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Review of diversity of the public sector workforce and boards in Wales

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Review of diversity of the public sector workforce and boards in Wales

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Views expressed in this report are those of the researchers and not necessarily those of the Welsh Government

For further information please contact:

Equality, Race and Disability Evidence Units

Division:

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

Tel:

Email: EqualityEvidenceUnit@gov.wales

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Figure 1: The number of responding Welsh Public Sector Bodies that collect board member information on each equality characteristic according to Survey28

Glossary

Acronyms or shorthand phrases and their definitions:

PSED:	Public Sector Equality Duty
ArWAP:	Anti-racist Wales Action Plan
EDI:	Equality, Diversity and Inclusion
Evidence Units:	The Equality, Race, and Disability Evidence Units
National Survey:	National Survey for Wales
ONS:	Office for National Statistics
SEB:	Socio Economic Background

Disability

Disability is defined by the Equality Act (2010) which is informed by the medical model of disability and defines people as disabled by their impairment. Welsh Government has adopted the social model of disability which views people with impairments as disabled by physical, attitudinal, and organisational barriers created by society.

Ethnic minority people

This is the shortened term for “Black, Asian and Minority Ethnic people” and both are the preferred terms following discussions with the Anti-racist Wales Action Plan Steering Group in the development of the Anti-racist Wales Action Plan.

Gender

Gender is a term used to refer to someone’s sense of themselves which can include female, male or non-binary. Someone’s gender does not always align with the sex they were assigned at birth. This term can also be used in the context of gender expression or gender identity.

Impairment

Impairment is an injury, illness, mental or physical health condition, neurodivergence, a characteristic or feature someone experiences. It may or may not be lifelong and they may or may not arise from illness or injury. They may affect a person's appearance and/or the way they function or communicate, and/or they may cause a range of difficulties including pain and fatigue.

Intersectionality

Intersectionality is the combined effect of multiple forms of oppression that result from belonging to multiple stigmatised groups, and how they interplay and are interconnected. For example, disabled women may face different forms of discrimination and disadvantage compared to disabled men.

LGB+

Refers to the community of people who identify as Lesbian, Gay, Bisexual or another minority sexual orientation. This only includes those with minority sexual orientations not those with minority gender identities.

LGBTQ+

Refers to lesbian, gay, bisexual/bi, transgender/trans people, queer or questioning. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations, including intersex, asexual and aromantic people.

Protected Characteristics

Section 4 of the Equality Act 2010 sets out what are protected characteristics, which are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Public Sector Bodies

A public sector body is a formally established organisation that is publicly funded to deliver a public or government service, though not as a ministerial department. The term refers to a wide range of public sector entities.

Sex

This refers to the binary variable categorised as female and male. In the UK, an individual's legal sex is recorded at birth based on their biological characteristics. Some people's gender does not always align with the sex they were assigned at birth.

1. Executive summary

Background and introduction

- 1.1 The Equality Act, 2010 introduced the [Public Sector Equality Duty \(PSED\)](#). The aim of the PSED is to ensure that those subject to it consider advancement of equality when carrying out their day-to-day business, including developing policy, design and delivery of services and in relation to employees. In Wales, [specific duties](#) set out additional statutory requirements for public bodies to help improve performance against the PSED.
- 1.2 The Welsh Government's long-term aim for equality and human rights in Wales and the supporting '[National Equality Objectives 2024-2028](#)' include goals in relation to improving representation and inclusive workplaces. The objectives link to distinct and underlying equality action plans targeted at protected characteristic groups as defined within the Equality Act 2010, and wider human rights treaties and United Nations Conventions.
- 1.3 Whilst the Commissioner for Public Appointments publishes an [annual report of public appointments](#) which includes diversity analysis of regulated appointees and re-appointees, this does not include non-regulated appointments or provide a full picture of diversity.
- 1.4 This report presents the findings of two complementary pieces of research undertaken by the Equality, Race and Disability Evidence Units, Welsh Government. Overall objectives of the research were to: provide an indication of the diversity of public sector boards in Wales; ascertain whether diversity data for board members is being collected effectively; better understand the value of diversity in public sector bodies; and identify barriers and appropriate strategies to increase diversity in Boards and wider public sector workforce.
- 1.5 The research involved surveys of public sector bodies and board members in Wales and a desk-based review of relevant literature.
- 1.6 The surveys were used to answer more specific research questions which were, in the main, distinct from those addressed by the literature review. Findings from the

surveys and literature reviews have therefore been analysed and reported separately in this report. Section 1 reports on findings from the surveys. Section 2 reports on findings from the literature review. Where relevant, the conclusions and future considerations sections draw on evidence from both the surveys and the literature review.

- 1.7 The surveys targeted public sector bodies in Wales listed in the Order in Council as following the Governance Code on Public Appointments. 39 public sector bodies (including NHS bodies and advisory panels) were invited to take part in the surveys between 10 May 2023 and 7 July 2023. The first survey asked public sector bodies about their approach to collecting diversity information and 29 survey responses were received. The second survey asked Board Members questions about their characteristics to assess current levels of diversity. Responses to the second survey were received from 222 Board members spread across 30 public sector boards and Welsh Government. However, the group that responded may not be representative of all boards and this needs to be considered in interpreting the findings.
- 1.8 The overall number of board members is not readily available therefore it is not possible to determine an accurate response rate and there is a level of uncertainty as to how representative the findings are. The data should give some indication of the diversity of public sector board members. However, findings should be considered with caution as the information is provided by a volunteer sample, and some groups may be under- or overrepresented in the data.
- 1.9 The literature review explored available literature on diversity monitoring for boards and the wider workforce in public sector bodies in the UK and comparable countries.

Main findings from the surveys

To what extent is diversity data being collected on boards in Wales?

- 1.10 Of the 29 public sector bodies who responded to the survey, 8 (28%) stated that they do not collect or hold any equality data on their board members because this

information is collected and held by the public appointments team in Welsh Government for regulated appointments.

1.11 The remaining 21 public sector bodies stated that they collect and hold some equality information about their board members, with all stating that they collect and hold information on at least 3 of the equality characteristics asked about. Of these 21 public sector bodies:

- All collect information on age.
- Most collect information on ethnicity, Welsh language skills, impairment, religion or belief, sex and sexual orientation. However, there is a lack of understanding and consistency in collection of information on sex and gender.
- Just over half (11) collect data on gender identity.
- There is a lack of standardisation in how diversity data is collected and reported across different public sector bodies. This makes it difficult to report diversity information across all public sector bodies.

What were the findings regarding the current level of diversity of public sector board members?

1.12 Compared to Census 2021 population results for Wales, the survey suggests a slight under representation of Black, Asian and Minority Ethnic people (5% compared to population of 6.2%)

1.13 There was a larger under-representation of disabled people (14% compared to the general population of 21% in Census 2021).

1.14 The age distribution of Boards tends to be skewed towards older age groups with 56% of respondents aged 55 or over which compares to 35% in the general population in Census 2021.

1.15 Survey responses suggest that membership of public sector body boards is disproportionately female. 57% of Board members who responded to the Survey reported their sex as female and 42% as male. In Census 2021, 52% of the adult population in Wales reported their sex as female.

- 1.16 The survey found that 9% of those Board members that responded identified as Gay or Lesbian, Bisexual or another minority sexual orientation (LGB+). This is higher than the percentage of those identifying as LGB+ according to the 2021 Census (3%).
- 1.17 Of the respondents that answered the question on gender identity, no respondents (0%) stated that the gender they identify with is different to their sex registered at birth. This proportion is broadly comparable to figures from the 2021 Census (0.4%).
- 1.18 Compared to Census 2021 data, there was a higher proportion of Board members who identified as Christian (49% compared to 44%) and a lower proportion of Board members who reported as having no religion (39% compared to 47%). The proportion of Board members identifying with another religion (5%) was broadly similar to Census 2021 figures (4%).

What are the data challenges?

- 1.19 To successfully implement interventions which improve board and workforce diversity and the outcomes of people from minority groups high quality data is required to monitor and evaluate.
- 1.20 Boards of public sector bodies can be relatively small. This can make it difficult to draw meaningful conclusions on how representative boards are, particularly for certain characteristics. Small numbers also mean data cannot be reported publicly as it risks disclosing personal information.
- 1.21 Diversity data is not collected consistently across boards and does not use the same definitions of characteristics.

Main findings from the literature review

What are the most effective diversity data collection and monitoring methods?

- 1.22 Self-reporting staff surveys on diversity are the easiest ways to collect large amounts of diversity data.

- 1.23 It is important to measure attitudes towards inclusion in addition to diversity data.
- 1.24 It is essential to build trust to gather data from all groups, and to be transparent with how this data might be used. Using staff networks and allowing anonymity are recommended.
- 1.25 Existing administrative resources, particularly self-service HR portals, as well as employee induction are effective opportunities for data capture.
- 1.26 Results of the data collection should be publicly available for accountability reasons although disclosure must be considered.

How important is diversity in public sector board members and the workforce?

- 1.27 The more diverse a public service, the more attentive and responsive it is to the diverse needs of diverse populations.
- 1.28 In the private sector, companies with more diverse boards tend to outperform companies with more homogenous boards.
- 1.29 Diverse role models positively impact on progression throughout the organisation for groups who share characteristics with senior leaders.
- 1.30 Diverse boards have a greater problem-solving potential through a broader range of life experiences.
- 1.31 Diverse public sector bodies tend to receive a more diverse pool of applicants for positions/appointments, with greater potential for talent acquisition.
- 1.32 Diverse public sector body leadership is often able to make policy which more accurately accounts for the diverse needs of the public which it serves.
- 1.33 Diverse public sector bodies improve the experience customers from minority backgrounds have when interacting with the public sector body.

What are the barriers to diversity and strategies that could be used to increase diversity?

- 1.34 The literature suggests that a main driver for ongoing disparity in public sector bodies is a progression gap, which gets more prominent at more senior levels, linked to the recruitment style which favours certain groups.
- 1.35 The literature also suggests that Socio-Economic background may be a crucial barrier to progression in the public sector, and historical societal inequities must be considered in recruitment and promotion to create an environment of equal opportunity.
- 1.36 A lack of available data is a barrier to the implementation of effective interventions. Proper data disclosure creates accountability and can improve diversity in organisations.
- 1.37 Some private sector policies are good examples of ambitious diversity policies which have had a positive effect.
- 1.38 Sharing diversity objectives and clear accountability for senior leaders can improve diversity and representation.
- 1.39 Perception of fairness is just as important for improving diversity and inclusion as structured and implemented policies. Formally recognised staff networks and visible diverse role models can support a feeling of fairness.
- 1.40 Training is important so issues around diversity and inclusion are understood and policies are not seen as a tick box exercise. Training on unconscious bias and inclusive practices for those involved in the appointment process is important.

Conclusions and future considerations

Considerations arising from the evidence to improve and more effectively report on the diversity of public sector boards and workforces in Wales.

- 1.41 Diversity data collection exercises of public sector bodies need to be standardised and taken regularly as part of routine administrative data collections.

- 1.42 An overall picture of Public Service Board representation is not currently available in Wales on a regular basis. The regulated public appointments data held by the Public Appointments Team at Welsh Government could be explored further as a source of information.
- 1.43 Socio-Economic Background could also be considered for collection as part of diversity data as it is suggested it could be as significant a barrier as protected characteristics.
- 1.44 There are existing guidelines for diversity on boards of publicly held companies in the private sector which public sector bodies could adopt or learn from for a more ambitious diversity policy.
- 1.45 Accountability is a primary reason why disclosure is so effective as a method of improving outcomes for the diversity of an organisation. Policies are more likely to be effective if it is public knowledge who is responsible for their implementation.
- 1.46 Public disclosure of the collected diversity data, as well as any diversity targets is a important aspect of encouraging an organisation to have a culture of diversity and inclusion.
- 1.47 An organisation can improve its culture of diversity and inclusion by having policies which focus on employee welfare and wellbeing, and while these policies don't need to be targeted, it needs to be ensured that they are appropriate for all groups.
- 1.48 A perception of fairness within an organisation is important to improving diversity outcomes. Policies implemented by organisations with a perception of unfairness are unlikely to be as successful as they otherwise might be.
- 1.49 Those responsible for appointing candidates to public sector body boards may benefit from training that informs them of the 'business case' benefits of board diversity. This training could also be carried out for all recruitment panel members throughout public sector bodies.
- 1.50 The tools for high level data collection in the public sector largely already exist, and HR or online portals could be an effective tool for data collection and measurement.

1.51 In all approaches, intersectionality should be considered when designing interventions. A policy which would solve problems for one group could be ineffective, or even actively detrimental to others.

2. Background and introduction

- 2.1 The Equality Act, 2010 introduced the Public Sector Equality Duty (PSED). The aim of the PSED is to ensure that those subject to it consider advancement of equality when carrying out their day-to-day business, including developing policy, design and delivery of services and in relation to employees. In Wales, specific duties set out additional statutory requirements for public bodies to help improve performance against the PSED.
- 2.2 Ensuring representative diversity levels of public appointments is an objective for Wales set out in the “Diversity and Inclusion Strategy for Public Appointments in Wales (2020 to 2023)¹” strategy documents. Due to the role that they play in relation to guiding public services, it is important for board members to reflect diversity in Welsh society to better inform decisions ensuring all members of society are accounted for. It is suggested in some studies that high diversity levels on boards have several benefits when compared to more homogenous boards², however most of the specific board related research relates to private sector boards. A Welsh Government (2016) round table found through several different experiments that racially diverse groups outperformed non-diverse groups.
- 2.3 The Diversity and Inclusion Strategy for Public Appointments outlined goals to increase awareness of public appointment opportunities. The Government aims to improve overall participation through developing initiatives including training and shadowing opportunities for Black, Asian and Minority Ethnic people, as well as other protected characteristic groups (Welsh Government, 2020). One of the Diversity and Inclusion Strategy’s goals identified in the “Reflecting Wales in Running Wales” strategy document is to ensure that reliable qualitative and quantitative diversity data is gathered across all protected characteristic groups (Welsh Government, 2020). In 2022, commitments were set out in the Anti-racist Wales Action Plan to develop the Diversity and Inclusion strategy for public appointments through expanding the availability of opportunities for community

¹ [Reflecting Wales in Running Wales - Diversity and Inclusion Strategy for Public Appointments in Wales \(2020-2023\), Welsh Government, 2020](#)

² [Board Diversity and Effectiveness in FTSE 350 Companies, FRC, 2021](#)

leaders to be involved in policy development and decision-making in public appointments.

- 2.4 The Welsh Government's long-term aim for equality and human rights in Wales and the supporting 'National Equality Objectives 2024-2028' include goals in relation to improving representation and inclusive workplaces. The objectives link to distinct and underlying equality action plans targeted at protected characteristic groups as defined within the Equality Act 2010, and wider human rights treaties and United Nations Conventions.
- 2.5 The Anti-racist Wales Action Plan includes a goal to improve representation and development in the Leadership Chapter. The LGBTQ+ Action Plan includes a theme of 'Inclusive workplaces' as part of its vision to improve inclusion and participation for LGBTQ+ people in all areas of life. The Welsh Government plans to develop the work of the Disability Rights Taskforce into a cross-government 'Disabled People's Rights Action Plan', which aims to put the Social Model of Disability at the heart of its ambition for Wales.
- 2.6 This report presents the findings of two complementary pieces of research undertaken by the Equality, Race and Disability Evidence Units, Welsh Government. The aim of the research was to better understand approaches to monitoring diversity within public sector bodies, particularly in the Welsh context.
- 2.7 Overarching aims of the research were to:
1. Provide an indication of the diversity of public boards in Wales and explore whether public sector Board Members' diversity data is being collected effectively.
 2. Understand the value of diversity in public sector bodies, including boards and workforces.
 3. Identify barriers and appropriate strategies to increase diversity in unrepresented groups in workforces and senior management.
- 2.8 To meet the research aims, it was felt that both a survey of public sector bodies and a review of relevant literature were required. Specific research aims of the survey and literature review are outlined in more detail in sections 3 and 4 below.

3. Methodology

3.1 This section will lay out the methodology chosen for both the desk-based literature review and survey sections of the research project. It provides an explanation for the methodological decisions taken and the strengths and limitations of the findings of the report.

Surveys

3.2 Two surveys on public sector body diversity were undertaken by the Equality, Race and Disability Evidence Units in Spring/Summer 2023. The data collection targeted public sector bodies or panels that are listed in the Order in Council³ as following the Governance Code on Public Appointments and are therefore regulated by the Commissioner for Public Appointments. Between 10 May 2023 and 7 July 2023, representatives and board members from 39 regulated public sector bodies (including NHS bodies and advisory panels) and Welsh Government were invited to take part. Both surveys were conducted online using SmartSurvey.

3.3 Survey 1 focussed on the current approaches that organisations take to collect diversity information on their Board members. The survey included questions on whether organisations currently hold or collect any equality characteristic information from their board members, and if so, how this information is collected. It asked about the collection of 11 equality characteristics, including socio-economic status and Welsh language skills.

3.4 Survey 2 collected information on the equality characteristics of Board members of regulated public sector bodies and Welsh Government. The survey asked Board members about their personal characteristics, including the following:

- Ethnicity
- Whether someone is disabled
- Age
- Sex

³ [Orders in Council - Commissioner for Public Appointments](#)

- Religion or Belief
- Sexual orientation
- Gender identity

3.5 The information collected in Survey 2 builds on the work of the Commissioner for Public Appointments who produces and publishes an annual report of public appointments. This report includes diversity analysis of regulated appointees and re-appointees in the given reporting period across all UK Government departments, including data for Welsh Government appointments. The Commissioner's report sets out appointment analysis on ethnicity; disability; gender; age; sexual orientation; religion and belief; area of principal residence; principal employment; additional appointments; and political activity. The findings from Survey 2 outlined in this report however are intended to assess the diversity of current Welsh public sector body Boards as a whole, at a point in time, including both regulated and non-regulated appointments.

3.6 Responses to Survey 1 were received from 29 public sector bodies (74%). These bodies are listed in Annex A. A range of representatives completed Survey 1 on behalf of their organisation - these included:

- Board secretariats
- Chief Executives
- Welsh Government partnership/ sponsorship teams
- Corporate governance and Operations personnel
- Equality, Diversity and Inclusion Specialists
- Human Resources & Workforce managers

3.7 There were 222 responses to Survey 2 across 30 public sector bodies and the Welsh Government Board. Between 2 and 19 Board members from each public sector body completed Survey 2.

Data collection challenges

3.8 The findings from Survey 1 provide an overview of how diversity information is currently captured across Boards. They also provide insight into the challenges

associated with collecting equality data and how equality monitoring could be improved. Findings from Survey 2 provide some insight into Public Board diversity in Wales. However, limitations and challenges associated with the findings of the surveys are detailed below and should be noted.

- 3.9 The process for collecting diversity information can differ depending on the way in which a Board member is appointed and their role within the Board. This means that survey responses on how data collections are conducted may not apply across all Board member appointments. For some organisations, all or some of their Board members are appointed by Welsh Government. For such appointments, diversity information is collected on appointment to the Board and held by Welsh Government but not necessarily the Body themselves.
- 3.10 Public sector bodies do not currently collect or hold diversity information in a consistent way. This presents challenges in reporting and comparing findings across all public sector bodies.
- 3.11 Boards of public sector bodies can be relatively small. This can make it difficult to draw meaningful conclusions on how representative Boards are, particularly for certain characteristics. Small numbers also lead to the additional risk of identifying or disclosing personal characteristics about people which is a barrier in the collecting, reporting and monitoring of this information.
- 3.12 Information on the total number of board members for each public sector body is not readily available and therefore it was not possible to determine an accurate response rate for Survey 2. This introduces a level of uncertainty as to how representative the findings are.

Desk based literature review

- 3.13 An initial library search was carried out in house by Welsh Government's Knowledge and Analytical Services to explore existing evidence in relation to:
- understanding how diversity in public sector bodies is monitored,
 - whether data collection approaches are effective in the UK and other comparable countries,

- the extent to which diversity among the workforce and boards of public sector bodies can lead to meaningful change,
- identifying the barriers to appointments, retention, and promotion in public sector bodies, and how best to address the identified barriers at cultural, systemic, and physical levels for protected characteristic groups.

This initial search was followed by a Desk Based Review to interrogate and expand on this literature. The literature review also sought to identify trends in publicly listed companies and the private sector, to see what lessons can be learnt from regulations and processes which apply to these bodies.

- 3.14 A subsequent literature review was carried out as a Rapid Evidence Assessment (REA), aiming to provide a rapid synthesis of evidence currently available. This literature review is not exhaustive and therefore does not follow a full systematic review process, which would have more rigour. It is therefore recognised that an REA may be subject to greater bias than a systematic review (HM Treasury, 2020). This method of literature review was selected to meet time constraints to scope out evidence to coincide with and provide additional evidence to complement these surveys.

Structure of the literature review

- 3.15 The aims of this literature review were to understand approaches to monitoring board and workforce diversity within public sector bodies. The focus was on whether diversity data is being collected effectively, and to understand the value of diversity in public sector bodies' boards and workforces and identify appropriate strategies to increase diversity in unrepresented groups in boards, workforces and senior management.
- 3.16 The research sought to explore several research questions, which have been condensed as follows:
1. To understand how diversity in public sector bodies is monitored in England, Scotland, Northern Ireland, and comparable countries further

afield, and whether data collection approaches are effective (including in terms of consistency within and between public sector bodies).

2. To understand how and the extent to which diversity among the workforce and boards of public sector bodies can lead to meaningful change for people with protected and associated characteristics in Wales.
3. To help identify the barriers to appointments, retention, and promotion in public sector bodies (including cultural, systemic, and physical) for people with protected and associated characteristics (both within Wales and in comparable countries),
4. To identify strategies that public sector bodies in Wales can adopt to address the identified barriers at cultural, systemic, and physical levels to aid appointments, retention, and promotion to senior management for people with protected and associated characteristics.

3.17 The approach adopted to identify relevant publications relies on the use of keyword searches of a limited number of online repositories. The search for evidence took place between the 13th of February and 1st of March 2023. A range of search engines were used to search for evidence. The scope was limited to reports, reviews, journal articles, blogs, theses, and briefing papers, written in English and published between 2013 to 2023, as less recent research was not considered relevant for this review. The search strategy consisted of a combination of sets of primary key words: “workforce diversity” AND (public sector); “LGBT+ workforce” AND (public sector); BAME workforce AND (public sector); disabled AND (public sector); “workforce age” AND (public sector); monitoring AND diversity AND “public sector”; metrics AND “diverse workforce” AND (public sector) and secondary keywords for barriers, benefits, recruitment, retention, job progression and strategies.

3.18 While the search was subsequently filtered to documents published in the last ten years, some documents outside this date range have been included in the results, as they were considered relevant enough to be included. The information presented in this document should be considered in the context of the search criteria used. Seventy-three documents were identified by the literature search. While a formal

weighting system for the identified evidence has not been used in this review, in the discussion of evidence below most documents used have a Welsh or UK focus and where the focus is specifically diversity in public appointments.

3.19 The sources were then screened according to the following inclusion criteria:

- Study focus: articles with direct relevance to the research questions were retained and included in this REA. 8 sources from the literature search were sifted out.
- Age of the source: only sources from 2013 onwards were included in the report to keep information and statistics contemporary and up to date (this is not including the Carlton, 2008 source, as it contains the Diversity Delivers strategy, which is in turn referenced in the 2021 source by the Ethical Standards Commissioner). As a result 3 sources from 2011 or earlier were sifted out.
- Accessibility: only articles that were available in their full text format were included.

3.20 After the screening process of the literature, 59 sources remained. Further literature was also included that was discussed or referenced in the sources returned in the original library search.

Contextual compatibility

3.21 Much of the evidence was focused on the UK, England and Wales, or other UK nations, meaning there is a limit to the number of Wales based conclusions that can be drawn from the evidence. Some sources used in the review were based on EU countries, Australia, New Zealand, and the United States of America. However, most of the focus is on the UK and so is likely to provide a good indication of what the situation may be in Wales. Because this review is thematic in nature, not all documents that were identified in the searches are discussed. Documents with a very wide brief, or that have a focus on geographical areas other than Wales, the UK, or its constituent nations may be discussed briefly or not at all.

Methodological approaches

- 3.22 The publications adopted different methodological approaches. Broadly, the literature can be divided into publications that produced and discussed primary data, and 'discussion' pieces that drew on secondary sources as a basis for discussions. The characteristics and limitations of these publications are discussed in this chapter but should be kept in mind during the literature review findings chapter. Because of this, the review is limited in its ability to isolate the causalities of a lack of diversity in public sector bodies and/or boards.
- 3.23 Evidence that used primary data used a range of research methods in seeking to understand diversity in public sector bodies, methods of diversity measurement, the impacts of diversity on minority groups, and barriers to increasing or recording diversity. Most drew on qualitative methodologies, though some of those with higher sample sizes also adopt a quantitative approach. Many used surveys, for example, to examine the characteristics of diversity in public appointments and the patterns of diversity over time. Others used interviews with different groups of key informants to explore viewpoints, policy options, and impacts.
- 3.24 Evidence that used secondary data used resources such as administrative and market research data, or Census, employment, and labour market statistics. The latter category of publications tended to draw on secondary data or present existing discussions of academic and grey publications on the issue.
- 3.25 It is noted that of the evidence used, there were no large-scale comparisons of methodology where the data was provided on a granular level. While the literature contains large scale reviews covering a high sample size of organisations and their approaches, the information is a summary of the approaches, and the conclusions derived from many of these sources are second hand. In addition to this, conclusions have been drawn from a subjective summary of the many individual data collection interventions reviewed as part of the report.
- 3.26 The literature review should be considered as offering a firm indication of the extent and nature of the evidence base, particularly within a Welsh and UK context.

However, it should not be seen to be a definitive statement in relation to the evidence base on diversity in public sector bodies and their workforces.

4. Survey findings

This section presents findings from the two surveys. The aim of the surveys was to ascertain what diversity information is collected and held by public sector bodies in Wales and assess the current diversity of public sector body Boards.

Survey 1 findings

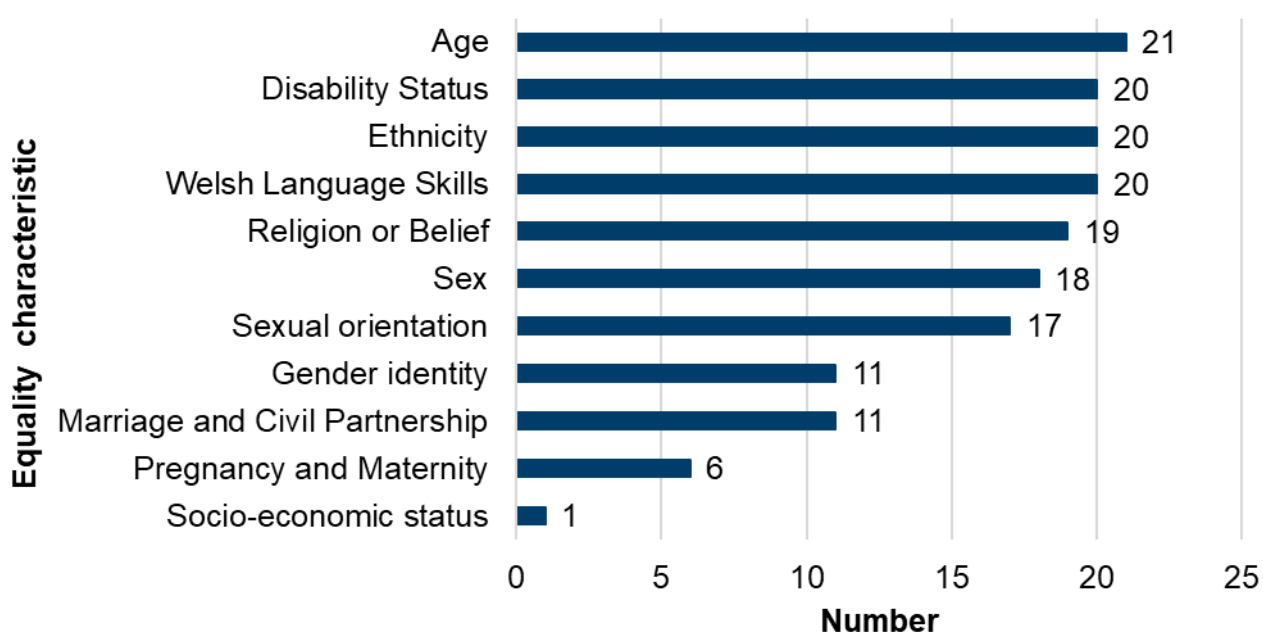
What type of diversity information on board members is collected or held?

- 4.1 The findings presented here provide an overview of how diversity information on Board members is currently collected across regulated public sector bodies. Figures should not be taken out of context or used without referencing the data quality caveats.
- 4.2 Of the 29 public sector bodies who responded to the survey, 8 (28%) stated that they do not collect or hold any equality data on their Board members because this information is collected and held by the public appointments team in Welsh Government for regulated appointments.
- 4.3 The remaining 21 public sector bodies stated that they collect and hold some equality information about their Board members, with all stating that they collect and hold information on at least 3 of the equality characteristics asked about.
- 4.4 As shown in Figure 1, of the 21 public sector bodies who collect some equality characteristic information on their board members:
- All 21 of the public sector bodies collect information on age
 - 20 (95.24%) of the public sector bodies collect data on ethnicity, Welsh Language skills and whether board members are disabled or not
 - 19 (over 90%) of the public sector bodies collect data on Religion or Belief
 - 18 public sector bodies collect information on sex. However, it is important to note that some open responses suggest conflation between sex and gender whereby information for these separate characteristics is collected interchangeably using the same question. This implies uncertainty in how sex and gender identity

information is defined and inconsistency in how this information is captured across public sector bodies.

- 17 public sector bodies collect information on sexual orientation.
- Just over half (11) of public sector bodies collect data on gender identity and Marriage and Civil Partnership.
- 6 public sector bodies collect board member information on Pregnancy and Maternity if applicable.
- 1 public sector body stated that they collect some socio-economic status information through members' biographies. However, there is no evidence that any organisations were using the government analysis function's harmonised standard for socio-economic background.

Figure 1: The number of responding Welsh Public Sector Bodies that collect board member information on each equality characteristic according to Survey



Description of Figure 1: A horizontal bar chart showing the number of Public Sector Bodies, out of the 21 that responded, who collect information on each equality characteristic.

Source: Equality, Race and Disability Disparity Evidence Units, Survey, Welsh Government

- 4.5 Survey 1 also provides insight into the range of equality characteristic information collected by each public sector body. Of the 21 public sector bodies who responded to the survey and collect some equality characteristic information on their board members, only 3 (14%) stated that they collect information on all 9 protected characteristics as described under the [Equality Act 2010](#). These public sector bodies also collect Welsh Language skills information. A further 4 public sector bodies stated that they collect information on 8 protected characteristics, with information on either gender identity⁴ or pregnancy and maternity being omitted. 12 public sector bodies stated that they collect information on 6 or 7 of the equality characteristics included in the survey. 2 public sector bodies stated that they collect information on less than 5 equality characteristics.

How is the data collected?

- 4.6 In response to an open question on how equality data is collected, some respondents described or shared the form their organisation uses to collect equality information from their board members. Others outlined the form issued to board members by the Welsh Government's Public Appointments Team as part of the process for regulated appointments.
- 4.7 An analysis of open responses was conducted and shows that, although there is some consistency across Bodies in the way in which equality information is captured, the wording of questions and response options or categories vary across data collections and in how well they correspond to the [Government Analysis functions harmonised standards](#).
- 4.8 To collect information on age, most organisations stated that their data collection forms included age category options or a question asking respondents to state their date of birth. There were varied responses regarding which age groupings are used.

⁴ The protected characteristic in question is 'gender reassignment' so questions around gender identity are covered under 'protected and associated characteristics'.

- 4.9 Most organisations stated that the five high-level ethnicity groupings of White, Mixed/ Multiple ethnic groups, Asian/ Asian British/ Asian Welsh, Black/ African/ Caribbean/ Black British/ Black Welsh and Other ethnic group were used to collect ethnicity data. Some also stated that they include a prefer not to say option and the opportunity for respondents to self-describe their ethnicity. A small number of public sector bodies stated that more granular ethnic group categories were included in their response options.
- 4.10 Similarly, most respondents stated that data on religion and belief, sexual orientation and marriage and civil partnership is collected by asking board members to select from a list of options. Options commonly provided for each characteristic are listed below:
- Religion and belief: No religion, Christian (all denominations), Buddhist, Hindu, Jewish, Muslim, Sikh, any other religion. Response options often include prefer not to say (some data collections also include other religion or belief categories).
 - Sexual orientation: Heterosexual/ Straight, Gay/Lesbian, Bisexual, Other and prefer not to say. Some respondents stated that there was also a self-description option.
 - Marriage and Civil Partnership: single, married, civil partnership, separated, divorced/ legally dissolved, widowed, other
- 4.11 Data on whether board members are disabled or not is often captured on appointment for diversity monitoring purposes as well as to identify any additional working requirements or reasonable adjustments, such as access requirements.
- 4.12 Questions are commonly based on the Equality Act 2010 which defines disability as “a physical or mental impairment which has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities”. However, the diversity monitoring form issued by the Public Appointments team in Welsh Government for regulated appointments acknowledges the social model of disability. The social model states that disabled people are not disabled by their impairment or health condition but by policies, processes and environments which

may not be accessible to them. For regulated appointments, the question is ‘do you consider yourself to meet either the social definition of disability which the Welsh Government uses and/or the definition in the Equality Act 2010?’ with a ‘yes’ or ‘no’ response option.

- 4.13 Responses to the survey suggest a lack of consistency in how sex and gender identity data is collected as well as some conflation of these separate characteristics. However, there is also evidence that some diversity monitoring forms follow the Government Analysis Functions harmonised standards guidance for reporting on [Sex and gender](#) and [Gender identity](#). To measure gender identity, some data collections ask, ‘Is the gender you identify with the same as your sex registered at birth?’ with response options, ‘yes’, ‘no’ and ‘prefer not to say’. Some data collections also provide respondents with an option to write in their gender identity. Other data collections ask about respondents ‘trans status’ for example, ‘Do you or have you ever identified as trans or transgender?’
- 4.14 Some responses described the Welsh Language Skills question as covering the level attained across the categories of speaking / listening, writing and reading. Multiple respondents mentioned a 0 to 5 level system to score Welsh language ability.
- 4.15 Pregnancy and maternity information are sometimes collected as part of standard HR processes such as applying for maternity leave.
- 4.16 Over half of public sector bodies stated that equality data is collected on appointment to the board and then on an ad-hoc basis. A further 6 public sector bodies stated that this is collected on appointment to the board only. Equality data for regulated appointments is obtained on appointment to a board and is held by the Public Appointments Team in Welsh Government.

How is the data used?

- 4.17 In terms of how equality data is used, diversity information on regulated appointments is collected by the Public Appointments Team in Welsh Government. This data collection is undertaken to ensure compliance with the principles and governance code set out by the Commissioner for Public Appointments. The

principles state that public appointments should reflect the diversity of the society in which we live, and appointments should be made taking account of the need to appoint boards which include a balance of skills and backgrounds. The Commissioner for Public Appointments publishes an [annual report](#) reporting on the overall state of public appointments covered by the Order in Council, which includes statistical information on progress regarding increasing diversity.

- 4.18 Some open responses stated that equality data collected is used to inform monitoring equality reports and to inform strategic equality and/or workforce planning and strategy. It must be noted that some board members (e.g. executive directors) are also a part of the wider workforce and so their data may be collected in this capacity rather than to inform diversity monitoring of an organisation's board. A few responses in the survey also mentioned the use of collecting this data for the purpose of identifying and implementing reasonable adjustments.

Survey 2 findings - Equality characteristics of board members

- 4.19 There were 222 board member responses to Survey 2 across 30 public sector bodies and Welsh Government. The points below summarise the equality characteristics of board members who responded to the survey. The figures give insight into the diversity of boards across public sector bodies regulated by the Commissioner for Public Appointments. The purpose of this survey was not to report on how diverse individual boards are but to begin to understand how diversity of Welsh boards might be captured and reported on.
- 4.20 The survey findings should be considered with caution as responses are based on a volunteer sample of board members. This means that some groups may be under- or over-represented in the data and therefore findings may not fully represent the true composition of boards. In the analysis below, the survey findings are compared with Census 2021 population data. They are also compared with the figures published in the [2021 to 2022 Commissioner for Public Appointments annual report](#) on the characteristics of regulated appointees and re-appointees to Welsh Government public sector bodies for the given period.

- 4.21 94% of responding board members reported being in the White ethnic group, which is equivalent to the adult, white population in Wales according to Census 2021. 96% of the White high-level group identified as Welsh/English/Scottish/Northern Irish/British. 5% of responding board members were from an ethnic minority. The 2021 to 2022 Commissioner for Public Appointments report states around 13% of Welsh regulated appointees and re-appointees were from an ethnic minority group. However, trend data shows that this figure can vary quite considerably year on year. It is not possible to report on more granular ethnicity here due to small sample sizes, even when aggregated across all responding public sector bodies and Welsh Government.
- 4.22 14% of board members reported that they consider themselves to meet either the Social Model definition of disability and/or the definition as set out in the Equality Act 2010. This is lower than the proportion of the population aged 16 and over in Wales who reported being disabled under the Equality Act 2010 in the Census 2021 (21%). It's also slightly lower than the proportion reported in the 2021 to 2022 Commissioner for Public Appointments report (18%). 3% of responding board members preferred not to answer the question on disability.
- 4.23 The findings show that the age distribution of boards tends to be skewed towards older age groups. Over half (56%) of responding board members were aged 55 or over, which is close to the proportion reported in the Commissioners 2021 to 2022 report. According to Census 2021, 36% of the adult population in Wales were aged 55 and over. 24% of responding board members were aged between 45 and 54, which is lower than the figure reported in the 2021 to 2022 Commissioners report at 28% but higher than the proportion of adults in Wales in this age cohort according to Census 2021 (13%). 19% of responding board members were aged 65 or over which is higher than the figure reported in the 2021 to 2022 Commissioners report (12%), but lower than the proportion of the adult population in Wales over the age of 65 (22% in Census 2021). 17% of board members in the survey were between the ages of 16 and 44, which is substantially lower than the proportion of the adult population in Wales in this age cohort at 34% (Census 2021). 3% of survey respondents preferred not to answer this question.

- 4.24 According to the survey, more respondents identified as female than male. 57% of board members who responded to the survey reported their sex as female and 42% as male. This is comparable to how Sex is split according to the 2021 to 2022 Commissioner's report. In Census 2021, 52% of the adult population in Wales reported their sex as female.
- 4.25 49% of board members who answered the question on religion in the survey stated that their religion was Christian. This is higher than the proportion of adults reporting as Christian in Census 2021 (44%) and lower than the proportion reported in the 2021 to 2022 Commissioner's report (57%). 39% of board members who responded to this question had no religion, a higher figure than that reported in the 2021 to 2022 Commissioners report (32%), but lower than that reported in Census 2021 for the overall population (47%). Due to small sample numbers, it is not possible to report on specific religions other than Christian, so responses for other religions including Buddhist, Hindu, Jewish, Muslim, Sikh and other religion/ belief have been combined. 5% of responding board members stated that their religion was a religion other than Christian. This is slightly higher than the equivalent Census 2021 figure (4%) but lower than the figure reported in the 2021 to 2022 Commissioners report (11%). 7% of survey respondents preferred not to answer the question on religion, which is slightly higher than the percentage of those who did not answer the question on religion in Census 2021 (6%).
- 4.26 85% of those who responded to the question on sexual orientation described themselves as Heterosexual or straight which is lower than that reported in the 2021 to 2022 Commissioners report (91%) and lower than the overall adult population in Census 2021 (89%). Due to small numbers, Lesbian or Gay, Bisexual and other minority sexual orientation responses were aggregated together into an LGB+ group. The survey found that 9% of those who responded identified as being within the LGB+ group. This is the same as the figure reported in the 2021 to 2022 Commissioners report (9%) but higher than the percentage of those identifying as within the LGB+ group in Census 2021 (3% of adults). 5% of those who responded to the Survey preferred not to answer the question on sexual orientation. This is

slightly lower than the percentage of the overall Wales population who did not answer the Census 2021 question (8% of adults).

- 4.27 Of those who responded to the question 'Is the gender you identify with the same as your sex registered at birth?', all respondents stated that the gender they identify with is the same as their sex registered at birth. No respondents answered 'no' to the question. 5% of those who responded to the survey preferred not to answer this question. In Census 2021 and including those that did not answer the question, 93% of the adult population responded 'yes' to this question on gender identity and 0.4% responded 'no'. 6% of the adult population did not answer this question.

5. Findings from the desk-based literature review

The aim of the literature review was to review the available evidence on how diversity is monitored across the UK and internationally, the value of diversity and the barriers and potential solutions to improving equalities data.

How is diversity in public sector bodies monitored elsewhere?

In summary, the literature had several examples of data monitoring and collection in the UK countries, and comparable countries further afield, with those most frequently appearing in the body of literature being:

- (i) Self-reporting staff surveys on diversity are the easiest and least controversial way to collect large amounts of diversity data, though this is not the only option, and may provide an incomplete picture.
- (ii) It is important to measure attitudes around inclusion in addition to diversity data.
- (iii) It is essential to build trust to gather data from all groups, and to be transparent with how this data might be used. Using staff networks and allowing anonymity are recommended.
- (iv) Existing administrative resources, particularly self-service HR portals, as well as employee induction are effective opportunities for data capture.
- (v) Data must be collected on all protected characteristics, ideally from the same source/surveys, so that the data can be analysed intersectionally. Ideally this should be in conjunction with a wide range of additional variables including pay, seniority level, training opportunities and appraisals etc.
- (vi) Results of the data collection should be publicly available for accountability reasons.
- (vii) The section also contains specific methods for data collection/question wording, for which more detail is provided in the body of text

Self selection approaches

- 5.1 Broadly the literature reviewed suggests that most diversity monitoring in public sector bodies and other enterprises is done via self-reporting staff surveys, for which specific examples will be provided throughout this section. This is consistent

with the findings of the surveys described in Section 3 of this report. To a lesser extent, diversity is monitored through administrative data, though in many cases the origin of this data is also via self-reported staff documentation (particularly in the case of ethnicity). While the literature on what an organisation should do to monitor diversity seems to be well published, specific methods for how an organisation would go about this are not so broadly reported on.

- 5.2 The literature also discussed ways in which these staff surveys have increased their response rate, and techniques which are described in the literature as having the effect of improving the quality/quantity of diversity monitoring data. There are issues with providing a full picture of methods for diversity monitoring. As noted in an international review by UK Research and Innovation (Moody & Aldercotte, 2019), several of the studies reviewed as part of this did not provide sufficient detail to fully determine their methodology when sharing findings.
- 5.3 A study from the International Labour Organisation⁵ suggests that an effective, meaningful measure of diversity in an organisation, measuring both diversity and its benefits, uses a framework measuring:

“the degree to which employees say they feel included at work; the extent to which employees feel, (1) respected for who they are and the skills and experience they bring and experience a sense of belonging at work, (2) supported to perform well in their roles, and (3) rewarded and developed at work, all in an environment that supports equal opportunity and treatment; and the extent to which employees experience the positive benefits of inclusion referred to in the wider literature as potentially making a significant contribution to overall business performance.”

This Diversity and inclusion survey, covering 75 countries and over 12,000 participants, was conducted through third party firm PricewaterhouseCoopers (PwC) and utilised online survey platforms distributed to subjects via: PwC network and other channels; National employer and business membership organisations; and Local chapters of the ILO Global Business and Disability Network. The survey

⁵ [Transforming enterprises through diversity and inclusion, International Labour Organization, 2022](#)

was a multiple choice set question quantitative survey containing opinion and identifier questions. Specific questions were associated with feelings of inclusion and the level of agreement with these statements was offered on a graded scale. The response rate is not recorded, but it is noted in the paper that respondents in diverse groups reported feeling higher levels of inclusion in organisations which had representation of minority groups in senior leadership and management⁶. The study also qualifies that “results need to be analysed across diverse groups and hierarchical levels to gain a complete picture of how inclusion is experienced within enterprises.”

- 5.4 The New Zealand Government conducted a piece of research to assess New Zealand (NZ) public service workforce data using administrative data in the form of employee payroll data. The data from the employee payroll which contained some information on protected characteristics was supplemented with workforce surveys as part of an integrated data infrastructure⁷. These surveys include the Human Rights Commission, Workplace Dynamics Survey 2016, and NZ’s 2013 Disability Survey. It is noted that these surveys are not fully up to date for the 2018 overall piece of work. The time required to aggregate multiple data sets can lead to publications being unable to report on the most up to date data. To better access data from minority groups, the NZ State Services Commission (SSC) is working with minority groups to develop surveys targeting those groups as respondents. For example, SSC aimed to work with LGBTQ+ communities on developing a survey to measure gender and sexual diversity in the public service, and to measure aspects of inclusiveness within the Public Service for LGBTQ+ communities. Stats NZ also made note of some difficulties in collecting data without a standard and has created a new standard and accompanying guidance to improve the quality, ease and standardisation of the collection of this data. An example of this standardisation is the expectation that Public Service agencies shift to collecting information on what gender their employees identify with rather than biological sex.

⁶ In the source material, the phrase minoritized groups is used to refer to groups that are not dominant socially, economically, or politically or are numerically under-represented in your workplace or in society.

⁷ [Public service workforce data 2018, State Services Commission \(New Zealand\), 2018](#)

5.5 The McGregor-Smith Review (2018) on race in the workplace in the UK suggests that important aspects of data gathering are “setting, then publishing aspirational targets”; “publishing data to show how they [organisations] are progressing”; and “doing more to encourage employees to disclose their ethnicity”. The justification for this is the idea that “making this information public will motivate organisations to tackle this issue with the determination and sense of urgency it deserves.” While the review does not focus primarily on the specifics of how data should be collected, it stresses the importance of determining the current baseline picture of diversity statistics to make measurable targets for 5-year windows. It also stresses the importance of being “open with their staff about what they are trying to achieve and how they are performing” to increase participation and investment. The review provides several examples of organisations undertaking diversity best practice in the view of the authors. Common themes of recommendations for data collection across the case studies are: anonymity, inclusion of minority group staff networks in the process, a focus on ensuring talent pipelines are captured in the data, and capturing data at the recruitment/appointment phase to monitor progress.

5.6 The Equality Framework for Local Government is a document intended to help UK councils to, among other objectives (Local Government Association, 2021):

- Employ a workforce that reflects the diversity of the area they are serving,
- Provide equality of opportunity for all staff,
- and meet the requirements of the Public Sector Equality Duty and support any aspirations to exceed these.

The framework sets out the following examples of excellence in collecting, analysing and publishing workforce data: “Workforce data includes a wide range of information and protected characteristic profiles including pay levels, training opportunities, appraisal ratings. Sufficient information exists about staff to inform robust equality analysis. The organisation considers and is addressing pay gaps across other areas of inequality such as religion and belief/ age, LGBT+ etc. The organisation understands the effects of employment policy and practice on its workforce. The organisation has sufficient information about staff to inform robust

equality analysis. The workforce profile is updated regularly. It is possible to analyse data by all the protected characteristics whilst ensuring that there are appropriate safeguards in place to protect from any risk of personal identification.”

- 5.7 The source does not contain specific methods for achieving this excellence in all areas. It does state the importance of initiatives to encourage an increase of disclosure of equality information by staff, the systematic collection of data of those joining the organisation, and the progression of protected groups through the organisational hierarchy being monitored and reported on.
- 5.8 As per the OECD 2022 annual EDI report⁸, the OECD notes its use of relevant internal sources to track its own workforce diversity, such as representation indexes and staff surveys, as well as external benchmarking and assessments. The OECD conducts several staff surveys collecting different aspects of workforce diversity data, including:
- their teams through inclusive practices, and tracking perceptions as to whether An “Upward Feedback” survey designed to provide all OECD managers with constructive and anonymous feedback on topics including their ability to drive diversity and lead Directorates’ activities support a diverse workplace through all staff survey;
 - A survey of members of the OECD Women’s Network to grasp how the Network can best remain fit-for-purpose;
 - An “Intern Focused” survey to assess the degree to which an intern’s background and identity influence their experience at the OECD;
 - and a survey of Temporary Staff Networks.

The surveys each gathered some or all the following information:

- disaggregated data on gender and transgender identity,
- sexual orientation,
- nationality,
- race,

⁸ Annual diversity and Inclusion report, OECD, 2022

- disability,
- religion,
- first-generation college graduate status,
- and tracking diversity in OECD Learning and Development activities.

Interns also shared their perspectives on the OECD's commitment to Diversity and Inclusion. There is a focus on gathering workforce protected characteristics and views and perspectives, so quantitative analysis (for example pay gaps or management grade analysis) and qualitative analysis (monitoring feelings of inclusion) can be carried out.

5.9 The OECD also takes part in the independently examined and externally audited 'Economic Dividends for Gender Equality' (EDGE) independent benchmarking exercise, reviewed in this instance by third party Intertek. The report argues that external accreditation enables the organisation "to drive real progress towards building a more diverse and inclusive workforce and culture, by using a multidimensional approach to a wider diversity measurement and strategy." Then EDGE certification requires four elements, which are reviewed through qualitative and quantitative analysis:

1. **Representation:** measuring the gender balance at all levels of the Organisation.
2. **Policies and practices:** assessing whether our policies and practices framework ensures equitable career opportunities for both women and men
3. **Pay equity:** conducting a gender pay gap analysis according to the EDGE standard.
4. **Staff survey:** capturing employee perspectives."

5.10 Broadly the literature reviewed as part of this REA appears to agree that accountability and disclosure in relation to diversity and associated targets leads to positive diversity developments. The report also specifically credits the publishing of diversity and inclusion reports externally, sharing the staff profile statistics with the Executive Committee and Council, and quarterly tracking and reporting to Executive Committee on Senior Recruitments as highlights of workforce analytics initiatives which have shown progress towards achieving targets.

- 5.11 The data informing the USA based MissionSquare Research Institute's (MSRI) study on diversity⁹, equity, and inclusion in the US public service workforce uses data derived primarily from the MSRI State and Local Workforce survey, which surveyed 249 human resource managers on diversity topics including the perceived progression of different generations, genders, and ethnicities within the workforce, and the change in composition of the workforce concerning these groupings. While the outsourcing of diversity data collection in this way is something the Welsh Government could consider for its diversity monitoring purposes, it is noted that the source for the EDI portion of the survey draws on information from two further workforce surveys (one quantitative and one qualitative), the data in which is self-reported from the workforce. Therefore, this outsourced method may necessitate the design of further staff survey data collection regardless.
- 5.12 An example of qualitative research in UK public sector bodies into diversity is the Ethnic Dimension report on: 'Identifying and Removing Barriers to Talented Black, Asian, and Minority Ethnicity Staff Progression in the Civil Service'. The survey respondents included those across all grades from lower levels to the senior civil service, however with 75% of the staff based in London, due to local demographic differences is not fully representative of the UK population spread. The study consisted of face-to-face interviews, small focus groups, telephone interviews, and emailed responses. The research appears to be a qualified representative survey, as "the sample size, in qualitative terms, is robust" however it has been stated that "Whilst this is a significant sample size in research terms, the insights may not necessarily reflect those of civil service Black, Asian, and Minority Ethnicity staff as a whole." While the survey collects meaningful lived experiences from civil servants of a minority ethnicity, the report again gets its raw figures on diversity monitoring data from the 'ONS Civil Service Statistics', which draws its diversity data from a self-reporting survey. Due to the personal nature of identity, self-reporting survey data is a necessary part of any data collection project. The report mentions the 'Civil Service People Survey', which the Welsh Government already participates in, as a

⁹ [Diversity, equity, and inclusion in the public service workforce, Young, G., 2021](#)

useful ‘dip stick’ into the attitudes and work experiences of staff across the organisation.

- 5.13 While many sources provided general strategies for collecting data on diversity, there is also a body of sources with specific instruction for how to structure staff surveys to collect data on specific characteristics. The Equality and Human Rights Commission (2023) uses the 2011 Census categories when tracking diversity data on protected characteristics in their own organisation, as well as tracking the carer status of its employees. Declaration rates are calculated against payroll headcount, to determine whether specific data are significantly non-disclosive and have a high enough sample size to be useable. The report compares protected characteristic data against pay, position, progression, recruitment, leavers, sickness, and part time working. The non-protected-characteristic data is collected from admin sources and a staff survey. The report also analyses data trends over the past five years, but this presents some problems as the report has been recently updated to account for Census category changes, though it has not been stated how these data sets were compared. It is noted in the DAISY Guidance (Molyneaux, 2020)¹⁰ that it is necessary that “if you aim to benchmark against other statistics (e.g. census data), you need to find out how the questions were asked to develop these statistics and ask your questions in a comparable way. Small changes in the way questions are asked can lead to substantial differences in reporting rates,” which the guidance states is particularly true in questions on disability, depending on how impairment type/severity is described in the question.
- 5.14 A review of data collection via HR systems in Scottish colleges (ECU, 2017) found “inconsistencies in how questions were asked and the response options provided within Scotland’s college sector.” The report found that while ethnicity questions typically followed the question wording and response options in the UK censuses, this level of consistency was not found in questions about disability, gender identity and reassignment, and religion or belief. These differences hampered attempts to compare data across Scotland’s college sector (Guyan & Oloyede, 2019).

¹⁰ Diversity and Inclusion Survey (DAISY) question guidance, Dr Emma Molyneaux, Wellcome Trust, 2020

- 5.15 One method suggested in the literature is the use of existing administrative systems and technology for data collection beyond their original purpose. PricewaterhouseCoopers (2021)¹¹ recommends in their guide to diversity data that for organisations with a single HR system in place with self-service capability that this may be the best option. The guide stresses that when setting up a diversity data collection in this way, it is important to perform a review of permissibility of the proposed approach, and a detailed legal and privacy analysis to ensure that data is appropriately used and protected. The Ministry of Justice (2020)¹² has used this approach for their workforce monitoring reports, using data from their HR systems to map diversity data. Most of the data comes from a single HR system, but in some cases, data are drawn from different sources and linked to the internal HR system to ensure a consistent base population. However, it is noted that the HR system approach is more a change of practical approach than methodology, as in the case of the MoJ, the data still relies on self-reporting, and it is acknowledged in the MoJ report that HR data are unlikely to be precisely accurate for this reason. One institution in Scotland has made it so that updating diversity information on a secure HR portal is a mandatory precondition to viewing payslips online, while others have sent reminders to fill data in voluntarily with online payslips. Both methods improved response rates as opposed to institutions that did not implement these measures. It is also noted that new staff were more willing to disclose equality monitoring data to HR system collection methods than existing staff, particularly during the recruitment process (Guyan & Oloyede, 2019).
- 5.16 The Social Mobility Commission provides a toolkit for assessing the socio-economic background of members of the workforce¹³, using the questions: “What was the occupation of your main household earner when you were about aged 14?”; “Which type of school did you attend for the most time between the ages of 11 and 16?”; “If you finished school after 1980, were you eligible for free school meals at any point during your school years?”; and a further optional “Did either of your parents attend

¹¹ [Diversity Data Guide: Collecting and analysing data on the inclusion and diversity of your workforce, PricewaterhouseCoopers, & Bennett, K. & Buwanabala J., 2021](#)

¹² [Workforce Monitoring Report 2019/20, Ministry of Justice, 2021](#)

¹³ [Socio-economic diversity and inclusion: employers' toolkit, Social Mobility Commission, 2023](#)

university and gain a degree (e.g. BA/BSc or equivalent) by the time you were 18?”. The toolkit also provides information on the justification for the questions recommended, and provides insight on how they should be analysed, both individually and in an intersectional way. The toolkit stresses the importance of the collection of data that can be used longitudinally. The tool appears straightforward, and the questions could be used in a Welsh Government context to map any socio-economic background relevant inequalities that may exist. The Commission also recommends that annualization of the survey and data collection that allows a breakdown via grade/position/seniority will allow a true measure of social mobility within an organisation, measuring not just who can get in the organisation, but who can get on in the organisation. The also report states methods to increase participation in the self-reporting survey which, in broad agreement with the wider literature reviewed, largely centres on transparency and trust building as a pathway to increased response rates. Additionally, KPMG and the UK civil service largely followed these principles in conducting their Socio-economic gap research into the diversity data of their own workforces.

Novel approaches

- 5.17 A tool for gender disparity benchmarking identified within the literature is CivicPulse, which is used in the USA based ‘Local Government Diversity Dashboard’ (LGDD), DiversityDashboard.org¹⁴. CivicPulse’s methodology takes a novel approach to determine diversity information when it is not actively collected in the first instance. By using a comprehensive database/contact list of top appointed officials and de-identified data from the Social Security baby name data, researchers were able to “compute the probability that each appointed official’s first name had historically been associated with a man or a woman. Each record that could be coded with greater than 97% confidence was assigned a gender. This tool then aggregates this data to the state and region levels for each year, from 2013 to 2022. This approach allows the linking of health data with sex assigned at birth, if it has not been collected as part of a staff survey/ during employment and is not explicitly published.

¹⁴ New Benchmarking Tool and Report Reveals Widespread Gender Gap in Local Government Leadership, Local Diversity Dashboard, 2022

This approach appears to be broadly effective for measuring the gender diversity of local government, and therefore potentially public sector bodies, but it is noted that there is the potential for conflation of sex and gender with the approach, and the approach would not be useable for assessing other protected characteristics like LGBTQ+ identity or disability, and would require theoretical assumptions on the link between culture/religion and ethnicity to use for ethnicity mapping. Using such strong assumptions may not be considered appropriate.

- 5.18 Additional methods of identification for collection of diversity data beyond self-selection are outline in the OECD report on Diversity statistics. In this Report Balestra and Fleischer (2018) outline several novel approaches. Identification by community members, whereby individuals are considered as part of a group if they are recognised as such by members of the same group, is considered a less controversial method of non-self-selection. It is noted that this method could be more effective than self-selection in certain circumstances, including in scenarios where acceptance by the community matters for shaping someone's ethnic identity.
- 5.19 The OECD report¹⁵ makes a case for identification by a third party (other than community members) based on visual observation. It is noted that this is often considered the most controversial method for collecting data on ethnic and racial backgrounds, as it relies on the assumptions, evaluations or estimates of another party, and that there is often a mismatch between self or next-of-kin identification and third-party identification. The report though argues that this is a strength of the method, as opposed to a weakness. This is because discrimination is often based on how a victim is perceived by others, as opposed to how they self-identify, therefore diversity data seeking to address discrimination paints an incomplete picture without the perception of others accounted for. A third option is a self-selection option which asks a question not currently asked in UK diversity surveys, which is the reflected or perceived identity of the person. It is described as a "method [which] asks respondents not only about their identity but also about which ethnicity others might attribute to them (Roth, 2016). This is an important aspect of

¹⁵ [Diversity statistics in the OECD: How do OECD countries collect data on ethnic, racial and indigenous identity?, OECD, 2018](#) page 29

perceived discrimination, but only employed by Mexico in official statistics (2018).” This occupies a similar space to the previous method in filling out a wider data picture of discrimination and equality.

- 5.20 The literature largely suggests that a quantitative approach is likely to provide the most useful data to inform diversity disparities. The Welcome Trust (2017) literature review found that many EDI metrics were based at the individual level rather than the organisational or structural level. In this way, data derived was not easily useable for “appropriate measurements for multiple dimensions or intersecting dimensions of inequality” (Moody & Aldercotte, 2019)¹⁶. This is referred to in a study as “composite metrics”, described as collecting and presenting data where a person’s identity was represented across multiple characteristics simultaneously, which would allow organisations to prevent equalities effort being siloed by looking at individual protected and associated characteristics rather than “the magnitude and proportion of race and ethnicity” (McLaughlin, McLaughlin and McLaughlin, 2015). As part of the same review, it was also determined that broadly there is a gap in longitudinal analysis, in addition to data sets that are focussed on an aggregate and organisational level, as opposed to the individual level most of the work is focussed on.
- 5.21 PwC (2021) also states in their diversity data guide “Collecting and analysing data on the inclusion and diversity of your workforce” that “given the potential complexity of collecting diversity data and the multitude of external and internal stakeholders, it is important that it is not seen purely as a HR initiative.” It stresses the importance of organisation-wide buy in, and suggests the formation of a working group or committee comprised of some or all of the following stakeholders: Leadership, HR, HR systems/Information Technology, Legal and Compliance Teams, Communications Teams, Employee Networks, Employees, External Advisors, and Union Representatives. The expectation is that a diverse range of skillsets increases the likelihood that the research is carried out effectively and that there is high buy-in throughout the organisation. It is noted that algorithms, bots, and AI logic models can be discriminatory unless personal data such as protected

¹⁶ [Equality, diversity and inclusion in research and innovation: international review, Moody & Aldercotte, 2019](#)

characteristics are already gathered and used in the model building process (Zliobaite, 2016). Such models should not be used in the initiation of data collection where such data sets do not already exist to avoid algorithmic biases.

5.22 It is mentioned many times in the literature that effective diversity data collection requires buy-in and trust from those whose data you aim to collect. This is because diversity data is almost always collected on a voluntary basis through self-identification. PwC (2021) states in their guide that it is essential to have a clear communication strategy from the outset for the success of the research. This strategy must include identifying key stakeholders and building trust with employees. The strongest recommendation in the review appears to be concerted collaboration with employee networks. Additionally, the OECD report on diversity data (2018) highlighted the UK Race Disparity Unit's Ethnicity Facts and Figures data portal as an example of the disclosure of "uncomfortable truths" which elicited several positive policy interventions in response, highlighting the importance of publication in the process of diversity data research. Notably, a civil service report on barriers for Black, Asian and minority ethnicity employees, an NHS report on attracting, retaining and supporting a diverse workforce, and a report on international EDI innovation all recommend the inclusion of staff diversity networks in the data collection design/process.

Riddell (2021) states that the current process of public sector bodies collecting diversity data in the UK public sector is open to human error, and some departments struggle to share and collect valid data from new appointees and re-appointees – resulting in a lack of strategic insight. Furthermore, Cabinet Office (2022)¹⁷ present data acquired from the government department discussed in the report which is collated manually. Despite quality assurance efforts, the risk of errors and omissions must be considered. In future, to minimise the risk associated with manual inputting, the Cabinet Office are working on the development of an online application centre with an improved website to add features that will help with data collection (Cabinet Office, 2021; Cabinet Office, 2020).

¹⁷ Annex B.

- 5.23 The first goal in The Welsh Government's (2020) 'Reflecting Wales in Running Wales' strategy is to gather and share data, broken down by key characteristics and applied to all levels: boards, appointments, retention and what the experience is of being on these boards once appointed. Improving existing qualitative and quantitative data will assist in identifying what is currently working, what is not, which goals need to be set, and how the success of these goals could be monitored. The strategy states that reviewing and improving existing systems of data collections is essential for better data sharing and gathering. Recognising the challenges existing within the Welsh Government's 'Appoint' HR system, the strategy states improving confidence in reporting will establish greater outcomes from all groups. It states that not enough reassurance is currently being given to employees about what data is used for. This lack of transparency is limiting to the Welsh Government in terms of accessing data to effectively monitor diversity levels.
- 5.24 Bird (2019) researched the UK Statistics Authority and Commissioner for Public Appointment's annual report to assess the strength of reporting and overall diversity across boards. She identified issues in gender reporting, specifically the lack of reporting on the gender diversity of applicants and appointees, even though data should be available as applicants should be being asked diversity monitoring questions. Bird (2019) also noted that due to the way the information has been recorded, it is not possible to analyse paired characteristics.
- 5.25 Lord Holmes (2018) discussed the current method of data collection on disabled public appointees, and some of the reasons why this can be an issue. Existing data on disabled public appointees is collected at application through a diversity monitoring form. He found that reporting rates improved in 2016/17 and 2017/18 for new appointees, but despite this, appointees are rarely asked again, there is no requirement for regular collection of data, there are accessibility issues, and the form is inconsistently used. Reasons why applicants may not share such data included: stigma or labelling, fear it prejudices applications, mistrusting confidentiality, conflation of monitoring with interview schemes, that the information is irrelevant, and concern about data usage. The review suggests retaining the self-identifying disability question but adding a list of example conditions and a

definition. Lord Holmes (2018) also highlights the lack of data on disabled public appointees – in both 2017 and 2018, information on 35% of existing public appointees was unknown.

- 5.26 In summary, the literature suggests that data is largely collected via self-reporting or self-declaration in surveys carried out either as standalone pieces of research such as the civil service people's survey or using data from existing HR systems as is the case in the case study of the Scottish college system or the MoJ. The case for self-reporting is made due to the sensitive nature of diversity data. UK Government guidelines state that the best way for you to collect ethnicity data is to ask the person for it – for them to “self-report” their ethnicity. Ethnicity data collected by someone else will generally be of lower quality than when someone reports their own ethnicity - it might not necessarily reflect the ethnicity the person themselves would respond with. However, some novel approaches appeared in the literature and made compelling arguments in favour of third-party identification in data collection as a complementary data set for self-identification data. It is argued that using only self-collected diversity data gives an incomplete view of diversity data in relation to the impact of discrimination. This is because discrimination happens based on others' perceptions rather than one's own internal understanding of their identity. This would also implicitly allow the collection of data on discrimination against the perception of discrimination, by comparing third party and first party identified data sets. Finally, it is recommended in the literature that diversity data collection works best when it is seen as an organisation-wide responsibility and should not be siloed as solely an HR initiative. Diversity data collections work best when governed by working groups of a range of stakeholders including data subject groups, and when these initiatives, and their purposes, are clearly communicated.

How and to what extent can diversity among the workforce and boards of public sector bodies lead to meaningful change for people with protected and associated characteristics in Wales?

In summary, the chapter contains information on the various ways in which meaningful change is brought about for people from minority groups by increasing diversity in public sector bodies, including:

- (i) The more diverse a public service, the more attentive and responsive it is to the diverse needs of diverse populations.
 - (ii) Diverse role models positively impact on progression throughout the organisation for groups who share characteristics with senior leaders. This can have the effect of increasing motivation and performance and promoting feelings of inclusion for people from minority groups which share characteristics with members of senior leadership, as well as inspiring attempted participation in higher level appointment/employment.
 - (iii) Diverse leadership benefits additionally from diversity of perspective, and through a broader range of life experiences: diverse boards have a greater problem-solving potential.
 - (iv) Diversity can create a positive feedback loop, in that diverse public sector bodies in turn receive a more diverse pool of applicants for positions/appointments, including for senior or board positions, with greater potential for talent acquisition.
 - (v) Diverse public sector body leadership is often able to make policy which more accurately accounts for the diverse needs of the public which it serves.
 - (vi) Diverse public sector bodies improve the experience of policy customers from minority backgrounds when interacting with the public sector body.
 - (vii) Companies with diverse boards tend to outperform companies with more homogenous boards in the private sector.
- 5.27 The literature reviewed as part of this REA suggests that diversity in public sector bodies can be a cause of meaningful change for the lives of people with protected characteristics in Wales, both in public sector bodies and in wider society. There seem to be two main types of change leading from diversity within public sector

bodies: change owing to diverse leadership/boards; and change owing to a more diverse workforce. In this section both will be addressed. There is also some evidence of the potential negative impacts of organisational diversity if that diversity is poorly managed. This is noteworthy, but it is not clear if the examples provided in the literature apply to the Welsh context. For the rest of this section “the extent to which diversity among the workforce and boards of public sector bodies can lead to meaningful change for people with protected and associated characteristics in Wales” will be interchangeably referred to as “the positive impacts of diversity”.

- 5.28 The aspect of the positive impacts of diversity which most frequently appears in the literature is the idea that diversity on the board or in organisational leadership provides role models for minority groups. It is stated in the REA reviewed literature that from the perspective of employees from minority groups there is a belief that increased representation in leadership would help people get on within organisations. In the CIPD review on “Barriers to Black, Asian, and Minority Ethnicity employee career progression” it is noted that of the respondents, “all Black, Asian, and Minority Ethnicity employees, regardless of ethnicity – [said] that seeing other people like them that have progressed in the organisation would help boost their careers.” Inversely, the same report found that Indian/Pakistani/Bangladeshi employees were more likely to state that “a lack of role models and ‘people like me’” were significant barriers to progress through an organisation (CIPD, 2017).¹⁸
- 5.29 This may not just be a perception either, a report from the Equality Commission for Northern Ireland found that through their review of available writings and data that: “It is generally accepted that improving access to, and progression within, employment is seen in public policy as an important driver of economic and social wellbeing and presents a route to improved social mobility and inclusion as well as a route out of poverty.” The report notes that it is important to have leadership that values diversity, and to have diversity “embedded” in the leadership and for diversity to be “driven by the most senior people in the organisation” (ECNI, 2017).

¹⁸ Addressing the barriers to BAME employee career progression to the top, CIPD, 2017

- 5.30 It is not completely clear in the report if embedded diversity refers to policy or people, however in the report when embedded workforce diversity is discussed, it is mentioned alongside increased diversity in the workforce. In the report, the listed benefits of organisational diversity include the acquisition and retention of talented employees; increased productivity, motivation, and commitment of employees; increased creativity and problem solving; [and] better organisational flexibility” amongst others. Empowerment of employees is another listed benefit of diverse, inclusive, accountable leadership in a UTS report on improving gender diversity (Klettner et al, 2021). Furthermore, Hibbs’ paper on the effects of women’s empowerment and civic participation in Wales states that “empowered women will have the self-confidence, self-efficacy, and the belief that they have the necessary skills to exert control over decision-making processes and systems – all key ‘psychological predictors’ (Barrett, 2012) and ‘essential prerequisites’ (Cornwall, 2007) of civic participation,” (Hibbs, 2022). This suggests that more diverse leadership opens the path for meaningful change for people with protected or associated characteristics in Wales. This is echoed in the UTS report¹⁹, wherein empowerment is said to result in “all staff [taking] responsibility for implementing change.”
- 5.31 It is noted that having improved leadership diversity increases a feeling of inclusion, but this is not just an in-group phenomenon. In the previously referenced ILO paper, it was observed that while there was a greater impact on inclusion for respondents who are from “the same diversity group that is represented in top management,” there is a similar but less pronounced effect for other groups. As an example, the study found that “women respondents are 9% more likely, and men are 3% more likely to feel included” when women are represented in at least 40% of top management positions. Further, links have been made showing that working environments with inclusive policies have a similar effect of feelings of inclusion across the workforce. While causation cannot be definitively drawn, the New Zealand report²⁰ on public service workforce data notes that concurrently to

¹⁹ [Improving Gender Diversity in Companies, - University of Technology Sydney, 2021](#)

²⁰ [New Zealand Public Service Workforce Data Report, State Services Commission \(New Zealand\), 2018](#)

increased gender diversity of senior leadership, there is an increase in diversity through public service, a decrease in gender pay gaps, and an increase in gender diversity throughout management levels of public service. However, the report does note that ethnicity pay gaps are not improving at the same rate as gender pay gaps concurrent with more gender diverse leadership, implying perhaps that the improved representation in leadership for one protected characteristic does not necessarily increase positive outcomes for all minority groups.

- 5.32 A paper on inclusion of Lesbian, Gay and Bisexual workers (Colgan, Creegan, McKearney, & Wight, 2006) shows that when compared to organisations where people feel the need to lie about their personal lives while at work, working in a 'gay friendly' environment has a positive impact on job satisfaction and can lead to greater happiness, openness, confidence, work productivity and a feeling of loyalty and pride in the organisation (Parker, Young-Hauser, Loga & Paeac, 2022). In the OECD 2023 report on Diversity and Inclusion, this same diversity benefit link (creativity, well-being, and productivity) was found, however an argument was made based on a case study that these benefits were most strongly noticed when associated with staff-networks for certain protected characteristics. The work suggests that the more visible people from minority characteristic groups are, the greater the inclusion benefits. Staff retention is also a listed benefit of organisational diversity and the presence of active pro-diversity management policies (Weiler, 2016).
- 5.33 The theory of representative bureaucracy, that a workforce that looks like the citizenry it serves should be more effective in meeting changing needs, is well represented in the literature produced by public sector bodies in the UK and in comparable countries. In this theory, the case for public workforce diversity rests on the potential for improved efficiency, effectiveness, and innovation, in addition to the need to reflect the society it serves (Kohli, Gans, and Hairston 2011). These benefits apply to both the employees of the body, and the overall minority characteristic population. One of the most notable recurring benefits in the literature is the idea that diversity of characteristics provides the additional benefit of a diversity of perspective. In the European Commission policy paper on diversity, it

states that in addition to moral and intrinsic representational benefits, diversity is valuable because “the exclusion of valuable experiences and perspectives in the policy-making process may result in outcomes that fail to reflect the concerns and issues of the diverse populations the policymaker represents” (Mintz & Wayne, 2016).²¹

- 5.34 While the literature makes this case for workers in government policy, the effects on minority groups are also pronounced in other public sector body areas. In the NHS report on attracting and retaining a diverse workforce, it states that based on their own research there is a “robust evidence base demonstrating the benefits, including: improved quality of care for patients.” The impact of improved care for patients was universal, but it was most pronounced for ethnic minority patients, and this is attributed to “unique cultural sensitivity” and being more aware of the “needs of the community”, this in turn leads to higher patient satisfaction and outcomes (Hemmings et al, 2021). This lends credence to the previously mentioned theory of representative bureaucracy wherein, “theoretically, we would expect that gains in organisational diversity will ultimately - and positively - impact both service effectiveness and citizen satisfaction” (Borry, Getha-Taylor & Holmes, 2021). The theory that more diverse leaderships of public sector bodies are more responsive and effective when enacting policy to address social issues that impact diverse groups is highly prevalent in the literature (Leibig & Kashani et al, 2020).
- 5.35 This has the possibility of creating a positive feedback loop, where visibly diverse public sector bodies who are seen to be actively helping minority groups can indicate to members of these groups that they have the power to influence policy that impacts them. This can create a more diverse pool of applicants which can, in time, compound these positive effects. Indeed, a MissionSquare Research Institute survey showed that “77% [of] applicants said that it was ‘very important’ that their next workplace is mindful of creating an inclusive and welcoming environment for all identities. This even outranked other factors such as developing professional skills and helping with career advancement” (Liss-Levinson, 2022). Furthermore, rather

²¹ A. Mintz and C. Wayne, 'The Polythink Syndrome and Elite Group Decision-Making' (2016) 37 Political Psychology 3

than simply being a benefit, an inclusive atmosphere is so important to employees that diversity in the workplace can be a 'salve' that offsets negative feelings regarding other aspects of the workplace. In a comprehensive study on this topic with a sample size of 2580 valid responses from staff in five local councils in England, results showed that perceptions of management exertion to ensure an equal working environment can have a "strong mediating effect on public service motivation" and even a "compensational effect on perceived lower pay" (Wang & Seifert, 2022). Literature reviews in this area (Ritz et al., 2016) claim a causal link between visible leadership diversity (and thus perceptions of a fairer work environment), and staff job satisfaction, staff performance, and organisational citizenship behaviour" (Kim et al, 2015).

- 5.36 While these effects have been noticed in public sector bodies, there is also a body of research in the private sector that suggests diverse leadership is impactful to EDI efforts, and vice versa. In a report on the relationship between board diversity and company performance in FTSE 350 companies (Akimoto et al, 2021)²², a relationship was found between "greater representation of women in the boardroom is reshaping culture and dynamics and benefiting businesses from a social justice as well as a performance perspective." Some of the specific gains that were observed by measuring diversity against other measures in FTSE350 companies were "Better future financial performance (as measured by EBITDA margin²³), especially after three years; Higher stock returns, especially when diversity is well managed; boards less likely to experience shareholder dissent; and boardroom culture becomes more relationship focused and collaborative." The reasons given for these changes for boards with a higher percentage of women were: decentralisation and strong delegated powers; governing through consensus rather than diktat (e.g. by voting); belief and action on ensuring fair outside search for board members; equal application of standards; and reduced overconfidence about the board's problem-solving skills. This parallels the benefits seen in public sector bodies, in that for both public sector bodies and FTSE boards, more diverse

²² [Diverse boards lead to better corporate culture and performance, FRC](#)

²³ Earnings Before Interest, Taxes, Depreciation, and Amortization

leadership trends towards being more responsive and aware of the needs of those for whom they have responsibility. When voting on all types of voted resolutions in FTSE 350 companies AGMs, there was an 8% lower predicted probability of dissent in boards which had at least one woman, showing quite a pronounced effect. There was a similar but less pronounced effect regarding ethnic diversity, however there is a caveat on the ethnicity findings due to limited data and an insufficient variety in the ethnic diversity of FTSE 350 boards. There were concerns in the research that this may not be a causal relationship, and that firms that were more open-minded would be inclined to better performance and to social progress. The impact was isolated, and reverse causality was partially addressed using a measure over time, such that it could be seen over time that diverse leadership preceded or accelerated EDI policies.

5.37 The NHS Confederation also advocated for how diversity could be improved through empowerment. The NHS Confederation (2021) taskforce delivered a report of recommendations to improve diversity in NHS boards. Findings were acquired from surveys, focus groups, interviews, and roundtable discussions with executive search firms (ESFs), chairs and non-executives currently in roles, or who had been candidates in the past. Triangulation of methods was used, using different methodological approaches to address data collection, which can strengthen the validity of findings. Findings from the roundtable showed that the NHS is off-putting for protected characteristic groups due to images and descriptions of present boards that showed the organisation as male-dominated and predominantly white, requiring qualifications or experiences not necessarily held by protected characteristic groups. Therefore, it was recommended that greater awareness of diversity through inclusion of protected characteristic groups in media promotions of the role is needed, though the report did not provide examples where this had been done. Potter (2017) also recognised under-representation of women in managerial decision-making roles could be due to how most popular images of leadership portray men in leadership roles. The NHS Confederation (2021) highlighted that NHS board roles are limited in terms of representation due to rigid criteria in terms of previous experience and unrealistic time commitment expectations. Chairs and executives thought ESFs had poor access to diverse candidates despite them

specialising in sourcing underrepresented groups. The NHS Confederation (2021, p: 9) recommended “long-term contractual relationships (compact) between ESFs and the NHS that are performance dependent [to] help to stimulate competition, clarify and standardise expectations and motivate ESFs to collect data. This could be made public, build up databases with pools of candidates from underrepresented groups and support succession planning, training, and development initiatives to support more appointments from underrepresented groups.”

UK interventions

- 5.38 In addition to policy approaches to public sector bodies and boards the literature highlighted good practice from non-government organisations. Hibbs (2022) used 7 retrospective semi-structured interviews to assess the impact of an intervention - a non-government organisation (NGO) intervention to increase female participation in public life in Wales and help more women, including Black, Asian, and Minority Ethnic women, to secure roles. Findings from this source can be used as a model for effective engagement with women and Black, Asian, and Minority Ethnic people through empowering them to engage more with public life. The NGO’s methods of improving representation were through education and helping to build social connections and social capital within the characteristic group. They also provided a welcoming atmosphere to learn, which was considered necessary in encouraging women to engage in networks containing people different from themselves, leading to better understandings and reduced discrimination. It is important to note when assessing the reliability, that participants were recruited via a gatekeeper and therefore engagement with participants means it is likely recruited participants benefitted from the NGO, limiting representativeness of the sample, as it is unlikely they would have maintained contact if they had a predominantly negative experience. Furthermore, it is also important to consider that the research did not have an experimental design with a control group, and information was recalled from memory, limiting the reliability.
- 5.39 Inclusion Scotland (2021) facilitated an intervention giving six disabled people the chance to shadow six regulated public sector body boards in Scotland over a year-long period to provide disabled people with greater knowledge of the public

appointment process, and for boards, board mentors and shadows to develop productive ways of working with each other. Responses showed that the intervention had a positive impact. There was an equal gender split among those involved in the project, improving validity, however it is important to consider the fact that the intervention ran from September 2019- September 2020, meaning it would have been impacted largely by COVID-19. Considerations must therefore be made about its applicability to today's public appointment system. It was recommended that boards develop reasonable adjustment guidance, recognise them as standard working practices, and ensure they are delivered quickly. The removal of financial barriers was also recommended for disabled people through advancing payments for board members. It was also advised that public appointment vacancies should be advertised on standard job sites, boards for disabled people, and disabled peoples' organisations to improve accessibility. This was also suggested by Welsh Government (2020), and The NHS Confederation (2021). Park and Taylor-Collins (2020) also state the importance of shadowing and mentoring opportunities for protected characteristic groups to become more 'board confident'. However, they emphasise the importance of this support being ongoing. Welsh Government (2020) also noted opportunities must be well advertised and accessible, removing travel barriers and promoting regional opportunity equality.

5.40 Implementation of improved training has been an overarching theme in the literature analysed. The first training recommended was for existing employees. Park and Taylor-Collins (2020) argue that people sitting on interview panels need to be aware of challenges that protected characteristic groups face, specifically if they do not belong to any of the groups themselves. Panellists need to be trained on equality issues, and unconscious bias to minimise the impact it may have on outcomes. Furthermore, Inclusion Scotland (2021) recommended for all people sitting on a public sector body board to be required to complete Disability Equality Training at least once during each term and advised for it to be a mandatory requirement for board members during on-boarding. The second type of training that was identified was training for applicants. Banks et al. (2015) completed a comprehensive literature review of information available for Northern Ireland and concluded that

mentoring programmes and training were important enablers both for younger and older people in encouraging them into public appointments.

The barriers to appointments, retention, and promotion in public sector bodies for people with protected and associated characteristics

This chapter contains information on the barriers to achieving both high level apportionment in public sector bodies, as well as general advancement in public sector bodies for people with protected or associated characteristics. In summary, the main points of the section are:

- (i) Progression gaps within organisations appears to be the primary barrier for people with protected characteristics in organisations, rather than an appointment gap.
 - (ii) The literature suggests that Socio-Economic background may be as much of a barrier in civil service progression and public appointments as any protected characteristic for most civil service grades.
 - (iii) Owing to historical societal inequalities, true meritocracy is not effective at addressing inequalities, and adherence to meritocratic principles in this environment can prevent equal opportunity for all groups.
 - (iv) Artificial intelligence tools can be a barrier to equality of opportunity if there is a lack of disclosure on how they work and are developed. There are issues with organisations assuming that AI systems are not biased.
 - (v) Even if barriers are removed in an organisation, a perception of unfairness can be as negatively impactful as actual barriers to feelings of inclusion.
 - (vi) One of the most significant barriers to implementing interventions to help with equality issues in public sector bodies is a lack of available equalities/diversity data and failing to implement proper data collection strategies.
- 5.41 The literature provided many examples of types of barriers that prevent people from certain characteristic groups from being appointed, promoted or retained in public sector bodies. The most frequently cited as a barrier is a progression gap, where women and members of minority groups are frequently concentrated in more vulnerable, less well paid, and less valued professions, with less opportunity for

advancement (Young, 2021)²⁴. An OECD report on diversity at work found that despite initiatives in the public sector, a wage gap also persists because “women are less frequently promoted, they are less often appointed to senior positions and they tend to be clustered in specific, lower-paid occupational groups” (OECD, 2020)²⁵. While the OECD provides this observational insight, the report does not posit what the reasons for the progression gap are. Young’s report, using MissionSquare research data makes some suggestions, including: women and ethnic minority groups are more highly concentrated in customer/client facing roles, which have more strict scheduling than other “white collar” work, making progression, training and extra projects harder to fit into a schedule; and also that recently these roles have been more heavily impacted by Covid, which may have led to slower progression during the years the data was collected.

Socio-Economic Background

5.42 When reviewing the literature for the most prominent reasons for barriers to appointments and promotion in public sector bodies, the single most significant factor according to several sources was Socio-Economic Background (SEB). Lower SEB is linked strongly to difficulty in gaining appointments and progression in the senior civil service in UK government, with only 18% of senior civil servants being from low SEB, compared to 43% amongst most junior grades (Friedman et al, 2021)²⁶. Particularly telling of the enduring nature of this barrier is that while progress has been made on senior civil service diversity in other characteristic areas, the SEB composition has been largely unchanged since 1967. Indeed, work with the Sutton Trust, *Elitist Britain*²⁷, showed as recently as 2019 that 59% of serving permanent secretaries had attended an independent school. The explanation given for this in the Social Mobility Commission’s report on SEB²⁸ and career progression in the civil service is a cultural bias which favours traditional

²⁴ Diversity, equity, and inclusion in the public service workforce, Young, Gerald, 2021

²⁵ Diversity at Work: Making the Most Out of Increasingly Diverse Societies, OECD, 2020

²⁶ Navigating the labyrinth: Socio-economic background and career progression within the Civil Service, Friedman, Sam, 2021

²⁷ [Elitist Britain, Sutton Trust, 2019](#)

²⁸ Navigating the labyrinth: socio-economic background and career progression in the Civil Service, Friedman, Sam, 2021

signifiers of UK upper classes. The cultural biases specifically mentioned include the significance of received pronunciation (RP) accents, emotional detachment, understated self-presentation, studied neutrality, and the dependence on “guide relationships” which often require a sense of cultural connection or affinity, and the sharing of leisure pursuits outside of work. While a cultural bias is not explicitly racist, there is significant overlap for cultural and ethnic differences. The report states that lower SEB ethnic minorities are significantly underrepresented when compared to white counterparts. In addition to other sources reviewed as part of the REA, this could suggest that the presence of anti-EDI culture can limit the effectiveness of pro-EDI systems, such as those put in place by UK government.

- 5.43 In both public sector bodies and private organisations, SEB was a greater barrier for getting into an organisation, and for getting promoted from middle to senior roles, than protected characteristics (KPMG, 2022)²⁹. It is noted in this report on social mobility (using progression data on 16,500 KPMG partners) that lower SEB often intersects with other characteristics, which compounds the difficulty faced by low SEB people from minority backgrounds. When comparing senior civil service to other professions in Friedman’s civil service report, only medicine has a higher proportion of people from a higher SEB. Additionally worthy of note, at the board level, those from a low SEB typically progressed marginally quicker than those of a higher SEB in private organisations, which was not the case in the mentioned civil service-based studies.
- 5.44 While SEB is listed as a barrier in the literature, it is arguably the culture around SEB that presents barriers. The literature clearly suggests that cultural leadership is a barrier to progression within the civil service. In addition to the cultural barriers mentioned in the Friedman and Cabinet papers³⁰, Ethnic Dimension’s work on barriers to “Black, Asian, and Minority Ethnicity staff progression” states that cultural and leadership climates are the main barriers to progression and appointments (Ethnic Dimension, 2014)³¹. This culture is expressed in many ways, including: a

²⁹ [KPMG Social Mobility Progression Report 2022: Mind the Gap](#)

³⁰ Navigating the labyrinth Socio-economic background and career progression within the Civil Service, Friedman et al, 2021

³¹ [Identifying and Removing Barriers to Talented BAME Staff Progression in the Civil Service, Ethnic Dimension, 2014](#)

lack of role models from minority groups, a lack of clear diversity strategy for high level appointments, conscious or unconscious bias, a lack of evaluation planning for EDI initiatives (OECD, 2011)³², and a lack of common vision. This culture can, based on the results of two broad and robust surveys³³, result in feelings of unfairness and lack of inclusivity, perceptions of an “old boys’ club” where outsiders cannot get on, and people from minority groups being less likely to be offered work on high-profile projects. The literature broadly suggests that successful diversity requires proper management, common vision, coherence of policy, co-ordination between policy and implementation, addressing discriminatory practice and regular evaluation. Any culture which tends towards behaviour counter to this could therefore be a barrier to progression on EDI fronts.

- 5.45 While not a primary barrier, it is noted in the literature that in addition to real improvements in diversity policy and inter-group fairness being an important factor in improving equality outcomes, a perception of fairness is also important. Indeed, it is noted in a civil service review on ethnic disparity a that feeling of hopelessness or fatalism can make minority groups feel like they cannot climb the ladder, and that this perception can make it seem like there are no opportunities even if interventions have been implemented (Commission on Race and Ethnic Disparities, 2021). A further study on “Black, Asian, and Minority Ethnicity Staff and Public Service Motivation” in UK local government found during a survey that while “Black, Asian, and Minority Ethnicity employees have a significantly stronger PSM (Public Service Motivation) than their white colleagues; however, this has been eroded by their perception of unfair treatment: being underpaid allied with a lack of effort from management to ensure an equal work environment, to be specific, to prevent discrimination, bullying, and racism at the workplace.” The literature suggests that perception of fairness, while not an equivalent to actual equality policies, is an important factor in effective diversity management which has a measurable effect (Wang and Seifert, 2018)³⁴.

³² Fostering diversity in the public service, OECD, 2011

³³ The 2014 Civil Service People Survey and the Hay Group ‘Removing Barriers to Success’ survey (November 2014).

³⁴ BAME Staff and Public Service Motivation: The Mediating Role of Perceived Fairness in English Local Government, Wen Wang & Roger Seifert

5.46 While most of the barriers listed so far could be described as unconscious, active discrimination is another widely stated barrier in the literature. Anecdotal examples in the Ethnic Dimension report mention being denied opportunities to application for promotion due to accent thickness (Ethnic Dimension, 2014). A case study of workforce diversity in the NHS found that 13% of staff reported experiencing discrimination in their work, which was present at every stage in the career pipeline (Hemmings et al, 2021). Specifically, it was noted in the report that staff from ethnic minority backgrounds were less likely to be appointed to shortlists or promoted to senior leadership. Intersectional discrimination between ethnicity and religion appeared stronger still, with those who additionally identify as Muslim, Hindu or Sikh having significantly lower success rates for NHS appointments. Diversity progress in the most senior leadership is particularly slow. In an OECD report³⁵ on discrimination in civil services, data showed that gender diversity progress in senior executive services across all OECD countries increased by only approximately 4% from 2010 to 2015. Some suggested reasons for the widespread senior progression gap, noted via feedback from “inclusion nudges” sessions, were: senior leaders knew the identity of a significantly higher portion of male employees at appointment level than female employees, suggesting women were being systemically ignored; and that there is a “readiness bias”. This is when committees were asked to put forward candidates they felt were ready, which resulted in few minority candidates, but when the committee was asked to assume everyone was ready and then had to provide reasons why individuals were not, a significantly higher proportion of ethnic minority people were considered ready for appointment by the end of the exercises (Nolan-Flecha, N. 2019). A similar report by CIPD³⁶, using data from Policy Exchange and Green Park suggests that in addition to unconscious bias, there is a high level of incidence in private and public sector bodies of senior leaders picking successors in their own image, requiring informal networks and “knowing the game” to advance, and stereotyping as reasons for senior leadership progression gaps (McGregor-Smith, 2017)³⁷. In this study, using the YouGov plc panel, 20% of ethnic

³⁵ [Next generation diversity and inclusion policies in the public service: Ensuring public services reflect the societies they serve, Nolan-Fletcher, N. & OECD, 2019](#)

³⁶ Addressing the barriers to BAME employee career progression to the top, CIPD, 2017

³⁷ Addressing the barriers to BAME employee career progression to the top, CIPD, 2017

minority respondents reported that direct discrimination had prevented them from advancing at work.

Positive/Affirmative Action

- 5.47 Even in systems or cultures where direct, intentional discrimination or bias does not exist, minority groups may struggle to progress in a blind meritocracy without equity tools and adjustment. It is debated in the literature whether formalised processes to ensure all are assessed by the same criteria may be a driver of inequality, rather than the inverse. This is, according to a report by Europaeum via inclusivEU³⁸, because these tools implicitly value the status quo, by assuming that everyone starts from the same point and has roughly equivalent circumstances. The report posits that these systems ignore unequal starting points and socio-cultural factors of discrimination and systemic racial profiling by not adjusting for historical disparities and makes the case that affirmative action is a better strategy for achieving equal representation (Beazly, Garcia Cancela, Nanni, Ostendorf et al, 2021). This widely shared theory is summed up in Michael Sandel's 'Tyranny of Merit' which posits that meritocracy disadvantages minority groups as they are not "recipients of long-standing inherited privilege that provides social and economic advantages" (Sandel, 2020) (Mijs, J. J. B., 2022)³⁹. Primary research done on this topic using private business and academia as case studies for advancement gaps does seem to moderately support this hypothesis, and even suggests that the myth that meritocracy solves these issues can exacerbate gaps over time (van Dijk et al, 2020)⁴⁰. While the theory on meritocracy's failures in promoting equality would explain some of the data in other sources, counterfactuals on this topic in the specific context of public sector bodies does not appear to be robust in the literature reviewed.
- 5.48 While some institutions have moved towards affirmative action approaches and pro-diversity interventions, these can, without proper management, lead to further

³⁸Advancing Diversity in the European Commission's Workforce: Policy Paper, Beazly, Garcia Cancela, Nanni, Ostendorf et al, 2021

³⁹ Belief in Meritocracy Re-examined: Scrutinizing the Role of Subjective Social Mobility

⁴⁰ Meritocracy a myth? A multilevel perspective of how social inequality accumulates through work, van Dijk et al, 2020

barriers. Reluctance to implement EDI practice, and a reliance on the business case can inhibit effective EDI integration (Moody & Aldercotte, 2019)⁴¹ For example, one of the recommendations of the Lord Holmes review is the implementation a public sector bodies guaranteed interview scheme for disabled people who meet the minimum requirements to increase board diversity (Lord Holmes, 2018). However, while the intervention may improve diversity, lived experience testimony from prominent disability activists has stated that interviews were not offered by a public sector body which had been accredited under the government’s Disability Confident Scheme (Webber, 2020)⁴². The case made is that just because a system is in place, if it is not followed and implemented, it will not succeed in improving EDI outcomes. It is recommended in UKRI’s report⁴³ that evaluations are regularly undertaken, disclosure is increased, and training and compliance processes are put in place to mitigate human error.

Artificial Intelligence tools

5.49 Artificial Intelligence (AI) tools and machine learning models have been proposed as a way of ensuring systemic interventions are evenly applied, but these are not without their problems. While there is promise in these areas, it appears to be essential to their positive implementation that the potential problems are acknowledged. Due to the nature of the way AI tools are developed without a full human understanding of how systems work, they can “contain biases that deepen rather than counteract exclusion” (WEF, 2020). Additionally, if technologies are used before being fully tested, they may prove to be damaging to attempts at EDI performance improvements. These issues could be due to a lack of diversity in the technology sector, which could contribute to blind spots in decision making (WEF, 2020)⁴⁴. It is noted in the WEF report that an essential component to addressing these barriers is to disclose the use of AI in appointments/promotion processes and acknowledge their fallibility. Additionally, AI can be especially discriminatory on an

⁴¹ [Equality, diversity and inclusion in research and innovation: international review, Moody, Aldercotte & UKRI, 2019](#)

⁴² [Disabled jobseekers ‘still face barriers to public sector roles’, Webber, 2020](#)

⁴³ [Equality, diversity and inclusion in research and innovation: UK review, Guyan & Oloyede, 2019](#)

⁴⁴ [Diversity, Equity and Inclusion 4.0, World Economic Forum, 2020](#)

intersectional basis, and AI tools brought in to replace bias can be discriminatory against women and members of minority groups, particularly when process lacks disclosure (Beazly, Garcia Cancela, Nanni, Ostendorf et al, 2021)⁴⁵.

5.50 To ensure that interventions remove barriers for all groups, they need to take intersectional needs into account. When referring to intersectionality in this report, this refers to the phenomenon where people have multiple characteristic identities (such as gender, ethnicity, or sexuality), and may experience discrimination from multiple overlapping characteristics. For example, in a review of EDI practices relating to older employees in the Australian workforce, over two thirds of survey respondents' organisations rarely offered unconscious bias training, and of those that did, 50% did not include modules on older workers (AHRI, 2021)⁴⁶. Older workers in particular are victim to this barrier, but it is broadly applicable that interventions that do not consider intersectionality can harm unconsidered groups. As an example, applications have in some organisations been anonymised as those that contain certain personal information can result in discrimination, however, anonymous applications can disadvantage older workers as it is more likely that workers from older generations will have fewer qualifications as leaving education early used to be more common (House of Commons: Women and Equality Committee, 2018)⁴⁷. Gains in diversity can be siloed to certain minority groups, and it is essential that intersectionality and overlapping social identities are kept in mind when designing solutions (CIPD, 2017)⁴⁸. Evaluation of policies' efficacy is also essential to ensure that they are working. In a study of USA admin agencies, the utilisation of family-friendly policies decreased the time it took the average female employee to reach executive level, more so than the use of promotional pathways, showing that in the instance flexibility was the main limiter to women's progression, rather than guidance (D'Agostino & Levine, 2010)⁴⁹.

⁴⁵ Advancing Diversity in the European Commission's Workforce: Policy Paper, Beazly, Garcia Cancela, Nanni, Ostendorf et al, 2021

⁴⁶ Employing and retaining older workers, Australian Human Resources Institute, 2021

⁴⁷ [Older people and employment \(parliament.uk\)](https://www.parliament.uk)

⁴⁸ Addressing the barriers to BAME employee career progression to the top, CIPD, 2017

⁴⁹ [The career progression of women in state government agencies, D'Agostino & Levine, 2010](#)

Evaluation and data collection

5.51 It has been noted previously in this review that evaluation of interventions is considered essential to have effective EDI improvements. Data availability can be a considerable barrier to improvement, making it difficult to measure the effectiveness of interventions. It is noted in an LSE report on global workforce diversity that scant data availability on ethnicity and disability issues limits most analysis on inequalities to the gender axis (LSE & Klingler-Vidra, 2018)⁵⁰, which as noted by previous works, does not always apply the same benefits to people of different ethnicities/genders/sexualities etc. Further, it is noted that sometimes when this data is available it is not disclosed, which reduces accountability and potentially also impact. The LSE Report contained interviews with representatives from innovation agencies and academics in the EDI field, and among the concerns around the success of their diversity initiatives were issues of a lack of systemic review mechanisms in place, and modest budgets which limit the types of policies and programmes they can run as well as their ability to evaluate them. It is noted in a UKRI review on EDI in research and innovation that most evaluations that do take place typically measure only process measures, like uptake or engagement, and “very few” went beyond to measure impact via control trials or comparator groups, meaning it is difficult to say with certainty whether interventions are working (Guyan and Oloyede, 2019)⁵¹. However, it is difficult to apply a randomised control trial, or similar, to studies on this topic for ethical reasons, as it would involve excluding certain people from EDI initiatives, which often seek to reduce negative treatment.

Strategies that public sector bodies in Wales can adopt to address the identified barriers.

This section covers the various methods other similar bodies have used to successfully implement interventions to improve their diversity, remove or reduce

⁵⁰ Global review of diversity and inclusion in business innovation, Robyn Klingler-Vidra & LSE Consulting, 2019

⁵¹ [Equality, diversity and inclusion in research and innovation: UK review, Guyan & Oloyede, 2019](#)

barriers and impact their organisational cultures. The intervention types include policy changes, training, SMART targets, and system implementation. In summary, the chapter contains approaches such as:

- (i) Ambitious and disclosed long term targets can be a successful method for improving diversity by way of creating accountability in the event of inaction and showing potential applicants that the organisation is pro-diversity.
- (ii) It is important to have leadership be invested in and responsible for improved diversity. Both by leading by example and by making diversity part of the organisational strategy with accompanying resource, diversity pushes with invested leadership are more effective than those without.
- (iii) An overall organisational culture change is useful to improving diversity and feelings of inclusion, this can be achieved through training and implementing policies which mitigate unconscious bias.
- (iv) Intersectional considerations are essential to ensure that interventions that help one group do not harm another group. Sometimes a combination of approaches is required to ensure that certain groups are not being harmed with interventions.
- (v) Visible role models from minority groups in an organisation can have a measurable impact of feelings of fairness and inclusion amongst members of the organisation.
- (vi) In other organisations without in house expertise in diversity matters, the use of external guidelines and standards has been helpful in both the public and private sector.
- (vii) The business case for diversity can be used to get management and stakeholders on side, but it is important to be invested for additional reasons.

5.52 There appear to be some strategies that have broader consensus regarding their efficacy in addressing barriers for minority groups in attaining appointment, promotion and retention to senior management. However, for other ideas, specifically the use of quotas, there also appears to be two opposing schools of thought.

5.53 A review of international EDI research and innovation listed the following as characteristics that made interventions to address barriers more likely to succeed

(Moody & Aldercotte, 2019)⁵²:

- Collaboration across the organisation and within senior management.
- Leadership and senior management commitment to intervention and strategy is integral to efficacy.
- Strategic alignment throughout the organisation on the importance of the policy/intervention.
- Community relationships and networks created by interventions.
- Evidence use to design and evaluate interventions.
- Accountability, having well defined targets, goals, expectations and roles.
- Organisation culture, embedding awareness and actions on EDI into the culture rather than having them be incidental.

These principles appear in most of the literature reviewed, regardless of the specific mechanism of the intervention or strategy.

Targets, key performance indicators, quotas and public disclosure

- 5.54 It should be noted for the UK context that while setting quotas is not in itself unlawful, positive discrimination is not permitted as per the Equality Act 2010. Any exploration of the use of quotas in the EU or US is primarily interested in the effects these interventions had on the attitudes and morale of the members of the organisations, and how this information might be relevant to any target setting in a UK context.
- 5.55 While it is noted that having well defined targets and goals is a feature of successful interventions in general, having publicly disclosed diversity targets can be a strategy to increase diversity in of itself. As part of a report by the International Labour Organisation on EDI initiatives, it notes when comparing companies across

⁵² Equality, diversity and inclusion in research and innovation: international review, Moody, Aldercotte & UKRI, 2019

Europe's biggest companies, that companies who are introducing voluntary targets to increase representation have "achieved concrete progress" towards diversity in boards. For example, a 300% increase in women on boards in FTSE 100 companies has been noted in the 10 years between 2011 and 2021 (ILO, 2022)⁵³. Recommendations from the McGregor-Smith review on private business diversity suggest the implementation of KPIs based on aspirational targets (as distinct from specific quotas), which must be disclosed, along with data on the progress towards these targets. The theory behind this strategy is that it creates accountability and sets a level beneath which the management can be seen to be "failing" to meet diversity targets, without setting quotas for specific roles which may leave some feeling discriminated against (McGregor-Smith, 2017).⁵⁴

- 5.56 Another technique which has been used in FTSE companies and is advocated for by auditors (with responsibility for assessing companies' corporate governance) is a "comply or explain" model in conjunction with aspirational targets. A "comply or explain" model would, in the event diversity targets were not met, require "feedback from leaders making promotion decisions on why eligible candidates were unsuccessful". The review states that for these interventions to work, the targets, diversity data, and explanations must be publicly disclosed. In their own independent research on social mobility, KPMG also found that setting clear, ambitious, and disclosed targets and outcomes is an effective component of a successful diversity initiative (KPMG, 2022)⁵⁵. Similarly, University of Technology Sydney in their literature review and research on improving gender diversity, it also notes the importance of integrated diversity initiatives through the leadership, that can be linked with KPIs, as well as collected and disclosed diversity data, as interventions to improve diversity (Klettner, Atherton, Clarke & Winterford, 2021)⁵⁶.
- 5.57 Park and Taylor-Collins (2020)⁵⁷ reviewed the Welsh Government's implementation of the 'Reflecting Wales in Running Wales' strategy which aimed to improve

⁵³ Transforming enterprises through diversity and inclusion, International Labour Organisation, 2022

⁵⁴ [Race in the workplace: The McGregor-Smith Review, Baroness McGregor-Smith, 2017](#)

⁵⁵ [Social Mobility Progression Report 2022: Mind the Gap, KPMG, 2022](#)

⁵⁶ [Improving Gender Diversity in Companies 2021, Klettner, Atherton, Clarke, Winterford, 2021](#)

⁵⁷ Park, M. Taylor-Collins, E. (2020) Supporting underrepresented groups into public appointments. Cardiff, Wales Centre for Public Policy

diversity in appointments. These discussions took place at a roundtable containing Welsh Government officials working with diversity and inclusion experts in public, private and third sector boards in the UK and US. They identified existing problems within the system, such as implying diverse candidates need to change to fit into public appointments. Arguing that protected characteristic groups should be recognised individually and as intersecting, not as a homogenous group, they found governments must be cautious not to reproduce existing pathways of privilege that exclude minority groups.

5.58 Park and Taylor-Collins (2020) also discussed the Disability Confident scheme, which is intended to guarantee interviews for disabled people meeting the minimum requirements for the role at sifting stage if requested. They found that this scheme can be off-putting and ineffective, and applications have accessibility issues. For example, there is currently nowhere to request reasonable adjustments in the application, CVs are a barrier to disabled people without 'traditional' work experience, people who have had long periods of time off for health reasons, or people who are carers. Ballantine et al. (2016)⁵⁸ concluded from in depth interviews with men and women, current and aspiring executives in public life that caring responsibilities are experienced more as a barrier for women rather than men. Park and Taylor-Collins (2020) highlight the importance of organisations representing underrepresented groups in society having a voice to shape the redesign of the public appointment system, consulting people alongside it to ensure change is impactful. Lord Holmes (2018)⁵⁹ also argued there are accessibility issues with applications, and recommended all public sector bodies in the UK should be Disability Confident by summer 2019. Whilst this has been achieved, there are still issues of the scheme's accessibility. Park et al. (2020) conducted a rapid evidence review, and mention that many people see the scheme as tokenism, and harmful towards their application and chances of getting through to interview. However, it is important to consider that the review carried out is not exhaustive and therefore caution must be taken when considering findings.

⁵⁸ [An Investigation of Gender Equality Issues at the Executive Level of the Northern Ireland Public Sector \(Ballantine et al, 2016\)](#)

⁵⁹ [Lord Holmes review – opening up public appointments to disabled people \(Lord Holmes, 2018\)](#)

- 5.59 Lord Holmes' (2018) review supports Park and Taylor-Collins' (2020) recommendations, specifically in the application stage. The source agreed that selection criteria disadvantage disabled peoples 'non-standard CVs'. He also highlighted that despite all public appointments stating that they welcome applications from disabled backgrounds and provided reasonable adjustments, the language and approaches used were often inconsistent and lacked accessibility. Welsh Government (2020) discovered through consultation with stakeholders that there is a tendency to recruit in their own image, this is extremely problematic due to lack of diversity levels as previously mentioned, leading to bias in recruitment. Lord Holmes (2018) speaks about this as an issue of retention, as well as recruitment, and recommends that in the future, guidance and good practice should be developed to ensure reasonable adjustments are delivered quickly and effectively for new and existing employees/appointees. More recently, Park et al. (2020)⁶⁰ also recommended the anonymisation of certain details of people's applications, such as their age, name, education etc. which, they argue, can minimise some cases of unconscious bias.
- 5.60 A guaranteed interview scheme is often used in UK public sector for disabled people. Guaranteed interviews schemes have been shown to be effective when implemented properly (Lord Holmes, 2018)⁶¹. It follows the same justification as quotas which suggest that it is a tool to provide a level playing field. The Ethical Standards Commissioner (2021) agreed targets with Scottish ministers in the 'Diversity Delivers' strategy aiming to encourage protected characteristic groups into applying⁶⁰. One strategy was awareness and attraction of public sector bodies and the appointment process, and to increase the proportion of Scottish adults who had some awareness of public bodies and the appointments process from 30% to 45%. Another strategy was to improve the confidence in the appointment process. The strategy found that 32% of people thought board members were invited, and 21% of people thought this was given as a reward. The strategy aimed for a reduction in these figures to 20% and 10% respectively. The last target was to improve the

⁶⁰ [Increasing diversity in public appointments through recruitment, Park et al. 2020](#)

⁶¹ Lord Holmes Review: Opening up public appointments to disabled people, Lord Holmes of Richmond MBE, 2018

number and diversity of applicants, with targets of 40% female, 15% disabled, 8% Black, Asian and Minority Ethnic, 40% aged 50 and under, and 6% lesbian, gay and bisexual applicants (Carlton, 2008). Looking at Annex C, the target for female representation is the only goal that has been met. The Ethical Standards Commissioner (2021) also recognised that female applicants are the only group that were likely to be successful when applying over the last four years, although in 2020, Black, Asian, and Minority Ethnic applications exceeded the target. Furthermore, they state that those declaring LGBT+ status were relatively successful, where targets for applications and appointments were not met, but have improved since 2019. Applications from disabled people are still unrepresentative of the working age population. When looking at the effectiveness of the Diversity Delivers targets, it is important to note that the targets are over 10 years old, and do not consider impacting factors such as COVID-19 and its effect on the process. Furthermore, The Ethical Standards Commissioner (2021) compares Scottish population data acquired from the 2011 census, which is also over 10 years old in Annex C, therefore caution must be taken when considering reliability of information.

- 5.61 The most prominent UK example of advocating for targets as a means for progress is the Parker Review, a review of ethnic diversity in UK corporate boards. When first published in 2017, it recommended that every FTSE 100 company set a target to have at least one director from an ethnic minority background by 2021, and each FTSE 250 company by 2024. It also recommended that companies set similar targets throughout the organisation such that it ensured a diverse talent pipeline and succession planning for people from diverse backgrounds. These targets are notable in that they are intended as a driver for change, alongside a regular audit cycle for accountability purposes (Parker, 2017)⁶². In the 2023 update, following surveys of diversity of UK FTSE companies, those that have followed this recommendation have seen progress in diversity outcomes, with 96 of the FTSE 100 meeting original Parker review recommendations (Tyler, 2023)⁶³. However, the

⁶² The Parker Review: A Report into the Ethnic Diversity of UK Boards, Sir John Parker, 2017

⁶³ [The Parker Review 2023, David Tyler, 2023](#)

research does not seem to account for the range of other approaches taken by companies that have set these targets. It does argue that the expectations created by these recommendations are an intervention in themselves, even if their purpose is to inspire the establishing of further interventions. Similarly, in the previously referenced international review of EDI R&I (Moody & Aldercotte, 2019), quotas and affirmative action were found to be effective internationally for promotions, education, funding, and reducing bias.

5.62 While quotas have been effective in other countries when implemented, there can often be significant resistance in middle management on the grounds of discrimination, and it was also noted that hard quotas may not be lawful in certain circumstances. As embedding culture and committed leadership is required for effective interventions, quotas may not always be effective if there is managerial resistance. This potentially highlights that the main mechanism which makes diversity targets and quotas an effective intervention is the clear management responsibility to improve diversity. This can be seen in another review of UK corporate boards in which the main findings of the research were interventions are most successful when “It is the responsibility of the Chair of a board to drive inclusion” (FRC, Akimoto et al, 2021)⁶⁴. Further, on diversity reporting in private companies, the McGregor-Smith review goes as far as to recommend legislation for businesses with over 50 employees to make it mandatory to disclose ethnicity data by salary band, to set a baseline (McGregor-Smith, 2017). These recommendations suggest it could be worth exploring how the governance codes for public sector bodies could be brought in line with corporate governance codes in the UK context. It is also noted that in EU parliament and commission, mandatory quotas particularly for women have been effective at substantially increasing the proportion of people from under-represented groups in senior positions and there have been promising results from intersectional quotas (Beazly et al, 2017)⁶⁵. Though this is a not UK-specific example it shows the possibility for large scale diversity gains with sufficient motivation and significant organisational and cultural buy-in.

⁶⁴ [FRC Board Diversity and Effectiveness in FTSE 350 Companies, FRC & Akimoto et al, 2021](#)

⁶⁵ Advancing Diversity in the European Commission’s Workforce: Policy Paper, Beazly, Garcia Cancela, Nanni, Ostendorf et al, 2021

5.63 An alternative perspective on the best way to approach these diversity initiatives is presented in the UK Commission on Race and Ethnic Disparities report. In this report, it states that many non-corporate academic researchers remain “sceptical about the impact of unconscious bias training, quotas and diversity specialists”. Referencing Harvard research⁶⁶, it has been noted that many EDI measures have not always been successful, and that those that have been successful do not always have an evaluation attributing that success to the measures. They noted that many products and recommendations of the EDI industry are not standardised, certified, or independently addressed (Kalev & Dobbins, 2016). The review identified that the leading cause for quota-based interventions failing is a feeling of discrimination against the majority group. For this reason, the main findings of the review are that more successful interventions seek to reframe targets, and “nudge” behaviour rather than prescribe it (Commission on Race and Ethnic Disparities, 2021)⁶⁷. Quotas can be resisted by workforce and management because they can be viewed as being discriminatory against the majority group or suggest that there are essential problems with the majority group. While positive discrimination would be unlawful in the UK, and quotas could only be acted on in the event of equally qualified candidates, individuals from the majority group might still feel aggrieved at perceived unfairness. As Musa al-Gharbi suggests people have a propensity to be defensive about in-group/out-group topics, and so interventions should instead focus on removing bias, discrimination, and nepotism, with these behaviours viewed as “general cognitive tendencies” which all people are susceptible to (As Musa al-Gharbi, 2020)⁶⁸.

Nudge actions

5.64 Examples of “nudge” actions that the Commission on Race and Ethnic Disparities report sees as improvements over quotas include: “name-blind CVs, transparent performance metrics, family-friendly policies, proactive mentoring and networking procedures.” These policies, where any person might possibly benefit but minority

⁶⁶ Why Diversity Programs Fail, Dobbin & Kalev, 2016

⁶⁷ Commission on Race and Ethnic Disparities: The Report, 2021

⁶⁸ Diversity is Important. Diversity-Related Training is Terrible, As Musa al-Gharbi, 2020

groups are more likely to be beneficiaries, may make reluctant organisation members more likely to become invested in diversity, which is a main requirement across the literature on successful interventions. The report does not suggest that there should not be a proper “fairness strategy” which may include aspirational targets, but these should not inform the day to day making of individual decisions and should instead be a yardstick for how well less prescriptive methods may have worked. The review also recommended that bodies do not disregard “nudge” solutions that may appear trite if they lead to an effective outcome, a successful intervention example given being the “[use of] images of successful colleagues with an ethnic minority background on walls.”

- 5.65 A “nudge” method well established in the literature is attempting to remove or account for unconscious bias. At the application stage, this largely consists of using neutral and inclusive language in recruitment adverts, making use of anonymous applications and shortlists, and using scored and structured interviews using a panel (CfAB, 2018).⁶⁹ Unconscious bias is highly prevalent barrier in the literature, but it is noted that these approaches must be taken in an intersectional way. It is observed that interventions such as anonymising applications which focus on qualifications are helpful for members of ethnic minority groups, but negatively impact the prospects of older applicants, for whom qualifications earned in youth are less common (House of Commons, 2018)⁷⁰. It should also be noted that methods that remove unconscious bias often make the assumption that a pure unbiased meritocracy will reduce disparity, but this does not account for barriers of generational inequality which prevent a level playing field. While anonymous applications seem to be an improvement over negatively biased recruitment, there is less information in the available literature on how anonymous applications compared to positive action recruitment models.

Organisational culture change

⁶⁹ [Becoming an age-friendly employer, Centre for Aging Better, 2018](#)

⁷⁰ Older people and employment: Fourth Report of Session 2017–19, House of Commons Women and Equalities Committee, 2018

- 5.66 Another method that is proposed in the literature is creation of a general culture of diversity and inclusion, which in turn allows the improved function of other EDI strategies. In a civil service review on removing barriers to “Black, Asian, and Minority Ethnicity staff progression,” it is advocated that organisations need to enact cultural change in addition to other interventions. Culture change as detailed in the review can take the form of: a highly publicised commitment to a EDI plan; building a critical mass of “Black, Asian, and Minority Ethnicity” role models at senior levels, preferably via an internal talent pipeline, though this can be kick started by bringing in successful ethnic minority directors from industry; and make special effort to establish, recognise, and/or support race & diversity staff networks (Ethnic Dimension, 2014)⁷¹. This can also be done by creating “a ‘positive inclusion climate,’ which makes employees feel that their social identities are valued and celebrated”. The main methods for the creation of an inclusive climate are: (1) organisational practices; (2) interactions among employees; and (3) objective characteristics of the work setting (Nishii & Rich, 2013)⁷². In the civil service review, a method of creating and perpetuating the culture of inclusion is to create a leadership structure that has diversity accountability, and that this accountability should be clear both within the organisation and from an external perspective. The review suggests that this responsibility is also stratified throughout the organisation, recommending that permanent secretaries and functional leads for all key areas should have “responsibility for delivering measurable diversity outcomes”, and line managers should have “diversity objectives built into their job descriptions and their competencies developed as inclusive leaders” (Ethnic Dimension, 2014).
- 5.67 The importance of leadership and accountability thereof is consistent across the literature. In its report on creating age friendly employer organisations, a Centre for Aging Better report states that an important method for the implementation of a Protected Characteristic (PC) positive culture is leadership. It states that “Leadership of PC-friendly workplaces comes from the very top, with a clear declaration of intent and modelling of good practice from the executive team.” In a

⁷¹ [Identifying and Removing Barriers to Talented BAME Staff Progression in the Civil Service, Ethnic Dimension, 2014](#)

⁷² Creating Inclusive Climates in Diverse Organizations, Nishii L. H. & Rich, R. E., 2013

report on workforce and board level diversity in the NHS, a large emphasis was put on the role of leadership and accountability, with recommendations made that bodies' CEOs should have explicit responsibility to lead on EDI, and to also have members of staff/boards who are explicitly responsible and accountable for diversity (Hemmings, Buckingham, Oung, & Palmer, 2021)⁷³. It states that leadership visibility and engagement on these topics are "crucial to driving change". This links with the findings of a report from the National Audit Office, where among its recommendations for cementing a "business case for diversity", it noted that data driven organisational accountability would be likely to "help galvanise" support for diversity initiatives. Further the report notes that "accountability is fundamental to change" and that diversity leads would address the accountability barriers in the civil service due to its federal and sometimes anonymous nature (National Audit Office, 2015)⁷⁴. The CfAB review also makes specific mention of the importance of systematising that leadership via HR action, as a means of embedding those decisions in the organisation's ways of working (CfAB, 2018). In a World Economic Forum report on EDI initiatives, it is also acknowledged that "achieving diversity, equity and inclusion requires an organisation-wide effort from the most senior leaders of the organisation, who can set the tone and lead by example with their actions" (World Economic Forum, 2020)⁷⁵. However, it also stated in its companion review 'HR 4.0'⁷⁶ that their research showed that systemic diversity initiatives are most effective when they fundamentally transform the way the organisation operates, as opposed to more ad-hoc per-team solutions.

- 5.68 Methods of embedding this culture throughout the organisation can be via highly overt diversity initiatives such as those previously mentioned, but all staff measures such as policies on bullying, discrimination, and racism have a motivational effect which can be observed to, over time, improve the progression of minority groups in

⁷³ Attracting, supporting and retaining a diverse NHS workforce, Hemmings, Buckingham, Oung, & Palmer, 2021

⁷⁴ Cabinet Office and cross-government: Equality, diversity and inclusion in the civil service, The Comptroller and Auditor General, 2015

⁷⁵ Diversity, equity and inclusion 4.0, World Economic Forum, 2020

⁷⁶ HR 4.0, World Economic Forum, 2020

organisations (Wang & Seifert, 2020)⁷⁷. Indeed, these measures can contribute to a greater feeling of inter-group fairness and contribute more strongly to inclusion than a narrow focus on fulfilling targets or legislation. Also in Wang and Seifert's report, it was found via a Unison funded survey of 5 English local governments that interventions designed to eliminate perceptions of unfairness, including pay fairness, were effective at removing the undermining effect perceptions of unfairness can have on diversity initiatives. Specifically, it is noted that if management "ensure an equal work environment - no bullying, no discrimination, and no racism" then ethnic minority staff members "tend to accept that their pay was fair as well" (Wang & Seifert, 2020). Additional policies which increase a general feeling of fairness and accessibility can be achieved via flexible ways of working. The business disability forum wrote in support of making flexible working the default. The forum noted that ways of working brought about by the Covid pandemic have shown that it is possible to make systems which remove barriers for a specific characteristic (in this case disability), with a policy that materially benefits all employees (Webber, 2020)⁷⁸.

- 5.69 In its recommendations on inclusivity strategies, the 2021 equality framework for local government notes that "excellence in inclusive strategies" would suppose that an organisation had policies in place that prevent bullying and harassment, and ensure all staff are treated with respect, that policies are applied evenly across all groups, and that staff are involved in the development of these strategies, and feel able to have "difficult discussions" with managers relating to these policies. In all, it highlights methods by which a feeling of fairness can be cultivated, and how buy-in can be achieved throughout the workforce (Local Government Association, 2021)⁷⁹.
- 5.70 A study based on data from the European Business Test Panel (EBTP) survey found that a "crucial" element in the successful implementation of diversity policies and practices is to include workforce representatives in decision-making. In addition to reasons already mentioned, the report notes that often implementing policies that

⁷⁷ BAME Staff and Public Service Motivation: The Mediating Role of Perceived Fairness in English Local Government, Wang W. & Seifert R., 2020

⁷⁸ Disabled jobseekers 'still face barriers to public sector roles', Personnel Today, 3rd December 2020, Webber A., 2020

⁷⁹ Equality Framework for Local Government (EFLG) 2021, Local Government Association, 2021

minority groups ask for that are unrelated to diversity can improve diversity by improving conditions in the organisation which disproportionately benefit women and minority groups (Weiler, 2006)⁸⁰. The policies which were specifically listed to have these effects included: anti-bullying policies; flexible working and home working policies; grievance, complaints and safety at work policies and procedures; and recording and management information systems to measure progress against equality goals.

- 5.71 Regardless of the method of intervention used, another theme throughout the literature is the importance of diversity data collection. A PwC report on diversity data collection and analysis makes the case that data collection and ongoing monitoring is important to success, both for the comparison with other organisations and within to compare with past data. It is important to perform longitudinal analysis to assess the success of interventions over a long period of time. Data collection exercises will fail to provide meaningful insight if they are undertaken as a “one off” exercise, and thus data collection will require continual and consistent buy-in from employees and leadership (Bennett & Buwanabala, 2021)⁸¹. Some of the recommended methods in the document include “Integrating monitoring into the existing HR processes [...] e.g. having a diversity overlay when reviewing pay decisions and performance outcomes.” It also recommends the use of staff surveys for data collection if an HR tool cannot be used. Additionally, while it is easier to measure diversity in this way, the source suggests that more successful interventions require the measurement of inclusivity in the same way. It is recommended that this is done via the same HR portal/survey so that results can be aggregated by staff diversity or progression level to give a highly interactive, intersectional, and granular picture of the inclusivity landscape. This can be further combined with other HR analytics such as “staffing, benefits, staff survey responses and performance metrics to allow for more nuanced analyses” (Nolan-Flecha,

⁸⁰ [Companies and workers benefit from diversity policies, European Foundation for the Improvement of Living and Working Conditions, Weiler A., 2006](#)

⁸¹ Diversity Data Guide: Collecting and analysing data on the inclusion and diversity of your workforce, Bennet, K. & Buwanabala, J., 2021

2019)⁸². Once a long-term evidence base is established that can enable learning about diversity and inclusivity, not only can organisations assess their interventions, but it is also suggested that it is possible to predict trends into the future based on past information, and set more realistic evidence-based targets based on past trends (Bennett & Buwanabala, 2021).

5.72 It is also important that this data collection is adequately resourced and costed from the outset, including full plans for how the data will be collected and used. In a review of NHS diversity and inclusivity, the writers noted that it was difficult for the NHS to use the data accurately because there were “substantial differences in funding available for equality, diversity, and inclusion programmes of work.” Additionally, it was noted that “conversations suggest that equality, diversity, and inclusion leads can sometimes be under-resourced and exposed to significant responsibility without sufficient support or seniority” (Hemmings, Buckingham, Oung, & Palmer, 2021)⁸³. The UKRI AdvanceHE EDI UK review recommends that data collection methods are standardised across different parts of the research landscape as far as is practical, which would allow the development of overarching EDI benchmarking data, as well as recommending long term data collection on intervention effectiveness (Guyan & Oloyede, 2019)⁸⁴. Without adequate planning and resource, it is difficult to glean useful insights and ensure the collection of the relevant data. For these reasons, Oung and Palmer’s NHS report recommended that trusts/bodies should have “a substantive equality and diversity lead, to help provide enhanced specialist support for trusts on key challenge areas” who would have the time and resource to dedicate to this task. It is advised that it is important for data collection approaches to also be used with any pilot scheme in certain public sector bodies before rolling out approaches widely. It is also important to measure unsuccessful prospective appointees/applicants as well as successful

⁸² Next generation diversity and inclusion policies in the public service: Ensuring public services reflect the societies they serve, Nolan-Fletcha, 2019

⁸³ Attracting, supporting and retaining a diverse NHS workforce, Hemmings N., Buckingham H., Oung C., Palmer W., 2021

⁸⁴ Equality, diversity and inclusion in research and innovation: UK review, Guyan, K. & Oloyede, F. D., 2019

appointees as it allows organisations to measure recruitment blockages as well as internal organisational ones (LSE Consulting & Klingler-Vidra, 2019)⁸⁵.

- 5.73 While it was noted earlier in the review that AI solutions might present some barriers for accountability reasons, in some of the literature there is a suggestion that AI and similar technological advances might be able to act as solutions for some of the barriers to increased diversity. In a World Economic Forum Review into the subject, talent sourcing and selection, organisational analysis and monitoring, and employee experience, reward and developing are identified as areas for action where technological solutions could help. Regarding talent sourcing, it is suggested that language models could address biased language in job advertisements, which could “evaluate the patterns within the language used in a job advert and rate it on its neutrality and appeal to different populations”. Similarly it suggests that AI could expand appointee search capabilities to target diverse candidates via “Candidate search platforms offer[ing] enhanced connectivity to sub-groups of diverse candidates” amongst other measures (WEF, 2020)⁸⁶. It is noted that while these developments could act as labour and resource saving methods of carrying out minutia of EDI details, there are concerns around bias in AI models if they are not used transparently, and that the machine learning can be fallible based on the human input that it is ‘fed’. Indeed, some technological solutions have been implemented, but found that the technology detracted from results, in particular this was the case with EDI training, which was deemed to be more effective when carried out by a human instructor rather than via computer, though the reasons for this do not appear to be fully known in the explored literature (Moody & Aldercotte, 2019)⁸⁷.

Intersectionality

- 5.74 It is noted in the barriers section that there is no correlation between gender and ethnic diversity in boards, and the kind of intervention that increases participation of

⁸⁵ Global review of diversity and inclusion in business innovation, Klingler-Vidra, R., 2019

⁸⁶ Diversity, equity and inclusion 4.0, World Economic Forum, 2020

⁸⁷ Equality, diversity and inclusion in research and innovation: international review, Moody J. & Aldercotte A., 2019

one group can present barriers to others. Women and various minority groups have different requirements for interventions, and therefore it stands to reason that the more specifically tailored to the subgroup an intervention is, including intersectionality, the greater the effect it will have (Borry, Getha-Taylor, Holmes, 2021)⁸⁸. It is noted in a US paper on the use of executive orders to increase diversity in the federal workforce that the sum of discrimination faced by, for example, black women was greater than the discrimination faced by white women and black men combined, and that intersectional interventions were deemed necessary to ensure that certain subgroups were not left behind by the intervention. Indeed, the importance of intersectional approaches regardless of intervention style are emphasised in literature (previously referenced in this report) on diversity programs in the US federal government, the European Commission, the New Zealand Government, the NHS, and the UK civil service. It is of particular interest that tailoring intersectional interventions is better understood given the increasing diversification of workforces (Parker, Young-Hauser, Loga & Paeac, 2022).⁸⁹

Use of external resources

- 5.75 While the literature broadly recommends internal benchmarking, target setting and the implementation of fairness and diversity strategies, there are also reports which recommend the use of external resources and guidance to fill organisational knowledge/experience gaps, and to provide a source of accountability. The OECD Annual report on diversity and inclusion promoted the use of external forums and benchmarking tools to know where organisations stand relative to each other. There is also a recommendation that membership of external forums such as Friends of Gender Equality Plus where EDI research and initiatives can be discussed is also beneficial for the organisations' diversity outcomes (OECD, 2022)⁹⁰. The role of the influence of external NGOs for training and accountability also appears in the examined literature. It is noted in a research paper on increasing women's civic

⁸⁸ Promoting Diversity and Inclusion in the Federal Workforce: Executive Order 13583 and Demographic Trends, Borry, E.L., Getha-Taylor, H. & Holmes, M.H., 2021

⁸⁹ Gender and ethnic equity in Aotearoa New Zealand's public service: where is the progress amid the pandemic?, Parker J., Young-Hauser A., Loga P. & Paeac S., 2022

⁹⁰ Annual diversity and inclusion report 2022, OECD, 2022

participation in Wales that due to their “voluntarist foundations and altruistic morals and values” NGOs proved to be instrumental to work such as “empowering interviewees, further equipping them with skills and resources to enable their future participation in civic life” (Hibbs, 2022)⁹¹. Additionally, as NGOs may have a closer knowledge of the socio-political contexts of minority groups than the body/employer in question, they may be more effective in “multi-stakeholder partnerships to build equality and achieve sustainable development goals through engaging otherwise-excluded communities” (Hibbs, 2022). On the topic of the use of external organisations, the McGregor Smith Review makes recommendations for mandatory training for all staff on unconscious bias, and further additional workshops for executives and senior management (McGregor-Smith, 2017).

Guidance and role models

- 5.76 In addition to targets and nudge methods, another method for increasing diversity in higher levels of organisations is via guidance, in the form of both role models/mentors as well as staff networks. In the CiPD (2017) report on Black, Asian, and Minority Ethnicity employee progression to the top, it makes specific mention of the perceived effectiveness these programmes, and in the surveys cited in the CiPD work, of the staff who had used guidance and staff network initiatives, “100% said mentoring is very/fairly effective and 73% said a Black, Asian, and Minority Ethnicity employee network is effective in helping their career development.” Further, on the topic of role models, the perception was similar: “two thirds (67%) of the 24 diversity and inclusion leads they surveyed said a lack of diverse role models was a barrier to increasing ethnic diversity in the pipeline”. In addition to diversity, staff networks have been shown to increase inclusivity. In a review of EDI in the US public service workforce, staff networks helped members of minority groups feel less isolated, more accepted, and more likely to be themselves at work, and thus bring more of their own perspectives (Mission Square & Young, 2021)⁹², a noted strength of diversity. This was noted to be particularly true in areas

⁹¹ “I could do that!”– The role of a women's non-governmental organisation in increasing women's psychological empowerment and civic participation in Wales, Hibbs, L., 2022

⁹² Diversity, equity, and inclusion in the public service workforce, Young, G. & Mission Square, 2021

such as tech which were more homogenous. While the literature is broadly in support of the benefits of staff networks, the international UKRI review of EDI stated that while the networks provided staff with social or emotional support, which was acknowledged as valuable, the analysed connections between networks and job prospects were “limited” (Moody & Aldercotte, 2019). It may be the case that networks increase a perception of inclusion but do not help to enable advancement, however it is noted that a feeling of fairness is considered essential to successful interventions.

Business case

- 5.77 Positives and negatives were listed in the literature regarding making the business case for diversity. It is suggested that it is important to make the business case for diversity to get key decision makers and management invested, but it is noted that organisations should not only rely on the business case for diversity. While the business case for diversity is useful to dispel negative attitudes towards diversity and convince people who would not be ‘on-side’, it is noted in the literature quite consistently that successful diversity interventions and capturing the full benefits of organisational diversity “require genuine efforts of inclusion” (OECD, 2011)⁹³. Indeed, an over-reliance on the business case for diversity was a common theme for examined diversity initiatives that were unsuccessful (Moody & Aldercotte, 2019). In addition to an overreliance on the business case, other examples of diversity initiatives being unsuccessful are those that are used for image or branding reasons, but with little regard for impact (OECD, 2020). Additionally this applies even if diversity initiatives are taken up with genuine regard for impact, but without the consideration of inclusion as part of the culture change. In the literature, diversity targets for diversity’s own sake appear to work as an intervention for increasing diversity, but it is best matched by building inclusive work environments, which is more effective at building a culture of diversity and getting the most out of diverse workforces (WEF, 2020). Diversity policies should be long-term and ambitious to foster a culture of diversity and inclusivity, but long-term strategy

⁹³ Fostering diversity in the public service, OECD, 2011

should be punctuated with short term equality goals that are actionable, and measurable to ensure progress, accountability, and evaluability (Parker, Young-Hauser, Loga & Paeac, 2022).

6. Conclusions

How and to what extent is public sector body diversity data is collected?

- 6.1 Findings from this research show that although some diversity data for board members is widely collected across public sector bodies in Wales, the range and consistency of collected information is variable and there is a clear need to standardise data collection approaches across organisations.
- 6.2 Measuring diversity within boards is also complicated by the different processes for appointing executive or non-executive members, specifically how their equality information is captured and who it is held by. There is not a consistent approach that brings data for all board members together in a meaningful way.
- 6.3 In addition, reporting granular diversity information about board members is limited due to the small size of boards, and this is the case even when aggregating data across public sector bodies.
- 6.4 Evidence from the literature reviewed suggests that most diversity monitoring in public sector bodies and other enterprises is done via self-reporting staff surveys.
- 6.5 Conducting large scale surveys, preferably utilizing online portals, which allow for self-reporting is an effective and uncontroversial method (compared to non-self reporting methods) for collecting large amounts of data.
- 6.6 Examples of effective data collection utilise existing HR structures and portals and collect diversity data regularly as part of administrative data collections, and upon recruitment or appointment.
- 6.7 It is ideal to collect data on as many different protected characteristics as possible during the same data collection exercise, and to do so in a way that can be linked to as many different indicators as possible from the same or other sources.

- 6.8 Alternative data collection methods including external-perspective labelling are available, and have successful case studies and compelling theoretical justification, however these methods are more controversial, and target populations may take issue being classified from an outside perspective.
- 6.9 Elements present in the most effective data collection exercises are those which require a regular public disclosure of the results and those conducted by organisations who have cultivated a large degree of trust within the organisation that data disclosure would not possibly result in reprisals.

The value of diversity in public sector bodies

- 6.10 There is evidence in the literature that diverse public services/bodies are more attentive to the needs of diverse populations, in particular customers of those specific public sector bodies. The primary literature which supported this assertion was smaller scale, but still robust, for example NHS studies noting the improved outcomes of patients from minority backgrounds when receiving care from a more diverse workforce or employees from the same minority group.
- 6.11 Another outcome, with more case study backed examples is the equality benefits that are seen from diversity within a public sector body and board within the organisation itself. The literature suggests that an organisation which is perceived to be more diverse is more likely to receive more applications for leadership or board positions from more people from minority groups. Diversity in leadership provides role models for progression, providing proof that the organisation is a diverse and inclusive one, and giving a road map that other people from minority groups can follow. It is suggested that an organisation with diverse leadership will experience a positive feedback loop - wherein its diversity will cause a greater number of applications from minority groups for future leadership posts, in turn creating a more diverse culture. It is noted that to realise these benefits, this must be viewed intersectionally, for example a higher representation of women in leadership is unlikely to result in positive outcomes for people from ethnic minority backgrounds, or vice versa.

6.12 Diversity is not only beneficial to wellbeing improvements but can lead to better performance in other more tangible areas. While the sources backing this are primarily studies on private sector publicly listed companies, in those studies it is noted that more diverse companies, or companies with more diverse boards, have outperformed companies with less diverse boards on several key financial measures over the course of the study.

Barriers to diversity in public sector bodies

6.13 Barriers discussed in the literature are largely progression barriers, more so than appointment barriers. That is not to say that there are no barriers to appointment - studies on the success of anonymous applications for people from ethnic minority backgrounds attest that in general there is a recruitment disparity based on protected characteristic groups.

6.14 Systems which remove bias are lauded throughout the literature as methods for improving the recruitment and appointment outcomes of people with associated or protected characteristics, meaning it could be concluded that there is a barrier relating to bias, conscious or unconscious.

6.15 Active discrimination is also a barrier in public sector bodies, with a sizable minority of staff in several public sector bodies, notably the NHS, having been discriminated against in work, or feeling they have been denied opportunities for discriminatory reasons.

6.16 Despite this, the greater proportion of the literature suggests that the main driver for ongoing disparity in public sector bodies is a progression gap, which gets more prominent at more senior levels of progression. Particularly in the senior UK civil service the literature has suggested that there is a recruitment style which supposes certain qualities typical of British middle to upper class as being signifiers for a culture match. It suggests there is an in-group bias which is particularly prominent for progression, or for the assignment of important projects which favours personal affinity with the in-group over other factors, unfairly disadvantaging those from other backgrounds. This also contributes to a profound socioeconomic background gap,

which is just as, if not more, pronounced than gaps among protected characteristic grounds.

- 6.17 The assumption of blind meritocracy as a potential solution for bias also fails to address inequalities owing to historical imbalances between groups which unfairly disadvantage sections of the population.
- 6.18 AI tools, another option often proposed to reduce barriers and bias, can in turn become a barrier in themselves. AI tools, whether human designed or based on machine learning, base their decisions on the previous programming or inputs from humans and can replicate their biases. If AI is being used, it is essential to disclose how it was developed to mitigate its bias as you would any human run system.
- 6.19 Additionally, some barriers are created through the interventions used to alleviate other barriers. As mentioned previously, name anonymous applications have been successful in increasing the participation of people from ethnic minority backgrounds. However, those same interventions have been shown to be discriminatory against older applicants, as per capita qualification levels and expectations were lower when they were of school leaving age. It is again concluded that diversity barriers must be viewed with intersectional nuance, as a one size fits all approach can create barriers for one group that did not previously exist.
- 6.20 Finally, a notable barrier to appointments, retention, and promotion in public sector bodies is the lack of available data. It is often stated in the literature that data is limited when trying to disaggregate by certain characteristics, and therefore it is difficult to state with certainty to what extent an intervention was effective.

Solutions for addressing barriers to diversity in public sector bodies.

- 6.21 Clearly disclosing the organisation's diversity objectives as measurable targets has been shown to be an effective method for addressing barriers. If leaders set and clearly disclose these targets, it shows the ambition of the organisation, as well as creating accountability and external pressure to succeed on these targets. It is also an effective signal to potential applicants for board positions with protected or associated characteristics that the organisation would be welcoming. This has been

shown to increase applications or willingness to apply, which helps address another barrier, that of a lack of supply of applicants.

- 6.22 The makeup of board and senior leadership positions can also help to address barriers simply through inclusion. Visible role models in the senior leadership of an organisation can provide measurable improvements to feelings of fairness in an organisation. Feelings of unfairness can be almost as damaging as actual unfairness if those negative perceptions of an organisation produce an attitude of fatalism, the feeling that there is no point in trying to get on the board because the institution is unfair, reducing the number of applications despite positive systems being in place. Therefore, it can be concluded that having role models in leadership positions can address barriers created by perceived unfairness.
- 6.23 It is important for leadership to be invested in improving diversity, both personally and contractually. This requires specific leadership members and committees to be visibly responsible and accountable for diversity outcomes, both internally and externally. By having diversity outcomes as a KPI for senior leadership, a barrier is addressed by incentivising them to scrutinize decisions that result in unsuccessful applications from people from minority backgrounds to ensure that it is for good reason, and not unconscious bias.
- 6.24 In addition to leadership, organisational culture can be a barrier for people not from the cultural in-group that makes up existing senior ranks of organisations. Concerted efforts to change organisation culture can have a positive impact in reducing these barriers. The methods in the literature most effective at creating an inclusive culture were training on unconscious bias and proper hiring/promoting practice, as well as increased systemisation and a lessening of reliance on personal preferences, instincts or feelings in the hiring and appointing process.

7. Future considerations

- 7.1 Based on the findings of the literature review, a few areas can be drawn out that need further consideration. Several strategies could be adopted to help achieve Welsh Government objectives of improving diversity in the boards and workforces of public sector bodies, and to have that diversity be beneficial to the organisation,

minority groups in Wales, and the wider public. To replicate successful strategies of other organisations, or synthesise interventions based on the core strengths of other approaches, the following are considered the main areas that need to be considered:

- 7.2 **Data collection methods:** To understand diversity in organisations, data collection exercises need to be taken regularly and as part of routine administrative data collections at workforce and board level, acknowledging possible issues with small sample sizes and disclosure. They should be collected upon appointment, contract change etc. as part of the HR process. For organisational workforce surveys, existing HR portals should be used to easily anonymously link data to protected and associated characteristics.
- 7.3 **Socio-economic background:** In any area where it is not already collected, there should be a focus on collecting SEB data when doing diversity data collections and linking it where possible to general diversity data. It is suggested in the literature that SEB may be just as significant a barrier in the senior civil service as protected characteristics, and public sector bodies would benefit from having data to be able to address this.
- 7.4 **Alignment with existing private sector policies:** Some of the more prescriptive and ambitious diversity policies in the UK corporate governance code could be applied to public sector body boards, particularly those involving the annual public disclosure and evaluation of diversity targets and progress, use and disclosure of diversity KPIs, increased expected use of the comply or explain model, disclosed individual and committee accountability for the achievement of diversity targets and achievement thereof. These targets, if applied, should be applied on a comply or explain basis, to acknowledge the different circumstances of different public bodies, and acknowledging a one size fits all approach may not work at the same pace for different boards.
- 7.5 **Disclosure:** A system of accountability for decision makers tied to diversity outcomes improves diversity and inclusion. In the literature, in both the private and public sectors, this seems to be best achieved through clear and publicly disclosed

members of senior leadership teams, and their specific measurable targets on improving diversity.

- 7.6 **Accountability:** To create a perpetual culture of inclusion in an organisation, one strategy is to ensure that the leadership structure and accountability for diversity and inclusion is clearly disclosed, both internally and externally. The literature suggests that it would likely improve success against diversity outcomes if high ranking officials and functional leads for all relevant areas have their responsibilities and measurable targets in this area clearly disclosed, organisationally and publicly. This responsibility would then be stratified through the lower levels of the organisation, and internally made clear that diversity management and inclusivity become competencies and KPIs for line managers.
- 7.7 **Employee welfare policies:** Not all strategies for improving diversity and inclusion require specific tailoring to a minority group or groups; a universally applied equality strategy is also an effective method. This requires robust policies in place to combat bullying and harassment which ensure that all organisation members are treated with respect and gives members confidence any raised concerns will be taken seriously and properly addressed. It is important that, for this approach to meaningfully improve diversity and the impact thereof, policies need to be applied equally across all characteristic groups, and it is important that it is clearly publicised that this is the case. These policies should be designed with input from minority groups to ensure that the policies are fit for purpose for all groups and that the concerns of individual minority groups are not overlooked in the design process.
- 7.8 **Fairness:** It is suggested throughout the literature that a perception of fairness can be just as important for improving diversity and inclusion in an organisation as well structured and implemented policies. In addition to a policy framework which promotes fair treatment of all members of the organisation, additional methods which are useful to the creation and maintenance of a culture of fairness and inclusion include the creation of new staff networks dedicated to improving outcomes of specific minority groups, or the recognition of existing networks. Management should formally recognise these networks and create formal procedures for dialogue, and for receiving feedback from the networks. Additionally,

advertising or publicising prominent role models within the organisation from minority groups makes it clear that progression within the organisation is possible. Where feasible, role models should have mechanisms for mentoring or supporting people from minority groups who may need guidance relevant to their specific perspective. Additionally, the literature suggests that if a public sector body is perceived to be fair to people from minority groups, board positions are likely to get more applications from people from those groups.

- 7.9 **Training:** Those responsible for appointing candidates to public sector body boards could be provided with material that informs them of the ‘business case’ benefits of board diversity. It should be clear to those responsible who may not be aware of the existing evidence that pushes for diversity are not simply “tick-box exercises” and provide real benefit to the public sector body, the minority groups who use its services, and the wider population.
- 7.10 **Measurement:** To implement successful interventions which improve diversity and inclusion within Welsh public sector bodies, it is important to be able to evaluate them, and this requires a high quality and quantity of data. As far as possible, this diversity measuring data should be collected via HR portals/surveys, in a way that allows the results to be aggregated by protected characteristics and progression level within the organisation. This allows for detailed and intersectional analysis of the data and can be combined with other data sets collected by HR to give as full a picture of the organisations’ diversity landscape as possible. The regulated public appointments data held by the Public Appointments Team at Welsh Government could be explored further as a source of information. A greater understanding of the data collection processes for regulated board members is essential to inform future survey development work in this area.
- 7.11 **Intersectionality:** Whichever intervention is implemented to improve diversity outcomes; all interventions should be designed with intersectionality as a core consideration. An intervention that is designed to target only one group may be ineffective or actively harmful for another. It is important to consider interventions in how they may impact different intersectional groups to prevent unintended negative consequences. The more specifically tailored to a group an intervention is, the more

successful it typically is, therefore there must either be multiple solutions, or solutions designed with multiple specific groups in mind, which is an important distinction from a generic design centring the experience of the majority group as a template.

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Annexes

Annex A - Public Sector Bodies who completed Survey 1 on approaches to collecting Board member diversity information

1. Advisory Panel to the Welsh Language Commissioner
2. Agricultural Advisory Panel for Wales
3. Amgueddfa Cymru - National Museum of Wales
4. Aneurin Bevan University Local Health Board
5. Arts Council of Wales
6. Betsi Cadwaladr University Health Board
7. Career Choices Dewis Gyrfa
8. Cwm Taf Morgannwg University Local Health Board
9. Design Commission for Wales
10. Digital Health and Care Wales
11. Health Education Improvement Wales
12. Higher Education Funding Council for Wales
13. Hybu Cig Cymru
14. Life Sciences Hub
15. Local Democracy and Boundary Commission for Wales
16. National Academy for Educational Leadership
17. National Library of Wales
18. Pembrokeshire Coast National Park Authority
19. Powys Teaching Health Board
20. Public Health Wales NHS Trust
21. Qualifications Wales
22. Royal Commission on the Ancient and Historical Monuments of Wales
23. Snowdonia National Park Authority
24. Social Care Wales
25. Sports Council for Wales
26. Swansea Bay University Local Health Board
27. Velindre National Health Services Trust
28. Welsh Ambulance Services National Health Service Trust
29. Welsh Industrial Development Advisory Board

**Annex B - Demographic profiles of public appointments in England and Wales
(Cabinet Office, 2022)**

Demographic profiles of public appointments in England and Wales (Cabinet Office, 2022)

Characteristic	Metric	Trends	2021	2020	2019
Gender	Board members	+3%	48%	46%	45%
	Chairs	+5%	33%	29%	28%
	All appointees	+2%	46%	44%	44%
Ethnic minorities	Board members	+1%	11%	9%	10%
	Chairs	+3%	8%	4%	5%
	All appointees	+2%	11%	9%	9%
Disability	Chairs		11%		
	Members		9%		

Annex C - Demographic profile of board chairs and members in Scotland (Ethical Standards Commissioner, 2021)

Demographic profile of board chairs and members in Scotland (Ethical Standards Commissioner, 2021)

<u>Target group</u>	<u>Difference in profile of chair cohort</u>	<u>Difference in profile of members cohort</u>	<u>Profile of board chairs at the end of 2020</u>	<u>Profile of board members at the end of 2020</u>	<u>Profile of board chairs at the end of 2019</u>	<u>Profile of board members at the end of 2019</u>	<u>Profile of board chairs at the end of 2018</u>	<u>Profile of board members at the end of 2018</u>	<u>Scottish population (2011 census)</u>
<u>Female</u>	+9.88%	+0.57%	39.29%	53.40%	29.41%	52.83%	28.24%	52.83%	51.5%
<u>Disabled</u>	-1.05%	+0.33%	10.71%	6.95%	11.76%	6.62%	9.41%	6.46%	19.6%
<u>Black and minority ethnic</u>	^	+0.57%	^	3.64%	^	3.07%	^	3.06%	4.0%
<u>Aged 49 and under</u>	+0.07%	-0.28%	5.95%	19.27%	5.88%	19.55%	9.41%	19.56%	54.3%
<u>Lesbian, gay and bisexual</u>	^	-0.27%	^	4.90%	^	5.17%	^	5.44%	6.0%

^ Values for fewer than five have been suppressed to decrease the risk of disclosure of information about individuals.