Can I ask you a personal question?

A guide to collecting Equality, Diversity and Inclusion data in the workplace.

pwc

REAL ESTATE BALANCE

Contents

Foreword

Recent social movements and the Covid-19 pandemic have exposed inequities within our societies and contributed to an increased focus on equality and fairness. At the same time, the evidence that an inclusive approach to employment is good for business continues to grow. Equality, Diversity and Inclusion (EDI) in the workplace is therefore a business and societal imperative, with opportunity and responsibility for organisations to take action to address inequality.

To create change, accurate data is needed to identify areas for appropriate intervention and to be able to measure progress. Most businesses still do not report EDI data beyond gender. **A PwC report** shows that only around 10% of UK companies have voluntarily disclosed their ethnicity pay gap. However, we are starting to see an increasing expectation on organisations to collect, analyse and report a broader range of EDI data. More than 130,000 people have signed the petition to introduce mandatory ethnicity pay gap reporting in the UK and although the government has stated that they do not intend on introducing mandatory reporting at this stage, they will be issuing guidance to support employers who are choosing to do so voluntarily.

However, collecting EDI data is not straightforward. The focus of this report is on collecting data on an attributable basis, allowing you to analyse your workforce and calculate metrics through the lens of EDI. We aim to share best practice as it stands today, but acknowledge that other categories of data may emerge as being crucial for capture as EDI data collection evolves as a discipline.

This guidance note provides insight into:

/ The business case for collecting EDI data
/ How to effectively collect broader EDI data
/ Overcoming common challenges in EDI data collection

Real Estate Balance and PwC have been working together to progress EDI in real estate since 2017. This guidance note draws on PwC's expertise in EDI research and feedback from REB members on the challenges they face in delivering on their shared commitment to gather their EDI data, track and report their progress and use the data to guide their priorities. Although it has been produced to assist real estate companies with carrying out that commitment, we hope its methodologies are applicable in helping to establish equal, diverse and inclusive workplaces across every industry.

Sue Brown / Managing Director / Real Estate Balance
Angus Johnston / UK and EMEA Real Estate Leader / PwC

It would not have been possible to produce this guidance note without the valuable contributions of the **Real Estate Balance Data Working Group**:

Karen Friebe / Bird & Bird LLP (Chair)

Sam Monger / Grosvenor	Emma Drake / Bird & Bird LLP
Jason Buwanabala / PwC	Paul Modu / Knight Frank
Neil Cable / Fidelity International	Anne Sloper / Grosvenor
Kelly Canterford / Changing the Face of Property	Katy Bennett / PwC
Stephanie Creed / Bird & Bird LLP	Anne Hurst / PwC

"For me, it really has to start with understanding the data and being able to measure diversity in multiple ways – by seniority, by levels of promotion, by department, by staff turnover.

So really understanding the trends within a business, the real picture rather than relying on high-level data points. This allows for much more focused action planning."

Mark Allan / Chief Executive Officer / Landsec

Overview

As Equality, Diversity and Inclusion issues continue to gain in prominence, more and more organisations are seeing value in collecting and analysing Equality, Diversity and Inclusion data (referred to as "EDI data" in this guide) about their workforce for the purposes of equal opportunities monitoring.
As they do so, a number of common challenges have emerged.

Consistency

The use of different definitions makes it difficult to benchmark performance and can lead to wasted effort in responding to multiple requests for information in different formats.

Intersectionality

Over time, the number of lenses through which organisations wish to look at EDI has grown, covering gender, ethnicity, sexuality, age, disability and social mobility among others. As a consequence, the range and volume of data required to track all these characteristics is considerable.

Clarity of aims and managing expectations

When undertaking a process to collect and analyse EDI data, employers will need to consider what their aims are in conducting their EDI data exercise and then identify what data they need in order to achieve these aims. This should assist both with ensuring that the exercise undertaken is effective for the employer, identifying and resolving risks at an early stage and managing the expectations of stakeholders and staff alike.

Data sensitivity and compliance

Information relating to an individual's protected characteristics, where individuals are identified or identifiable, is 'personal data' which may fall within the definition of 'special category' personal data under the General Data Protection Regulation, as applicable in the UK (**UK GDPR**). Therefore, where employers wish to collect and analyse EDI data for equal opportunities monitoring purposes, they will need to consider how to properly process any such data and what (if any) compliance steps and actions are required to safely process the relevant information, in the context of their overall aim(s).

Effort

As an increasing range of stakeholders become interested in equal opportunities monitoring data, including industry-wide, national and governmental bodies, there is a risk of creating inefficiencies and placing time burdens on the individuals and teams responsible for driving change in relation to Equality, Diversity and Inclusion.

Interpretation and communication

Successful EDI data collection relies critically on the goodwill of employees who are being asked to disclose potentially sensitive personal information. If trust in the motivation behind the exercise is not established, it is doomed from the start. In section 3C below we look at the importance of careful communications to employees in order to gain their trust.

This note provides practical guidance to Real Estate Balance members to help them address these challenges as they embark on this journey. It draws on emerging global best practice, adapting it for the UK real estate sector.

What do we mean by "Equality", "Diversity" and "Inclusion"?

In this guide, we are focusing on EDI data relating to your staff, whether they are employees, workers, contractors or volunteers. But what do we mean by the terms "Equality", "Diversity" and "Inclusion"?

The concepts of Equality, Diversity and Inclusion are often lumped together under one umbrella, but it is worth breaking down what we mean by them. The three concepts all have a slightly different emphasis or meaning and it can help to think about this when developing your strategy and planning how you will use data to do this.

/ Equality refers to the state of being equal, especially in status, rights, or opportunities and is often associated with concepts such as respect, dignity and fairness. Note that the concepts of equity and equality are often used interchangeably – equality generally requires us to treat everyone the same, whereas equity is more focused on individual need. You may decide that equity is a better description of the needs or aims of your business.

/ Diversity refers to the state of being diverse. In the workplace, this generally translates to the representation of varied identities and differences (sex, ethnicity, disability, sexual orientation, gender identity, national origin, socioeconomic status, thinking and communication styles, etc.) collectively and as individuals. Diversity is a relative concept – it refers to the composition of a group, rather than an individual. Referring to an individual as "diverse" effectively singles them out as different. The modern understanding of diversity in the workplace focuses less on what makes people different and more on understanding those differences.

/ Inclusion refers to the extent to which individuals – in the workplace, employees - feel a sense of belonging and value within the relevant group (for example, the workplace or their team). There is a common misconception that diversity plus equality/ equity results in inclusion. In practice, that is by no means the case. The key point here is that even among the most diverse teams, there is not always a feeling of inclusion. For example, women may be well represented at the senior management level but may still not feel included due to perceived gender roles, salary discrepancies and other factors.

Better Balance.

Each of these concepts is important in building a stronger, better balanced and safer workplace for all employees.

Just as the concepts of Equality, Diversity and Inclusion are separate but closely related, the data required to track progress in achieving them is similarly overlapping. In simple terms:

/ Equality or **equity** can be measured by monitoring differences in pay, progression, performance rating and employee sentiment across different diversity dimensions.

/ Diversity is mainly tracked by looking at the actual characteristics of the population in question.

/ Inclusion is generally best measured by asking employees from different groups whether they feel included in the organisation either through surveys, interviews or focus groups.

In the remainder of this report, when we refer to EDI data we mean all of these types of data. References to, for example, diversity data, refer specifically to data relating to diversity alone.

Why collect EDI data?

Given the increased corporate focus on EDI, robust data is a vital ingredient in any initiative seeking to understand and improve performance in this area. For example:

Transparency and accountability

Taking open actions to engage with and being transparent about the diversity of your workforce are important steps towards demonstrating your commitment to making meaningful change.

Better understand your workforce

Collecting EDI data in relation to your workforce will enable you to better understand your people, your workforce composition and the lived experiences of individual staff members. It can help you identify issues, gaps and biases that may be present and support engagement with staff.

Conduct and decision making

Greater diversity can lead to improved decision making and conduct as it helps reduce the biases created by groupthink. It also helps organisations understand the market they operate in, which in turn should support innovation.

Risk identification and management

Carrying out equal opportunities monitoring helps identify areas of risk, staff dissatisfaction and concern, allowing employers to manage and mitigate those risks at an earlier stage.

At the same time, key stakeholders including regulators and investors are expecting more transparency and greater commitments from organisations in respect of EDI matters.

Regulators

An increasing number of UK regulators have introduced measures, guidelines and requirements focused on EDI in the workplace. This is in addition to the introduction of gender pay gap reporting requirements under UK statute and new requirements for listed companies to disclose the ethnic diversity of their board and executive team.

Staff

Your approach to Equality, Diversity and Inclusion can have a significant impact on both current staff engagement/ retention and the attraction of new and future talent. Prospective employees, particularly those at the beginning of their professional career, are actively seeking employment or engagement with organisations whose principles and purposes align with their personal values.

Investors

Many organisations are facing increasing pressure from investors on their EDI policies and practices. The Institutional Voting Information Service (IVIS) is now **highlighting organisations** that do not meet certain gender and ethnicity criteria as having a significant issue to be considered.

Other stakeholders

Increasing numbers of customers, suppliers and clients are making commercial decisions based on performance against Equality, Diversity and Inclusion metrics e.g. through the inclusion of diversity clauses in contracts and the introduction of reporting on such metrics in requests for proposal ("RFP") documentation.

Achieving meaningful change.

Building an equal, diverse and inclusive workplace is a greater business imperative than ever before. The first step to achieving meaningful change in this space is by collecting EDI data.

How to collect EDI data

The first step in running a successful EDI data collection and analysis project is ensuring the restrictions and considerations of collecting this data are understood and the right stakeholders are involved in the process.

Key issues to consider before getting started

Discrimination

EDI data will almost certainly include data about characteristics which are protected under UK discrimination law. As such, there are clear risks with regard to the management of any EDI data and communication with staff about the collection and use of this data. Discrimination risks in relation to any EDI data project should be considered at the outset and should remain a central consideration throughout. Discrimination complaints and claims tend to be high profile and costly, so clear, consistent communications and engagement with staff will be key to managing these risks.

Data protection

In the UK it is possible to collect diversity data such as ethnicity and disability on an attributable basis but there are clear data protection considerations and risks in doing so and as such this should be done under the guidance of data protection lawyers. There are a number of additional compliance steps that employers will need to implement as this may involve the processing of (i) personal data and (ii) special category data under the UK GDPR. Complaints/ claims in relation to such activities tend to attract the attention of the Information Commissioner's Office (ICO), the media and staff.

Systems

If an employer wants to capture attributable EDI data, it is important to identify the most appropriate technology and systems for capturing this data and minimise data protection risks such as excessive sharing of personal data. For employers with a single HR system in place with self-service capability, use of this system may be the most efficient way to collect and manage any such data, allowing for easy entry and updating by staff members. Employers who have disparate HR systems and/ or disconnected staff will likely need to consider additional tools and technology to facilitate the collection and aggregation of responses obtained across different staffing populations. Whichever scenario applies, it is vital that appropriate role-based access controls and security measures are put in place to ensure compliance with data protection requirements.

Always ensure the restrictions and considerations of collecting this kind of data are understood.

Communications

EDI data should be collected on a voluntary basis (unless mandatory reporting obligations apply), so staff engagement is a key factor in the success of any EDI data collection and analysis exercise. Getting good response rates can be challenging and so building a clear communications strategy from the start will be critical to success. Likewise, managing the reaction and perception of staff is important in minimising the level of risk associated with any such project. It is therefore vital to plan your communications at each stage.

Who cares?

A successful EDI data collection initiative will require engagement from a range of internal and external stakeholders.

Key stakeholders

These typically include:

/ Leadership
Board level buy-in is critical.

/ Communications
To promote the strategy and engage staff.

/ Human Resources/ EDI specialist team
Support staff engagement and own the business case.

/ Staff
Early engagement will aid understanding and allow concerns to be addressed.

/ HR Systems/ Information Technology
Configuring data collection is key.

/ Staff representative bodies (e.g. unions)
Support staff engagement.
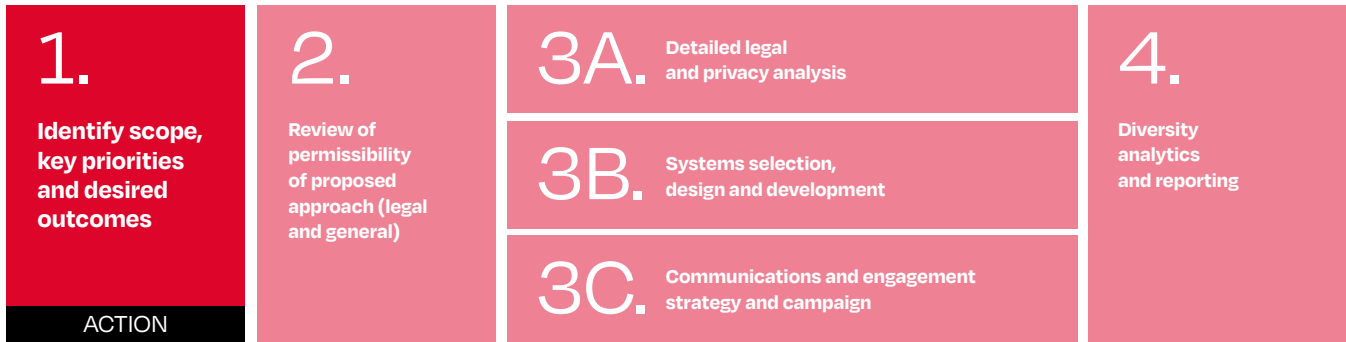
/ Legal, Privacy and Compliance
To ensure compliance with local legislation, assess risks and implement relevant requirements.

/ External advisors
Can provide help through independent advice, expertise and resources (e.g. consultants and industry groups).

What process should be used?

The diagram below sets out the key stages in a typical EDI data collection exercise. The scope and complexity of each step will likely be guided by the type of data collected and the size of your organisation.

1.	2.	3A.		4.
Identify scope, key priorities and desired outcomes	**Review of permissibility of proposed approach (legal and general)**	**Detailed legal and privacy analysis**		**Diversity analytics and reporting**
		3B. Systems selection, design and development		
ACTION		**3C.** Communications and engagement strategy and campaign		

1.

Identify scope, key priorities and desired outcomes

It is important to determine key objectives and agree on an appropriate scope at the outset – this should allow you to take appropriate advice on what can or cannot be done, allocate resources appropriately and identify any key risks at an early stage.

Key factors to consider in reaching this decision include:

/ Understanding your organisation's long-term EDI aims.

/ Identifying the purpose of EDI data collection for the immediate project.

Once a decision on the above has been reached, you will need to determine:

/ Which categories of EDI data to collect.

/ Which require the collection of data in identified/ identifiable form.

/ Where anonymised data collection is more appropriate.

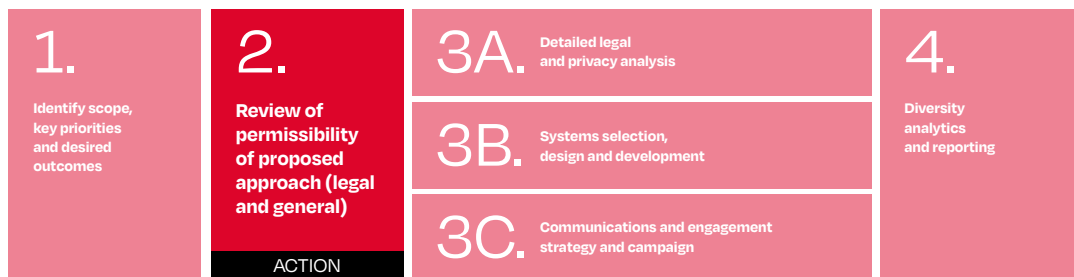/ Which stakeholders to involve and other relevant factors.

It is important to think about the type of EDI data you wish to collect and who you are collecting the data from, as this will inform your approach to collecting this data. Some of the main types of data and suggested collection methods are set out below:

Type of data	Potential collection method
Employee diversity data	Where permissible, encourage employees to self-report, ideally via an existing HRIS system.
Recruitment diversity data	Consider whether you can use an existing application tracking system or whether a separate tool or system is more appropriate. You may need to work with your recruitment agencies to ensure you can monitor this data effectively while complying with data protection requirements.
Inclusion and sentiment data	Regular, anonymous pulse surveys often work well for this type of data collection.

2.

Initial review of permissibility and risk of proposed approach

Once the scope is agreed, employers should undertake an initial permissibility and risk review, considering what data can and cannot be collected, taking into account (i) applicable data protection and employment law and (ii) cultural sensitivities, expectations and requirements. This initial review should help you to tailor your approach and plan the allocation of resources, by allowing you to identify and plan for areas where additional advice is needed, any additional stakeholders to involve, areas of higher risk and/ or cost and additional compliance requirements. At this stage, you should be undertaking an initial assessment of potential EDI data categorisation approaches and resources to support later systems design and configuration (see below and page 17 for our suggestions on data categorisation).

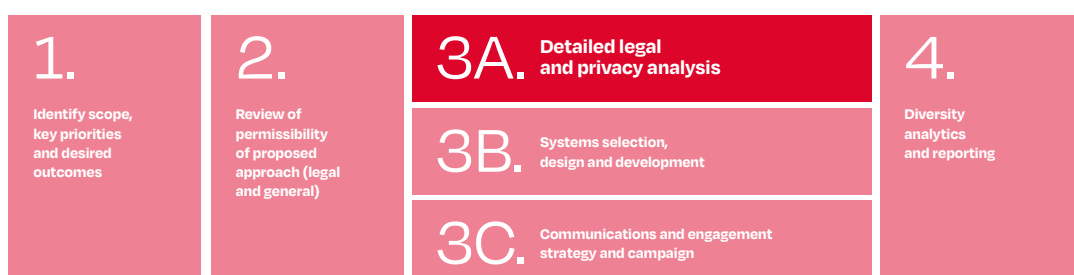| 1.	2.	3A.	4.
Identify scope, key priorities and desired outcomes	**Review of permissibility of proposed approach (legal and general)**	**3A.** Detailed legal and privacy analysis **3B.** Systems selection, design and development **3C.** Communications and engagement strategy and campaign	**Diversity analytics and reporting**
	ACTION		

3A.

Detailed legal analysis

Following the initial permissibility and risk review, your organisation should undertake more detailed analysis to identify key legal risks and compliance requirements in accordance with applicable data protection and employment legislation. Key points to consider are:

/ The collection of any EDI data should be voluntary. Whilst it is of course preferable to have a complete dataset for analysis purposes, it is unlikely that an employer would be able to justify or enforce a mandatory requirement to provide EDI data under UK law.

/ Where, as an employer, you want to collect and otherwise process personal data and special categories of personal data, you will need to comply with the UK GDPR. Aside from compliance with the general principles (e.g. data minimisation, transparency and so on), you will need to identify an appropriate legal basis for processing any personal data and to also identify applicable exemptions for processing any special categories data. You will also need to implement appropriate documentation, such as privacy notices and appropriate policy documents, conduct and document any required assessments and put in place any required technical and organisational measures.

/ You will also need to consider and implement controls, guidelines and training in order to ensure that any EDI data is processed in compliance with the UK GDPR and is not used in way that contravenes discrimination law.

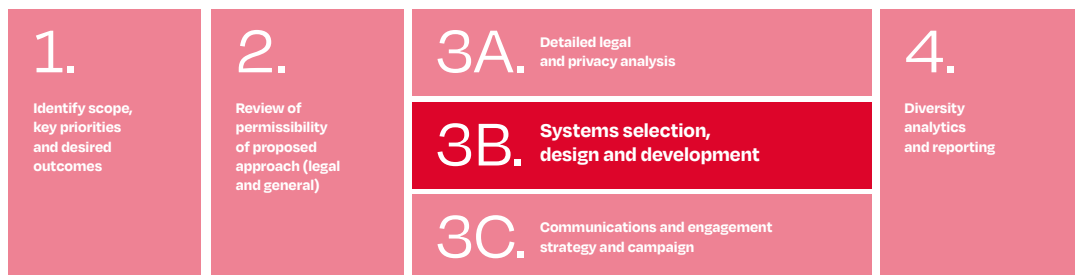| 1.	2.	3A.	4.
Identify scope, key priorities and desired outcomes	**Review of permissibility of proposed approach (legal and general)**	**3A. Detailed legal and privacy analysis** **3B.** Systems selection, design and development **3C.** Communications and engagement strategy and campaign	**Diversity analytics and reporting**

3B.

Systems selection, design and enablement

Tool selection will likely depend on the existing tools available (and their capability), the required use of the data and the extent to which this is permitted and the level of risk it carries. A single technology tool can help to collect data in a consistent and secure way.

The tools you use for any EDI data collection, storage and analysis must comply with data protection requirements and you will also need to consider discrimination law, cultural sensitivities and staff expectations. When conducting an international EDI data exercise, you should make sure that you can configure your tools at a local level (to take account of the requirements, risks and considerations for that jurisdiction) whilst also being able to generate meaningful data at a cross-company level.

If you have one, you should consider using your existing HRIS to collect and store staff diversity data (based on self-reporting by staff), as these systems will often provide you with more immediate tools to track and monitor response rates. You will, however, need to consider additional compliance steps when using them.

To capture staff sentiment on EDI matters, an anonymised survey is likely to be more appropriate. A key consideration here is designing any survey to balance the level of insight achieved with the need to maintain staff confidentiality. For example, if the number of women in a particular department is very small, any survey which allows responses to be summarised by department and gender risks making the responses of such staff identifiable.

1.	2.	3A. Detailed legal and privacy analysis	4.
Identify scope, key priorities and desired outcomes	Review of permissibility of proposed approach (legal and general)	3B. **Systems selection, design and development**	Diversity analytics and reporting
		3C. Communications and engagement strategy and campaign	

3C.

Communications: engagement strategy and campaign

One of the key challenges in collecting EDI data is encouraging staff to provide information which they commonly see as deeply personal and potentially sensitive. Careful communication planning is therefore critical, with a focus on building trust with staff, assuring them that their data will be protected and reinforcing the positive reasons for data collection. In doing this planning, it is important to recognise that the perspectives of staff members will differ. For example, some staff members may be reluctant to provide this data as they are uncomfortable sharing this data or may even fear it will be used for negative reasons, whilst others may assume that communications related to diversity and/ or wider EDI matters do not apply to them.
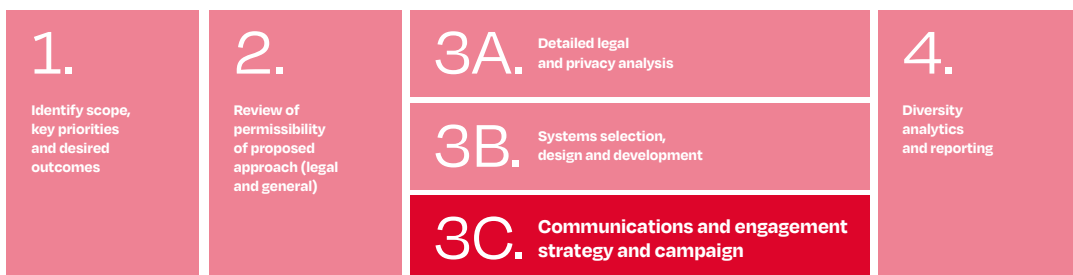
Early, planned and clear engagement with staff is vital, primarily to manage employee engagement, perceptions and reactions. Explaining what you are doing and why should help you to obtain a stronger a dataset and reduce the risk of staff resistance and adverse reaction, claims and other risks.

Staff communications also play vital role in ensuring that you get a useable end dataset. Data quality is key to this and is a particular problem in the employment context given staff concerns, lack of understanding across the workforce and the challenge of relying on self-identification. Early, continued and clear engagement with employees should mean that more people respond to the survey and that you get accurate responses.

Adverse staff reactions, suspicion and concern will affect the quality of the data you collect and increase the risk of employees raising complaints, grievances and claims (even where there may be no basis for claims in reality), all of which will require time and cost to resolve and carry potential brand/ reputational and other wider risks for the business.

When planning your communications and designing a survey, think about (i) clarity of expression, (ii) your audience, (iii) likely areas of concern, sensitivity etc. and (iv) your end goal. How are you going to encourage and reassure your workforce?

Support and guidance should be made available to staff and it should be made clear where further information can be found and to whom queries and concerns can be directed. Where appropriate, it may also be helpful to engage with representative bodies such as unions and works councils so they can support staff engagement. It is helpful to present and promote your EDI data collection and analysis exercise as part of your overall ongoing commitment to EDI.

1.	2.	3A.	4.
Identify scope, key priorities and desired outcomes	Review of permissibility of proposed approach (legal and general)	**Detailed legal and privacy analysis**	Diversity analytics and reporting
		3B. **Systems selection, design and development**	
		3C. **Communications and engagement strategy and campaign**	

4.

EDI analysis and reporting

Once EDI data has been collected, it can then be analysed and assessed in accordance with your strategy and objectives.
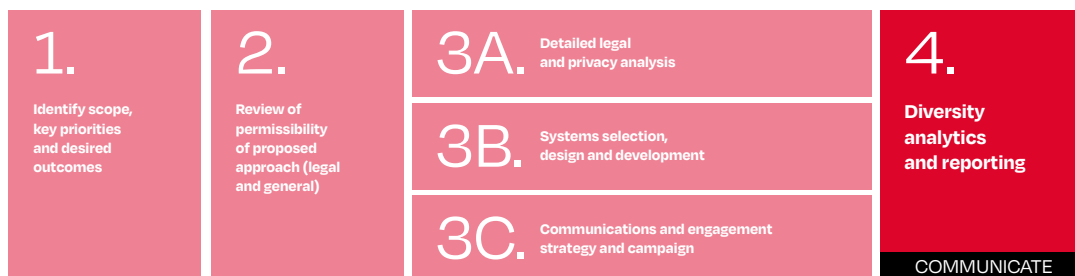
If you have been able to capture diversity data in a core HRIS, it should be possible to combine it with data on key events in the employment lifecycle, including employee start date, performance reviews, promotions and exit. This creates the potential for analysis of how different monitored groups are treated by the organisation throughout their careers. For example, do women tend to leave the organisation faster than men? Do employees from ethnic minorities get promoted more slowly than average?

The more robust and complete your dataset, the more insight you will gain. While we recommend aiming for a response rate of 80% of your population, you can still gain insight with less (we suggest 60% as a minimum). If response rates are low, you may wish to focus your initial analysis on areas with higher disclosure and supplement this with focus groups to gain additional insights.

Communicating with staff about your findings is a useful way of encouraging ongoing participation in and engagement with EDI initiatives and data collection. Many organisations have found that proactive reporting and transparency in telling staff what you have found and what action you will take as a result has significantly improved response rates.

Using the data you have gathered, you can identify areas of the business with lower rates of disclosure and use targeted communications to engage with staff in low response areas on how the data is being used, why data is needed and how their engagement will drive actions.

Response rates can also be improved by making data collection part of 'business as usual' activity by embedding it within standard processes such as annual year end, training or compliance exercises. It is also beneficial to review other staff communications where nudges on EDI data collection and reminders to keep any EDI data on record updated may be included, such as whenever new EDI initiatives are launched.

1. Identify scope, key priorities and desired outcomes	2. Review of permissibility of proposed approach (legal and general)	3A. Detailed legal and privacy analysis	4. Diversity analytics and reporting
		3B. Systems selection, design and development	
		3C. Communications and engagement strategy and campaign	COMMUNICATE

Case Study:
Personal data disclosure: Grosvenor approach

Context:

/ To support and inform our Diversity and Inclusion strategy, it was important to understand who we are as a business.

/ In Oct 2020, we started a personal data disclosure campaign focusing on the key demographics of ethnicity, sexual orientation, religion and disability (age and gender were already collated as part of our onboarding process).

/ This campaign resulted in an overall 70% uplift of personal information data over a three-month period. This increased by a further 13% over 2021. Grosvenor has now achieved an 85% response rate overall with a range of 75 – 98% completion for the individual demographics.

Our approach:

Our Executive and Senior Leadership teams, supported by HR Business Partners, led on messaging. They introduced the subject as part of a team meeting and opened up discussion as to why this information is important, providing an opportunity for questions to be asked.

This was then immediately followed up with a call-to-action email from each Executive Director reiterating the rationale with a direct link to the personal data page on our HRIS system. Reminders were also given via our regular employee newsletter.

Guidance covered:

/ Why we were collating the data, the value it adds to the business and importantly, what we do with this data once collated – informs planning and decision making.

/ Emphasis was on completion and for people to select "Prefer Not to Say" rather than leave fields blank – this in itself tells a story.

/ People understanding that this was a small, positive contribution they could make to influencing our culture and EDI.

After this initial six-week campaign, to keep the data current, we created an automatic nudge in our HRIS system. This sends a notification to employees with blank fields on a quarterly basis as a reminder straight to their inbox.

Additionally, we used our internal communications to remind employees at key points throughout the year e.g. our employee-led groups such as our (dis)Ability Network remind people of sharing their data as a first step to getting involved and helping to make a difference.

Diversity data definitions and categories

Choosing diversity definitions and categories

As part of the scoping process, it is important to be clear which EDI data points you are going to collect and analyse. Identifying which data points to collect will be an individual organisation's decision, but will often include consideration of:

/ Data required to meet Equality, Diversity and Inclusion goals and overall strategy

/ External data requirements (e.g. mandatory reporting requirements/ requests from clients)

/ Legal permissions and restrictions

/ Local cultural considerations

Typical diversity data points collected in the UK:

/ Sex

/ Age

/ Ethnicity

/ Sexual orientation

/ Gender identity

/ Disability

Diversity data points that are increasingly collected in the UK:

/ Socioeconomic status/ background ('social mobility')

/ Religion/ belief

/ Caring responsibilities

/ Further detail in relation to ability (e.g. physical ability, cognitive ability and neurodivergence)

Workforce diversity tracking – 2020 REB Member Survey Results

In the last Real Estate Balance members survey, conducted in 2020, members were asked which aspects of diversity they were either tracking already or had plans to measure in future. The chart below shows the results.
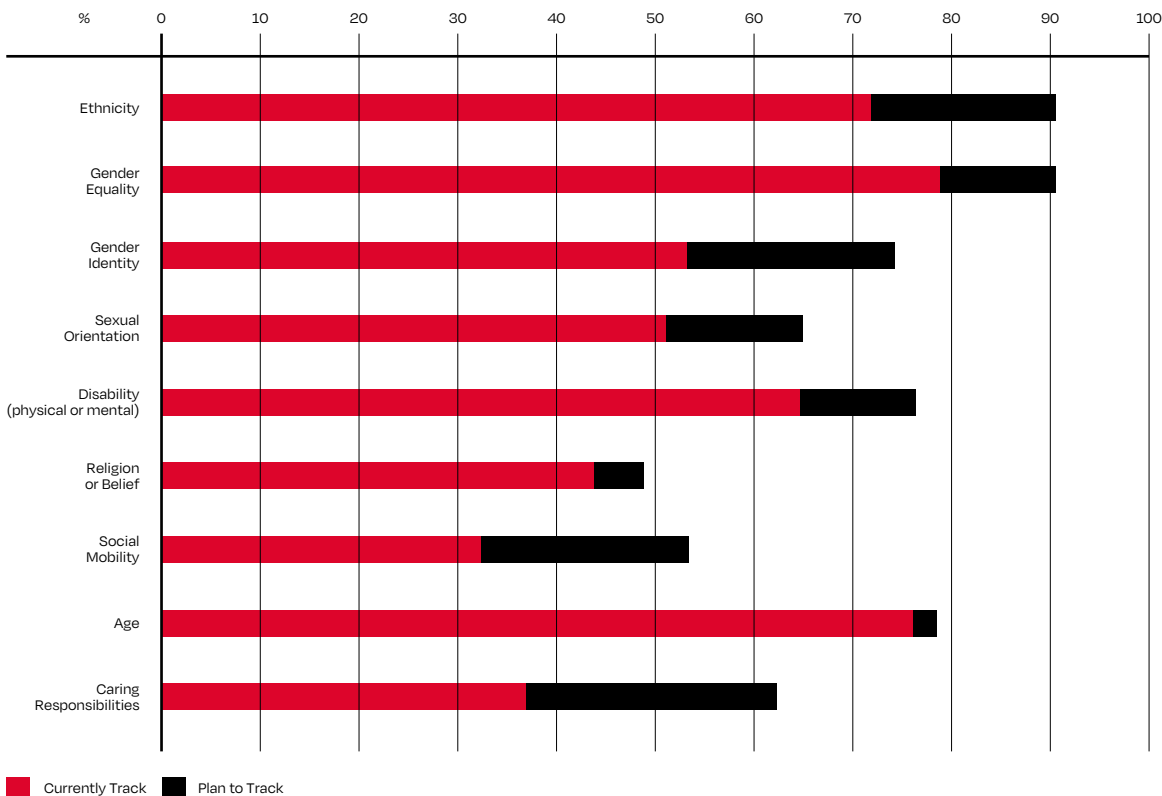
This shows that there is an ambition across the UK real estate sector to tackle diversity challenges on multiple fronts, but also that there is still a long way to go before consistent data is widely available in all areas.

How do you define yourself?

Once the relevant dimensions have been identified, it is important to then think carefully about the way that questions will be asked and the options provided for answering each question (referred to here as diversity data categories).

What questions to ask?

These should be drafted so as to clearly elicit the EDI data you want to collect and analyse, taking into account the characteristics protected under discrimination law and restrictions under data protection legislation.

On the next page, we have compiled a suggested set of questions and optional answers for use in the UK which reflect the way Office for National Statistics (ONS) Census data is collected. Adopting these questions and responses will make it easier for you to consider your results against Census data and should also help you with initial benchmarking exercises. In the future, it could also enable a real estate sector-specific benchmark to be established.

As the area of EDI data collection continues to evolve, it is likely that some of the categories and definitions suggested here may also need to be adjusted and additional areas of diversity might need to be considered. However, it's important to start somewhere and the approach suggested here will provide a strong foundation to build from.

Gender

What is your sex?

Male

Female

Other preferred description

Prefer not to say

Sexuality

What is your sexual orientation?

Bi

Gay/ Lesbian

Heterosexual

Other preferred description

Prefer not to say

Ethnicity

What is your ethnic group?

Asian/ Asian British

Bangladeshi

Chinese

Indian

Pakistani

Any other Asian background

Black/ Black British

African

Caribbean

Any other Black background

Mixed/ Multiple ethnic group

White and Asian

White and Black African

White and Black Caribbean

Any other Mixed/ Multiple ethnic background

White

British/ English/ Welsh/ Northern Irish/ Scottish

Irish

Gypsy or Irish Traveller

Roma

Any other White background

Other ethnic group

Arab

Prefer not to say

Gender identity

Is the gender you identify with the same as your sex registered at birth?

Yes

No

Prefer not to say

Religion

What is your religion or belief?

No religion or belief

Buddhist

Christian

Hindu

Jewish

Muslim

Sikh

Jedi

Any other religion or belief

Prefer not to say

Age

Which age category are you in?

16 – 24

25 – 34

35 – 44

45 – 54

55 – 64

65+

Prefer not to say

Disability

Do you consider yourself to have a disability according to the definition in the Equality Act 2010?

Yes

No

Prefer not to say

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

Yes, limited a lot

Yes, limited a little

No

Prefer not to say

Social background

Which type of school did you attend for the most time between the ages between the ages 11 and 16?

If you changed schools, please base your answer on the last two years of your education.

State-run or state-funded school (selective on academic, faith or other grounds)

State-run or state-funded school (non-selective)

Independent/ fee-paying school

Independent/ fee-paying school, where I received a bursary covering 90% or more of my tuition

Attended school outside the UK

Don't know/ not sure

Prefer not to say

Did either of your parents attend university by the time you were 18?

No, neither of my parents attended university

Yes, one or both of my parents attended university

Don't know/ not sure

Prefer not to say

What was the occupation of your main household earner when you were about 14?

Modern professional and traditional professional occupations such as: teacher, nurse, physiotherapist, social worker, musician, police officer (sergeant or above), software designer, accountant, solicitor, medical practitioner, scientist, civil/ mechanical engineer.

Senior, middle or junior managers or administrators such as: finance manager, chief executive, large business owner, office manager, retail manager, bank manager, restaurant manager, warehouse manager.

Clerical and intermediate occupations such as: secretary, personal assistant, call centre agent, clerical worker, nursery nurse.

Technical and craft occupations such as: motor mechanic, plumber, printer, electrician, gardener, train driver.

Routine, semi-routine manual and service occupations such as: postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sales assistant, HGV driver, cleaner, porter, packer, labourer, waiter/ waitress, bar staff.

Small business owners who employed less than 25 people such as: corner shop owners, small plumbing companies, retail shop owner, single restaurant or cafe owner, taxi owner, garage owner.

Long term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year).

Other, such as: retired, this question does not apply to me, I don't know.

Prefer not to say

Caring status

Are you a primary carer for a child or children under 18?

Yes

No

Prefer not to say

Do you look after or care for someone with long term physical or mental ill health caused by disability or age (not in a paid capacity)?

No

Yes, 1 – 19 hours a week

Yes, 20 – 49 hours a week

Yes, 50 or more hours a week

Prefer not to say

Inclusion and sentiment data

In addition to tracking core equal opportunities metrics, there can be a lot of value in monitoring staff sentiment in relation to EDI matters as this focuses on how staff feel as opposed to how they identify, which can provide useful contextual information. This could assist you in identifying potential areas of concern and for further action.

Sentiment and inclusion data can be collected in quantitative (e.g. scores out of 5 to measure levels of engagement) and qualitative (offering staff the opportunity to explain the reasoning behind their scores) forms.

As noted above, you may consider periodic pulse surveys a more appropriate method of collecting sentiment and inclusion data.

There is currently no standard approach to tracking staff sentiment, but there may in due course be value in identifying a small number of standard questions that Real Estate Balance members could be encouraged to ask on a regular basis. Based on a limited number of surveys shared by a sample of members, potential questions that could be adopted as standard measures are:

/ "I am treated with respect at work"

/ "I feel comfortable being myself at work"

/ "I feel a sense of belonging here"

/ "We are taking positive action to increase Equality, Diversity and Inclusion in the workplace"

/ "I feel able to raise new ideas and opinions, even if they differ from those of others"

Real Estate Balance is considering developing further guidance in this area with the input of their members.

Case Study:
Socioeconomic background data: PwC

Context:

In 2018, PwC had socioeconomic background data for less than 25% of our employees, so we were unable to analyse a full dataset and complete a robust analysis of the impact of an individual's socioeconomic background on their career at PwC. Specifically, we wanted to understand how someone's background impacted access to opportunities at the recruitment stage and once employed, the impact on performance, progression, pay and turnover.

Our goal was to have at least 70% of our employees disclosing their socioeconomic background data.

Having this information became the foundation of a data-driven approach to deliver on our diversity and inclusion strategy.

Our approach:

We launched an internal campaign to gather the socioeconomic background data using the **Social Mobility Commission's recommended measures**.

Essential elements of the campaign were:

/ Leadership and advocacy that reinforce the value of data.

/ Building trust that helps individuals feel comfortable sharing personal information.

/ Being transparent by explaining how the data will be used.

/ Having consistency by sustaining focus on requesting data throughout the year.

/ Maintaining confidentiality by securely storing data.

/ Making it meaningful by providing examples of how data is used in analysing and communicating pay gaps, monitoring applications and hires and career progression.

/ Modifying language such as inviting individuals to 'share' instead of 'disclose' their data.

/ Appealing to all by always having a 'prefer not to share' option.

We gathered socioeconomic background data for our current employees using a Google survey and this data was then joined with the data from the applicant tracking system in our enterprise data platform. We launched the Google survey with a firmwide email from our Chief People Officer and have since reminded employees at every available opportunity through any social mobility-related internal news articles, through our social mobility network and through our annual compliance returns.

Results:

Since the launch, 80% of PwC staff have now shared their socioeconomic background, rising to 85% at partner level. As a result, we have been able to publish data on the socioeconomic background of our people, by grade, in our annual report. We have also published the proportion of new hires and partners from lower socioeconomic backgrounds and their socioeconomic background pay gap.

"We've learnt a lot over the past few years about the importance of encouraging employees to voluntarily share their data, which provides us with an invaluable tool in identifying and tackling areas where improvement is needed.

Our action plans on gender, ethnic and socioeconomic background diversity and representation are all based on data, which helps us to track the impact of our actions. Our gender and ethnicity pay gaps are moving in the right direction and we hope to see the same for socioeconomic background in the years to come."

Laura Hinton / Chief People Officer / PwC UK
December 2021

Conducting an international EDI data collection and analysis exercise

Due to variations in legal regulation, particularly with regard to data protection and employment law, employers who wish to undertake a cross-border EDI data collection and analysis exercise should consider how to collect, analyse and otherwise process such data on a country-by-country basis as well as at a global level.

/ It is important to identify any global aims at the outset, as these should guide the overall process.

/ It is important to work with your local legal, privacy and compliance teams in each jurisdiction to understand what EDI data you can/ cannot collect, what you can do with that EDI data and what steps you need to take in order to collect, analyse and otherwise process such data.

  / The characteristics that are protected from discrimination, what amounts to prohibited discriminatory conduct and the level of risk associated with discriminatory acts under employment law differs across the globe.

  / Similarly, the restrictions on processing EDI data, the ways in which EDI data can be used, mandatory EDI data reporting requirements and the potential risks under data protection and employment law differ significantly around the world.

  / Cultural expectations and sensitivities also vary significantly from country to country.

/ Careful planning at the outset is particularly key for any global EDI data collection and analysis exercise. This should help you to choose key international stakeholders and to identify jurisdictions where additional advice is needed, where the proposed EDI data collection and analysis (and any proposed actions resulting from the process) are likely to be higher risk and/ or involve greater cost and any likely variation in compliance requirements across the relevant jurisdictions. It will also help to identify any jurisdictions where local regulations or commercial considerations mean that work should be prioritised. Completing this review early in the process will help ensure a tailored approach and project plan can be developed for each of your jurisdictions and that any required variations in tools and processes are identified.

/ The system you use for EDI data collection, analysis and other ongoing processing will need to allow for variation on a country-by-country basis. You should consider this aspect when selecting and configuring your tool(s) and factor in any additional cost and requirements.

/ You will need to consider the international dimension to your staff communications, taking into account legal and cultural considerations.

Case Study:
International data collection: Fidelity

Fidelity approach to Diversity:

Fidelity recognises that it needs the talent, energy and balance that comes from a fully diverse workforce and a culture of inclusion to work together to build better financial futures. A diverse workplace brings benefits for our customers, our business and our people.

/ We have set three firmwide goals for our global D&I strategy:

- **/ Inclusivity:** Create a culture of inclusion where everyone feels they belong and can thrive.

- **/ Diversity:** Build a workforce that reflects the full diversity of the communities where we work at all levels.

- **/ Reputation:** Embed our reputation with all our stakeholders and the market as a diverse and inclusive company.

/ In 2020, we decided to invite all employees globally to share information about their personal identity with us on a confidential and voluntary basis through our HR system about their ethnicity, sexual orientation, gender identity, religion or belief and whether they have a disability or health condition.

/ We have set a global target to achieve 70% disclosure rates by December 2023.

The Fidelity Real Estate Team's approach:

/ While this was a company-wide, global initiative, each part of the business was encouraged to have open dialogue and aim to create an environment of continuous improvement in both data collection and also achieving greater diversity within teams, taking account of their own team circumstances.

/ In the real estate team, located across seven different European offices and including a diverse range of people, we encouraged open dialogue, recognition of different challenges in local markets (sometimes including legal challenges as well as cultural ones) and encouraged creative and practical solutions as well as tracking hard data and targets.

/ Over the past three years in particular, our clients have become more demanding in seeking diversity data - and also requesting increasingly granular breakdowns, initially asking for statistics on gender diversity, but more recently drilling down to many other areas including ethnicity, sexual orientation and disability.

/ The need for better data was clear, both to inform us and our clients and also to help set baselines and targets for improvement.

Case Study:
International data collection: Fidelity

How have we encouraged diversity?

/ Created a communications plan to ensure employees are informed, engaged and enabled about diversity monitoring: we developed the 'Count Yourself In' campaign with our Fidelity For Everyone Networks and senior leader support to explain the purpose of diversity monitoring and how we would respect the privacy of the data.

/ Encouraged local campaigns to emphasise the benefits of diversity monitoring to different groups.

/ Provided talking points to HR and senior leaders about Count Yourself In and how sensitive personal data would be protected.

/ Produced weekly reports of disclosure rates by location and business function.

/ Encouraged Workday, our HR system provider, to make improvements to the diversity monitoring fields available.

/ Provided a step-by-step 'WalkMe' process to understand how to complete the diversity profile.

/ In regular team meetings, consistently discussed progress and reminded team members to complete the confidential Workday submission, also reminding everyone of the rationale and benefits of doing so.

/ Embedded the Count Yourself In data collection as part of the onboarding process for new recruits.

/ As of 1st April 2022, the Real Estate team has already hit the 70% response rate on the majority of questions, enabling greater transparency for our own team as well as our clients.

Lessons learned:

Open dialogue is important so that together we understand the importance of why we need the data and to reassure employees about privacy of that data. Technology can be an enabler but also a barrier to achieving response targets. More dialogue creates more creative ideas to make faster progress.

Responses of 'prefer not to say' are still important! Data collection (and submission by individuals) is still an administrative task, so regular reminders and 'nudges' are vital. Success breeds success!

Conclusions

Equality, Diversity and Inclusion within the workplace has become an important consideration as organisations respond to societal pressures, interests in and reactions to wider Equality, Diversity and Inclusion matters. Collecting and analysing EDI data is the starting point for employers who want to engage seriously with these important matters in relation to their workforce. Forward-thinking employers are increasingly using EDI data to guide key decisions by identifying the areas for action and appropriate interventions and to fully embed EDI priorities into their business agenda.

This guide seeks to articulate the value of collecting EDI data, how to analyse and report on EDI matters and the steps to follow in your ongoing EDI data journey.

It is important to continuously and consistently engage with and encourage your staff to share information and to review the questions you ask as well as the categories of data you collect to make sure these are both fit for purpose and in line with current sentiments and that any decision making is based on data which accurately reflects your workforce.

The pandemic has led to new ways of working with flexible and hybrid working patterns and fundamental changes to the employee experience. This will impact certain demographics differently, making it more important than ever to monitor experiences, offer support and mitigate unintended EDI consequences from a shifting workforce experience.

Collating data is fundamental but not the only proactive way of progressing EDI. **Real Estate Balance** has developed a diversity and inclusion toolkit and good practice framework designed to help companies at every stage of their EDI journey. Real Estate Balance members are also able to contribute to our campaigns, join our committees dedicated to cultural change in the property sector, take part in our surveys and attend regular EDI events.

Information and Notes

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