MONITORING ETHNICITY

A comprehensive guide for employers

About This Document

This document was originally published in 2012, hence it uses our old branding. Despite its age, the document contains relevant and useful information. However, some specific links, case studies and statistics may be out of date.

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Contents

Foreword

"What gets measured gets done. You cannot manage what you don't measure!"
These are significant truths that we have heard from a range of very senior leaders over the years and it rings true now.

The UK is becoming more diverse and 'Race to the Top' published by RfO in 2009 revealed that there has been a steady increase in the numbers of people with BAME heritage and backgrounds in the UK. However, their share of management and leadership positions has not seen the same growth hence though they account for 1 in 8 employees in the workplace only 1 in 15 is in a management position.

Now is the time for all employers to take a snapshot of their current workforce through monitoring which will enable them to a) identify where there may be 'bottlenecks' in the talent pipeline and b) identify where they might wish to target action and resource, track progress and celebrate improvements as they are made.

Sandra Kerr, OBE
National Director Race for Opportunity
Business in the Community

Introduction

What is monitoring?

Monitoring is the systematic collection and storage of information (usually data), and the analytical processing and evaluation of that information. This can cover existing and potential employees, customers, suppliers and other stakeholders.

Monitoring can be done at a variety of different points in the employment cycle including *attraction*, *recruitment, training, promotion, staff surveys, performance management, exit interviews, sick absence, grievances and dismissals.*

10 reasons to monitor

1. Effective monitoring is an important tool for measuring performance and progress towards equality and diversity goals and in ensuring a truly inclusive working environment.

2. Understanding the composition of the workforce can enable an organisation to highlight differences between groups in terms of satisfaction, engagement and progression. This in turn can enable organisations to identify, tackle and prevent issues that would otherwise undermine employee engagement and productivity.

3. Monitoring equality and diversity in the workforce enables organisations to examine how their employment policies and processes are working and to identify areas where these appear to be impacting disproportionately on certain groups of staff.

4. It can lead to the development of better and more informed, inclusive decision making, including decisions on recruitment and promotion.

5. **build reputation** – Research shows that the best performing organisations are those that invest most on promoting equality and diversity in their workforce[1];

6. **improve productivity** – We know that valuing and supporting the diversity of people's backgrounds and lifestyles is important in making the most of the contribution that they can bring to an organisation's performance[2];

7. **recruit and retain the best** from the widest talent pool;

8. **create awareness** - Signaling the organisation's understanding of and commitment to creating a more inclusive work environment;

9. **provide specific adjustments, training or interventions** - this will help you to identify at what level and employee group you may wish to target specific resource.

10. **Identify and address any inequalities -** in the application of employment practices; and **avoid risk** – effective monitoring also helps departments minimise possible legal, financial and reputational harm.

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[1] The Business of Diversity, Schneider-Ross (2002)
[2] Measuring Leadership Effectiveness for Improved Organisational Performance: ASR Research (2004)

How can I use the information that we collect through monitoring ethnicity?

- To inform Board discussions, general policy-making and action planning*.

- To manage on the basis of fact, rather than perceptions or gut feeling.

- To translate rhetoric and commitment into focused action.

- To spot trends and patterns that show where problems are early on. This in turn, can help employers to avoid the costs of expensive litigation and tribunal activity, and the corresponding loss of management time.

- To develop an effective management information system. This will enable managers to manage on the basis of a realistic assessment of where the organisation is.

- As a fundamental building block and key component of a successful race and diversity programme.

> **RfO comment:**
>
> With 1 in 4 children of primary school age from diverse backgrounds needing more role models to look up to this can no longer be seen as a 'nice to have' by big business, but a critical component of effective resource and employment engagement goals.
>
> Northern Ireland has monitored on the basis of religion over many years and is an example of how reviewing, measuring, monitoring and tracking specific aspects of inclusion, helps you to action plan for the future that you want to see.

*Employers who are seeking to diversify their workforce can use the comparisons to help them set appropriate targets for their diversity action plans.

Designing a monitoring programme

What should we monitor in terms of ethnicity?

You want to be confident that you understand the ethnic composition of your workforce, to take advantage of the benefits that a diverse workforce offers both the employee and the organisation. So ideally you should monitor ethnicity at **every stage of the employment cycle including:**

- who applies to join us.

- the profile of the communities in which we operate.**

- who we eventually hire, and what happens to them.

- all of our recruitment processes, including tests and assessment centres.

- appraisals and performance management processes.

- position, Grade/level and seniority.

- responses to our employee opinion or attitude surveys.

- how we retain people.

- remuneration, reward and promotion.

- who participates in our training and development schemes.

- incidents of bullying, harassment and other complaints.

- grievances and disciplinary action.

- resignations, redundancies, exit interviews.

- staff turnover.

**As best practice, RfO suggests that where there are sufficient numbers of ethnic minorities in the workforce the data should be further de-segmented by individual ethnic group and compared to local demographics.

Wherever and whenever possible, employers should follow the ethnicity classifications set out by the Office of National Statistics (ONS) and their equivalent bodies for the 2011 Census for England, Wales, Scotland and Northern Ireland. Deviating from these categories may be necessary where there are key operational or business concerns, or issues that need to be addressed that require deviation from this question set, or additional supplementary questions.

We recommend that each demographic question has the 'prefer not to say' option attached to it. If you are using electronic media to collect this information you should ensure that those completing the questionnaire are able to move through to later questions if they do not wish to answer a certain question. See an example of an ethnicity monitoring form at appendix 4.

How to communicate your aims and objectives

The quality of monitoring depends on the reliability of the information provided. If large numbers of employees opt not to respond or participate, then the credibility of the entire process is seriously undermined.

It is important to reassure all employees (and applicants) about why the organisation is undertaking a monitoring exercise, by communicating clearly and unambiguously why it is being carried out, and how it supports the overall commitment to equality of opportunity.

Key messages:

- What the purpose of the exercise is.

- Why the organisation wants (and needs) to do it.

- Why it is important for everyone to provide the information requested.

- How will the information collected be used, any follow-up actions or plans.

- All information collected will be treated in the strictest confidence.

- How the organisation knowing about demographics e.g. gender has enabled them to take action (include practical examples)

The categories used in Census 2011

Census 2011 **England and Wales**	Census 2011 **Scotland**	Census 2011 **Northern Ireland**
WHITE • English/ Welsh/ Scottish/ Northern Irish/ British • Irish • Gypsy or Irish Traveller • Any other White background (write in)	**WHITE** • Scottish • Other British • Irish • Gypsy/Traveller • Polish • Other White ethnic group (write in)	• **White** • **Chinese** • **Irish Traveller** • **Indian** • **Pakistani** • **Bangladeshi** • **Black Caribbean** • **Black African** • **Black Other** • **Mixed ethnic group** (write in) • **Any other ethnic group** (write in)
MIXED/ MULTIPLE ETHNIC GROUPS • White and Black Caribbean • White and Black African • White and Asian • Any other Mixed/ multiple ethnic background (write in)	**MIXED/ MULTIPLE ETHNIC GROUPS** • Any mixed or multiple ethnic groups (write in)	
ASIAN/ ASIAN BRITISH • Indian • Pakistani • Bangladeshi • Chinese • Any other Asian background (write in)	**ASIAN/ ASIAN SCOTTISH / ASIAN BRITISH** • Pakistani, Pakistani Scottish or Pakistani British • Indian, Indian Scottish or Indian British • Bangladeshi, Bangladeshi Scottish or Bangladeshi British • Chinese, Chinese Scottish or Chinese British • Other (write in)	
BLACK/ AFRICAN/ CARIBBEAN/ BLACK BRITISH • African • Caribbean • Any other Black/ African/ Caribbean background (write in)	**AFRICAN** • African, African Scottish or African British • Other (write in)	
OTHER ETHNIC GROUP • Arab • Any other ethnic group (write in)	**CARIBBEAN OR BLACK** • Caribbean, Caribbean Scottish or Caribbean British • Black, Black Scottish or Black British • Other (write in)	
	OTHER ETHNIC GROUP • Arab, Arab Scottish or Arab British	

	• Other (write in)	

5 steps to a successful monitoring programme

1   Confirm in advance that your storage and retrieval systems are capable of producing the information and analysis that you will require both for current and future needs.

2   Communicate, communicate, communicate

Consult with all levels of management, trade unions and other key employee groups or associations about what you are proposing to do, and how you will use the resulting information so that they can proactively support the drive to improve declaration. Make sure the groups you consult are diverse. Communication mediums you could use include:
- Personal emails
- Paper-based personalised notes
- Intranet pages
- Internal newsletters
- Team briefings
- Posters
- Launch events
- Top management messages of communication

3   Publish the results of the consultation to build ownership and credibility and address any frequently asked questions by creating a document webpage of questions and answers for transparency.

4   Ensure that your monitoring proposals are aligned to your Equal Opportunities policy (on which consultation will already have taken place).

5   Run a pilot of the proposed monitoring exercise in one section or department of your business, and/or for one or two recruitment exercises. Create a focus group of diverse stakeholders 'engaged and consulted' to test the tone of messages and language to ensure context is not misunderstood.

Collecting the information

Application forms and other selection tools

It is recommended that information relating to ethnic origin is separated from the main body of an application form, as long as there is a system to ensure that a link can be made for monitoring purposes.

On-line applications via the internet are becoming increasingly popular, and it is important to think about how monitoring information can be gathered so that it does not deter applicants.

Where can I ask the questions about ethnic origin?

1   In the body of an application form (but in a separate section to make it clear that the question is not being used for selection purposes).

2   On a separate sheet, titled 'Monitoring Form' linked to the application form by a unique identifier.

3   In a tear-off section, linked to the main form by means of a unique identifier.

The unique identifier

In the case of option 2 or 3, there needs to be an identifier linking the application and the ethnic monitoring information. You may also want to include the applicant's name as a back-up to any numerical system, especially where any part of the numbering system is manual and subject to clerical error.

Pros and cons

- In the body of the application form

  This is administratively the easiest way to ensure that the monitoring information stays linked to the individual, but it also makes it possible for the shortlister's decisions to be influenced by the ethnic origin information. Or for applicants to believe that they may be discriminated against.

- On a separate sheet

This probably poses the lowest risk, however it can lead to a lower response rate than a detachable tear-off sheet, since some people may simply fail to return the sheet.

- on a tear-off sheet

This can increase the applicant's confidence that the information will not be made available to shortlisters, and that once detached, eliminates opportunities to misuse the information. With appropriate assurances, most people are likely to accept that the information will be used purely for monitoring rather than selection purposes.

using photographs

Asking for photographs of applicants does nothing to allay any fears about possible discrimination. Where photos are being used as helpful reminders when selectors are seeing large numbers of candidates in a relatively short time, the photo should be sought as late as possible in the selection process, and not at the point of applying for the position.

questions about nationality

Questions related to nationality can heighten anxieties about possible discrimination depending on the context. If the real information being sought is about the applicant's eligibility to work, then that is the question that should be asked. Recruiters should be up to speed about the nuances of the [Nationality, Immigration and Asylum Act](#).

gathering information from CVs

Where a CV is the main way of applying for a role, it may be worth writing to applicants asking them to complete a monitoring form. Some organisations invite applicants to telephone in advance before submitting CVs, and include monitoring questions at that point.

we only hire through external agencies

If you are using an external agency to conduct a recruitment exercise, discuss with them how best to capture the monitoring information required, and in what form, as early on the in the process as possible. Agencies should adopt a process to monitor the diversity of all job seekers on their books which would enable any subsequent review and follow up action to be analysed by organization and by diverse group.

monitoring initial enquiries

If you want to monitor all of your applicants, including the people who enquire about vacancies but do not follow them up, then the individuals who are the first point of contact should be trained in how to capture information about ethnic origin in a sensitive way.

telephone interviewing

Telephone interviewing is sometimes used for conducting initial interviews, and it is important to monitor its impact on different groups of candidates.

It may be more appropriate to gather ethnic monitoring information at an early stage of the interview rather than at the end. Interviewers will need training around how to do so in a sensitive way. Construct a script of consistent messages - deliver short workshops and include it in interview training.

Managing the information

how can I manage the information that we collect?

The key requirement is to be able to collect and store information in ways that can maintain a permanent link with the individual to whom it relates. This is easily done using a computer database, which also provides the flexibility to analyse the data in a number of ways.

The **Data Protection Act 1998** provides for confidentiality and for access to their own data by the individuals to whom it relates.

confidentiality

Any information related to an individual collected through monitoring is confidential, and must be protected from misuse.

It is important to assure all employees of the security of the data, and to have transparent policies about who exactly within the organisation has access to it.

All employees and job applicants must be informed of the precise reasons for collecting the monitoring information.

Information and documents collected through routine monitoring may serve as evident at tribunals to show that the equal opportunity practices adopted by an employer are not discriminatory. However, where the duty of confidence to others is an issue, it may be agreed that actual names can be withheld, provided that the relevant information is still available e.g. data on gender or ethnic origin.

who should have access to the information?

The Data Protection Act 1998 requires employers to take responsibility for ensuring that all data processing is carried out in accordance with **8 statutory principles**[3]. These principles, with some specific exemptions, require personal data to be processed fairly and lawfully.

The Act also defines the general right for employees to have access to personal data held by their employer, except where the privacy of another might be infringed. Of

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[3] See appendix 1

particular sensitivity is information related to ethnic origin, religion, trade union membership, sexual life, criminal proceedings, etc.

All employers are urged to study the Data Protection Act as an essential prerequisite to conducting a monitoring exercise.

involving trade unions

Trade unions have a dual role as employers and providers of services. They have an important role to play in tackling discrimination and promoting equality on behalf of their members. Ideally they should work with you to promote your policies, so that any measures introduced have the backing of both management and unions.

It is essential that trade unions or staff representatives are involved in and consulted on all aspects of the use of records of ethnicity as a means of monitoring an equal opportunity policy.

Where monitoring shows that discrimination has occurred, unions should work with employers to eliminate it.

analysing data

- Think about why you need the information and how you are going to use it before designing questions or collecting any data.

- Also consider how the data will be analysed, e.g. can the software package used generate the type of statistics and reports required.

- You need to collect and analyse data for each stage of the employment cycle to understand the full picture, including success or failure rates for each stage of your recruitment or retention processes.

- Do not use information collected through monitoring for any other purpose than that specified at the outset, without first communicating why the information is being put to this new use.

how can I deal with non-responders?

Missing monitoring information should be treated in the same way as any other missing management information.

An initial reminder should be sent to individuals who did not state their ethnic origin, and an appropriate follow-up letter can be used if the data is still not forthcoming. You may also wish to involve their line manager in asking for the information in a sensitive way, explaining the purpose of the exercise.

This is a sensitive area as people may feel threatened by the questions, and become more anxious if follow-up takes place without proper communication of the purpose of the exercise beforehand.

If there is a large proportion of people not providing information about their ethnic origin then you need to try and find out the reasons why e.g. convene specific focus groups to discuss or ask individuals if there is anything that could be done to allay their fears.

Examples of good practice:
what employers say about their monitoring programmes

Department of Health
Diversity monitoring

In July 2009, the Department of Health launched its diversity monitoring exercise through the Permanent Secretary's monthly update, Managers' briefing and a front-page story on the intranet. The aim was to update the existing employee data on disability and ethnicity using the census classifications; and to extend monitoring to sexual orientation, religion or belief and caring responsibilities.

The first stage of the exercise was an on-line completion via the HR self-service facility. The second stage involved a paper-based exercise after which those that had not made a declaration were followed up by phone. Four months on, the Department achieved declaration rates of 95% on Disability and 96% on Ethnicity and around 60% for the other three new categories.

The Department of Health believe that the successful outcome of the exercise was due to;
- a comprehensive communication strategy;
- the involvement of stakeholders (including Unions and staff networks) from an early stage; and
- the paper-based follow-up – which was the most productive method used.

The paper-based exercise only required staff to tick a few boxes and return in a self-addressed envelope provided. The response rate was higher than the telephone follow-up.

The communication strategy included a note from the HR Director outlining the aims and benefits of the exercise, attached to the note was a 'Question and Answer' brief covering all aspect of the exercise from 'how the categories were developed' to 'what the data would be used for'.

Environment Agency

In March 2005, the Environment agency wrote out to all employees to update the data we collect on diversity for our staff. Of the 12,000 employees who received this form we had a return rate of over 80%. The criteria used to monitor race and religion and belief mirrored that used in the census data allowing us to make direct comparisons with the communities we serve and the information collected has directly led to bringing about improvements in our policies and approaches.

Using data collected from this monitoring exercise, we chose to write to all our Black and minority ethnic employees in January to seek views on ways we can improve the way we attract, recruit and retain people from different backgrounds.

In partnership with a specialist research company, we put together an online questionnaire which asks for opinions on how the Environment Agency is perceived from the outside and what it's like to work for us. The questions invited a range of views from how aware people are of us and what we do, through to the best way to engage with potential employees from ethnic minority backgrounds and the most appropriate messages to use. Following the completion of this survey, employees were invited to attend one of a number of focus groups facilitated by an external organisation to explore issues in more detail.

All information collected was treated in the strictest of confidence and will be used to help inform future strategy and working practices.
Source - Race for Opportunity benchmarking 2006

National Assembly of Wales

The National Assembly for Wales has conducted a monitoring survey of all staff within the organisation across all the equality strands including, age, gender, race, disability, sexual orientation, religion or belief and carer status.

We achieved a 90% response rate on the ethnicity question, which met the target stipulated in our Race Equality Scheme. As a result of this monitoring exercise, we can now migrate the data into our HR IT system. This will allow us to see how specific groups of staff are developing, which staff are leaving, getting promoted and accessing training. From this baseline data, we will be able to see whether any groups of staff are not accessing particular services, are not being promoted or developed or are leaving the organisation.

By conducting this monitoring exercise, we have created a baseline set of data, which can be used in the future. It will be used to assess the efficacy of our policies and procedures and to ensure that appropriate access to learning and development, career progression and access to other services is given to ethnic minority staff. It will also help us to see why staff are leaving the organisation in conjunction with exit questionnaires.
Source - Race for Opportunity benchmarking 2006

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Appendix 1

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The Data Protection Act 1998
The eight statutory principles:

Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

1.   Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless,

(a) at least one of the conditions in Schedule 2 is met and

(b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

2.   Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

3.   Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

4.   Personal data shall be accurate and, where necessary, kept up to date.

5.   Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.   Personal data shall be processed in accordance with the rights of data subjects under this Act.

7.   Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8.   Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

http://www.ico.gov.uk/for_organisations/data_protection/the_guide/the_principles.aspx

Appendix 2

PREVIOUS CENSUS CLASSIFICATIONS

Census 1991	Census 2001 England & Wales	Census 2001 Scotland	Census 2001 Northern Ireland
White **Irish**	White British Irish Any other White background	White Scottish Other British Irish Any other White background	White Irish Traveller
	Mixed White and Black Caribbean White and Black African White and Asian Any Other Mixed background	Mixed Any Mixed background	
Black African **Black Caribbean** **Black Other** **(Please specify)**	Black or Black British Caribbean African Any Other Black background	Black, Black Scottish or Black British African Any Other Black background	Black Caribbean Black African Black Other
Indian **Pakistani** **Bangladeshi**	Asian or Asian British Indian Pakistani Bangladeshi Any Other Asian background	Asian, Asian Scottish or Asian British Indian Pakistani Bangladeshi Chinese Any Other Asian background	Indian Pakistani Bangladeshi
Chinese **Other**	Chinese or Other Ethnic group Chinese Any Other Ethnic background	Any Other Ethnic background	Chinese Mixed Ethnic group Any Other Ethnic background

EXAMPLE OF TEXT TO COMMUNICATE MONITORING EXERCISE

Diversity - We measure it because it matters

(Company name) is committed to being an Equal Opportunities Employer and we wish to ensure that all our employees are treated fairly.

Monitoring equality and diversity in the workforce enables us to examine how our employment policies and processes are working and to identify areas where they appear to be impacting disproportionately on certain groups of staff. Monitoring can lead to the development of better and more informed, inclusive decision making, including decisions on recruitment and promotion.

To help us achieve this, you are requested to complete and return this form. Copies of our diversity policy are available upon request. We are sensitive to the fact that some people would rather not complete diversity forms - either because they fear the information will be misused, or because they consider some of the questions to be highly personal. We would like to put your mind at rest. We can assure you that the information being given is kept separately from the information used in all personnel related decisions (i.e. promotions, evaluations etc). The information will not be used to influence recruitment decisions. All information is strictly confidential, PURELY for statistical purposes and to ensure that policies are being applied fairly; it will only be shared with a restricted number of authorised personnel. We will not discriminate against individuals who decide not to complete the form. However, we ask that as many people as possible agree to help us measure diversity – because it matters to us.

EXAMPLE OF ETHNICITY MONITORING FORM

(Company name) strives to operate a policy of equal opportunity and not discriminate against any person because of sex, race, colour or national origin.

To help us monitor this, will you please provide information requested. The information you provide will only be used for monitoring purposes.

How would you describe yourself? Choose ONE section from A to F, and then tick the appropriate box

A	White ☐ British ☐ Irish ☐ English ☐ Welsh ☐ Scottish ☐ Northern Irish ☐ Gypsy or Irish Traveller ☐ Any other White background (please specify) ....
B	Mixed ☐ White and Black Caribbean ☐ White and Black African ☐ White and Asian ☐ Any other Mixed/multiple background (please specify) ....
C	Asian or Asian British ☐ Indian ☐ Pakistani ☐ Bangladeshi ☐ Chinese ☐ Any other Asian background (please specify) ....
D	Black or Black British ☐ Caribbean ☐ African ☐ Any other Black background (please specify) ....
E	Other Ethnic Group ☐ Arab ☐ Any other ethnic group (please specify) ....
F	☐ Prefer not to say

Are you male / female ....

Surname ....

First name(s) ....

Department/section ....(for existing workers)
Pay number .... (for existing workers)

Date ....
Please return this form in the Confidential envelope provided *(or via email).*

/...

.................../

Guidelines to help with answering

If you tick any of the 'Any other' boxes (including 'Any mixed or multiple ethnic groups') please also write in (specify) your ethnic group.

If you unsure of your ethnic group, you should select the option that you think is most appropriate. Ethnicity is a matter of self identification. Remember that the question asks you to choose **ONE** section from A to F and then tick **ONE** box that **best describes** your ethnic group or background.

More questions?

Can I describe my ethnic group as something other than the tick box categories listed?
Yes, if you feel that none of the specific response options is appropriate, there is an 'other' option within each of the main ethnic groupings which you can select and then enter your ethnic group in the space provided. This ensures that people can record their ethnic group in whatever way they wish.

My ethnic group is not listed. What should I do?
Please use the response options to help guide you but if you feel that the tick boxes provided are too broad or do not allow you to identify your ethnic group please select 'Any other, please specify' option under the most appropriate section (A, B, C, D, E or F) and enter your ethnic group.

RfO Board

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"There are a growing number of reports showing that companies with diverse boards, and diverse workforces, are more successful. Add to this the fact that businesses must reflect and cater to the diversity of their customers, shareholders and other community stakeholders. These are the commercial considerations which will propel businesses to implement the changes they need to make.

It's not so hard to make diversity a priority. Just by gathering accurate and complete diversity data, companies can establish exactly where in their organisation the diversity gaps lie. From there, it takes interventions at the very top of the company hierarchy, charging the most senior executives to act as diversity champions, and tying senior rewards to the meeting of diversity targets to really make an impact. On the softer side, tailored development programmes can help, and mentoring schemes and employee networks for diverse staff grow diverse talent."

Carmen Watson, Managing Director, Pertemps Recruitment Partnership and Board member Race for Opportunity

Race for Opportunity

Race for Opportunity (RfO) is unique in its business-focused approach to working on race in the UK environment.

More than 100 private and public sector organisations across the UK currently work with Race for Opportunity to realise their objectives on race, usually as part of their diversity programme.

RfO works primarily with employers who recognise that race and diversity are core business issues. Organisations in the RfO network receive a programme of specialist support and advice to develop and actualise their action plans, as well as the chance to benchmark alongside other employers committed to this aspect of diversity.