DIVERSITY AND INCLUSION ACTION PLAN (DIAP) 2021-2026



A message from our CEO – Sally Munday

At UK Sport, we are determined to lead by example, striving to be a role model organisation in all we do in equality, diversity and inclusion, from leadership to delivery. We are committed to building a culture where difference is embraced and exceptional talents can flourish, regardless of background.

This updated Diversity and Inclusion Action Plan (DIAP) focuses on our people.

- It sets out our internal objectives for the next 12 months to ensure that our workforce becomes increasingly representative of the diversity of the UK population and that our people feel valued, supported and can thrive.
- The plan is **evidence-based**, drawing not only on quantitative data about the make up of our workforce, but also qualitative data from our annual Culture Feedback Survey.
- We will continue to use these insights to measure progress against our goals and will constantly evolve and change our approach if our initiatives are not delivering the right, timely impact. This includes taking bold, positive action to tackle stubborn inequalities.
- We will ensure that everyone, at every level of the organisation, knows that these are our EDI priorities and understands their personal role and responsibility in helping us to achieve them.

We will not only hold ourselves to account as we strive for a more inclusive organisation, but by publishing this plan externally, will invite independent challenge and scrutiny too. I am confident that this DIAP provides the roadmap to help us deliver our goal of positive and sustainable change.



INTRODUCTION

UK Sport's purpose is to lead high-performance sport to enable extraordinary moments that enrich lives. In May 2021, shaped and informed by a public consultation of over 4,000 individuals from the general public and the sports sector, we launched our <u>10 year Strategic Plan</u> in which we set out our new mission to create the greatest decade of extraordinary sporting moments; reaching, inspiring and uniting the nation.

At the heart of the Strategic Plan are UK Sport's three ambitions: to keep winning and win well, to grow a thriving sporting system and to inspire positive change, with equality, diversity and inclusion embedded into how each of these ambitions are achieved. The Plan provides the opportunity to create a sporting system that is truly collaborative, inclusive and representative of UK society, and one that people aspire to be a part of.

Equality, diversity and inclusion are central to this mission.

In June 2021, we published our <u>Equality, Diversity and Inclusion (EDI) Strategy</u> to ensure that the Olympic and Paralympic high-performance community is where the nation's diverse and exceptional talent belongs and has the opportunity to be the best they can be. The Strategy covers all aspects of UK Sport's remit, both external and internal, and focuses on four priority areas:

- To power a more diverse and inclusive Olympic and Paralympic team that delivers a broader range of champions and medallists than ever before.
- To increase the diversity of leadership of high-performance sport in national and international sports bodies.
- To promote and embed inclusion across UK Sport's external programmes.
- To drive with pace, ambition and accountability the equality, diversity and inclusion agenda within UK Sport.

UK Sport's Diversity and Inclusion Action Plan (DIAP) represents the fourth priority and sets out our ambitions for advancing equality, diversity and inclusion at every level of the organisation.





UK SPORT'S DIAP

Our DIAP is centred on four core goals for our own organisation:

GOAL 1

Our people are increasingly reflective of UK society

GOAL 2

We have greater confidence to talk about all aspects of diversity and inclusion and are empowered to embed EDI in all UK Sport activity

GOAL 3

UK Sport leaders are passionate about EDI and foster an inclusive culture

GOAL 4

Our policies, procedures, working practices and culture are fully inclusive. Our people feel respected and valued

Each goal is underpinned by specific activity assigned to responsible leads with a target timeframe for delivery. The DIAP covers our Board, Senior Leadership Team (Directors and Heads) and workforce.

The DIAP is focused on achieving the following headline KPIs for our organisation:

By 2031, the people in UK Sport will be reflective of UK society. Specifically, this means that our Board, Senior Leadership Team and Workforce will separately and collectively be comprised of min: 50% female, 20% disabled, 18% diverse ethnic background, and 3% LGBTQ+, as well as people with different lived, regional and socio-economic experiences. The representation targets we have set ourselves are based on national demographic benchmarks from the 2021 census. Whilst they are key to enabling us to measure success, they are not an end in themselves. We will always recruit the best individual for every role to help drive our ambition of creating an inclusive workplace environment where diversity of thought is fully represented.

The people we recruit from 2022 to 2026 will be in line with our intended 2031 diversity ambitions. This means that the group of people that we welcome to our organisation in this period will reflect the diversity of thought, experience and background that we are aiming to achieve across the whole organisation no later than 2031. This will ensure that we are changing the composition of UK Sport to meet our 2031 aims.

A high proportion of our people feel that UK Sport role models the standards expected for equality, diversity and inclusion. We have established baseline data to determine a clear ambition in this area and set a target above the upper quartile.

The success of this DIAP will be owned and shaped by our people. This includes taking action to identify and remove barriers to representation and inclusion, as well as actively implementing our own learning from internal staff discussions, working groups and public commitments made in EDI areas, such as those outlined following the Sports Councils' review into Tackling Racism and Racial Inequality in Sport (TRARIIS).

Progress against this Plan will be monitored by our EDI Advisory Panel, chaired by our Board Diversity Champion, who ensure we deliver against our overall EDI strategy for high performance sport; and on a quarterly basis by our Directors' Team. In line with the revised Code for Sports Governance requirements, our Board will also review the Plan and progress against it on at least an annual basis. We will be transparent and public on how much progress we are making against the actions we have set out; and where we are not doing enough and what we will do about it.



OUR PROGRESS

We published our first Diversity and Inclusion Action Plan in October 2021 and it was formally fully reviewed by our Board in December 2022. In August 2023, the Board considered progress against our EDI strategy and the next formal review of our DIAP is scheduled for February 2024. Whilst we have achieved some progress as set out below, we recognise we have much more work to do. Notable achievements in this period include:

GOAL 1

56% of our new recruits were women, 7% had a disability or long-term health condition, 8.4% were from an ethnically diverse background and 5% from the LGBTQ+ community.

New board recruitments included one member from an ethnically diverse background, two women and one member with a disability. SLT membership remained unchanged over the previous year comprising one male and four female Directors.

Four new policies have been created: Transitioning at Work, Menopause, Baby Loss and a Fertility policy. We reviewed our procurement policy and guidelines and embedded EDI and sustainability within them to diversify our supply chain and increase the inclusion of suppliers from previously underrepresented groups.

Our flexible working practices are changing the geographic location of our staff. 69% of our staff are London-based; 14% field-based; 11% Loughborough-based; 6% Manchester-based. Additionally, 10% of our staff work part time.

We offer guaranteed interviews to candidates from ethnically diverse backgrounds or those with a disability or long-term health condition if they meet the minimum criteria for the role.

In summer 2023, our first internship programme for 5 young people from ethnically diverse backgrounds, led to two of them securing fixed term roles in UK Sport.

GOAL 2

At an all staff away day dedicated to EDI, our newly appointed Director Diversity Champions shared their own lived experiences and explained why they had chosen their particular protected characteristic or inclusivity issue to champion.

Our Gender Champion hosted a "breaking the taboo" lunch and learn to introduce our new menopause, baby loss and fertility policies. In response to universally positive feedback, we repeated it for the wider sporting sector.

Organised by our LGBTQ+ ERG and led by our CEO and LGBTQ+ Director Champion, a group of LGBTQ+ colleagues and allies marched in the London Pride parade for the first time, demonstrating our support for and celebration of the LGBTQ+ community within the sporting sector and wider.

Our Anti-Racism Group has hosted a range of inspirational ethnically diverse leaders who are driving racial equity initiatives within and outside of sport to share learnings and inspire us to be bold in our ambitions.



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We strengthened the governance around our EDI work by appointing our Deputy CEO as executive EDI sponsor and ensuring the Team of Directors formally review progress against our DIAP and wider EDI strategy every quarter.

At staff request, mandatory personal EDI objectives were introduced for all staff from April 2022, to ensure that all UKS colleagues are responsible for contributing to the EDI agenda and are held accountable and recognised for their contribution.

GOAL 4

We created a Tackling Racism and Racial Inequality in Sport (TRARIIS) action plan to help deliver on our mission to become an anti-racist organisation and accelerate the pace of delivery internally and across the system.

Together with the other Home Country Sports Councils, we published six monthly updates of our work in response to the five TRARIIS commitments and hosted a webinar for over 200 of our sector partners to raise awareness of the ongoing issues and share best practice in advance of an in-person conference in March 2024.

We have increased personal diversity data disclosure rates of UK Sport staff to around 80% for all protected characteristics (from 55% in October 2021), enabling us to plan and deliver more targeted data-led interventions to promote equality and progression in UK Sport.

In our annual survey 2022, 77.6% of staff agreed that UK Sport role models the standards expected for equality, diversity and inclusion (an increase on the 2021 score of 74.5%); 87.8% felt they had a growing understanding of all aspects of diversity and inclusion (new question for 2022); 74.1% felt confident to talk about issues of inclusion (new question for 2022) and 75.5% said they felt valued and included at UK Sport (a 1% increase on the 2022 score).



CHALLENGES AND FUTURE FOCUS

Following a UK Sport Board review of the progress against our EDI Strategy in December 2022, the Board concluded that we needed to simplify and streamline the strategy to distil the most critical activities we are driving in order to help senior leadership identify those which we need to prioritise, support and monitor. In response we have now distilled the 4 priorities in our EDI Strategy and set the following end state outcomes:

PRIORITY 1 – ATHLETES

A truly diverse and inclusive team by Brisbane 2032, with a broader range of champions and medallists, and an athlete cohort that is representative of the national community

PRIORITY 2 – LEADERS

By 2032, the leadership of high-performance sport is representative of the national community

PRIORITY 3 – FANS

Olympic and Paralympic success is reaching and enriching the lives of a truly diverse cross-section of the British public

PRIORITY 4 – OUR PEOPLE

By 2031, the people in UK Sport are representative of the national community, and over 90% of our people consistently feel that the organisation role models the standards expected for EDI.

In response, Priority 4 of our Strategy, covered by our DIAP, is now centred on our People, focused on better understanding the diversity of our staff and removing barriers to enable us to attract and develop a far more diverse cohort of candidates. Our greatest challenge for the coming year is to make progress against our recruitment targets. This will include a revised approach to recruitment focussing on how diversity can be maximised in each stage of the process as recommended from a recent HR review, as well as building on experimental approaches such as our current inclusive internship programme in partnership with the University of East London and Badu Sports and a trial of blind recruitment.

The Board also encouraged us to strengthen the strategic oversight of our EDI Strategy and DIAP. Noting that the Board and Director Team ultimately oversee this work, it recognised that our existing EDI Working Group was committed to driving change but was largely operational in nature. At a subsequent Board meeting in August 2023, Board agreed that to inject greater momentum into EDI work and progress against strategic objectives, our internal group should be reformed.

We have therefore decommissioned the EDI Working Group and plan to replace it with a new EDI Advisory Panel which will include 2 UK Sport Board Members to add perspective and challenge and enable the UK Sport Board to have a clearer line of sight into EDI activity and progress as well as 2 external independent members to provide expertise in delivering change. Once formed, the new EDI Advisory Panel Working Group will conduct an initial review of our refreshed DIAP. Recognising that this is intended to be a dynamic plan, we will adjust priorities and delete or add any additional initiatives in response to their recommendations, including, if relevant a change to the structure of our DIAP.



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UK SPORT'S DIVERSITY AND INCLUSION ACTION PLAN (DIAP), 2021-2026

GOAL 1

OUR PEOPLE ARE INCREASINGLY REFLECTIVE OF UK SOCIETY

Outcomes:

- UK Sport Board composition represents and better reflects the diversity of UK society
- Inclusive recruitment processes guarantee all talent an equal opportunity of selection
- Candidates feel valued and supported throughout the process
- Targets help deliver an increase in the number of new recruits with diverse backgrounds

See table overleaf



ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
1.1 Based on national benchmarks from the 2021 Census and internal data, agree and implement 5-year recruitment targets for women (50%), people with a disability (min. 20%), those with ethnically diverse backgrounds (min. 18%) and LGBTQ+ (min. 3%) for the whole of UK Sport, including Board, Senior Executive and wider workforce.	Chair/CEO/ Head of People/HR Lead	Increase in the number of recruits from diverse backgrounds at Board, Senior Executive and wider workforce to attract broader diversity of thought	Recruitment targets met by 2026
1.1a Collaborate closely with BEAA and BPA on attracting ethnically diverse and disabled former athletes and support staff into our organisation.	HR Lead	Increase the lived experience of high-performance sport within the organisation to the benefit of the wider sector	July 2024
1.1b Research and introduce an additional target for socio-economic diversity	Head of People/ Senior EDI Advisor/ socio-economic Diversity Director Champion	Broaden our ambitions to take account of intersectionality	April 2024
 1.2 Provide short term, temporary paid placements to young people under the 10,000 Black Interns Programme or from the University of East London, Badu Sports or other organisations to support people with different lived, regional and socioeconomic experiences. 1.2a Conduct a lessons learned review of the first iteration of the internship programme to capture the benefits for the interns and the UKS staff who served as line managers or mentors. 	Head of People	Provide entry point and future pipeline of individuals from underrepresented backgrounds (links also to TRARIIS Action plan)	First interns to be hosted in Summer 2023 (complete) Review completed in December 2023 ahead of Internship programme for 2024
1.3 Create and run an outreach programme with educational institutions with diverse student populations to raise awareness of the range of roles available in UK Sport and disrupt any perceptions or assumptions held about the organisation.	Senior EDI Advisor	Showcase the range of careers in sport to marginalised groups who would not otherwise have access to the sector	Host a first Insight Day in collaboration with The Careers Office by April 2024
1.4 Mandate diverse shortlists. Offer guaranteed interviews to candidates from those groups which are currently most underrepresented in UK Sport: people from ethnically diverse backgrounds or with disabilities, so long as they meet the minimum requirements of the role. (Complements 1.12 which focuses on training and supporting recruiting managers).	HR Lead/ Hiring Managers	Achieve an increase on the 2022/23 recruitment outturns in respect of people recruited from underrepresented groups i.e. more than 7% with a disability or long-term health condition, more than 8.4% from an ethnically diverse background	April 2024



Recruitment targets and targeted initiatives

	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
	1.5 Undertake audits (together with DCMS, in respect of those positions where recruitment is the responsibility of DCMS) of applications for UK Sport Board, committee and panel, and senior leadership posts, to capture diversity data on applicants (by reference to the protected characteristics and any other key diversity indicators, such as socio-economic status, education and professional background).	Chair/CEO/ Head of People	Where possible (in light of public appointments being led by DCMS), understand and baseline the diversity of applicants for Board, panel and senior leadership posts and enable challenge of non-diverse shortlists.	Ongoing (in line with positions becoming vacant)
	1.6 Review diversity data of all applicants applying for roles at UK Sport and where they exited the recruitment process.	HR Lead	Mitigations identified for any bias or disadvantage	March 2024
training and development	1.7 Ensure new members receive a full, formal and tailored induction bespoke to their needs, skills and experience on joining the Board. This may include specific additions to their Board Induction Pack, personal L&D as well as discussions with the Chair, other Board members or members of UK Sport.	HR Lead	Check for issues of culture to inform any training or policy interventions	January 2024
	1.8 Assess the effectiveness of our advertising outlets and recruitment partners in helping us reach new and more diverse groups and networks.	HR Lead	Ensure transparency, help identify and address causal indicators	By 31 March 2024
	1.9 Conduct equality impact assessments (EQIA) of our HR policies every 2 years as a minimum to ensure that they remain inclusive in nature.Update policies in line with the EQIA outcomes and implement new policies where there may be gaps.	Senior EDI Advisor, with HR Lead and Legal Team	Provide clear guidance for staff and line managers and help facilitate discussion about workplace inclusion issues	Ongoing – minimum of 6 policies a year to be reviewed
	1.10 Implement the recommendations of the HR review intended to transform our recruitment process, focussing on how diversity can be maximised in each stage of the process.Wherever possible, ensure all roles are open to flexible working, unless by exception.	Head of People/ HR Lead	Inclusive recruitment processes guarantee all talent an equal opportunity of selection Candidates feel valued and supported through- out the process. Any bias or barriers are identi- fied and removed	Strategy produced and early signs of positive change evidenced by April 2024

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	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
ses, t	1.11 Interview panels to be diverse and comprise, as a minimum, gender and ethnic diversity. (See 1.12 for training requirements). HR team to monitor adherence to the guidelines.	HR Lead	Impact of unconscious bias mitigated. Candidates see aspects of their identities represented in the panel members and trust their capabilities	Partially implemented in Nov 23, fully integrated into policy by July 2024
licies, process development	1.12 Mandate the completion of updated recruitment and selection training by all hiring managers, ensuring managers are informed, supported and engaged to help meet recruitment targets.	HR Lead	Upskill panel members and ensure unbiased interviews; behaviour change is promoted and embeds across the organisation	Implemented as part of recruitment project, delivered by July 24
Recruitment policies, processes, training and development	1.13 Scope the design and possible sources of funding to create a placement opportunity for Paralympians in transition to gain insight into, and experience of a range of roles in sports administration.	Head of People/ Disability Director Champion	Build a strong, more diverse talent pipeline into the organisation in the future	December 2023
	1.14 Participate as a Host Board in the Levelling Up Department's Board Apprentice Scheme to provide development opportunities for the board candidates from underrepresented backgrounds.	Chair	Board candidates enter the recruitment process with firsthand experience of UK Sport governance	October 2023
Retention, Development and Progresssion	1.15 Introduce mentoring, co-mentoring (with Board and senior leadership team), job-shadowing and/or sponsorship opportunities for underrepresented staff.	Head of People/Senior EDI Adviseor	Level the playing field through positive action designed to raise the profile of underrepresented staff and give them access to senior decision-makers	June 2024
Retention, Developm and Progresssion	1.16 Analyse attrition rate of current diverse workforce, identify any causal indicators and introduce any necessary corrective measures.	HR Lead	Check for issues of culture to inform any training or policy interventions	January 2024
	1.17 Produce and publish our gender and ethnicity pay gap reports internally and externally. Identify actions to address imbalances.	HR Lead	Ensure transparency, help identify and address causal indicators	By 31 March 2024



WE HAVE GREATER CONFIDENCE TO TALK ABOUT ALL ASPECTS OF DIVERSITY AND INCLUSION AND ARE EMPOWERED TO EMBED EDI IN ALL UK SPORT ACTIVITY

Outcomes:

- **EDI values and principles** are embedded in all ways of working and in the planning and delivery of all UK Sport activity
- UK Sport staff have greater **awareness of and empathy for** all aspects of diversity in the workforce and more confidence to talk about issues of inclusion

	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
Communications	2.1 Deliver an employee engagement plan to increase organisational-wide understanding of the importance of EDI to celebrate diversity and to raise awareness and greater depth of understanding of the action UK Sport is taking in this space to drive positive change. This to include presentations at Staff Brief, articles in Inside Track, lunch and learns etc.	CEO / Directors / Senior EDI Adviser / Engagement Team	UK Sport is an inclusive organisation which takes pride in and celebrates the diversity of its employees. Teams are confident about how to embed EDI into their everyday activity	Minimum of one intervention per week
	2.2 Continue focused discussions about race; hold similar conversations about other differences (e.g. disability, socio-economic/ educational background and LGBTQ+) to surface the lived experiences of our people; agree language and tone around EDI matters, embedding this culturally in our organisation.	Director Diversity Champions / Senior EDI Adviser	Increase awareness of, comfort with and empathy for all aspects of diversity in the workforce. Encourage staff to bring their whole identities to work and foster a culture of allyship	Minimum of one key event (e.g. all staff day, ERG meeting, bespoke session) per month.



OUR LEADERS ARE PASSIONATE ABOUT EDI AND FOSTER AN INCLUSIVE CULTURE

Outcomes:

- Board Diversity Inclusion Action Plan (DIAP) is fully embedded: progress against it regularly assessed •
- EDI organisational plan regularly reviewed by Directors and **demonstrates progress** Board EDI Champion routinely **challenges decision-making** ٠

	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
Senior Team	3.1 Board reviews DIAP at least every 12 months, with regular engagement and challenge from Board EDI Champion. Updated DIAP to be published at least every 12 months. (Last formally reviewed by Board in December 2022).	Board/Board EDI Champion	Board fully incorporates EDI as part of its decision-making, reviews DIAP and publishes outcome	Following February 2024 Board review of DIAP
Board and Senior Leadership Team	3.2 Directors check and challenge on at least a quarterly basis the implementation of the DIAP and separate cross-organisational EDI strategy, progress against KPIs and risks within corporate risk register.	Directors Team	EDI Strategy and DIAP regularly reviewed by Directors and demonstrates progress	Quarterly
āĭ	3.4 Director Diversity champions advocate for their chosen characteristic/inclusion issue, inspire best practice EDI activity; facilitate the work of the newly formed Employee Resource Groups and support bespoke inclusion initiatives.	Directors Team	Directors publicly role model intention, behaviour change and commitment, and enhance accountability	Directors communicate to all staff on their area of interest at least once a year
	3.5 Each individual staff member agrees a	All Staff	All staff are encouraged and empowered to	Annually in April
Staff	personal EDI objective aligned with UK Sport's values and in support of the ambitions in our EDI Strategy. We engage with inclusion initia- tives and attend relevant training to grow our understanding and increase our confidence to contribute effectively to our EDI agenda.		contribute to delivery against the EDI Strategy and drive the pace of change and are held accountable for their contribution in the annual appraisal round	



OUR POLICIES, PROCEDURES, WORKING PRACTICES AND CULTURE ARE FULLY INCLUSIVE. OUR PEOPLE FEEL RESPECTED AND VALUED

Outcomes:

- Annual culture survey shows all UK Sport people feel psychologically safe, more included and valued in the workplace
- EDI AP and Anti-Racism Group input informs and shapes inclusive, anti-racist strategies
- More equitable outcomes achieved in the representation and progression of female, disabled and ethnically diverse staff

	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
Anti-racism and EDI Advisory Panel, Data, Standards and Surveys	4.1 Maintain an Anti-Racism Group (ARG) which is open to all Board and staff members and oversees implementation of our separate, targeted 'Tackling Racism and Racial Inequality in Sport' (TRARIIS) Action Plan.	CEO	Deliver on UK Sport's mission to become an anti-racist organisation and accelerate the pace of delivery internally and across the system	Ongoing (6 weekly meetings)
	4.2 Create and maintain an EDI Advisory Panel to provide expert, strategic and technical advisory support and challenge on our progress on EDI and the implementation of our EDI Strategy.	Deputy CEO and Head of Sporting System	A strategic programme of measurable activities furthers EDI in UK Sport and across the high-performance system, making tangible difference	Ongoing (quarterly meetings)
	4.3 Introduce an annual internal workforce data update exercise to maintain EDI data disclosure rates achieved in the "Count me in!" campaign to above 80%.	People Director	To maintain a robust picture of the diversity of our workforce to inform interventions and enable us to measure the effectiveness and impact of our remedial action	First communication to issue in April 2024
	4.4 Work towards Inclusive Employers' national inclusivity standards.	Senior EDI Advisor	To access external expertise, improve our practices and gain public recognition for progress in this area	First submission on Inclusive Employers' Foundation standard to be completed by November 2023 (complete)



	ACTIVITY	RESPONSIBLE OWNER	INTENDED OUTCOME	BY WHEN
Data, Standards and Surveys	4.5 Ensure our peoples' views about levels of inclusion and belonging at UK Sport are captured as part of UK Sport's People Plan and incorporate actions (drawn from those findings) within this plan. Maintain or improve on the 2022 Culture Feedback favourability score of 90% against the question "Do you feel valued and included at UK Sport?"	People Director	Annual culture survey to determine whether at UK Sport, people feel psychologically safe, more included and valued	January 2024 Culture Feedback survey
	4.6 Ensure that Board and SLT effectiveness reviews incorporate work to gauge the degree to which there is a culture of inclusivity in those groups and identifies any additional training needs.	Chair/CEO/ Deputy CEO	Areas of improvement and progress are identified at the leadership of the organisation	Annually
	4.7 Newly created Employee Resource Groups (ERG) offer consultancy on any new policies or procedures; identify gaps and propose/ implement initiatives to promote inclusivity for the underrepresented groups they champion.	All Staff	Peer group support is established, providing a sounding board for the needs of underrepresented groups to help with attrac-tion and retention, and to serve as internal consultants/agents on EDI issues	One significant policy/project proposal from each ERG Group is implemented annually

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Culture

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