DIVERSITY MONITORING GUIDELINES

It is good practice to gather information on the diversity breakdown of employees, members, applicants, attendees at events etc in terms of gender, age, disability, ethnicity, religion and belief, and sexual orientation, and any other characteristics of focus within the organisation (eg socioeconomic background, geographic location etc). This information can then be used to monitor the effectiveness of an organisations' Diversity & Inclusion (D&I) policy.

A suggested format for a Diversity Monitoring Form is included in Appendix A. The diversity categories included in the form follow the categories within the UK Census.

Professional Engineering Institutions (PEIs) would benefit from breaking down their Diversity monitoring by the following:

1. Membership – split by members, fellows and any other membership grades
2. Registrants – split by CEng, IEng, ICTTech and EngTech
3. Governing body and associated decision-making structures (eg councils and committees)
4. Employees
5. Attendees at events/conferences etc

Global diversity monitoring

Outside of the UK, leglisation relating to Diversity monitoring is different in each country. Where an organisation operates outside of the UK, it is recommended that they seek guidance from within the country that they are operating as to what is legally and culturally acceptable within that country.

Why monitor?

Diversity monitoring can help to:

- build reputation: the best performing organisations[1] are those that invest most on promoting diversity and inclusion in their workforce;
- improve productivity[2]: valuing and supporting the diversity of people's backgrounds and lifestyles is important in making the most of the contribution that they can make to organisational performance;
- recruit and retain the best from the widest talent pool;
- identify and address any inequalities in the application of employment policies and facilitate specific adjustments or interventions;
- avoid risk: by helping to avoid damaging and costly employment tribunals or negative publicity

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[1] McKinsey research "Diversity Matters" 2015
https://www.mckinsey.com/~/media/mckinsey/business%20functions/organization/our%20insights/why%20diversity%20matters/diversity%20matters.ashx

[2] "Waiter is that inclusion in my soup?" Deloitte 2013
http://www2.deloitte.com/content/dam/Deloitte/au/Documents/human-capital/deloitte-au-hc-diversity-inclusion-soup-0513.pdf

Under the General Data Protection Regulation (GDPR), it is possible to gather and analyse information about employees, applicants, membership etc for diversity monitoring purposes, as long as the organisation has the legal basis for processing the data and, where applicable, are able to meet the rules that relate to processing Special Categories of Personal Data (eg race, sexual orientation). To monitor the effectiveness of an organisations Diversity and Inclusion policy, would meet the legal basis for processing the data.

What are the diversity characteristics?

The Equality Act 2010 sets out nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation that should be used when collecting diversity data. Other useful categories include caring responsibilities, working pattern, geographic location and socioeconomic background.

How and when should diversity data be collected?

- It is good practice to ask for diversity information at the recruitment stage for employees.
- For members at the point of joining would be the opportunity to ask for diversity data
- For registrants when applying for registration
- It is also good practice to ask as part of registration for events, people applying for awards/grants etc

Information can be requested via an on-line form and using a paper form. It needs to explicitly say that the information is not being used to make any decisions about suitability for a role, grant etc and that it will be kept separately from any other information.

What are the general principles for collecting diversity data?

- Explain why you are collecting the information e.g. to ensure that the organisation's workforce is representative of the local/UK population; to ensure that we have a diverse pool of talent.
- Emphasise privacy and confidentiality *and* the data protection aspects i.e. how the information will be stored and used.
- Work with in-house Data Protection teams, employee representative groups and employee networks on large scale data gathering exercises.
- Use a 'Prefer not to say' option. This will help to increase the response rate, highlight where there might be resistance/concerns, and build this into ongoing communications to encourage completion.
- It is possible to use "consent" as the legal basis for processing the data as the employees, applicants etc have a genuine choice as to whether or not to provide the information and there are no adverse consequences for those who choose not to provide it.

How and when do I use the diversity data?

Diversity data should be used to monitor impact and outcome for different groups at all stages of the employee life cycle e.g. recruitment, measuring the diversity of people receiving awards, measuring the diversity of registering, measuring the diversity of registrants etc.

This information can then be used in promoting the organisation and the work that it is doing to achieve a diverse and inclusive culture within it. This can be done via including in an annual report, publicising via social media, including within publications linked to the organisation both internally and externally, etc. This will have an impact on the brand of the organisation by demonstrating its commitment to diversity and inclusion.

Gathering data - encouraging declaration

When asking individuals to share their diversity information, it is really important to explain the following:

- Explain why the information is being asked for
- The commitment of the organisation to their Diversity & Inclusion policy
- Describe what will be done with the data
- Identifies who will have access to the data
- Give a named contact for further information
- Stresses the usefulness of individuals contributing their data
- Gives, where possible, examples of where positive change has happened as a result of monitoring

This is an example of how a statement could be written:

The (name of organisation) is committed to ensuring that it is accessible to everyone regardless of gender, ethnic or nationality, disability, religion, sexual orientation, gender reassignment, socio-economic background or age. We aim to foster an environment free from harassment, unfair and unlawful discrimination where everyone is treated fairly. We gather and analyse diversity data to assess the extent to which we are achieving our diversity and inclusion aims. We use this information to review our processes to ensure they are fair and transparent, and do not have an adverse impact on any particular group.

All information provided will be treated as strictly confidential in accordance the (name of organization)'s Privacy Notice in line with the General Data Protection Regulations (GDPR) 2018. The information will only be used for statistical purposes only with access restricted to staff involved in processing and monitoring the data. It will not be seen by anyone involved in any selection processes. No information will be published or used in any way that allows individuals to be identified.

We recognise that some people may regard this information as private and have therefore included the option of 'prefer not to say' in all categories. You do not have to complete the form but it will help us improve our services and processes if you can complete as much as possible.

To find out more about why we gather this information contact: email.name@institution

Diversity Monitoring and Data Protection

Diversity information for an individual falls within the scope of 'sensitive personal data' under GDPR 2018. The Data Protection Action 2018, which supplements the provisions of the GDPR, includes a

limited provision that specifically allows these types of special category data to be processed for the purpose of monitoring equality of opportunity or treatment between different groups.

It cannot be assumed that an individual who is willing to complete a diversity questionnaire explicitly consents to you storing, analysing, reporting and publishing their data. You must give clear information on the questionnaire about how you will use the data and how long you will store it.

The individual must be asked to give explicit consent to the use and storing of this information by having a positive "opt-in" box on the form.

The three stages of diversity monitoring

There are three stages of diversity monitoring:

- Collecting diversity data
- Aggregating and reporting the data
- Publishing the data

Stage 1: Collecting diversity data

You cannot assume that by completing a diversity questionnaire your members, registrants or employees also agree to you storing, analysing, reporting and publishing their responses. So, you need to be explicit about what the information is going to be used for, who it might be shared with (in an aggregated form) and how long it will be stored.

There are no rules on how you should collect the data, so you're free to be as creative as you like. You can e-mail the questionnaire, distribute paper copies or use an online survey. Although the there is a sample questionnaire in Appendix, this is for guidance only.

Stage 2: Aggregating and reporting data

The information gathered should be stored in such a way that it is anonymous and it is not possible to attribute to an individual. This can then be used to complete analysis of, for example, the diverse makeup of the employees in a company or the diverse makeup of members of an organisation etc. Where the information is being used to track a selection process for example, it will need to be attributable to the individual however when reporting, this should be anonymous so that individuals are not able to be identified.

Thought needs to be given to the sample size and when it could be possible to identify individuals if the sample size is small eg under 50 people.

Many organisations will report their diversity characteristics in their annual reports or on their websites. There may be occasions where other organisations e.g. Royal Academy of Engineering, may ask for aggregated information on the diverse makeup of an organisation.

Stage 3: Publishing data

Apart from reporting PEI diversity data to the Academy for aggregation with other PEI data, individual PEIs are encouraged, and should publish their individual data in an anonymised form. However, in doing so, to ensure anonymity, smaller institutions may combine

membership/registrant categories, or publish for total membership, registrants or governance to avoid the risk of identification.

If an institution is in a position to publish data in an anonymised form, it should:

- make this clear to your employees.

- be very careful that no individual can be identified from the way in which you have published the data.

Retaining diversity data

The D&I Progression Framework encourages all PEI's to collect diversity data so that the diversity of people attending events etc can be monitored. This is part of the requirements within the maturity model.

Monitoring the diversity of your members and registrants will inevitably involve retaining diversity data over a period of time and you should be aware of the GDPR requirement not to keep data for longer than necessary.

If you do monitor your PEI's diversity trends, any meaningful changes could take years to materialise, which will involve retaining data for a lengthy period. You should not retain data going further back than the period you intend to monitor, so if you want to monitor data over a five-year period, you should not retain data going back more than five years.

Appendix A

SAMPLE DIVERSITY MONITORING FORM

The form below is an example of a monitoring form organisations might find useful in designing monitoring for their registrants, members and/or employees. Expanded and comprehensive categories have been included based on those used by national data collectors. However, it is up to individual organisations to adapt the form to suit their requirements.

1. Professional registration (Please tick the level that applies)	☐EngTech ☐IEng ☐CEng ☐ICT*Tech* ☐Application in progress ☐Not yet registered
2. Membership category (Please tick the grade that applies)	☐Student ☐Associate ☐Affiliate ☐Member ☐Fellow ☐Honorary Fellow ☐Other, please specify

3. Gender
What is your gender?

☐Male   ☐Prefer not to say
☐ Female   ☐ Other_____

4. Gender Identity
Is your gender identity the same as the gender you were assigned at birth?

☐   Yes

☐   No

☐   Perfer Not to Say

5. Age
Please indicate from the list which best describes your age group

☐15-19	☐45-49	☐Prefer not to say
☐20-24	☐50-54	
☐25-29	☐55-59	
☐30-34	☐60-64	
☐35-39	☐65-69	
☐40-44	☐70+	

6. Nationality
This question is about the country or nation that you belong to. Please tick one option that most accurately describes your nationality?

☐UK/British
☐English
☐Welsh
☐Scottish
☐Northern Irish
☐Irish
☐Other EU ((includes: Belgium, France, Germany, Italian, Netherlands, Luxembourg, Denmark, Ireland, Greece, Portugal, Spain, Austria, Sweden, Finland, Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia, Slovenia, Bulgaria, Romania))
☐Non-EU
☐USA
☐Australian
☐New Zealander
☐Chinese
☐Chinese (Hong Kong SAR)
☐African (excluding South African)
☐South African
☐Indian
☐Pakistani
☐Bangladeshi
☐Other, please specify
☐Prefer not to say

7. Ethnic origin
This question is not about your nationality, place of birth or citizenship – it is about the cultural group to which you perceive you belong. Please tick one option you feel most accurately describes you.

White

☐British

☐Irish

☐European

☐Any other White background, please describe _____

Mixed / Multiple ethnic backgrounds

☐White and Black Caribbean

☐White and Black African

☐White and Asian

Any other Mixed / Multiple ethnic background, please describe_____

Asian / Asian British

☐Indian

☐Pakistani

☐Bangladeshi

☐Chinese

☐Any other Asian background, please describe _____

Black / Black British

☐African

☐Caribbean

☐Any other Black / African / Caribbean background, please describe_____

Other ethnic group

☐Arab

☐Any other ethnic background, please describe _____

☐Prefer not to say

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8. Disability

The Equality Act 2010 defines a disabled person as someone who has *'a physical or mental impairment which has a 'substantial' and 'long-term' adverse effect on his/her ability to carry out normal day to day activities.'*

For example, this can include diabetes, learning difficulties, hearing or speech impairments, arthritis, heart problems, epilepsy etc

Do you consider yourself to have a disability as defined above??

☐No

☐Yes

☐Prefer not to say

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9. Sexual orientation

Please indicate from the list which best describes your sexual orientation

☐Gay woman/Lesbian
☐Gay Man
☐Bisexual
☐Heterosexual/Straight
☐Other
☐Prefer not to say

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10. Religion

Please indicate from the list which best describes your religion or belief

☐No religion
☐Christian (including Church of England, Catholic, Protestant and all other Christian denominations)
☐Buddhist
☐Hindu
☐Jewish
☐Muslim
☐Sikh
☐Any other religion, please specify_____
☐Prefer not to say

Your consent

I hereby give my consent for the monitoring information provided on this form to be held on the computer or other relevant filing systems and to be shared with other accredited agencies (for instance to understand the diversity of those receiving engineering grants and awards from a number of organisations) in the understanding that it will only be used for statistical purposes and handled in compliance with the [insert PEI name] Privacy Notice in line with the General Data Protection Regulations 2018.

Full name_____

Signed _____ Date_____

Please check this box if you are filling in this form electronically to show that you read the declaration above ☐

Thank you for completing the form