



DIVERSITY  
COUNCIL  
AUSTRALIA

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## Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

Dear Commissioners

Thank you for the opportunity to provide a submission to the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*.

Diversity Council Australia is the only independent, not-for-profit workplace diversity and inclusion advisor to business in Australia. We have a wealth of experience providing advice to our members on the business benefits of diversity.

DCA's research shows that Australian workers with disability consistently report lower levels of inclusion and higher levels of exclusion than their colleagues without disability.

**Based on our research we recommend that more must be done to build inclusive workplaces across Australia to improve employment outcomes for people with disability.**

Please feel free to contact myself or Cathy Brown, Director, Policy & Projects, ([cathy@dca.org.au](mailto:cathy@dca.org.au)), should you require any further information about this matter.

Yours sincerely

**Lisa Annese**  
**Chief Executive Officer**

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# I. ABOUT DIVERSITY COUNCIL AUSTRALIA

## Who we are

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We provide unique research, inspiring events and programs, curated resources and expert advice across all diversity dimensions to a community of member organisations.

## DCA's Membership represents 15% of the Australian workforce

DCA's prestigious group of over 600 members is drawn from business and workplace diversity leaders and includes some of Australia's biggest employers. Our membership reaches approximately **15%** of the Australian labour market (two million Australians).

## About our members

- Over 600 member organisations, including almost 40 ASX100 Listed companies.
- Our members are drawn from across the corporate, government and not-for-profit sectors and vary from small to large workforces in size.
- Our founding members include ANZ, AMP, BHP, Coles, IBM Australia, Myer, Rio Tinto and Westpac.

DCA's Members are listed on our website here:

<https://www.dca.org.au/membership/current-dca-members>.

## Our mission

In partnership with our members, our mission is to:

- Lead debate on diversity in the public arena;
- Develop and promote the latest diversity research, thinking and practice; and
- Deliver innovative diversity practice resources and services to enable our members to drive business improvement.

## What we do

DCA, formerly known as the Council for Equal Opportunity in Employment Ltd, was established in 1985 as a joint initiative of the Australian Chamber of Commerce and Industry and the Business Council of Australia to demonstrate the business community's commitment to equal opportunity for women.



Our focus since then has expanded to cover all aspects of diversity in employment, reflecting changes in practice to embrace all areas of the diversity of human resources.

DCA is not government funded - its income is generated from membership fees, sponsorships and services to business/employers.

## **Our Research**

DCA works in partnership with members to generate groundbreaking evidence-based diversity and inclusion resources that enables Australian organisations to fully leverage the benefits of a diverse talent pool.

- **DCA resources are ahead of the curve.** They establish leading diversity thinking and practice, enabling Australian organisations to re-imagine and reconfigure the way they manage talent in today's dynamic operating environments.
- **DCA resources drive business improvement.** They are high impact, driving business improvement through providing evidence-based guidance on how to fully leverage the benefits of a diverse talent pool.
- **DCA resources are practice focused.** They respond to the information needs of industry leaders and the people they employ.
- **DCA resources speak to the Australian context.** DCA projects generate leading diversity thinking and practice that speaks to Australia's unique and distinctive institutional, cultural and legal frameworks.
- **DCA resources considers all diversity dimensions.** The full spectrum of diversity dimensions are investigated including age, caring responsibilities, cultural background and identity, disability, Aboriginal and/or Torres Strait Islander status, sexual orientation, gender identity, intersex status, and work organisation.



## II. INTRODUCTION & SUMMARY

For almost two decades, the unemployment rate for people with disability in Australia has been almost twice that of people without disability (9% versus 5%), while the labour force participation rate of people with disability has continued to be 30 percentage points lower than that for people without disability (53% versus 81-82%).<sup>1</sup>

DCA's research also shows that Australian workers with disability consistently report lower levels of inclusion and higher levels of exclusion than their colleagues without disability.

In developing this submission, DCA sought to understand what are the barriers to employment of people with disability from an **employer perspective**.

We asked DCA members to respond to a number of questions from the *Issues Paper* about the experiences of people with disability in employment and what leading practice organisations can do to facilitate better employment outcomes for people with disability. We received a small number of employer responses (five) which are detailed in this submission.

We also looked at DCA's recent research and previous consultations to inform this response and our recommendations.

### Recommendations

1. Research shows that organisations that are inclusive have lower levels of harassment and discrimination.

**To effectively prevent, or respond to, discrimination, violence, abuse, neglect and exploitation against people with disability in the workplace, Australian workplaces should make D&I a priority within their organisation, and develop the inclusion capabilities of leaders and employees at all levels.**

**DCA's research on Inclusive Leadership<sup>2</sup> recommends that as a first step towards becoming an inclusive leader that individuals practice the behaviour of being 'identity aware' and then learning how to relate to that identity. This process of learning is a vital part to building the type of empathy required for a workplace inclusive of people with disability.**

2. Inclusive organisations that are psychologically safe create a climate in which people with disability, and people from other diversity groups, feel able to disclose and discuss their disability with managers, colleagues and leaders (if they wish to do so).



**Organisations that wish to attract, recruit and retain employees with disability should invest in developing leaders capabilities in psychological safety to create an inclusive workplace climate where people with disability can feel safe sharing their disability with the organisation (should they wish to do so).**

3. There is a strong business case for inclusion as a driver of productivity and wellbeing.<sup>3</sup>

**Based on our research we recommend that more must be done to build inclusive workplaces across Australia to improve employment outcomes for people with disability.**





### III. DCA MEMBER CONSULTATION

As DCA is a membership-based organisation, we sought the views of our membership to inform our submission to this inquiry.

We asked DCA members to respond to a number of questions from the Issues Paper about the experiences of people with disability in employment and what leading practice organisations can do to facilitate better employment outcomes for people with disability in the labour market.

The issues covered included:

- Dealing with and responding to harassment and discrimination;
- Effectiveness of current employment programs and supports (from an employer perspective); and
- Employers' experiences of hiring and retaining workers with disability; and
- Ideas for improving employment participation for people with disability.

This submission provides an employer perspective on these issues. We received five responses to our consultation. Some of the quotes below have been edited for clarity.

In seeking responses from DCA members, we strongly advocated to our stakeholders that employees who wanted to provide a personal perspective (as a person with disability) could do so directly to the Royal Commission.

#### **Response to the issues paper**

##### **What could be done to prevent, or respond to, discrimination, violence, abuse, neglect and exploitation against people with disability in the workplace?**

Respondents indicated that leadership was essential to dealing with and responding to harassment and discrimination, but for this to be effective there must be accountabilities for leaders built into models of leadership or leader's responsibilities.

One respondent highlighted the importance of educating people without disability to become disability confident combined with effective complaints mechanisms, and that these two elements need to work together:

*This has to start with education and training for people without a disability to improve their disability confidence, paired with complaint systems that are efficient and effective - and involve people who have a reputation for being disability confident throughout the organisation.*

Other suggestions included implementing mentoring programs, cultural change across organisations and sectors, and improving complaints mechanisms.

#### DCA Comment:

Research shows that inclusive organisations have lower levels of harassment and discrimination. To effectively prevent, or respond to, discrimination, violence, abuse, neglect and exploitation against people with disability in the workplace, Australian workplaces should make D&I a priority within their organisation, and develop the inclusion capabilities of leaders and employees at all levels.

DCA's research on Inclusive Leadership,<sup>4</sup> recommends that as a first step towards becoming an inclusive leader that individuals practice the behaviour of being 'identity aware' and then learn how to relate to that identity. This process of learning is a vital part to building the type of empathy required for a workplace that is inclusive of people with disability.

### **Are the current employment programs and supports for people with disability effective? If not, why not? What changes should be made to these programs?**

Respondents had mixed views on existing employment programs. One respondent identified current employment systems can be problematic where they require people with disability to work for free:

*Better employment system for people with disability so they aren't exploited for free labour e.g. National Work Experience Program.*

One respondent noted that it could be challenging working with multiple providers:

*Challenges are working with all disability employment service providers (having 22 in your catchment is huge - with some being good and some not so good).*

Another respondent highlighted the issue that some programs set low expectations of people with disability, which results in precarious temporary work:





*Current employment programs are riddled with Expectations Bias - low expectations of PWD so they are funnelled into low paid, low skilled and precarious temporary roles. We have a program that places people into BELOW entry roles. The roles are so low they don't even exist in the organisation.*

While another respondent highlighted issues with funding for programs:

*Funding for organisations to run these programs needs to be made easier to access (even by Government who are woeful at employing people with disability).*

Finally, one respondent highlighted how a lack of disability confidence in organisations creates barriers to employment of people with disability:

*Most of the feedback I get is that there isn't widespread confidence in organisations to deal with any issues people with disability may have. This stems from a lack of disability confidence in organisations and leaders, and it not being a clear priority for organisations.*

**What are employers' experiences of hiring and retaining workers with disability? What benefits and challenges have employers encountered? What supports have helped, or would help?**

Our respondents reported no concerns with their experiences of employees with disability, but some noted that they had experienced issues with perceptions that people without disability hold towards people with disability:

*No challenges with PWD, only challenges with abled people.*

...

*Benefits have been that it opens us up to more talent and provides a diverse perspective in our teams. The challenges have been the hiring managers' disability confidence in the interviewing process, and in providing workplace adjustments if needed. Support to make this better would be disability confidence training for recruitment teams in People and Culture and hiring managers / people managers.*

Another respondent highlighted that changes to organisational culture and leadership were needed to create a safe and inclusive environment for people with disability:

*Lack of leadership and support to ensure that people with disability are in a safe space.*



One respondent noted that retention is an issue when people are placed into fixed term roles and that this needs to be considered as a part of a holistic strategy:

*When it comes to retaining workers with disability, this is made harder by the fact that people with disability seem to be disproportionately represented in fixed-term roles.*

### **Do you have any ideas for improving employment participation for people with disability? Do you have examples of good practice?**

A number of respondents recommended working with peak organisations that represent people with lived experience of disability.

*Do a recruitment review with Australian Network on Disability.*

The Australian Network on Disability (AND) was recommended in particular as a peak organisation for people with disability that has a good understanding of the lived experience of people with disability.

*Employment pathways that reach people with disability, such as AND's Stepping Into internship programs has been a great experience to access people with disability directly, and deliberately. The feedback I have received from people with disability is that it is a more relaxed process if they know they are dealing with an organisation who 'gets it' - so I think a lot of it actually sits with the organisation, making sure they have accessible systems and cultures.*

Another respondent raised that existing support systems create a barrier to work for people receiving government payments:

*A less punitive approach for people wanting to work on the disability support pension. If people are benchmarked to work 8 hours and they have done well and have started to pick up an additional shift (e.g. working 15 hours a week), they should not be punished for this in the next review by losing payments - instead they should have some sort of incentive to continue to aim for more hours.*

Finally, one respondent suggested that organisations need to use work design processes to specifically that:

*For people with more significant disability - there needs to be smarter ways of creating jobs. We need to job carve some of the less difficult tasks out of people's roles and make them available to people with more significant*



*disability. All organisations have these types of roles and should be doing the right thing in creating roles for people of all abilities.*

## **DCA Comment: Creating Psychologically Safe Work Environments**

*A “psychologically safe” workplace is characterised by a climate of interpersonal trust and mutual respect in which people feel comfortable being themselves to make mistakes or take risks in their work.<sup>5</sup>*

One challenge faced by workplaces in recruiting and retaining workers with disability is monitoring the number of people with disability employed in an organisation.

Employees can be wary about sharing their disability status due to past experiences of discrimination, or fears that their disability status will not be treated confidentially (where they wish it to be). What’s more, for people with disability who do not require reasonable adjustments, it can seem irrelevant or unnecessary to share their disability status with their workplace.

However, if organisations cannot effectively measure or understand the experiences of people with disability in their workplace, they are unable to design and implement strategies or initiatives to attract, recruit and retain employees with disability. As DCA’s *Change at Work* research explains, having an evidence-base of data gathered from different sources (including employees) is a critical first step in developing any initiatives for organisational D&I change.

Inclusive organisations that are psychologically safe create a climate in which people with disability, and people from other diversity groups (such as LGBTIQ+ people),<sup>6</sup> feel able to disclose and discuss their disability with managers, colleagues and leaders (if they wish to do so).

Organisations that wish to attract, recruit and retain employees with disability should invest in developing leaders’ capabilities in psychological safety to create an inclusive workplace climate where people with disability can feel safe sharing their disability with their organisation (should they wish to do so).



## **DCA Comment: Other Recommendations from DCA Members**

DCA members have (previously) put forward a range of initiatives which can support greater workforce participation by people with disability. At an individual organisational level, these can include:

- **Reasonable Accommodation Committees** – formal forums representing all aspects of the business at a high level that can assess and approve accommodations for employees through a lens of enabling employee productivity versus provision of performance concessions.
- **Developing an Accessibility Action Plan** and centralised Workplace Adjustment Policy and process (asking universally at recruitment and on boarding and providing an accessible way of requesting a workplace adjustment at any point during employment) with an associated budget.
- **Creating employee driven Networks** for people with disability and/or older employees.
- **Establishing a CEO led Diversity and Inclusion Strategy** with Disability Employment as an identified as a priority.
- **Partnering with specialist organisations** such as the Australian Network on Disability.
- **Encouraging awareness of the issues impacting on employment of people with disability** through facilitating active engagement with people with disability.
- **Eliminating Barriers to Access Employment Opportunities** – through accessible workplace intra/internet interactions and recruitment practices.
- **Mainstreaming Flexible Work Practices** – so as to facilitate flexible accommodation of all employee needs for productivity and work-life balance, such that people with disability are not purported to be in receipt of “special” treatment that would not be afforded to other employees.
- **Facilitated Disability Disclosure** – provision of guidance and facilitative mechanisms to support disability disclosure in a non-threatening and non-discriminatory manner.
- **Promotion of role models** for people with disability and older people within businesses to dispel community stereotypes.



## IV. DCA RESEARCH

### **Inclusion@Work Index 2019 – 2020**

DCA's *Inclusion@Work Index*,<sup>7</sup> is a nationally representative survey of 3000 Australian workers.

Conducted every two years, the Index has been designed to understand two key questions:

- *How inclusive is the Australian workforce for a diversity of employees, and how has this changed over time?*
- *What impact does inclusion have on performance and wellbeing?*

In 2019, our data revealed that Australian workers with disability consistently reported **lower levels of inclusion and higher levels of exclusion** than their colleagues without disability.

Workers with with disability were less likely than workers without disability to agree that they trusted their organisation to treat them fairly or to report that they were treated with respect at work. They also reported high rates of experiencing or witnessing discrimination and/or harassment in the past 12 months.

However, the *Index* also showed that workers with disability in organisations taking D&I actions were more likely to be very satisfied with their jobs than those in organisations where no D&I action was being taken, this was also the case for how accepted workers felt and whether they felt they had the same opportunities.

There is a strong business case for inclusion as a driver of productivity and wellbeing.<sup>8</sup> The *2019-20 Index* also strongly demonstrates the importance of inclusive organisations to Australian workers with and without disability.

That workers with disability were less likely (than colleagues without disability) to experience inclusion at work is concerning.

Based on our research we recommend that more must be done to build inclusive workplaces across Australia to improve employment outcomes for people with disability.



## V. CONCLUSION & RECOMMENDATIONS

1. Research shows that organisations that are inclusive have lower levels of harassment and discrimination.

**To effectively prevent, or respond to, discrimination, violence, abuse, neglect and exploitation against people with disability in the workplace, Australian workplaces should make D&I a priority within their organisation, and develop the inclusion capabilities of leaders and employees at all levels.**

**DCA's research on Inclusive Leadership,<sup>9</sup> recommends that as a first step towards becoming an inclusive leader that individuals practice the behaviour of being 'identity aware' and then learning how to relate to that identity. This process of learning is a vital part to building the type of empathy required for a workplace inclusive of people with disability.**

2. Inclusive organisations that are psychologically safe create a climate in which people with disability, and people from other diversity groups, feel able to disclose and discuss their disability with managers, colleagues and leaders (if they wish to do so).

**Organisations that wish to attract, recruit and retain employees with disability should invest in developing leaders' capabilities in psychological safety to create an inclusive workplace climate where people with disability can feel safe sharing their disability with the organisation (should they wish to do so).**

3. There is a strong business case for inclusion as a driver of productivity and wellbeing.<sup>10</sup> DCA's *2019-20 Index* also further demonstrates the importance of inclusive organisations to Australian workers with and without disability.

**Based on our research we recommend that more must be done to build inclusive workplaces across Australia to improve employment outcomes for people with disability.**







## VI. ENDNOTES

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<sup>1</sup> Australian Bureau of Statistics (ABS), *Disability and Labour Force Participation*, Cat. 4433.0.55.006, Canberra, ABS, 2012.

Australian Human Rights Commission, National Inquiry into Employment and Disability: Issues Paper 1, AHRC, Sydney, 2005.

<sup>2</sup> Diversity Council Australia (O’Leary, J., Russell, G. and Tilly, J.) *Building Inclusion: An Evidence-Based Model of Inclusive Leadership*, Sydney, Diversity Council Australia, 2015.

<sup>3</sup> For example, see:

- Diversity Council Australia (O’Leary, J. and Legg, A.) *DCA-Suncorp Inclusion@Work Index 2017-2018: Mapping the State of Inclusion in the Australian Workforce*, Sydney, Diversity Council Australia, 2017.
- Diversity Council Australia (O’Leary, J., Russell, G. and Tilly, J.) *Building Inclusion: An Evidence-Based Model of Inclusive Leadership*, Sydney, Diversity Council Australia, 2015.
- McKinsey & Company (Hunt, V., Dixon-Fyle, S., Prince, S. and Dolan, K.) *Diversity wins: How inclusion matters* May 2020, McKinsey & Co, 2020.

<sup>4</sup> Diversity Council Australia (O’Leary, J., Russell, G. and Tilly, J.) *Building Inclusion: An Evidence-Based Model of Inclusive Leadership*, Sydney, Diversity Council Australia, 2015.

<sup>5</sup> icare & R U OK?, *World 1st - Australian Workplace Psychological Safety Full Report*, 2017.

<sup>6</sup> Diversity Council Australia (Brown, C., O’Leary, J., Trau, R., Legg, A.), *Out At Work: From Prejudice to Pride*, Sydney, Diversity Council Australia, 2018.

<sup>7</sup> Diversity Council Australia (O’Leary, J. and D’Almada-Remedios, R.) *DCA-Suncorp Inclusion@Work Index 2019–2020: Mapping the State of Inclusion in the Australian Workforce*, Sydney, Diversity Council Australia, 2019.

<sup>8</sup> For example, see references at Endnote 3.

<sup>9</sup> Diversity Council Australia (O’Leary, J., Russell, G. and Tilly, J.) *Building Inclusion: An Evidence-Based Model of Inclusive Leadership*, Sydney, Diversity Council Australia, 2015.

<sup>10</sup> For example, see references at Endnote 3.

## Appendix – Additional data – Not for Publication

# EXCERPT OF DATA FROM THE INCLUSION@WORK INDEX

This section is from a data report only available to DCA Members.

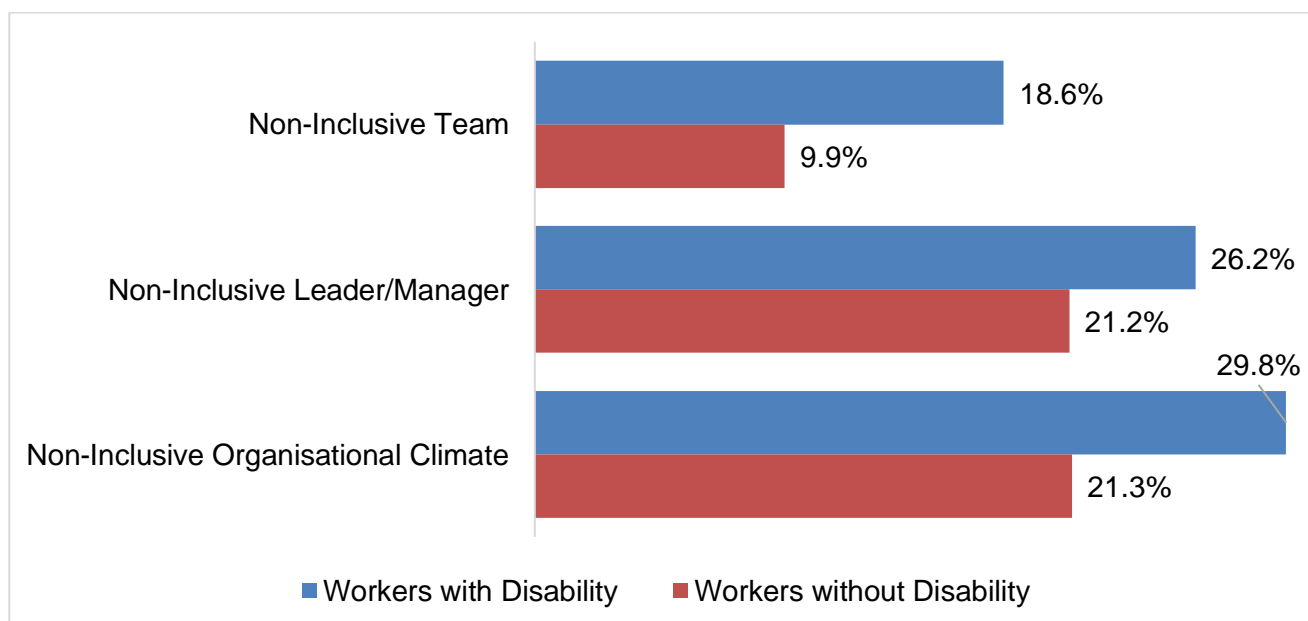
We ask that if this submission is published, this section is not made available to the public.

### Australian workers with disability experience lower levels of inclusion and higher levels of exclusion than their colleagues without disability

#### Less Likely to Experience Team, Leadership, and Organisational Inclusion

A significantly greater proportion of people with disability work in non-inclusive teams than people without disability (19% versus 10%). People with disability are also more likely to report having a non-inclusive leader/manager (26% versus 21%) and working in a non-inclusive organisational climate (30% versus 21%) than their people without disability.

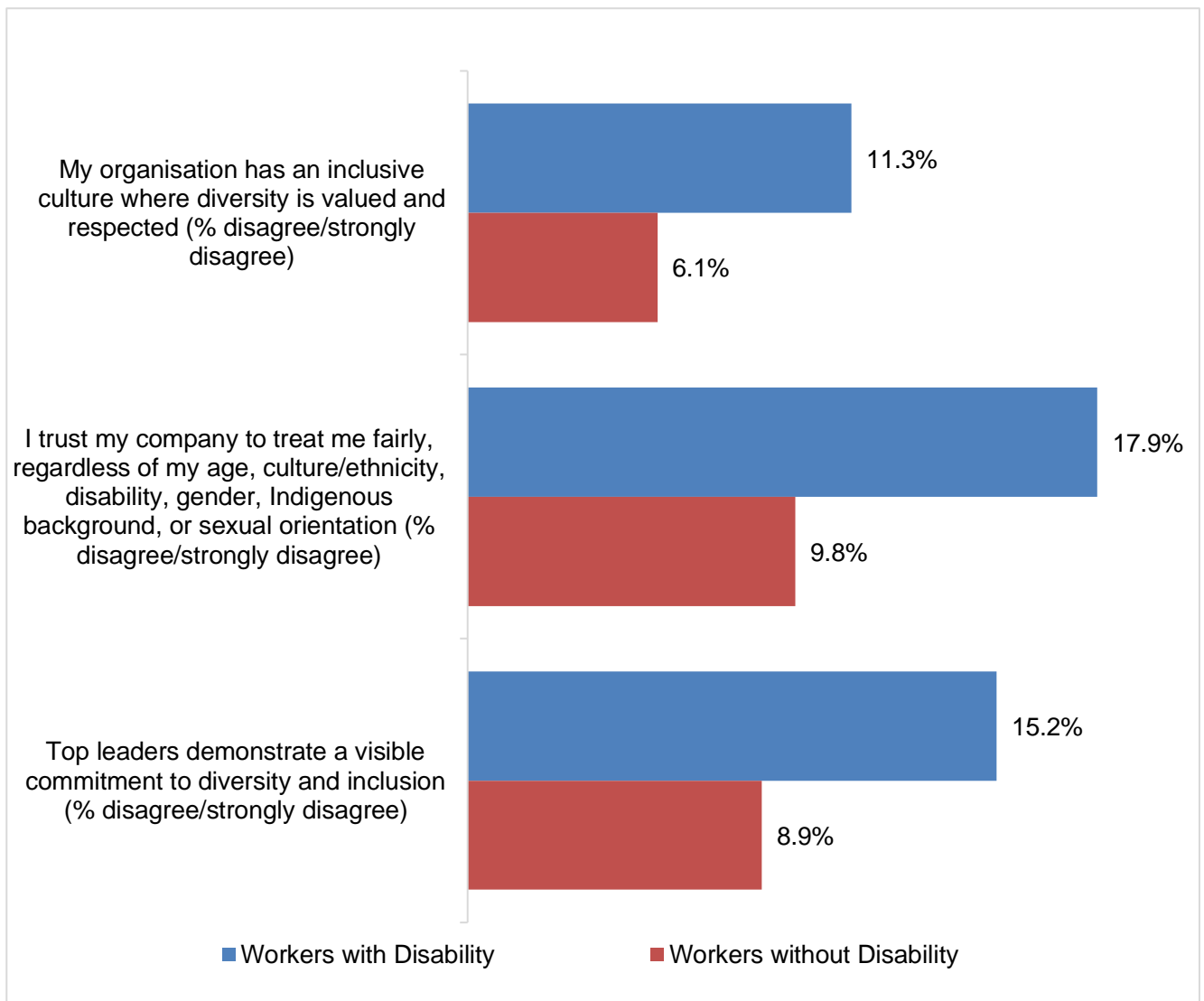
Figure 1: Proportion of Workers with Disability in/with Non-Inclusive Teams, Leaders, and Organisations



### Less Likely to Experience Inclusive Organisational Climate

Workers with disability were less likely than workers without disability to agree that they trusted their organisation to treat them fairly (64% strongly agreed/agreed versus 73%), that top leaders were committed to D&I (59% strongly agreed/agreed versus 66%), and that organisation had an inclusive culture (67% strongly agreed/agreed versus 75%). Conversely, workers with disability were also significantly more likely than workers without disability to disagree that their organisation was inclusive (see bar chart below).

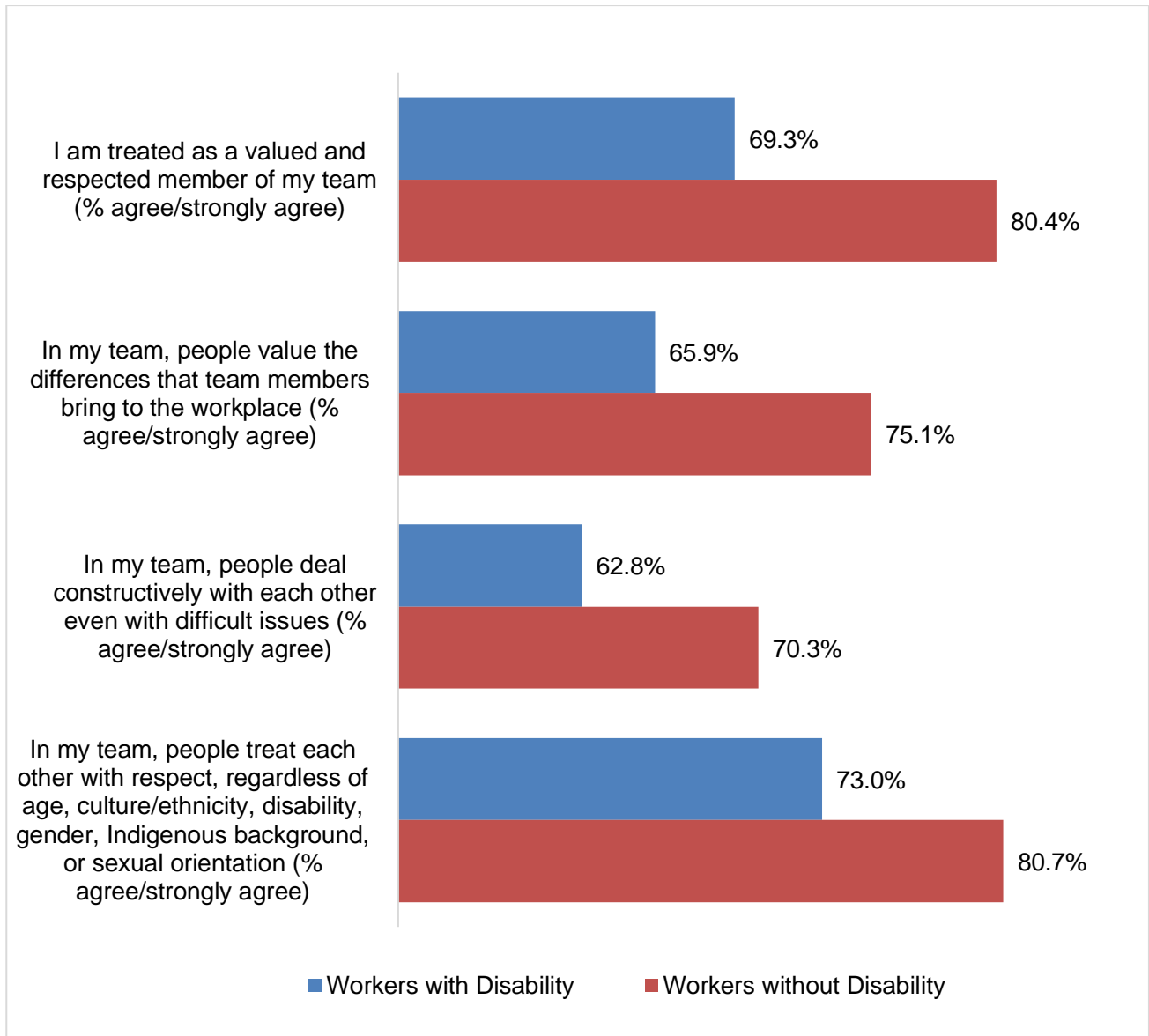
Figure 2: Workers with Disability's Experience of Inclusive Organisational Climate



### Less Likely to Be Respected

Australian workers with disability were less likely than their colleagues without disability to report both that they were treated with respect at work (69% compared to 80% strongly agree/agree) and that their team worked together respectfully – as illustrated in the bar chart below.

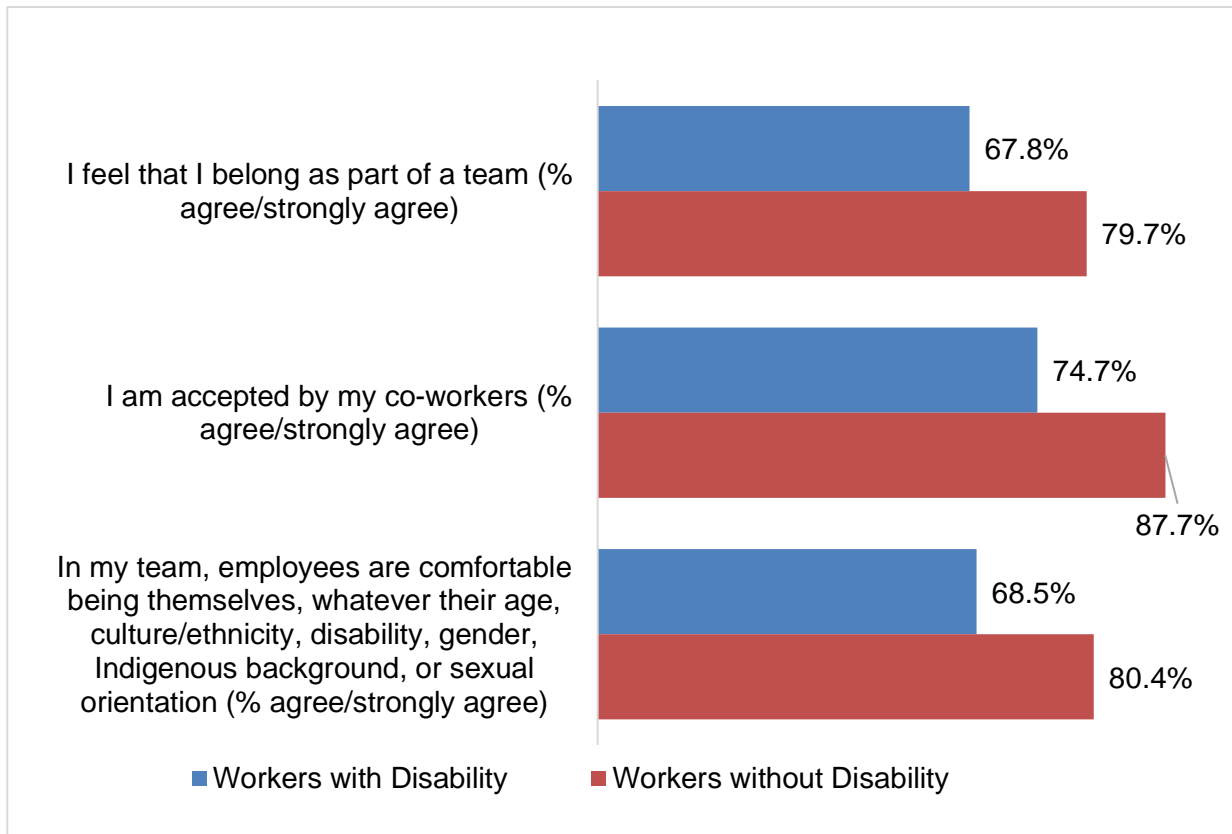
Figure 3: Workers with Disability's Experience of Being Respected and Valued



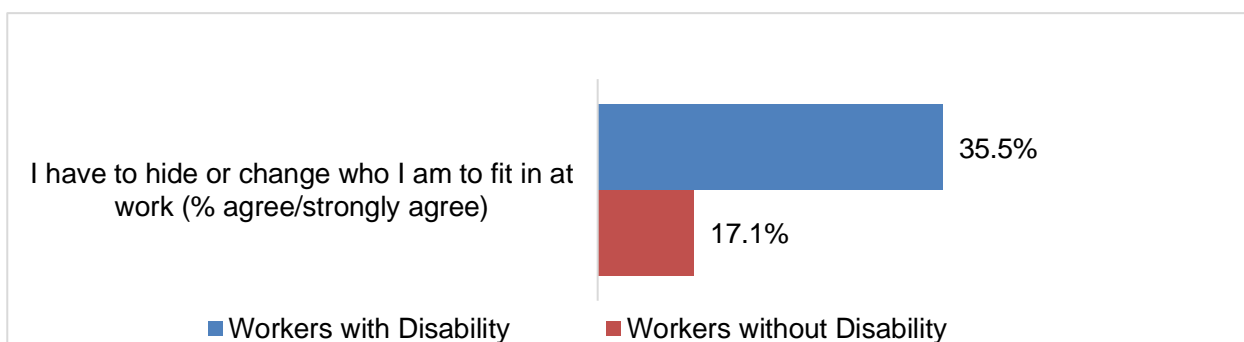
### Less Likely to Be Connected

Workers with disability were less likely to report being accepted by their co-workers (75% compared to 88% strongly agree/agree) and feeling that they belonged (68% compared to 80%) than workers without disability.

Figure 4: Workers with Disability's Experience of Being Authentic and Connected



Significantly, twice as many workers with disability agreed they had to hide or change who they were at work to fit in (36% compared to 17% of workers without disability).



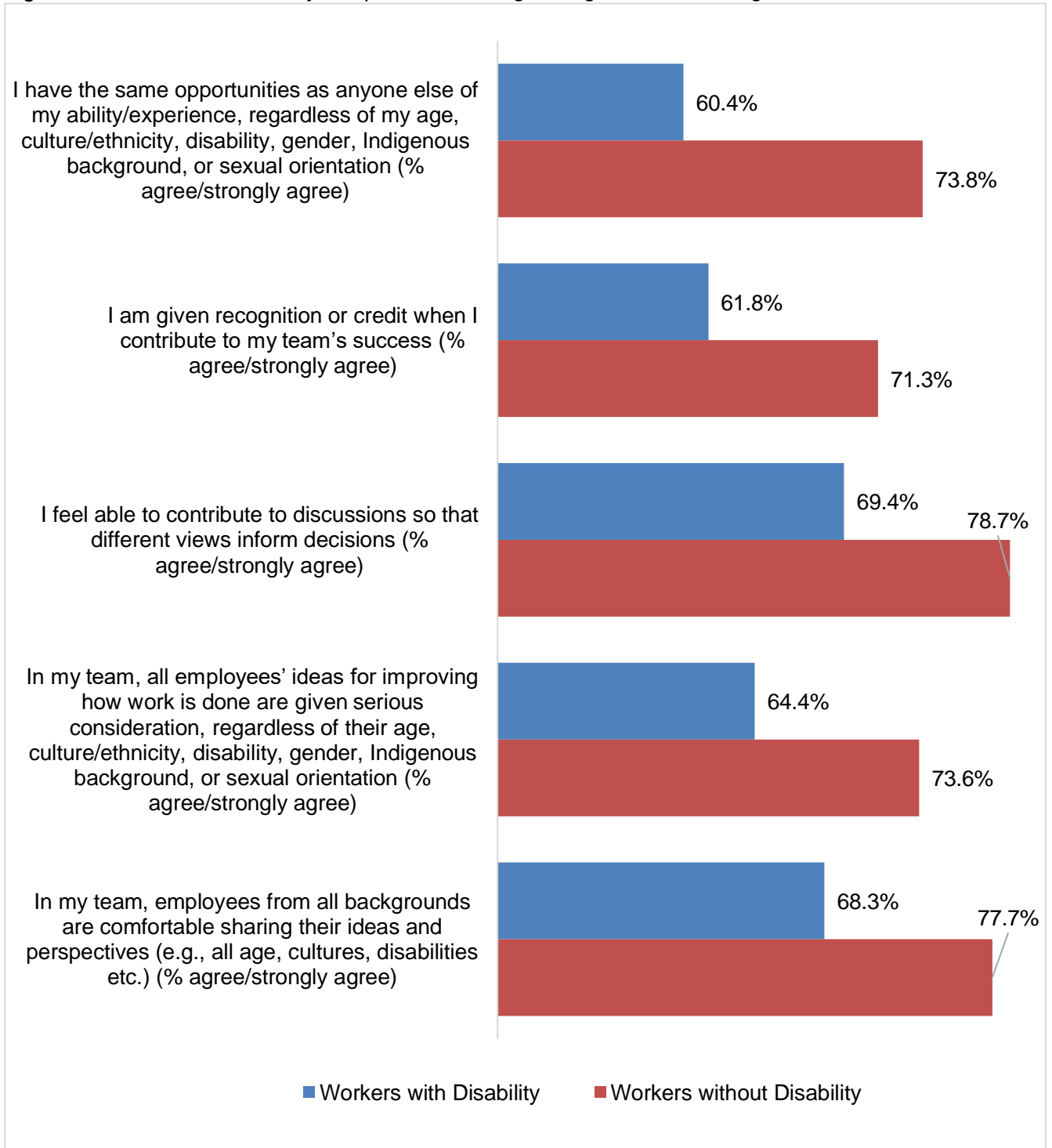


## **Fewer Opportunities to Contribute and Progress**

Workers with disability were also less likely to report that they experienced opportunities to progress and to contribute at work compared to workers without disability:

- **Less recognition:** Workers with disability were less likely to report that they were given recognition or credit when they had contributed to their teams' success (62% compared to 71% strongly agree/agree)
- **Lower progression.** Workers with disability were less likely to agree they felt they had the same opportunities as anyone else with the same abilities and experience (60% compared to 74% strongly agree/agree)
- **Lower opportunity to contribute.** Workers with disability were also less likely to agree that they were able to contribute to discussions so that different views inform decisions (69% compared to 79% strongly agree/agree)
- **Lower idea sharing:** They were also less likely to report that in their team employees from all backgrounds felt comfortable sharing their ideas and perspectives (68% compared to 78% strongly agree/agree).

Figure 5: Workers with Disability's Experience of Progressing and Contributing



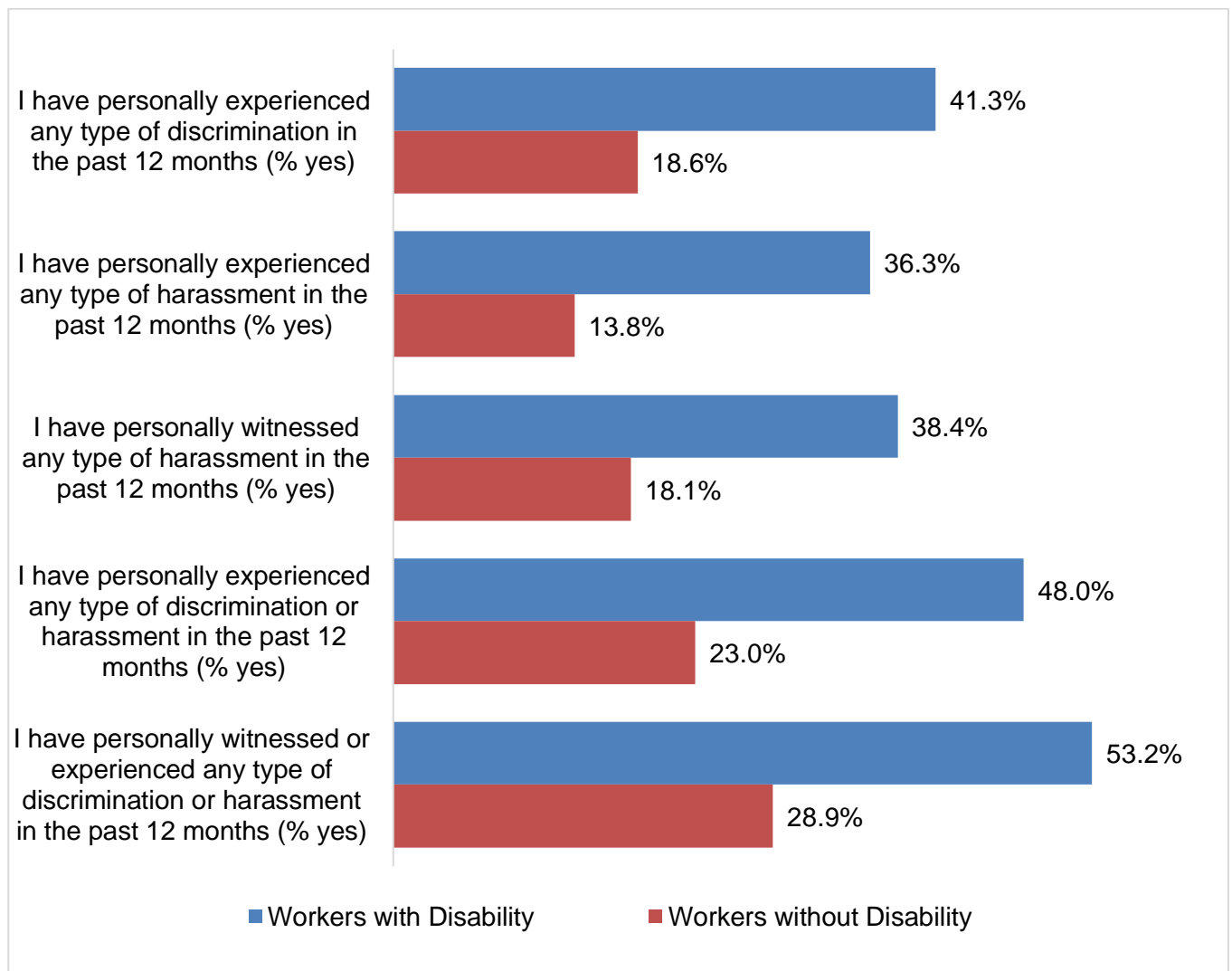
## The Highest Levels of Exclusion of Any Demographic Group

Workers with disability reported high rates of experiencing or witnessing discrimination and/or harassment in the past 12 months. **Over half (53%) of workers with disability had personally experienced or witnessed discrimination or harassment in the workplace in the last 12 months, the highest of any demographic group in the 2019-2020 Index.**

Workers with disability were significantly more likely than workers without disability to:

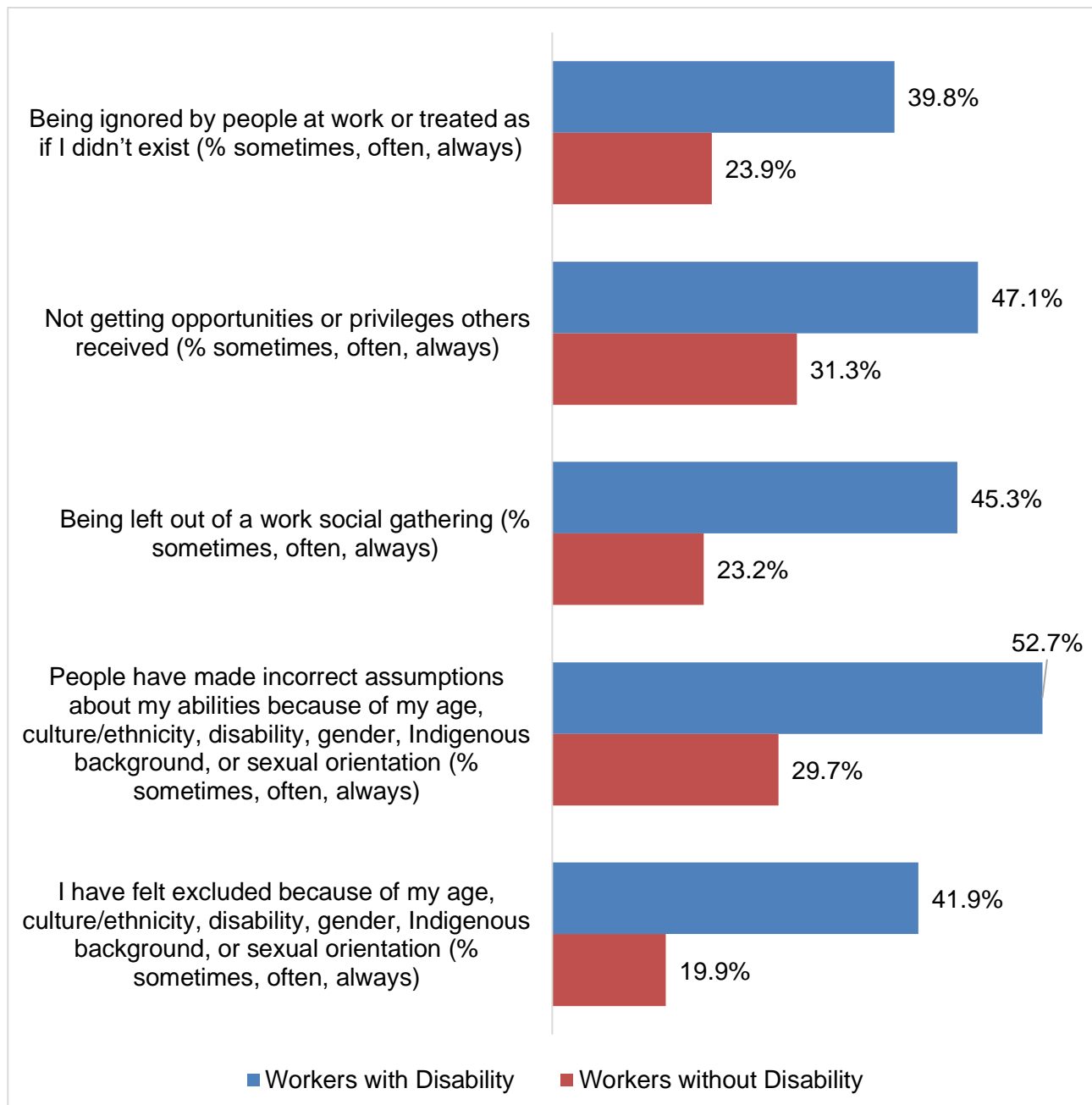
- **Experience discrimination:** 41% compared to 19%
- **Experience harassment:** 36% compared to 14%
- **Witness harassment:** 38% compared to 18%

Figure 6: Workers with Disability's Experience of Discrimination and Harassment



Workers with disability were significantly more likely than workers without disability to experience exclusionary behaviours in the workplace. This included being ignored (40% compared to 24%), not having access to the same opportunities or privileges as others (47% compared to 31%), and being left out of work social gatherings (45% compared to 23%).

Figure 7: Workers with Disability's Experience of Exclusionary Behaviours

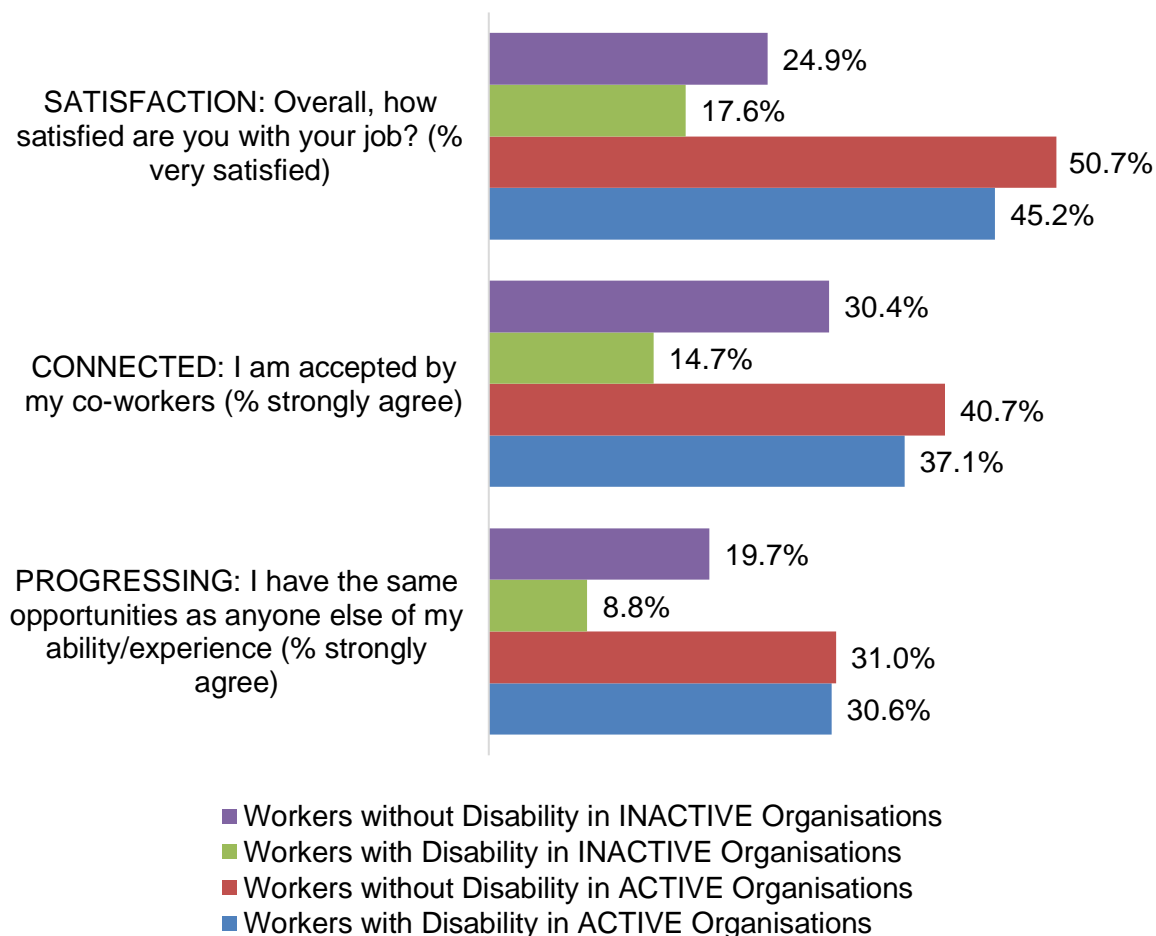


## Inclusion@Work Benefits EVERYONE

When organisations take action to create a more diverse and inclusive (D&I) workplace, it benefits everyone.

In organisations taking D&I actions, we found similar proportions of workers with and without disability were very satisfied with their jobs (45% workers with disability, 51% workers without disability) – and significantly more satisfied than workers with and without disability in organisations where no D&I action was being taken (18% workers with disability, 25% workers without disability). This was also the case for how accepted workers felt and whether they felt they had the same opportunities.

Figure 8: Impact of Organisational D&I Action on Selected Outcomes by Disability Status



This also demonstrates the importance of D&I for workers with disability as workers with disability in organisations taking D&I actions were more likely to be very satisfied with their jobs than those in organisations where no D&I action was being taken.