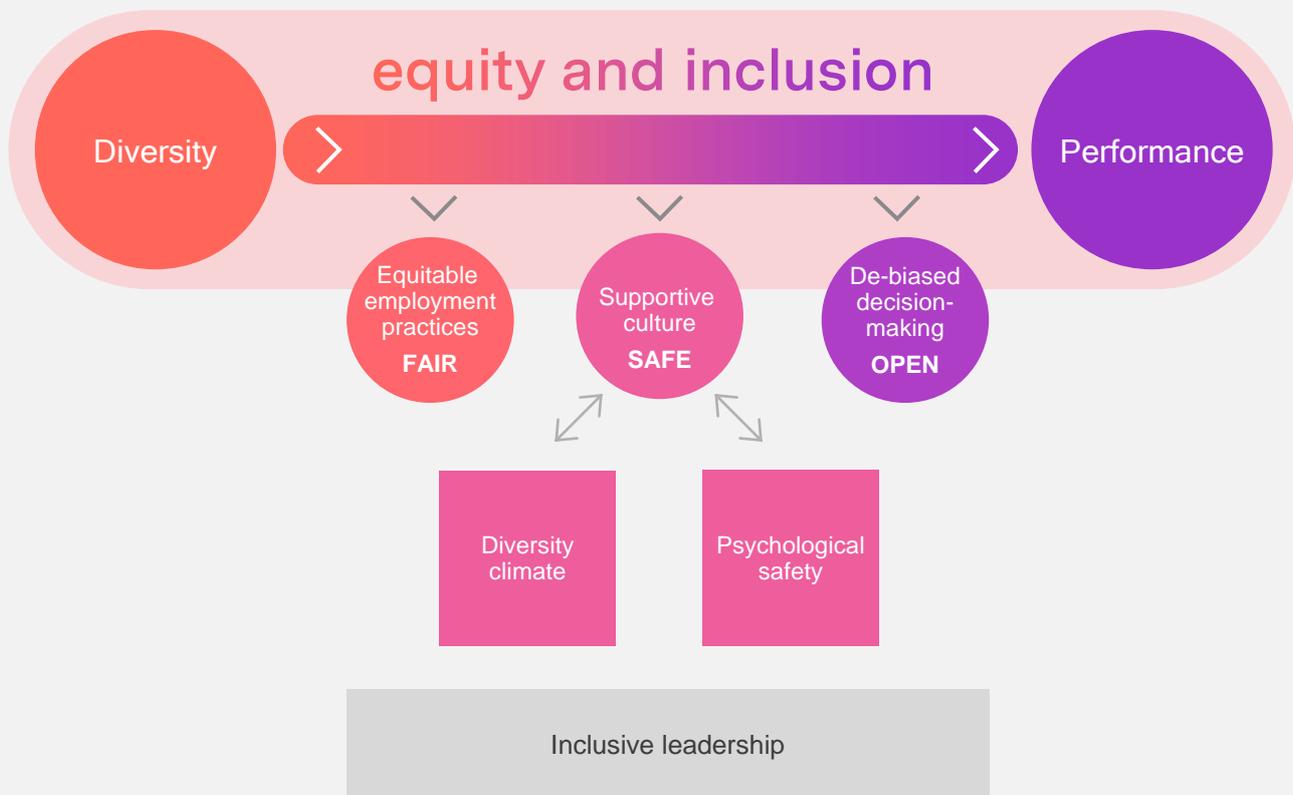
## Review of the evidence

Our review of academic and industry research is distilled in the diagram below. The following pages describe key characteristics associated with stronger business benefits from diversity. We focus on characteristics where:

- **Empirical evidence is associated with performance gains from diversity.** Many of these conditions support *general* people-related performance gains such as productivity improvements. But we include only those with evidence showing performance gains associated with diversity.
- **Theory suggests it can be understood as *causing* performance improvements.** While a correlation does not indicate that these conditions cause (or influence) performance improvements associated with diversity, we include all conditions where we see a credible pathway for such causation.
- **Levers for intervention are suggested by our analysis.**

**Companies** should self-assess against these pre-requisites to identify areas where additional effort would be beneficial. Prerequisites are outlined on pages 8-10.

**Investors** should use indicators of these attributes (and management attentiveness to them) to gauge the impact of DEI efforts in investee companies. Indicators are discussed in more detail on pages 14-15.



**Equitable employment practices**

Conventional processes for recruitment, development, recognition, remuneration and progression are easily distorted by unconscious, careless or convenient biases that disproportionately advantage some groups over others.<sup>9</sup>

These biases impose opportunity costs for organisations (and investors) when talent is sub-optimally deployed or managed. Biases also increase labour costs by artificially reducing a pool of talent *seen as* qualified for a role. Both types of cost increase with role seniority, given the greater influence and higher pay associated with these roles.

Inherent conflicts between the interests of an organisation and employees who view themselves as beneficiaries of reduced labour market competition, mean fairness in employment arrangements is a proper subject for independent oversight and risk management (typically by the Board).

Since these arrangements are wholly within the control of the organisation, their strength is a reliable indicator of an organisation’s commitment to DEI.

Features that indicate comparatively stronger commitment include transparency and accountability for fairness in:

- Allocation of an organisation’s tangible and intangible resources (such as access to opportunities for development or recognition).
- Design of customised, qualitative processes to protect against bias (for example challenging “essential” elements in selection criteria) and reduce subjectivity (eg in job interviews, performance reviews or pay negotiations).
- Approach to senior and junior roles, for example use of widely advertised, pre-determined and pre-weighted *competency-based* criteria applied by a diverse, independent panel of evaluators.
- Pay that reflects the level of skill, effort and responsibility required relative to other roles (rather than being subject to the influence of previous, potentially biased remuneration outcomes or an employee’s ability to negotiate – both of which compound inequities over the course of a career).



Supportive culture

Conditions that shape an individual's subjective experience of belonging, being valued and feeling safe to fully participate.

DEI climate

DEI climate describes an employee's perception of the extent to which their organisation values diversity. This is evident in the organisation's formal structure, informal values and social integration of under-represented employees.

Business benefits are apparent when DEI programs prioritise effectiveness over tokenism and evidence the same organisational commitment as other business initiatives. This evidence (or lack thereof) is apparent in formal instruments such as policies, codes of conduct, risk appetite statements and leader KPIs.

DEI climate can also be influenced by proof points such as observable diversity, and organisational enforcement of stated policies concerning inclusive behaviour.

Higher feelings of commitment, greater organisational citizenship behaviour,<sup>10</sup> and greater more voluntary knowledge sharing are all associated with **people's trust in the organisation's DEI strategy.**<sup>11, 12</sup>

Psychological safety is "a condition in which human beings feel (1) included, (2) safe to learn, (3) safe to contribute and (4) safe to challenge the status quo – all without fear of being embarrassed, marginalised, or punished in some way."<sup>13</sup>

Psychological safety

A climate of psychological safety supports everyone's ability to make their best contributions at work. While DEI climate describes people's perceptions of an organisation's intentions, psychological safety focuses on interpersonal interactions.

Improvements in psychological safety have greater benefits for people from groups who are most at risk of feeling excluded or marginalised, including for reasons of difference from the dominant group.<sup>14</sup>

Feelings of psychological safety are shaped by interactions with an employee's organisation, their manager and their peers. So it is not surprising to find evidence that the quality of these interactions is linked to diversity-related performance. For example:

- Turnover is reduced in diverse teams when **leaders establish high-quality relationships with all team members.**<sup>15</sup>
- Team creativity and drive are higher when members are directed to **seek to understand each other's thoughts, motives, and feelings.**<sup>16</sup>
- Team member creativity is enhanced when **clear expectations of inclusive behaviour are communicated** (eg "politically correct" language standards) as these reduce uncertainty that people may experience when interacting with those they feel to be different to them.<sup>17</sup>

**De-biased decision-making**

Conditions that reduce the influence of subjectivity in business decisions, enabling non-dominant group member contributions to be unimpeded by unconscious, careless or convenient bias.

**Our interviews, engagement history and analysis suggest that inclusive conditions tend be more evident in companies where:**

- They face a constrained labour market
- The work is knowledge based
- There is a focus on innovation
- There is a threat of disruption

While psychological safety is associated with helping people apply their full talents at work, integrating people’s contributions requires attention to decision-making processes. Reducing subjectivity improves decision-making via processes that leave less room for unconscious, careless or convenient biases.

Organisational conditions in this category reduce the role of subjectivity in determining *whose* input influences business outcomes. These include:

- Distributing knowledge of people’s roles, skills and capabilities to facilitate effective task-related information exchange across diverse team members (“knowing who knows what”).<sup>18,19</sup>
- Instruction and support for democratising input into business decisions.<sup>20</sup>
- Accountability via transparency about business decisions: whose decisions, what was decided and why.
- Task-focused leadership style: rather than leadership need or interpersonal relationships.<sup>21</sup> (This also links to feelings of inclusion, ie psychological safety.)



## Testing our model for effective DEI: reviewing inclusive leadership

The three elements of our model allow evaluation of the rigour of any DEI program.

Inclusive leadership was recognised by the practitioners we interviewed as critical for DEI outcomes. Our analysis shows that essential characteristics of inclusive leadership span **each** element in our model.

This is shown in the table below.

For example, where inclusive leadership is confined to actions that address diversity climate (eg a leader's statements about the importance of diversity) it would be unlikely to deliver benefits.

*"What leaders say and do makes up to a 70% difference as to whether an individual reports feeling included."*<sup>22</sup>



## From theory to implementation

The conditions described above suggest a general evidence base. A decision to direct organisational efforts to improving one or more of these conditions should be based on organisation-specific gap analysis.

But some general observations can be made.

- 1 **Equitable employment practices and inclusive decision-making** are direct levers for improving performance, irrespective of diversity. Failure to adopt these practices may indicate broader business issues (such as entrenched management).

**For investors, the absence of these practices in an organisation indicates elevated risk.**

- 2 Diversity climate and psychological safety are mediated by a person's subjective experience. Insight into subjective experience is required to advance these factors. For example, interviews with employees from non-dominant groups can unearth obstacles or work practices that present challenges specific to that group.

Due to this subjectivity, care should be taken to avoid assumptions about who needs additional support to offer their best contributions, or what support is needed. Investigations and interventions should be designed to understand the needs of all people (not only those from under-represented groups).

Analysis should acknowledge intersectionality. For example, while the sole woman on an executive leadership team may be well positioned relative to other women in an organisation, she may be hindered relative to her closest peers by exclusionary practices – for instance if business matters are discussed in gendered settings (eg during regular informal events).

**For investors, lack of bottom-up feedback as a basis for top-down DEI initiatives suggests limited performance gains from a company's DEI programs.**

**A failure to build inclusive cultures can have wide-ranging impact far beyond people typically identified as excluded.**

**39% of those who witness disregard (exclusion) of others in the workplace report coming up with fewer creative ideas and are 26% less likely to help their colleagues.<sup>23</sup>**

- 3 Other organisational initiatives such as oversight, management and evaluation are necessary to ensure resources applied to DEI are best directed in delivering outcomes.

Oversight and management arrangements should follow an organisation's general oversight architecture. For instance, board ownership of strategy should be reflected in board-level policies and delegations, while implementation responsibilities may sit with team leaders supported by clear accountability frameworks such as inclusive behaviour KPIs.

**For investors, the strength of these arrangements are at least as important as any numerical data.**

## A blueprint for good practice

	Strategy should:	Interventions should:	Monitoring should:
What "good looks like"	<ul style="list-style-type: none"> <li>Address business performance as well as any social objectives.</li> <li>Articulate which gaps (between aspiration and status-quo) are priorities.</li> <li>Acknowledge likely obstacles that need to be overcome.</li> </ul>	<ul style="list-style-type: none"> <li>Prioritise most important gaps, not only easiest interventions.</li> <li>Receive adequate resourcing, relative to the strategic goal.</li> <li>Address root causes, not just symptoms.</li> </ul>	<p>Enable evaluation of:</p> <ul style="list-style-type: none"> <li>implementation effectiveness,</li> <li>progress,</li> <li>the need for course-correction.</li> </ul> <p>(measurement is discussed in more detail overleaf)</p>

### EXAMPLES

Equitable employment practices	<p><b>Obstacle is the potential for conscious or unconscious bias in all informal and formal processes.</b></p> <p><b>Goal is to reduce the role of subjectivity in all formal and informal decisions.</b></p>	<p>Recruitment based strictly on competencies rather than conventional proxies (such as years of experience). For instance by:</p> <ul style="list-style-type: none"> <li>advertising all roles and requiring all criteria to be competency-based</li> <li>anonymising resumes to reduce bias or ensure representation from non-dominant groups (depending on objectives)</li> <li>evaluating work-related tasks rather than interview technique</li> <li>using structured, consistent interview questions across all candidates</li> <li>having diverse interview panels</li> </ul> <p>Performance reviews reduce subjectivity by having multiple reviewers (360 degree feedback).</p> <p>Undertake job evaluations across the organisation based on levels (vs types) of skill, effort and responsibility, to challenge biases institutionalised in status quo.</p> <p>Flexible benefits, eg ability to work flexibly or take career breaks for any reason, not only family reasons.</p> <p>Transparent criteria for allocating work, recognition, and learning / development opportunities.</p> <p>Clear conduct policies.</p>	<p>Measures of compliance with DEI policy, for instance appointments that fully comply, by hiring manager/department/level.</p> <p>All employees, and especially those from non-dominant groups, agree that employment practices are fair, transparent and do not compound disadvantage.</p> <p>Employees, especially those from non-dominant groups, agree that there are consequences for poor interpersonal conduct.</p>
Supportive culture	<p><b>Obstacle is an organisational climate that does not provide sufficient psychological safety to allow full participation of non-dominant groups.</b></p> <p><b>Goal is to shape interpersonal behaviours to better create a climate of trust and respect.</b></p>	<p>Flexible feedback and resolution processes, including for interpersonal issues. Investigations are timely, with protections for those acting in good faith, with appropriate transparency to involved parties.</p> <p>Performance management includes 360-degree feedback on interpersonal behaviours specific to trust and respect.</p> <p>Cultural signals of what matters don't undermine equity and inclusion ("walking the talk") and foster respect, eg rewarding effort over outcome or conventions for the use of language.</p>	<p>Usage rates indicate employees find the interpersonal supports useful.</p> <p>Employees, and particularly employees from non-dominant groups agree that they feel able to be their whole selves at work.</p>
Inclusive decision-making	<p><b>Obstacle is inertia, given that existing power structures tend to reproduce themselves.</b></p> <p><b>Goal is to overcome organisational inertia and resistance where this threatens the power held within dominant groups.</b></p>	<p>Actively seek and incorporate diverse perspectives, prioritising feedback from people in non-dominant groups. This should include affinity groups' input into organisational decisions but should also seek out other voices.</p> <p>Build cross functional teams to promote information and perspective sharing.</p> <p>Manage team dynamics to elicit wide contributions that are actively incorporated into transparent decision making.</p>	<p>Usage rates of a variety of feedback channels.</p> <p>% employees agree they can productively disagree with co-workers regardless of seniority.</p> <p>% employees who agree they can influence organisational decision-making.</p>

## Measurement that matters

DEI metrics such as number of employees by gender or ethnicity play an important role in understanding the current organisational context, guiding interventions and monitoring progress. But there are reasons for care in the use of these metrics:

### 1. Qualitative and subjective indicators

provide richer insights and a stronger basis for effective interventions. Despite this, because they can be harder to measure, they are often omitted.

For example, data on employee turnover is silent about the reasons for resignations. Exit interviews and qualitative engagement survey items would provide a stronger signpost for appropriate interventions.

### 2. Triangulation of metrics provides necessary context

Used in isolation, organisational interventions are more likely to misdirect efforts to symptoms rather than causes, sabotaging progress. This can occur due to the cost of collecting data or fear of fuelling further discontent.

For example, workforce composition data may identify fewer women in an organisation's senior roles than might be expected based on numbers in middle management. Regnan's engagement with company directors has often revealed an assumption that women lack interest in the demands of senior roles in an organisation.

Bringing other data to bear on the subject could instead reveal that this is due to the impact of bias in pay and progression decisions when compounded over a career. It may show that work-life balance policies ignore needs other than those of parents with young children. Or it could reveal executive appointment processes that give excessive emphasis to prior relationships and networks.

Addressing this requires very different interventions in each case.

### 3. Metrics should reflect the attributes most relevant to an individual's experience at work

Metrics driven from top-down assumptions can hinder the effectiveness of interventions in addressing real needs versus those a dominant group pre-supposes to be relevant.

For example, flexible work is often helpful for women with young children. But it is also helpful for people with religious observance requirements or health issues that make commuting a challenge.

Conversely, women with young children can have higher DEI priorities than flexible work, depending on their personal circumstances.

## Types of indicators

There are six main types of indicators that organisations should gather and monitor:



Internal demographics



External reference points



Behavioural data



Attitudinal data



Implementation measures



Outcomes measures



## Internal demographics

Data on workforce composition is a useful starting point for baselining and directing further inquiry. Demographic data includes the widest range of workforce information that can be collected under privacy consent and local laws (for example age, gender, ethnic or language background, family status, sexual orientation, disability and neuro-diversity). These are cross-referenced to role, department, level and other organisational groupings.

Where available, internal demographic data should be used to understand systematic differences in other data, for instance employee engagement survey responses or take up of inclusion initiatives.



## External reference points

Benchmarking internal data against the wider ecosystem provides a basis for identifying anomalies. While this may be used to identify areas of underperformance, it can also support strategic workforce planning via the identification of untapped labour markets. For example:

- comparison to the wider talent pool, for instance commuting region, time-zone (for remote work) or organisations of similar size and/or industry,
- pay data,
- peer benchmarking of workplace data, for instance retention rates following parental leave.

Care should be taken when working with reference points that may themselves contain inherent biases, to ensure these are not perpetuated.



## Behavioural data

Data typically collected in human resource systems can illuminate useful areas of enquiry when considered against internal demographic data and support the prioritisation of interventions.

Evidence from departures, absenteeism/health claims, formal complaints, employee referrals, use of benefits (eg flexible work or counselling services) may compare well with external reference points such as industry benchmarks. But it also offers an opportunity to identify anomalies internally (eg specific teams or cohorts) when considered against internal data.

Trends can help identify areas of emerging concern, allowing action to be taken before problems spread across an organisation.



## Attitudinal data

This involves gathering information on the subjective experience of employees (especially those from non-dominant backgrounds) via techniques such as employee surveys, focus groups, exit interviews and 360 feedback. This feedback provides useful insight into how DEI initiatives are being perceived; can identify the need for course-correction; and suggest how DEI programs should evolve in the future.

The exercise of gathering this information can substantiate the organisation's commitment to DEI, even before the initiatives are implemented.



## Implementation measures

These measures test the progress of DEI *activities* providing a vital feedback loop to support continued improvement. This can include measures of adoption, implementation progress, compliance with policy and other measures of success. For instance, the percentage of positions filled without being advertised/contested internally or externally, or employee satisfaction with accessibility accommodations made.



## Outcomes measures

While this is often focused on the achievement of diversity goals – for instance women in management or achieving workplace parity for specific ethnic groups, it should also consider the contribution to business performance. This includes metrics that uncover the relationship between DEI and business key performance indicators, such as productivity or innovation measures.

## Afterword

Organisations and investors have redoubled diversity efforts in recent years. These efforts are largely well-intentioned. But evidence strongly suggests that attention is better initially directed to equity and inclusion, rather than to diversity, both for business performance and for social equity reasons.

It's not only that a focus on representation is insufficient. Tokenism that provides a false sense of progress can even undermine members of groups usually thought to be beneficiaries of this focus.

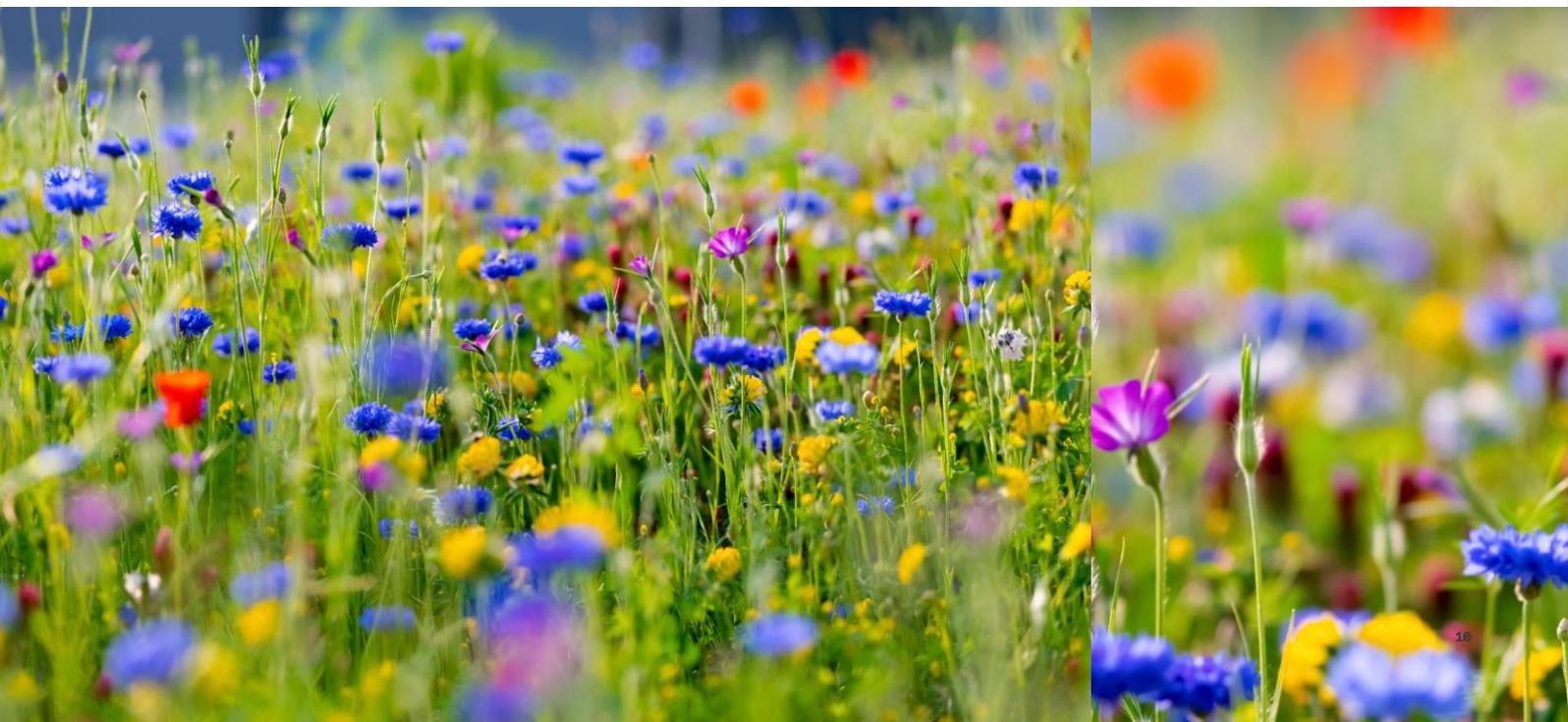
This is true even among the most powerful groups in organisations – company boards. Based on Regnan's engagement discussions with company directors since 2001 it is clear there are instances where external pressure to meet diversity targets has come up against an incumbent's reluctance to share power through more inclusive decision-making – often with negative consequences.

DEI policies should address bias – whether unconscious, careless or convenient for incumbents or dominant groups.

Instead of focusing exclusively on numerical representation, DEI programs must give due attention to the distribution of power and authenticity of approach. This is needed to cultivate a culture where people can fully contribute and organisations can deliver business and social benefits.

Investors who fail to pay attention to the essential prerequisites for effective DEI will not only miss vital indicators of future performance – they may, via their engagement efforts, further entrench counterproductive activities.

**The impact is felt at the most senior levels of governance: 36% of US company directors say it is “hard to voice a dissenting opinion”. Many attribute this to a “fear that dissenting opinions will damage collegiality in the boardroom”, highlighting the challenges to inclusive decision making even among the most senior business leaders.<sup>24</sup>**



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## Glossary

**Diversity:** Representation of different kinds of people. These differences can be based on aspects such as culture, race, ethnicity, religion, age, nationality, gender, sexual orientation, disability, neurodiversity, ideology, socioeconomic background, education, personality, skills and professional background.

**DEI climate:** An employee's perceptions about the extent to which their organisation values diversity, as evident in the organisation's formal structure, informal values and social integration of under-represented employees.

**Equity:** The process of ensuring processes and programs are impartial, fair and provide equal possible outcomes for every individual.

**Inclusion:** An environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources and are empowered to contribute fully to an organisation's success.

**Intersectionality:** How a person's social and political identities combine to create different context-specific disadvantages and advantages.

**Interventions:** Targeted initiatives undertaken by organisations to address specific areas.

**Non-dominant groups:** Groups that may be in the majority in the workplace but are not advantaged relative to others.

**Pre-existing conditions:** Existing behaviours, culture, structures and systems an organisation operates on, whether intentionally or unintentionally.

**Psychological safety:** A condition in which human beings feel (1) included, (2) safe to learn, (3) safe to contribute, and (4) safe to challenge the status quo – all without fear of being embarrassed, marginalised or punished in some way.

**Systemic bias:** The complex interaction of culture, policy, and institutions that works to uphold discriminatory outcomes for non-dominant groups.

**Under-represented / marginalised groups:** A group whose representation in a specific context is smaller than their representation in the general population.

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