ICMM Mining with Principles

Strategy Development and Governance Tool

ICMM Tools for Diversity, Equity and Inclusion

Introduction

Diversity, Equity and Inclusion (DEI) strategies establish clear frameworks for commitments, actions, and progress monitoring, detailing objectives, activities, and accountability, while setting time-bound goals and the pathway to achieve them.

These strategies are crucial for navigating the complexities of DEI implementation, fostering an inclusive organisational culture by ensuring alignment with the company's operating context and purpose.[1]

DEI governance, on the other hand focuses on the systematic management and oversight of these strategies, ensuring their effective development, implementation, and execution. Strong DEI governance is essential for sustaining progress by ensuring fair practices, promoting a diverse workforce, and enhancing overall organisational performance and community relations through strategic alignment and leadership accountability.

Research on DEI strategies in mining companies highlights a lack of a baseline understanding of their key DEI issues, and gaps which often lead to a divergence between the companies' DEI goals, and other business goals. A lack of integration and accountability mechanisms is also noted as a key barrier to success.

This tool is designed to assist mining companies in establishing comprehensive strategies and governance mechanisms for their DEI programmes. Recognising the unique challenges and opportunities within the mining sector, this toolkit offers practical insights, and leading practices, to support effective implementation and management.
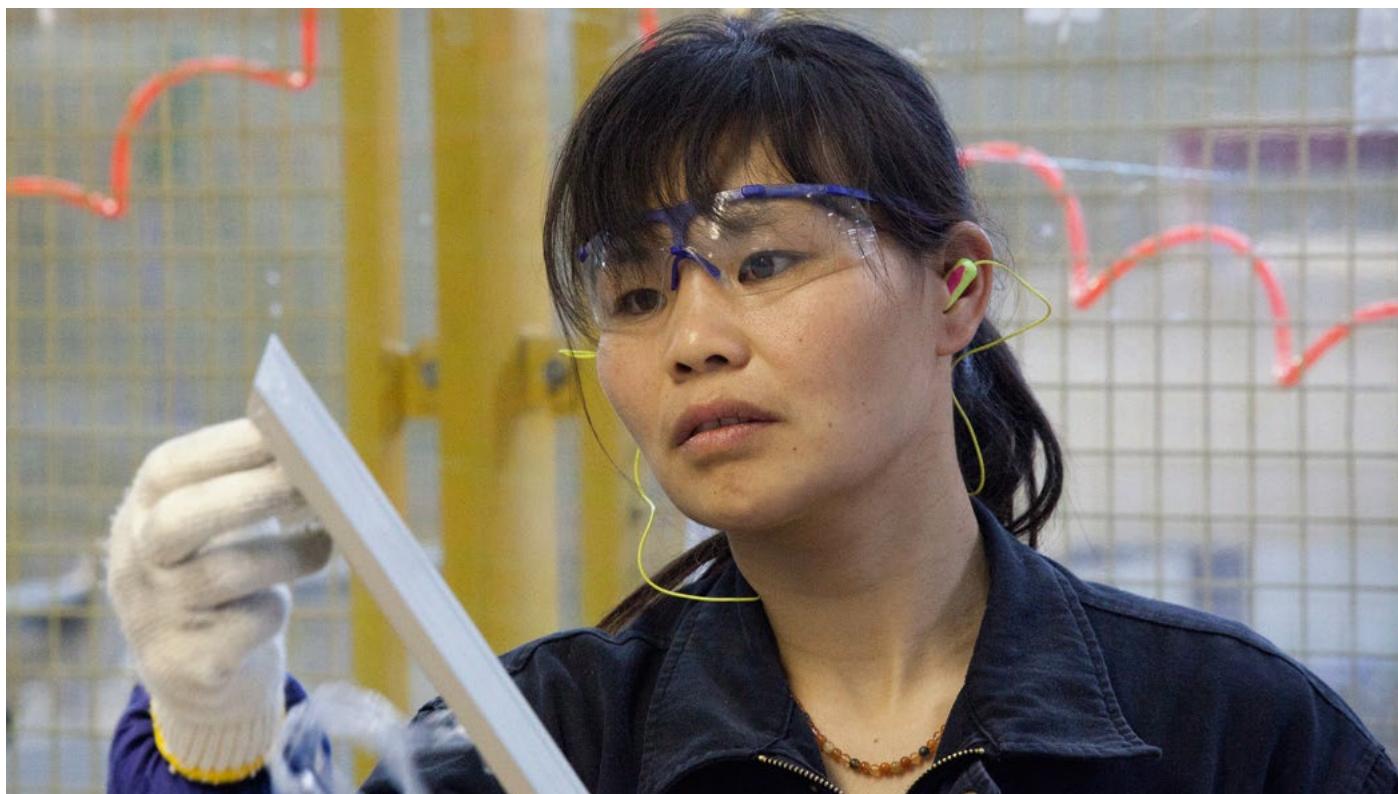
1. Galindez, Hughes and Clark (n.d), *Job aid: Diversity, equity, and inclusion governance framework*, [Online]. Available at: https://hr.mcleanco.com/research/job-aid-diversity-equity-and-inclusion-governance-framework

Developing a DEI Strategy – Key Considerations

There are a range of factors that can influence the development, implementation, and success of a DEI strategy. Some of these factors include:

Operating Context: Understanding the distinct organisational context and culture is pivotal in shaping an effective DEI strategy. This considers industry conditions, geographic locations, organisational structure, and governance systems.

Resourcing: The development and implementation of a DEI strategy depends on the skills, capabilities, and engagement of individuals within the organisation. This includes not only DEI specialists but also non-specialists, spanning corporate and asset levels. Identifying individuals with the requisite expertise to lead and execute DEI initiatives effectively is crucial in driving diversity objectives.

Global Policy and Legislative Landscape: Mining companies should align their DEI strategies and initiatives with international standards and regulations such as ICMM's Mining Principles, the United Nations Universal Declaration of Human Rights, and others that govern DEI practices. Where local laws are weaker than the international standards, companies should adhere to the higher standard, while maintaining compliance with the law. Ensuring alignment with global policies not only emphasises corporate accountability on a broader scale but also positions mining companies as responsible global citizens committed to fostering DEI within the industry and beyond.

Regional and Local Nuances: Due to the geographic spread of mining assets, companies must consider the applicability of the strategy and initiatives to cultural, social, and economic sensitivities within specific geographical locations. For example, some countries may have different perspectives and hostile legislation on LGBTQIA+ rights compared to more secular countries which tend to protect the rights and freedoms of gender and sexual minorities.

Intersectionality: Understanding that diversity is complex and involves many different aspects, and that DEI challenges can have a greater impact on minority groups[2], companies should make sure their DEI strategy includes more than just gender. It should also consider groups like Indigenous Peoples, racial and ethnic minorities, people with disabilities, members of LGBTQIA+ communities, and neurominorities, among others.[3]

2. The UN provides a detailed list of vulnerable groups here: https://www.ohchr.org/en/special-procedures/sr-health/non-discrimination-groups-vulnerable-situations tps://www.un.org/en/fight-racism/vulnerable-groups.
3. Thim and Reca (2020), *Why company diversity, equity, and Inclusion Programs Need Intersectional Approaches*, [Online]. Available at: https://www.bsr.org/en/blog/company-diversity-equity-inclusion-programs-need-intersectional-approaches;

Procedure for Developing a DEI Strategy

Table 2.1 suggests a procedure for developing a DEI strategy

Stage	Actions	Outcomes
Rationale	— Develop a clear rationale for how increasing diversity will improve business outcomes.[4]	— A presentation-ready rationale that is relevant to all geographies represented in the organisation.[5]
Leadership Approval	— Mobilise management support and communicate strategy to stakeholders.[6]	— Approved commitment document. — Clear leadership communication to all employees and external stakeholders of the commitment.[7]
Review	— Gather data on demographics, including gender, ethnicity, disability status and others.[8] — Conduct an independent, review of the current state of DEI within the company.[9] — Analyse workforce composition data and independent reviews to identify existing challenges. — Using the data gathered above, asses the company's maturity level using the ICMM DEI Maturity Matrix.	— A detailed report on the current workforce composition, highlighting gender, race, ethnicity, disability status and other relevant demographics. — A comprehensive picture of the state of DEI within the organisation, depicting employees' experiences with respect to workplace culture, systems, and mechanisms. — Mapped out focus areas and action points based on recommendations, workforce composition analysis, legislative landscape, and industry standards.
Assess	— Draft the vision, mission, and comprehensive strategy, ensuring alignment with the organisation's overall mission, vision, and strategy.[10] — Assess the drafts with both internal and selected external stakeholders across applicable geographies.[11]	— Strategy outlining the end state (vision), and specific, measurable DEI goals, accompanied by a timeline for achievement. — A practical, and robust strategy, which is aligned with stakeholder expectations and lived experiences of minority groups within the workforce.
Monitoring & Accountability	— Develop KPIs aligned with DEI goals, and overall business objectives. — Define realistic timelines and accountability mechanisms for the KPIs identified above. — Assign responsibility for KPIs, ensuring that accountability is decentralised. — Develop incentive programmes aligned with meeting DEI goals and KPIs, encompassing financial incentives for managers and departmental recognition. awards for teams achieving success in DEI objectives.[12]	— Detailed mapping of focus areas to goals, KPIs, and outcomes. — Leadership and site-level dashboard, scorecard, or other relevant system to regularly track and display progress on KPIs. — Clearly defined roles and responsibilities for specific KPIs assigned to relevant individuals or teams, fostering transparency. — Structured and motivating framework to drive DEI success at all levels.

4. Society for Human Resource Management (2023), *Guide to Developing a Strategic Diversity, Equity and Inclusion Plan*, [Online]. Available at: https://www.shrm.org/resourcesandtools/tools-and-samples/hr-forms/pages/guide-to-developing-a-strategic-diversity-equity-and-inclusion-plan.aspx.
5. Ibid.
6. International Finance Corporation (2023), *Engineering inclusivity: Infrastructure for everyone*, [Online]. Available at: https://commdev.org/infra-gender-toolkit/
7. Ibid.
8. In some operating contexts it may not be appropriate to ask workers or communities to identify their ethnicity or other identity characteristics as it might not support the desired outcome of addressing inequalities, but have unintended consequences, e.g., fuelling conflict. Companies should consider carefully what is appropriate in each operating context. More information can be found under *Reporting on Diversity* in the ICMM Social and Economic Reporting Framework.
9. International Finance Corporation (2023), *Engineering inclusivity: Infrastructure for everyone*, [Online]. Available at: https://commdev.org/infra-gender-toolkit/
10. Society for Human Resource Management (2023), *Guide to Developing a Strategic Diversity, Equity and Inclusion Plan*, [Online]. Available at: https://www.shrm.org/resourcesandtools/tools-and-samples/hr-forms/pages/guide-to-developing-a-strategic-diversity-equity-and-inclusion-plan.aspx
11. Ibid.
12. International Finance Corporation (2023), *Engineering inclusivity: Infrastructure for everyone*, [Online]. Available at: https://commdev.org/infra-gender-toolkit/

DEI Programme Governance

Governing Committees and Leadership Roles

The extent of change, objectives, and types of initiatives needed within the DEI strategy determines the competencies needed to manage them. In most cases, the workload could be substantial, hence relying on individual employees alone to manage it alongside their existing responsibilities may impede the effectiveness of the strategy. Some examples of committees and leadership roles that can be enrolled to lead or support on the work are detailed in Table 2.2.

Table 2.2: Examples of Governing Committees and Leadership Roles

Committees/leadership roles	Role of committees/leadership roles in DEI programme governance
Executive Diversity Council	Consists of leaders representing all business functions, and led by the CEO, or Chief Diversity Officer. The core responsibility is developing the top-level integrated strategy.
Advisory Board	Usually, a combination of external stakeholders, and internal members, advisory boards act in a mentorship capacity, with no fiduciary duty to the company.
Diversity Council	Made up of employees and external experts who lead, coordinate, inform, or monitor the management of the DEI strategy.
Employee Resource Groups	Voluntary, employee-led groups that foster a sense of community and provide support for specific demographic or affinity groups within the organisation.
Community Partner Councils	Community partners affiliated with the organisation or those with whom the organisation aims to build and strengthen relationships with to share knowledge, collaborate on research, and address community concerns.[13]
Chief Diversity Officer	Typically, a senior role that collaborates with senior leadership to establish policies, practices, and initiatives that address barriers to inclusion and promote diversity in all facets of the organisation, from recruitment to leadership development.[14]
DEI Manager	Implements and manages DEI programs, initiatives, and events. Collaborates with human resources to develop inclusive policies and practices, conducts training sessions, and tracks metrics to assess progress toward DEI goals.
DEI Specialist, Consultant, Analyst or Officer	Provide specialised expertise in DEI strategies, conducts assessments, and collaborates with DEI manager and leadership to design and implement tailored initiatives.

13. Vardhmane (2017), *Diversity & Inclusion Councils*, [Online]. Available at:
https://ccdi.ca/media/1072/20170831-ccdi-diversity-council-toolkit-final-v3.pdf
14. Emmert, Williams and Wade-Golden (2023), *The chief diversity officer*, [Online].
Available at: https://doi.org/10.4324/9781003447672

DEI Governance Structures

DEI governance can be structured in various ways, each offering unique advantages based on the company's goals, size, and operational context. The key is aligning the structure with the desired outcomes to effectively drive the DEI strategy.

Functional Structure: A functional structure aligns DEI efforts with specialised departments, such as human resources, training, and communication, each contributing expertise to specific aspects of the programme. Mining companies with multiple units in different jurisdictions, contractors, and supply chain operations spanning various regions and divisions may structure DEI initiatives tailored to the unique requirements of each asset.

Flat Structure: For smaller companies needing agility and quick implementation, a flat structure allows for a streamlined and collaborative approach, granting employees autonomy to enact DEI strategies.

Matrix Structure: In matrix governance structure, employees may have responsibilities spanning different areas, enabling a comprehensive and integrated approach to DEI, where, for example, an individual may contribute to various aspects of the DEI strategy.[15]

Checklist for Implementing a DEI Governance Framework

People and Roles:

Define staffing needs and position(s) dedicated to supporting DEI (if needed), and recruit.

Identify the training or internal resources needed to effectively implement both the governance framework and DEI strategy.

Define decision-making guidelines for each individual and committee within the framework.

Structure and Process:

Determine the decision-making role of each committee contributing to the overall governance framework and DEI strategy implementation.

Determine meeting frequency and agendas and identify milestones.[16]

Management and Communication:

Establish a communication plan to disseminate the DEI governance framework throughout the organisation.

Outline key milestone dates for information dissemination.

Designate organisational stakeholders to spearhead communication efforts.

15. Lim (2023), *Organisation structure and DEI in the Workplace*, [Online]. Available at: https://www.diversely.io/blog/organisation-structure-and-dei-in-the-workplace

16. Galindez, Hughes and Clark (n.d.), *Job aid: Diversity, Equity, and Inclusion Governance Framework*, [Online]. Available at: https://hr.mcleanco.com/research/job-aid-diversity-equity-and-inclusion-governance-framework

Monitoring and Evaluating Impact

Assessments of the reporting landscape of DEI initiatives in the mining industry reveals a lack of data on the impact and an over reliance on easily obtainable data such as demographics and policies. However, there is a lack of reporting on ethnic diversity and other indicators related to structural aspects of employee inclusion.

Sustainability reporting frameworks such as the Global Reporting Initiative (GRI), and ICMM's Social and Economic Reporting Framework (SERF) provide a measurement framework for DEI strategy evaluation.[17] For a more comprehensive approach to evaluating the impact of DEI strategies, there is a need to move beyond traditional metrics and explore innovative methods that capture the dynamic nature of DEI efforts, fostering a deeper understanding of the true impact and progress.

This includes:

— Combining quantitative and qualitative data points.

— Developing custom metrics that reflect the company's priority areas, goals, and industry leading practice.

— Merging traditional and non-traditional data acquisition methods such as social network analysis and cultural network mapping on employee communications.

— Communicating expectations and achievements in a consistent format and time frame.

In every context and company structure, monitoring systems and metrics are essential for evaluating impact of DEI programmes, allowing organisations to adapt strategies and cultivate a workplace culture that reflects the diverse nature of their workforce.

17. Kincaid and Smith (2021), *Diversity and inclusion in mining: An analysis of indicators used in Sustainability Reporting*, [Online]. Available at: https://doi.org/10.1016/j.exis.2021.100981

Wayfinder

IFC Gender & Infrastructure Toolkit
The toolkit provides practical steps for companies to make their businesses more gender-inclusive and achieve measurable results It includes proven how-to guides, tools, and strategies covering all aspects of operations.

SHRM: Guide to Developing a Strategic Diversity, Equity and Inclusion Plan
This tool provides guidance on the fundamentals when creating a DEI Action Plan, topics include: Business Case for DEI, Commitment from the Top, Vision, Mission and Strategy, DEI Recruitment and Sourcing, Employee Retention, Training and Development, Onboarding, Communication, Marketing, Advertising and Branding, Leveraging Employee Diversity, Strategic Alliances and Partnerships, Corporate Social Responsibility, Customer/Member Experience, Supplier/Vendor Diversity, Measurement and Accountability.

EU Diversity Self-Assessment Tool
This tool is for employers in the public and private sectors to assess how well their organisation manages diversity.

WGEA: Gender Equality Diagnostic Tool
In October 2019, the Australian Government published this tool in partnership with the Workplace Gender Equality Agency to help companies analyse the status of gender equality and pinpoint gender equality gaps.

WEPs Gender Gap Analysis Tool (WEPs-GAT)
The Women's Empowerment Principles Gender Gap Analysis Tool (WEPs Tool) is a business-driven tool designed to help companies from around the world assess gender equality performance across the workplace, marketplace, and community.

Gender Dimensions of the Guiding Principles on Business and Human Rights
This booklet produces the United Nations Working Group on Business and Human Rights' gender report in a user-friendly manner. It also includes the text of each principle of the UNGPs alongside the gender guidance and illustrative actions. This booklet is part of the collective efforts of the Working Group and UNDP to widely disseminate the gender guidance for the UNGPs.

Gender Lens to the UNGPs: Working Group on Business and Human Rights
This page provides further information on the importance of gender in the UNGPs, with links to relevant reports.

2023 Gender Insights Report by World Benchmarking Alliance
This is the 2nd iteration of the Gender Benchmark that assesses companies globally on their responsibility to drive and promote gender equality in their entire value chain.

GRI Standards
— GRI 401: Employment 2016
— GRI 402: Labor/Management Relations 2016
— GRI 403: Occupational Health and Safety 2018
— GRI 405: Diversity and Equal Opportunity 2016
— GRI 406: Non-Discrimination 2016

IGF: Women and the Mine of the Future Country Reports
These country reports we produced to inform the Women and the Mine of the Future Global Report and provide in-depth analysis of policies and data related to employment, education levels, age, skills, gender pay gap, and other critical profiles of women and men in the large-scale mining sector.

IGF & IWiM: Parental Leave Policies in the Mining Sector Paper
This paper takes an in-depth look at parental policies in the mining sector. The purpose of this paper is to review the existing international and national frameworks as well as the publicly available parental leave policies of the 12 countries that were examined as part of the IGF-led Women and the Mine of the Future project.

ILO Research Guides: International Labour Standards
This page lists the International Labour Standards, including those relating to DEI.

Oxfam: A Guide to Gender Impact Assessment for the Extractive Industries
This is a tool for the extractive industry to ensure that women's voices are meaningfully included in project decision-making.

ICMM stands for mining with principles.

We bring together a third of the global metals and mining industry, along with key partners to drive leadership, action and innovation for sustainable development, ultimately delivering a positive contribution to society.

Through collaboration, ICMM member companies set the standard for responsibly produced minerals and metals in a safe, just and sustainable world.

December 2024