

# Approved Bias Audit Report

**Prepared By:** HR Governance Analyst (with GenAI drafting assistance) **Reviewed By:** Diversity Reviewer **Approved By:** HR Director, People & Culture **Date:** 22 February 2027 **Organisation:** Northbridge Advisory Partners **Classification:** Internal - Restrict Access **Status:** Approved

## 1. Audit Scope

This bias and consistency review covered four HR artifact types produced during the H2 2026 / Q1 2027 governance cycle at Northbridge Advisory Partners:

Artifact Type	Source Workflow	Items Scanned
Policy Draft Redlines	HR10 - Policy / Handbook Update	11 policy sections (2 full sections, 9 subsections)
Performance Review Narratives	HR11 - Performance Goals & Review Narrative	5 goal-level narratives for 1 employee
Promotion Panel Outcomes	HR13 - Promotion / Calibration Panels	4 candidate decisions
Compensation Recommendation Rationale	HR16 - Compensation Review Cycle Analysis	5 employee recommendations

**Total items scanned:** 25 discrete passages or decisions across 4 artifact types.

**Bias review criteria version:** September 2025 (note: the criteria document is overdue for its annual review; see Recommendation 5).

**Consistency standards checklist version:** November 2025.

## 2. Findings Summary

Category	Critical	Major	Minor	Informational	Total
Gendered Language	0	1	0	0	1
Subjective Qualifier	0	2	2	0	4
Cultural Bias	0	0	0	1	1
Exclusionary Term	0	0	0	0	0
Vague Justification	0	2	3	0	5
Consistency Discrepancy	0	2	1	1	4
<b>Total</b>	<b>0</b>	<b>7</b>	<b>6</b>	<b>2</b>	<b>15</b>

### By recommendation:

Recommendation	Count
Accept	12
Modify (post-modification accepted)	1
Reject (false positive)	2
<b>Total</b>	<b>15</b>

### Rejected items:

- B8 (Cultural Bias, Policy Draft Redlines S5.4 original text): The flagged passage is in the original policy text that is already being redlined. The HR10 revision addresses the language issue. No additional correction needed.
  - C4 (Consistency Discrepancy, policy audit threshold vs. compensation cap): The 5% pay gap audit trigger (HR10 S6.4) and the 8% individual adjustment cap (HR16) serve different governance purposes. The 5% threshold triggers a practice-wide audit; the 8% cap governs individual adjustments. These are not inconsistent; they operate at different levels. Reclassified as Informational.
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### 3. Key Findings

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#### Finding: Subjective qualifiers used as evaluative evidence without behavioural anchoring

- **Finding Refs:** B2, B4, B5, B11
- **Artifacts Affected:** Performance Review Narratives (G3), Promotion Panel Outcomes (Candidates 2 and 3)
- **Severity:** Major (B2, B4); Minor (B5, B11)
- **Recommended Action:** Replace subjective descriptors ("proactive", "channelled", "waited for") with factual statements of what was observed, expected, and the gap between the two. See Final Redlined Corrections 2, 4, and 5.

#### Finding: Decision rationale lacks specificity for edge-case deferral decisions

- **Finding Refs:** B7, B9, B12
- **Artifacts Affected:** Promotion Panel Outcomes (Candidates 1 and 4), Compensation Recommendation Rationale (EMP-041)
- **Severity:** Major (B9); Minor (B7, B12)
- **Recommended Action:** Deferral rationale must quantify the constraint being cited, state what threshold or standard the employee falls short of, and document any organisational factors (e.g., missing development support, system process gaps) that contributed to the shortfall. See Final Redlined Corrections 6, 7, and 8.

#### Finding: Inconsistent application of Knowledge Sharing criterion across promotion candidates

- **Finding Ref:** C1
- **Artifacts Affected:** Promotion Panel Outcomes (Candidates 2 and 4)
- **Severity:** Major
- **Recommended Action:** Where the same criterion is treated differently for different candidates, the panel rationale must explicitly document the distinguishing factors. The correction for Candidate 2's Knowledge Sharing section now includes a cross-reference to Candidate 4 explaining the different treatment. See Final Redlined Correction 4.

#### Finding: Same employee assessed with different rationale frameworks across promotion and compensation artifacts

- **Finding Ref:** C3
- **Artifacts Affected:** Promotion Panel Outcomes (Candidate 1 / Senior Data & AI Consultant), Compensation Recommendation Rationale (EMP-041)
- **Severity:** Major
- **Recommended Action:** When the same employee appears in multiple governance artifacts within the same cycle, the rationale frameworks should cross-reference each other. The promotion deferral cites Business Development gaps; the compensation deferral cites tenure. Both are valid but the absence of cross-referencing creates a risk that different reviewers reach contradictory conclusions. See Final Redlined Corrections 7 and 8.

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## 4. Systemic Patterns

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- **Subjective language masquerading as evidence:** Across performance and promotion artifacts, evaluative terms ("proactive", "channelled", "centralising", "tighter") are used as though they describe observable behaviours, but they embed assumptions about expected conduct that are not defined in the applicable competency frameworks. This makes it difficult for employees to understand what standard they are being held to and creates inconsistent assessment risk.
  - **Passive accountability in systemic failures:** Both the missed compensation review cycle (EMP-063) and the deprioritised knowledge-sharing session (G4) use passive constructions that avoid attributing the gap to either the employee or the organisation. When systemic factors contribute to an individual shortfall, the artifacts should distinguish between the individual's accountability and the organisation's responsibility to support.
  - **Inconsistent rigour in deferral rationale:** Promotion deferrals and compensation deferrals vary in the specificity and evidence depth of their rationale. Candidate 4's deferral includes detailed historical context (three review cycles), while Candidate 1's deferral acknowledges a structural constraint without quantifying it. The compensation deferral for EMP-041 applies a tenure rule without documenting the equity trade-off. Deferral decisions carry significant career and financial consequences and warrant a consistent documentation standard.
  - **Cross-artifact blind spots for the same employee:** The Senior Data & AI Consultant appears in performance review (HR11), promotion panel (HR13), and compensation review (HR16) artifacts with no formal cross-referencing mechanism. Each artifact assesses the employee within its own framework, creating a risk that cumulative governance decisions (performance narrative shapes promotion outcome, which shapes compensation treatment) compound biases introduced at an earlier stage without detection.
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## 5. Recommendations

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1. **Define behavioural anchors for commonly used evaluative terms.** Create a reference guide mapping terms like "proactive", "empowering", and "strategic" to specific, observable behaviours at each level of the Northbridge banding structure. Integrate this guide into the performance review template and promotion evidence framework to reduce reliance on subjective qualifiers.
  2. **Require cross-referencing when the same employee appears in multiple governance artifacts.** Introduce a mandatory cross-reference field in promotion panel and compensation review templates that links to the employee's current-cycle performance review and any other pending governance decisions. This enables reviewers to identify compounding effects across decision types.
  3. **Standardise deferral rationale requirements.** Establish a minimum documentation standard for promotion and compensation deferrals that includes: (a) the specific threshold or criterion not met, (b) quantified evidence of the gap, (c) any systemic or structural factors that contributed, (d) the measurable criteria for re-evaluation, and (e) a timeline for the next review. Apply this standard uniformly regardless of whether the deferral is an upgrade or downgrade from the draft recommendation.
  4. **Add a Knowledge Sharing consistency check to the calibration panel process.** Before finalising promotion decisions, the panel facilitator should verify that criteria treated as development items for some candidates are not treated as blocking gaps for others at the same level without documented justification for the differential treatment.
  5. **Update the Bias Review Criteria document.** The current version (September 2025) is overdue for annual review. The update should: (a) resolve the acknowledged overlap between Subjective Qualifier and Vague Justification categories, (b) replace the legacy Mercer grade references with the current Level 1-5 banding structure, and (c) incorporate the January 2026 expansion of the Cultural Bias category for post-acquisition language.
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## Panel Attestation

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This report has been reviewed by the Diversity Reviewer and approved by the HR Director. The 9 accepted corrections and 1 modified correction documented in the Final Redlined Corrections are authorised for implementation in the affected artifacts. The 2 rejected items have been reclassified and documented above.

**Diversity Reviewer Sign-Off:** Confirmed - 21 February 2027 **HR Director Sign-Off:** Confirmed - 22 February 2027

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