CIPD

Championing better work and working lives

MEETING THE BITC RACE AT WORK CHARTER

An employer's guide

The CIPD is the professional body for HR and people development. The registered charity champions better work and working lives and has been setting the benchmark for excellence in people and organisation development for more than 100 years. It has more than 150,000 members across the world, provides thought leadership through independent research on the world of work, and offers professional training and accreditation for those working in HR and learning and development.

Business in the Community is the oldest and largest business-led membership organisation dedicated to responsible business. We were created nearly 40 years ago by HRH The Prince of Wales to champion responsible business.

We inspire, engage and challenge members and we mobilise that collective strength as a force for good in society to:

• develop a skilled and inclusive workforce for today and tomorrow
• build thriving communities where people want to live and work
• innovate to sustain and repair our planet.

BITC Advisory Services supports organisations to take action against the commitments and drive change. They offer a range of advisory products and services. This can include the design and development of diversity and inclusion strategies, guidance on ethnicity pay gap reporting, learning and development programmes for senior leaders and employees, and development and delivery of sponsorship and mentoring programmes.

Guide

Meeting the BITC Race at Work Charter: an employer's guide

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① **Introduction**

The Race at Work Charter was launched by Business in the Community in late 2018, with the aim of tackling ethnic disparities in the workplace. The CIPD was one of the first organisations to sign the charter. During the launch, CIPD Chief Executive Peter Cheese said:

> *'The CIPD has consistently highlighted the need for organisations to be more transparent about how they report on the diversity of their workforce and how they reward, manage and develop people as a catalyst for creating more diverse and inclusive workplaces.'*

Business in the Community (BITC) was set up nearly 40 years ago by the Prince of Wales to champion responsible business. With a membership of hundreds of small and large businesses, BITC has inspired, engaged and challenged its members to support the creation of a skilled, inclusive workforce, build thriving communities, and sustain our planet. BITC set up the Race at Work Charter in collaboration with the Government in 2018, one year on from the McGregor-Smith Review: *Race in the Workplace*. The year 2020 marked the BITC milestone of 25 years campaigning for race equality in the UK.

Led by Sandra Kerr CBE, the Race at Work Charter requires signatories to make five commitments:

1 Appoint an executive sponsor for race.
2 Capture ethnicity data and publicise progress.
3 Commit at board level to zero tolerance of harassment and bullying.
4 Make clear that supporting equality in the workplace is the responsibility of all leaders and managers.
5 Take action that supports ethnic minority career progression.

BITC has a clear set of objectives that it wants signatories to achieve, which includes:

• encouraging leadership, allyship and connections to foster advocates and allies that are willing to proactively take actions to ensure their workplace is safe and inclusive
• encouraging businesses to take strategic action on leadership by bringing the attention of all senior leaders within the organisation to the issue of race relations
• promoting mentoring and sponsorship of ethnic minority employees by putting them forward for development or progression opportunities, especially in organisations that do not have ethnic minority role models in senior positions.

The CIPD has continuously campaigned for race equality through our public policy work, engagement with government, and guidance to employers. The CIPD viewpoint on race inclusion is a belief that: *'Every person, regardless of their ethnicity or background, should be able to fulfil their potential at work.'* The CIPD also believes that the need for more inclusive and diverse workplaces has been known for a long time with very little action taken and that *'ethnicity pay reporting can serve as a catalyst.'*

Our views on race align with the Race at Work Charter and the belief of BITC that *'every employer must prioritise action on race.'*

This guide aims to provide a practical framework that signatories of the Race at Work Charter can follow to meet the five calls to action. We have given research-backed recommendations to improve race equality and inclusion and highlighted resources to support the race inclusion commitments which have been referenced in this guide.

② The Race at Work Charter and how to meet the five commitments

As outlined, the Race at Work Charter requires signatories to make five commitments to help tackle ethnic disparities in the workplace. Below we've outlined advice on how to meet each of these commitments.

1 Appoint an executive sponsor for race

Senior management sponsorship is key to getting real momentum behind inclusion and diversity (I&D) initiatives. CIPD research has shown that lack of progress on I&D is often linked to senior executives not prioritising it as a business imperative. The CIPD report, *Diversity Management that Works*, identified three levels of commitment to I&D from senior executives:

- **level 1:** advocacy, communicating values and recognising that the culture and values of the organisation need to change
- **level 2:** advocacy and resources to support activity that promotes I&D, recognising that it needs investment
- **level 3:** advocacy, resources and holding people to account, both through KPIs that incentivise managers and being willing to 'call out' and act upon bad behaviour, applying sanctions when needed.

> **To meet this part of the Race at Work Charter, we recommend that organisations should seek to:**
> - Ensure executives have KPIs specifically related to race inclusion.
> - Champion race equality throughout the organisation and ensure race is firmly on the agenda.
> - Task executives to lead on race equality strategy with oversight of the delivery of programmes of work.
> - Encourage senior leaders to question the lack of diversity at senior levels and commit to taking firm action.
> - Initiate ethnicity pay reporting to encourage action to redress pay differences.

Further advice on each of these points is outlined below.

Executives must have KPIs specifically related to race inclusion

Senior leadership accountability is key to fostering any significant change on race. Requiring leaders to report on their performance on improving race at work will encourage them to commit to and deliver measurable positive outcomes.

Champion race equality throughout the organisation and ensure race is firmly on the agenda

Senior leaders championing race throughout an organisation will lead to all parts of the organisation taking race equality seriously. This could take many forms, including discussing race at senior management meetings, sponsoring ethnic minority staff networks, or actively participating in race inclusion events such as Black History Month. This, in turn, will lead to more action on the ground around race.

Task executives to lead on race equality strategy with oversight of the delivery of programmes of work

Senior leaders need to have oversight of I&D initiatives to ensure outcomes are delivered on time and to budget. They can provide impetus for the organisation to support I&D

initiatives at department and team level so that everyone is accountable. Departmental and functional managers will be held accountable for I&D by the senior executive, so they too will work to ensure the programme of work is delivered and goals are achieved.

Encourage senior leaders to question the lack of diversity at senior levels and commit to taking firm action
Senior leaders genuinely holding organisations to account for the lack of diversity by reviewing policies, processes and systems through a race inclusion lens will lead to real and sustained change. Setting targets for the recruitment and promotion of ethnic minority employees can have a significant impact on increasing representation and inclusion across an organisation.

Initiate ethnicity pay reporting to encourage action to redress pay differences
The CIPD is calling on the Government to introduce mandatory ethnicity pay reporting. This will introduce accountability into pay decisions and will start organisations on a course towards fairness in pay decisions.

2 Capture ethnicity data and publicise progress
The CIPD report, _Diversity Management that Works_, found data can help organisations understand the nature and extent of challenges such as inequality in career progression. It also found evidence that suggests UK employers are poor at collecting data on workforce diversity. The McGregor-Smith Review established that a large percentage of FTSE 100 companies need to have better data to drive progress on race and ethnicity. The review gives practical steps of what organisations need to do to get progress on ethnicity inclusion, stating that:

> _'Organisations need to establish a baseline picture of where they stand today, set aspirational targets for what they expect their organisations to look like in five years' time, and measure progress against those targets annually.'_

One of the key challenges to achieving these aims is a lack of disclosure of ethnicity data,[1] with employees citing a variety of reasons that hindered disclosure, including:

• weak trust in their employer
• being unsure how the data would be used
• belief employers will claim to be acting on inequalities with no change evident.

To meet this call to action, organisations should seek to:

• Review the data you already collect and ascertain whether this is sufficient to measure the ethnic demographic of your organisation. If you don't currently collect ethnicity data, set up processes for doing so.

• Carry out meaningful analysis of the data, drawing out patterns of under-representation.

• Identify channels to distribute the data, both internally and externally; don't just put it on your website.

• Develop meaningful actions to address disparities found.

• Lay out a clear plan to continue collecting data and reporting on progress as well as regularly evaluating the effectiveness of programmes to address disparities.

Review your data

To establish whether your data is sufficient to measure the ethnic demographic of your organisation, you need to review what you already collect. If you don't currently collect ethnicity data, set up processes for doing so.

According to a PWC study,[2] 75% of organisations do not have enough data to support ethnicity pay reporting. To remedy this, organisations should:

- Review the data you already have to see whether the categories used to self-identify align with the Government's list of ethnic groups.
- Ascertain if you have enough data in each category to allow for aggregation and reporting while protecting individuals from being identified.
- Establish how can you collect ethnicity data. According to CIPD research,[3] the majority of ethnicity data is collected from application forms (44%) followed by onboarding forms (21%).[4] An underutilised tool is the staff survey. A staff survey is a great medium for collecting data on ethnicity as there should already be a relationship of trust with those who make the effort to complete a questionnaire.

Carry out meaningful analysis of the data, drawing out patterns of under-representation

There needs to be a good reason for collecting ethnicity data; CIPD research[5] found the top four steps employers can take to encourage disclosure are:

- Give a clear explanation of how the data will be used.
- Offer assurances of confidentiality.
- Share visible evidence of the organisation's dedication to creating a fairer and more inclusive organisation.
- Ensure senior leaders show their commitment to diversity, equality and inclusion.

Identify channels to distribute the data, both internally and externally; don't just put it on your website

A large proportion of employees (30%)[6] believe their employer will not do anything with the ethnicity data. It is important to ensure that data is widely distributed internally using a variety of channels, such as a staff newsletter, promoting through social media, or information in the annual report.

Develop meaningful actions to address shortcomings found

More than a third of employees in our survey[7] wanted to see evidence of their employer's dedication to creating a fair and inclusive organisation. Employers need to develop an action plan to address the findings of ethnicity disclosure, such as how to increase representation at all levels of an organisation.

Lay out a clear plan to continue collecting data and reporting on progress

Communicate a clear plan showing how the organisation will continue to collect data and report on progress, as well as evaluating the effectiveness of programmes to address shortcomings. Employers should increase their efforts to collect ethnicity data and consider how they can encourage more disclosure.

They should also review the effectiveness of any actions taken to address any lack of representation identified and report the outcome to employees to help boost confidence in the employer's commitment to creating inclusion. A data-driven approach is essential to both identifying areas of inclusion where improvements are required and monitoring the effectiveness of strategies, policies and programmes of work.

3 Commit at board level to zero tolerance of harassment

Bullying and harassment can be major issues in the workplace, with some of it related to personal characteristics such as race and ethnicity. They can be detrimental to the performance of individual employees as well as affect their physical and mental wellbeing, be disruptive to teams and departments, and ultimately have legal implications.

Bullying and harassment have a legal context that is important to understand for both employers and employees. The Equality Act 2010 defines harassment as:

'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'.

Although bullying doesn't have a legal definition, the Health and Safety at Work Act 1974 and the Employment Rights Act 1996 place obligations on employers to protect employees from bullying.

Acas defines bullying as:

'offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient'.

The CIPD report, _Managing Conflict in the Modern Workplace_, found that 15% of employees had experienced bullying at work and 8% had suffered harassment.[8] Bullying is more prevalent in the public sector, with 21% claiming to have experienced bullying compared with 14% in the private sector and 10% in the voluntary sector. Worryingly, 40% of employees say they have been bullied or harassed by their line manager or supervisor, followed by 29% saying the perpetrator was a team member.[9]

To meet this call to action, organisations should seek to:

- Develop an anti-harassment and anti-bullying policy and framework.
- Run an organisation-wide campaign on dignity and respect in the workplace.
- Create a network of anti-bullying champions to support victims and act as a first point of contact and be able to signpost to sources of help.
- Ensure people managers have adequate training to be able to address race discrimination.
- Carry out enforcement of a zero tolerance approach where harassment or bullying occurs.

Develop an anti-harassment and anti-bullying policy and framework

CIPD guidance on tackling bullying and harassment recommends the development of a well-designed policy on bullying and harassment. The policy should clearly explain what constitutes bullying and harassment and its impact on victims, highlighting that it is a disciplinary offence and can have legal implications, including personal liability. The policy should include a section on race-related bullying and harassment with examples of the types of inappropriate behaviours, such as jokes, banter, cyberbullying, threats and physical assault.

Run an organisation-wide campaign on dignity and respect in the workplace

Focusing on the positive aspects engendering dignity and respect is a better focus and more likely to elicit engagement. Creating awareness and clearly setting out how employees should behave towards colleagues, customers and partners will ensure everyone knows what is expected of them. Crucially employees will know what kind of behaviour is unacceptable and could lead to disciplinary action.

Create a network of anti-bullying champions to support victims

Allyship has been very effective[10] in many areas of inclusion, including race and ethnicity. Creating a network of anti-bullying champions that can be the first point of contact for victims can be powerful in helping employees to come forward. These champions can also signpost to sources of help.

Ensure people managers have adequate training

Line managers have an important role to play in preventing the escalation of incidents of bullying and harassment and can, if they address issues when they arise, foster informal resolution. It is important for managers to feel confident so that when they are faced with a conflict, they can address it. Resources for line managers on dealing with conflict at work are available on the CIPD website.

Carry out enforcement of zero tolerance approach

Zero tolerance should mean exactly that. If there are still incidents after the organisation has developed and communicated its anti-bullying and harassment policy and made attempts to foster dignity and respect among the workforce, a firm approach should be taken in line with the organisation's disciplinary procedures. This may include sanctions up to and including dismissal.

4 Make equality in the workplace the responsibility of all leaders and managers

Equality and inclusion is often the realm of people professionals and I&D leads, and maybe the chief executive, as well as staff networks. Yet the case for organisation-wide 'buy-in' is strong and, by now, well known. Even within the executive team you may have the CEO and the HR director who have genuinely bought into the need for inclusion, with the rest repeating the same message. Starting at the top, senior leaders, and especially those from core/revenue-generating functions, need to have an understanding of what equality and inclusion means for them and their area of responsibility and why it is important. Some senior executives do believe[11] the benefits outweigh the costs when it comes to I&D, despite the time, energy and skill required. That belief needs to be fostered across organisations to achieve genuine progress on equality and inclusion.

To meet this call to action, organisations should seek to:
- Create an inclusive organisational culture.
- Ensure that all leaders and managers take ownership for delivering I&D.
- Make I&D a key responsibility in job descriptions (and assess it during interviews).
- Assess performance on I&D during appraisals.
- Ensure leaders and managers are plugged into I&D by developing networks and events, and ongoing communications.

Create an inclusive organisational culture

An inclusive organisational culture where employees bring their whole selves to work, where no one has to try to 'fit in', will lead to more authentic behaviour and improved performance. The CIPD report, _Building Inclusive Workplaces_, defines inclusion, makes the case for why it is good for everyone – not just people with protected characteristics – and how people professionals and wider business can become more inclusive.[12]

Ensure that all leaders and managers take ownership for delivering I&D

The relationship between employees and line managers is very important in building inclusion.[13] Managers have the role of implementing I&D policies into day-to-day working practice. The way managers treat employees, consulting them in decision-making, is essential in creating an inclusive workplace. Senior leaders must 'walk the talk' and champion inclusion as they set the tone for how the organisation behaves. Buy-in for I&D is important at all levels of organisations, including senior leaders, middle managers, team leaders and supervisors. Anyone that has people management responsibility and is in charge of resource and budget allocation needs to buy in to I&D. The CIPD report, _Diversity Management that Works_, provides evidence that progress on inclusion is unlikely without senior management support. Middle managers also need cues from the top to prioritise I&D. Gaining buy-in from managers requires involving them in formulating I&D initiatives and allowing autonomy on how initiatives are implemented locally rather than being prescriptive.

Make I&D a key responsibility in job descriptions (and assess it during interviews)

The trend over the last two decades is to have a customary sentence right at the end of a job description requiring a commitment to I&D. This is tokenistic at best and is sometimes tested at interviews where the panel expect a generic statement about the candidates' commitment to I&D. It is very rarely tested as a competency. Employers need to develop competency-based questions on I&D that test the candidate's approach to applying inclusion in day-to-day working practices. An example of this may be a question asking a candidate how they have inclusively managed a team.

Assess performance on I&D during appraisals

Accountability is key to getting progress on inclusion. While there is a slowly growing trend to include I&D KPIs for senior leader roles, that trend is yet to extend to all staff across organisations. The expected I&D performance of employees will be vastly different from that of senior leaders but should nonetheless be meaningful. This could include KPIs around inclusively working as part of a team, which may be assessed through 360-degree feedback, taking part in allyship programmes and supporting minority groups through advocacy and other activities.

Develop networks, events and ongoing communications

Ensure leaders and managers are plugged into I&D by getting feedback from 'the shop floor'. This is very important for leaders to know that I&D initiatives and programmes are working and also to keep in touch with the reality on the ground in terms of what is not working or failing to make a positive change.

5 Take action that supports ethnic minority career progression

The potential to progress one's career is a key consideration when looking at jobs. More employees from ethnic minority backgrounds prioritised career progression as an important part of their working life compared with white British employees.[14] Ethnic minority employees are also more likely to say that their identity and background has an effect on the opportunities they are given. The report also found evidence that ethnic

minority employees feel the need to alter some aspects of their behaviour to fit in, and censor how much they tell colleagues about themselves and their personal life. Transparent career paths and seeing role models that have progressed would help boost career advancement, according to the report.

Managers underestimating BAME employees' career ambitions and making assumptions about their career paths were also reported as hindrances to advancement. This is echoed in the CIPD report *Race Inclusion: Ensuring equality of career progression opportunities*, which found that 22% of the BAME group respondents said that their career progression has failed to meet their expectations because they have experienced discrimination, compared with 15% of the white British ethnicity respondents.[15]

Against this backdrop it is important to identify what kind of organisational culture supports ethnic minority employees in advancing their careers and achieving their potential.

To meet this call to action, organisations should seek to:

- Offer opportunities for ethnic minority employees to build relationships across an employer organisation.
- Provide employees from ethnic minority backgrounds the chance to work on a variety of stretching projects at work.
- Provide high-quality line management and support.
- Give improved access to training and development opportunities.
- Introduce positive action programmes to increase the pool of diverse talent.

Offer opportunities for ethnic minority employees to build relationships

One of the key enablers of career progression is opportunities for employees from ethnic minority backgrounds to build relationships across an organisation.[16] This could include professional working relationships, colleagues acting as sponsors and mentioning ethnic minority employees when progression opportunities arise, and networking with peers that can open doors to cross-departmental projects.

The report identified relationships built across an organisation as a key enabler to career progress, with 37% of respondents stating it is important. Similarly, 28% of respondents from ethnic minority backgrounds and 27% of white British respondents stated that 'who you know/informal relationships' played a part in career progression.[17] Employers can help develop these relationships by setting up networking events for ethnic minority employees to network with senior colleagues from across an organisation. Aim to match ethnic minority employees with senior sponsors who can mention their name when progression opportunities are discussed.

Provide ethnic minority employees the chance to work on a variety of stretching projects at work

Another enabler of career progression is to have the opportunity to get involved in different projects which help develop employees' skills. Skills and talent being overlooked was one of the reasons given by 38% of employees (BAME and white) as to why their career progression had failed to meet their expectations.[18] Strive to offer ethnic minority employees the opportunity to work on a range of projects to enhance their skills (and improve their peer networking, as discussed above).

Offer high-quality line management and support

A key enabler for both white and ethnic minority employees (30%) is good-quality line management at key points in their career. Conversely, 36% of employees whose career progression had failed to meet their expectations said they had experienced poor-quality line management.[19] Employees given people management responsibilities need to be equipped with the appropriate skills and knowledge, including how to support the career development of their reports. Line managers should be provided with training and guidance on using meetings and performance appraisals to assess the skills gaps of employees and identify development opportunities. Resources on supporting development are available as part of the line manager support materials on the CIPD website.

Give improved access to training and development opportunities

A lack of effective training and development programmes was cited by a quarter of ethnic minority respondents as a reason for a lack of career progression, including 18% stating that they received little or no training when they entered the workplace.[20] The impact of a lack of training or inadequate training on career prospects is higher for ethnic minority employees than it is for white British workers. Receiving effective training had contributed to the career progression of 23% of respondents (BAME and white).[21] First and foremost, employers should set employees up for success by initiating an effective onboarding process, including training on how to carry out the various duties of the job. Line managers should support employees by providing coaching and/or mentoring during the initial few weeks after a new employee comes on board.

Introduce positive action programmes to increase the pool of ethnic minority talent

Twice the number of ethnic minority respondents compared with white British employees said they had not participated in an effective graduate programme at the start of their career.[22] Employers and especially people professionals should identify where ethnic minorities are under-represented and initiate effective positive action measures, including early career and graduate programmes, middle and senior management development programmes, mentoring schemes and work shadowing. The Equality Act 2010 allows positive action measures to be taken where there is evidence of the under-representation of a group with protected characteristics. HR professionals should improve their own understanding of positive action, so they are better equipped to advise their organisation.

(3) Conclusion

The CIPD recommends that employers sign up for the BITC Race at Work Charter. We have a vast range of resources, including research reports as well as guidance on race inclusion, to support employers to meet the five calls to action of the charter, including:

- *Developing an Anti-racism Strategy* – guide
- *How to Have Difficult Conversations about Race at Work* – guide
- *Barriers to BAME Career Progression to the Top* – report
- *Race and Employment* – factsheet.

Signing the Race at Work Charter signals an organisation's serious commitment to fostering race inclusion in their organisation. The commitments made in the charter will ensure there is a clear focus and prioritisation of race equality in employment and career progression. For further information about the Charter, BITC membership and advisory services please contact race@bitc.org.uk

The CIPD is proud to partner with BITC in offering our skills, knowledge and expertise to support employers in meeting the charter commitments.

④ Appendix: Advice for small businesses on meeting the Race at Work Charter

Introduction

Smaller employers often face similar challenges to larger organisations when it comes to inclusion and diversity (I&D), but they may also have constraints such as fewer resources and a lack of dedicated HR and I&D support. This advice is aimed at supporting small and medium-sized enterprises (SMEs) to meet the commitments of the Race at Work Charter. Medium-sized businesses are those that employ between 50 and 250. Small businesses are defined as employing fewer than 50 staff, and micro businesses are organisations employing fewer than ten people.[23]

While many of the measures undertaken by larger employers to improve I&D may not work for SMEs, and diversity monitoring and reporting may be more difficult due to smaller numbers of staff, the Race at Work Charter offers a way for SMEs to work towards improving their I&D. The five Race at Work Charter commitments outline that businesses should aim to:

1 Appoint an executive sponsor for race.
2 Capture ethnicity data and publicise progress.
3 Commit to zero tolerance of harassment and bullying.
4 Make clear that supporting equality in the workplace is the responsibility of all leaders and managers.
5 Take action that supports ethnic minority career progression.

This guide provides practical steps that smaller employers can take to help meet the five charter commitments and, ultimately, improve their inclusion and diversity.

1 Appoint an executive sponsor for race

Leadership is key to creating an inclusive workplace and tackling discrimination.

Senior leadership accountability for race inclusion

Most micro and small firms are typically run by an owner-manager who can ensure they take personal responsibility for improving race inclusion in their firm. Slightly larger employers, for example those with 50 or more staff, need to be creative about making senior leaders in the business or managers accountable for race inclusion. Building in reverse mentoring and 360-degree feedback processes can be one way to encourage senior leaders to take ownership of delivering inclusion and diversity.

Champion race equality and lead by example

Senior leaders will be much closer to employees in smaller organisations. Therefore, it is vitally important that leaders display inclusive behaviours in all of their interactions with employees, customers, suppliers and any other stakeholders. Leaders and managers in SMEs will need to reflect on their own behaviour and knowledge around the issue of race at work and access information and guidance in order to ensure that they are role-modelling the right behaviours.

At the heart of inclusive workplaces are leaders and managers who treat people fairly and consistently and with respect, regardless of their background or personal characteristics.

Lead on race inclusion strategy and support the rollout of initiatives

In all organisations and particularly in smaller firms with no HR function, the starting point for improving race inclusion is understanding the legal requirements associated with employing and managing people, including employment contracts and status. It is crucial that key people management practices, for example recruitment and reward, take place without bias or discrimination. The CIPD's People Skills Hub provides access to resources on the people management 'essentials' that need to be in place to underpin an inclusive business.

Once the core HR and people management policies and practices are in place, business leaders and managers should work with HR/I&D if they have these roles in-house or (where possible) engage an external consultant to help develop I&D strategies, policies and initiatives. These should be developed keeping in mind the size of the organisation and its access to resources. Employers can access the free resources of the CIPD, including our research report, _Diversity Management that Works_.

Capture ethnicity data and publicise progress

Collecting data may be more challenging within smaller organisations, particularly considering:

- Small sample sizes may make it difficult to aggregate data and protect individuals from being identified.
- Encouraging the disclosure of race and ethnicity data may also be difficult; employees may be concerned about being identified and there may be issues around trust in management to use the data only for equality reporting purposes.
- There are challenges in carrying out meaningful analysis, especially where small changes in the employee profile can skew the results.
- It may be challenging to publicise progress for all of the reasons already mentioned, to protect anonymity, and there may be a lack of meaningful analysis and potentially misleading results.

Employers need to think about their organisation and what is possible in terms of reporting while ensuring individuals are not identifiable. Consequently, small and micro employers should focus on engaging with individual employees via one-to-ones, for example, where they can ask individuals about their perceptions of fairness and equity in the organisation. This may serve as a better measure of the impact of inclusion and diversity programmes instead of attempting to collect large data sets.

In slightly larger organisations of more than 50 staff, and certainly in those with over 100 employees, collecting and analysing workforce data becomes increasingly important to understand employees' perspectives on racial inclusion and if there are areas of the organisation or practices such as promotion where there might be bias.

Commit to zero tolerance of harassment and bullying

Bullying and harassment are common issues within all organisations, and it is no different for smaller employers. Smaller employers may have fewer formal processes for addressing this issue when it arises. Depending on the size of the organisation, employers may choose to develop anti-harassment and anti-bullying policies similar to larger employers. However, for organisations employing fewer than 50 people, there may not be much merit in creating long and complex policies, especially if you have to hire external expertise. Instead, writing a simple code of conduct on the expected behaviour of staff may suffice. It is important that employers check with a qualified employment lawyer that the code of conduct meets all relevant legislation.

Employers should then promote the code of conduct to employees and ensure all staff are encouraged to read it. It should also be mandatory reading for any new hires to ensure

that, as your business expands, everyone is made aware of the business standards, values and culture of inclusion that you wish to foster. Managers should gain an understanding of managing conflict so that they are equipped to address any issues when they arise. This may be done through training or accessing some of the free resources available from the CIPD, including our report, *Managing Conflict in the Modern Workplace*. There is also a guide specifically for line managers on managing conflict.

Make clear that supporting equality in the workplace is the responsibility of all leaders and managers

Inclusion and diversity will be much closer to senior leaders and managers in smaller organisations. Leaders and managers must take personal responsibility for I&D and give it the same degree of importance as other essential employment policies, such as health and safety and employee wellbeing. Leaders should actively engage in getting feedback from the 'shop floor' and set and regularly review the achievement of I&D goals. Smaller teams make it possible to get much wider feedback on I&D than in a larger organisation. Smaller employers could invest in employee engagement software or other infrastructure but could easily collect feedback through the one-to-one process. Even collecting anonymous feedback may be relatively easy through an online questionnaire using a free survey platform. This makes it possible for employers with resource constraints to collect robust data to support I&D.

Take action that supports ethnic minority career progression

Smaller employers can take steps to improve inclusion through positive action measures. These are proportionate actions that employers can take to encourage under-represented groups to apply for jobs or provide additional support to help career progression. The positive action can be:

• additional support for individual employees from the line manager
• mentoring from senior leaders
• funding made available to employees from under-represented groups to attend external training courses
• access to stretching projects that help employees demonstrate their skills and knowledge and build their expertise – creating a fair and inclusive working environment, where employees, regardless of their background, can make a valid contribution and develop a successful career is important to employers of all sizes, regardless of staff numbers or resources.

More information on positive action is available in our FAQs about race in the workplace.

The Race at Work Charter provides a framework for SMEs to aspire to in creating inclusive workplaces where people of all races can bring their whole self to work and have a fulfilling and rewarding career. The importance of race inclusion has been highlighted by the CIPD *Race Inclusion Reports*, which show inequalities are still pervasive in many workplaces and there is a need to talk about race and collect data to support the identification of disparities. The reports also show that there are disparities in career progression opportunities for ethnic minorities.

Signing the charter and working towards achieving the commitments demonstrates the promise of employers to address race inequalities and create a working environment where all employees can flourish.

Appendix

⑥ **Endnotes**

1   CIPD. (2021) _Race inclusion: encouraging ethnicity data disclosure._ Available at: www. cipd.co.uk/knowledge/fundamentals/relations/diversity/race-inclusion-reports

2   PWC. (2019). _Taking the right approach to ethnicity pay gap reporting._ Available at: www. pwc.co.uk/human-resource-services/assets/pdfs/ethnicity-pay-gap-report.pdf

3   CIPD. (2021) _Race inclusion: encouraging ethnicity data disclosure._ Available at: www. cipd.co.uk/knowledge/fundamentals/relations/diversity/race-inclusion-reports

4   Ibid.

5   Ibid.

6   Ibid.

7   Ibid.

8   CIPD. (2020) _Managing conflict in the modern workplace._ Available at: www.cipd.co.uk/ knowledge/fundamentals/relations/disputes/managing-workplace-conflict-report

9   Ibid.

10 BITC. (2020) _Anti-racism and allyship in the workplace: a brief guide._ Available at: www. bitc.org.uk/toolkit/anti-racism-and-allyship-in-the-workplace-a-brief-guide/

11 CIPD. (2019) _Diversity management that works._ Available at: www.cipd.co.uk/knowledge/ fundamentals/relations/diversity/management-recommendations

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Appendix 1