



# Using data to grow inclusive and diverse professional communities

**A guide for professional bodies**

The I&D of Professions Network is a group of professional bodies working together to improve our collective impact on inclusion and diversity. We have a shared commitment to identifying and addressing the barriers that prevent fair access to the professions we represent. And we're working towards equity of experience and progression in the professional journeys our members undertake.

The network currently includes the ACCA, CII, CIPD, CIPFA, CIPS, CMI, ICAS and IWFM. Together these membership bodies cover a wide range of professions, including accountants, insurers, financial planners, people professionals, procurement and supply professionals, managers and leaders, and workplace and facilities management professionals.





## A guide for professional bodies

# Using data to grow inclusive and diverse professional communities

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## Note on terms used in this guide

In this guide we use the terms 'inclusion and diversity'. These terms incorporate the idea of equalities in its widest possible meaning, including as under the Equalities Act 2010. This is based on the premise that all people should be able to be their best selves in an organisation where positive action is taken to address disadvantage and discrimination to achieve equality of access and outcomes.



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# 1 Executive summary

This guide explores the question of how data collected from members can be used by professional bodies to build more inclusive and diverse professions.

There are considerable benefits to having access to such data. Foremost among these is that you cannot effectively remove barriers you don't know exist or don't fully understand. By collecting data from members, professional bodies can understand where inequalities might exist and take action to address them. As stewards of our professions, this is an important responsibility that we ought to pay attention to.

The more granular and attributed this data is, the better equipped we are to address barriers and play our role in creating a more equal society. However, as data becomes more granular and attributed the complexities and risks of capturing and using it increase. We set out a three-step maturity model professional bodies may seek to progress through.

- At level 1, general and anonymised survey data is used to identify groups' different experiences.
- At level 2, survey data is captured at key moments in the member lifecycle, enabling barriers to be assessed at the level of individual products or experiences.
- At level 3, personal data is collected at joining, aggregated and used to analyse patterns of experience over time.

Each step brings additional benefit in terms of being able to address I&D issues. Each step requires a more sophisticated approach to data collection and management. Technological, legal and communication considerations are critical and bringing together the relevant internal teams is therefore a must.

There are numerous techniques that can be applied in turning data into action. Here we adapt some of the principles of evidence-based practice for this task, in particular 'appraising', 'applying' and 'assessing'. Outcomes from analysis must be fed into innovation processes and business planning to ensure that meaningful change is delivered.

Managing data effectively and promoting I&D are two critical areas of challenge for professional bodies. None of this work is simple, but it is vitally important. We hope that by offering this thinking we assist more organisations to evaluate their approaches and set out their future directions.



## 2 Why this guide?

*'Is my profession open to people like me?'*

### How are we growing our professions?

We are only too aware that the purpose and longevity of our professional bodies depends on a healthy, growing and engaged membership. When we draw our members from a broader and more diverse pool, we support capable, critical, creative professionals who represent and serve their communities. And we grow professional workforces that boost their economies and societies.

Many of us are now actively pursuing an inclusion and diversity (I&D) agenda. We're doing it to increase the diversity of our memberships, to make access to and progression within our professions more equitable, and to ensure our activities are relevant, engaging and inclusive. And we're doing it to support the communities we work within, to serve our customers and to build public trust. However, many of us are still learning how to take the right steps to be genuinely impactful.

This guide draws on the valuable work already done to clarify what we mean by equity, equality, inclusion and diversity within our professional bodies. Its purpose is to share what we're learning about collecting and using our members' I&D data in meaningful, legal and respectful ways, within our resources and technical capabilities.

*'As professional bodies, we support people into livelihoods and positions of influence over others. In doing so, we have a responsibility to ensure that we are enabling fair access and representation. That can only be achieved with an evidence-based approach, for which good-quality data and analysis are absolutely vital.'*

David D'Souza, Membership Director, CIPD

### The challenges of collecting I&D data

Gathering, using and securing sensitive personal data comes with significant challenges. Different cultural and legislative practices in different geographies demand that we are mindful of the potential risks – and even dangers – to our members in the event of a data breach or misuse. And our members' right to privacy requires us to be clear about why we ask for their data, what we do with it and the steps we take to safeguard it.

Within the UK<sup>2</sup> and across Europe the complexity of data protection legislation, including the General Data Protection Regulation (GDPR) and its local equivalents, has sometimes discouraged organisations from gathering personal data beyond the minimum they need to do business. However, a reluctance to get to grips with data protection requirements leaves us poorly equipped to gather the evidence we need to progress our I&D efforts.

This guide shows the difference we can make when we overcome these challenges. Greater diversity among our membership strengthens our organisations, creates a sense of community and broadens the perspective of our professions. It is only through understanding our members' different experiences that we can build equity and inclusion into their journeys with us and achieve the diversity we need to sustain our professions in



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the long term. Data is crucial to that. And we can only normalise the collection and use of this data by starting to do it, generating positive results, and communicating these to our stakeholders. This guide offers suggestions on how to do exactly those things.

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With every data breach that hits the headlines, our members have a growing understanding of the value of their personal data and an expectation of how we should gather, use and secure it. Article 5 of the UK GDPR sets out seven key principles that guide this expectation and requires that personal data is:

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- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary for the purposes for which it is processed
- accurate and, where necessary, kept up to date
- kept in a form that permits personal identification for no longer than is necessary for the purposes for which it was collected
- processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage
- managed responsibly, with appropriate accountability, measures and records in place to demonstrate compliance.

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These principles reflect the legal context for many in our network. We are aware that different risks, legal frameworks and cultural practices may need to be considered when operating outside of the UK and Europe. This guide shares what we've learned from working within our contexts and offers broader suggestions and frameworks that support good practice and collaboration between us. A good starting point, wherever we're based geographically, is to explore the intersection between our actions and the diversity of our members.

### 3 Why collect members' I&D data?

*'Is my professional body helping me contribute my talents and insights to my profession and my community?'*

#### **What are we here for?**

We've always collected information about our members to manage the professional journey they undertake with us. We need to communicate with them, promote our support to them, encourage them to progress, discover why they stay or leave us. We want to understand how our decisions and actions deliver the return our organisations need.

However, we are learning that transacting well with our members is no longer enough – for them or for us. Our members want to feel part of a thriving, inclusive professional community. And diversity in our professions broadens our perspective, enhances our practice, ignites our innovation, builds our influence and strengthens our relevance.

We are accepting that when we place inclusion and diversity at the heart of our work, we become better at:

- developing and supporting capable, critical, innovative professionals
- sustaining and growing skilled professional workforces and economies

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- establishing, upholding and updating professional standards
- being accountable to the individuals and communities served by our professions
- understanding the very real barriers to entry, achievement, progression and representation that many people face.

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Removing barriers to entry, achievement and progression in our professions is the right thing to do. Our promise to our membership, and to the wider public, can only be fulfilled when we support all our members to contribute the best of their talents and insights to their work, their communities and their professions. We need to gather and use our members' I&D data to understand how we can go further to fulfil this duty.

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#### **Our day-to-day challenges**

Removing barriers to greater equity and inclusion requires effort and engagement. For our organisations, it demands a broad perspective of the I&D agenda, a willingness to listen to all our members, and agility in how we use our resources. We need the commitment and stamina to challenge beliefs about status, concerns around standards, and biases for or against specific groups. If we're to successfully engage our members in our I&D efforts, we need to anticipate their concerns and provide them with convincing reasons to get more deeply involved with us.

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#### **Our day-to-day decisions**

Our intention to understand and remove any barriers that limit our members' contributions is the justification for gathering special categories of personal data from them – data that is sensitive to our members and their identities. We need this data to understand the current diversity of our members. And we need to make sense of this data alongside the key events in our members' professional journeys. These events will vary within and across our professions. Explored with care, they are our opportunities to create greater equity and inclusion.

The following areas and questions offer guidance on how we can explore the inclusivity of our policies and activities.

#### **Acquisition and retention**

Are we making our professions attractive and accessible to people from all parts of society?

Are we enrolling students from the most diverse pool we can?

Are we recruiting members from the most diverse pool we can?

Are we retaining a diverse membership through all stages of the professional journeys we offer?

Do any aspects of our membership structures – for example fees – present barriers to specific groups?

#### **Campaigns, services, advocacy and events**

Do our activities present barriers to specific groups of members and potential members?

Do our campaigns and communications engage all groups within our membership and our wider profession?

Do our activities – for example our choice of speakers, imagery, event settings – exclude specific groups?

#### **Education, development and progression**

What are the engagement rates in our development programmes by specific groups of members?

What are the outcomes in our education and accreditation programmes for specific groups?

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Do any aspects of our education policy – for example course delivery, course fees, curriculum, mentoring programmes, teaching – present barriers to specific groups?

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Do any of our membership levels present barriers to specific groups?

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Do specific groups of our members experience barriers at any key stages in their careers?

#### **Awards and grants**

Do the policies that underpin our prizes, awards, grants or sponsorships present barriers to specific groups of members?

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#### **Inclusion and diversity**

Are our inclusion and diversity interventions effective?

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Is the targeting of our activities redressing imbalances in our membership?

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Is the targeting of our activities working towards equity in our members' experiences of their professional journey with us?

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The intersection between our actions and the diversity of our members is critical.

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Why? Because we know that different people are confronted by different barriers. And our assumptions about the nature and impact of these barriers remain just that – assumptions – without the data that tells us more about our members' identities, backgrounds and experiences.

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So what data do we need to collect?

## 4 What data do we need to collect?

*‘Are you asking me for more personal information than you need to know?’*

#### **What are we trying to understand?**

Our members expect us to collect the personal data that helps us identify them and communicate with them. This might include their name, contact details, organisation name and details, job title, membership number, membership grade, age, sex, education levels, qualification records, training details, CPD record, areas of professional interest, bank and payment details.

This level of data helps us run our organisations: communicate standards, provide networking events, deliver training, arrange mentoring, administer qualifications, set fees, manage renewals and operate membership levels.

But this data alone doesn't equip us to understand the diversity of our membership. Nor does it help us explore whether the professional journeys we design for our members provide equality of access and outcomes. That requires us to collect more complex and sensitive data.

#### **Key data-gathering guidelines**

Regardless of our geographical and legal contexts, three key questions can help us manage the shift from gathering personal data to more complex and sensitive I&D data:

**What difference do we want to make?** What actions do we want to take to improve the experiences of all our members? What data do we need to inform those actions?

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What data do we need to collect?





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**Can we justify the data we're gathering?** How do we ensure that we ask only for data necessary for our intended purpose or activity? How do we review and refine the boundaries we set?

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**Can we collaborate in making a difference?** Are we using data categories and questions, within our defined boundaries, that allow meaningful comparisons with other professional and government bodies? Can we benchmark our progress? Can we share what we're learning?

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### **Key data categories**

The Office for National Statistics (ONS) demographic categories, used within the UK's 2021 Census and its economic and occupational analyses, are a good starting point. In addition, the work of other government and special interest agencies suggests further categories that are not yet defined in local equality legislation but are becoming accepted as inclusion and progression measures.

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The Social Mobility Commission, for example, exists to create a United Kingdom where the circumstances of birth do not determine outcomes in life. And the Social Mobility Foundation's Employer Index<sup>4</sup> reports annually on employer-led findings and practical recommendations, with a particular focus on social mobility for young people.

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A common framework of I&D categories could therefore include:

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- age
- caring responsibilities
- disability and illness
- ethnicity
- gender
- marital status
- religion
- sex
- sexuality
- social mobility.

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By taking a common approach to gathering data we can:

- 1** Work together to identify and remove barriers experienced by certain groups across our professions generally.
- 2** Identify and remove unique barriers within our own professions, learning from others that do not have similar barriers.

Our analysis of the question sets used by professional bodies shows variations in data categories and granularity. This is understandable – different bodies, representing different professional roles, will be interested in different data. Therefore, we don't want to recommend that all professional bodies sign up to a common set of questions. However, in the appendix we offer a pool of questions, drawn from the ONS Census and other bodies, that you can adapt to your needs.

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## 5 How do we collect our members' data?

*'How many questions? How often? And can I trust you with the data I give?'*

### Being clear about our choices

Our organisations are under pressure to collect and use more data, more efficiently and effectively, with the limited resources we have. And our requests for data compete with many other calls on our members' time. This presents us with distinct choices about how we streamline and schedule our approach to gathering our members' data.

Our practical choices are limited by the sophistication of our IT systems and the level of resource we can give to data management. They're also shaped by the degree of direct involvement we have in aspects of our members' journeys, for example qualifications, licensing or certification.

Our choices around data management lend themselves to three distinct approaches, each with their own opportunities, risks and demands. We offer these approaches here as a maturity model. We can choose a level that matches our current technical and resource capability, and then plan to move up the levels as our systems and intentions mature over time.

**Table 1: A simple maturity model for collecting and using diversity data**

Increasing ability to identify inequalities and take action		
<p><b>Level 1</b></p> <p>I&amp;D data:</p> <ul style="list-style-type: none"> <li>remains anonymous and unattributable</li> <li>is captured at points in time</li> <li>is gathered through survey questions</li> <li>reveals general perceptions and experiences</li> <li>is deleted after analysis</li> </ul>	<p><b>Level 2</b></p> <p>I&amp;D data:</p> <ul style="list-style-type: none"> <li>Is collected alongside other specific feedback</li> <li>is captured at key events</li> <li>is gathered through survey questions</li> <li>reveals perceptions at key events</li> <li>is deleted after analysis</li> </ul>	<p><b>Level 3</b></p> <p>I&amp;D data:</p> <ul style="list-style-type: none"> <li>is attributable to a member's identity is captured early</li> <li>is gathered directly or through survey questions</li> <li>can be tracked through a member's journey</li> <li>can be reviewed by the member</li> </ul>
Increasing risks and data management challenges		

### Matching our intentions to our approach

Our biggest choice is around our intentions – the level of understanding we want to gain about our members' diversity and the decisions and actions we're ready to take to be more inclusive and equitable.

#### Level 1 data management

At level 1, we use anonymous and aggregated I&D data instead of personal data, thereby avoiding the need to comply with data protection legislation. We rely on the engagement of our members – at the time we ask for it – to understand the relationships between our actions and the experiences of specific groups of members.

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**Gathering anonymous data to spotlight a specific issue**

At the simplest level, we can focus on regular general membership or topic-based surveys. This involves asking our members questions about our offerings or specific inclusion or progression issues and requesting additional demographic data to form meaningful conclusions about barriers or under-representation. We delete any attributable data after use, preserving anonymity.

**Table 2: level 1 of the maturity model**

Data collection event	Regular (anonymous) member survey	Regular (anonymous) topic-based survey
Purpose	Spot and understand under-representation or group differences at any specified event or member experience	Spot and understand under-representation or group differences around specific issues: salary, promotion etc.
Opportunities	Reach specific audiences Demonstrate commitment Enable detailed questions	Bolt onto other activities Less disruptive to members
Challenges	Limited conclusions High resource investment	Limited conclusions Resource investment

**CASE STUDY**

**Do all our members feel they are progressing in their careers?**

In an annual survey of their members, Organisation A explored how confident people felt, and why, about their future career prospects. The survey included a set of demographic questions.

Analysis of the data revealed that women had considerably more concerns than men about their career progression, particularly around their ability to maintain momentum after taking a career break.

Organisation A was able to respond to these concerns by providing tailored mentoring support for members returning from career breaks.

**Level 2 data management**

At level 2 we focus our inquiries on the events or issues we feel are most significant to our members' experiences and our effectiveness. The risks of data breach or misuse are managed because we dispose of attributable data after each investigation. However, this requires us to request data more frequently, asking more of our members' time, patience and engagement.



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**Gathering demographically attributable data to spotlight an issue**

This approach involves asking questions at the point of delivering a service. We survey members in this way to explore a specific experience in their journey with us alongside demographic questions. This means we can understand the intersections between our actions and the diversity of our members or potential members.

**Table 3: level 2 of the maturity model**

Data collection event	Student enrolling	Member joining	Member renewing	Member upgrading	Member lapsing or leaving
<b>Purpose</b>	Spot and understand early point of entry under-representation or achievement of less successful study outcomes	Spot and understand point of membership under-representation	Check currency, accuracy and completeness of data on record	Spot and understand under-representation at each level of membership	Spot and understand whether certain groups are more likely to leave
<b>Opportunities</b>	Potential to prompt for data early and update frequently	Likely first event at which to request data	Relationship formed – members may feel more willing to share sensitive data	Trust strengthened – members willing to share more data	Capture reasons for lapsing or leaving membership
<b>Challenges</b>	Professional body may not have control of student event	Potentially short data shelf life – need for frequent checking	Body and member want low-friction renewal process	Unlikely to get 100% response rate	Small numbers so limited ability to form conclusions

**CASE STUDY**

**How can we improve the candidate experience for all potential members?**

After carrying out membership assessments, Organisation B issued a standard survey asking about people’s experiences as candidates. The survey included a short demographic section.

Over time, the team analysing the feedback noticed that candidates from ethnic minorities reported a significantly worse experience than other groups. They undertook a listening exercise to explore the reasons and found that a lack of representation in marketing materials and among the assessor pool may have contributed.

The marketing materials were amended, with more representative imagery and case studies, and diversity was made a priority in the organisation’s future recruitment campaigns.



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### Level 3 data management

A level 3 approach gives us the greatest opportunity to understand and respond to the diversity of our members. By gathering members' I&D data when they join us and tracking their perceptions and experiences throughout their journey, we can begin to understand how our actions help or hinder their entry, achievement and progression. However, we need to take responsibility for maintaining data securely, limiting access to it and mitigating the risks of data breach.

#### Tracking our members' professional journey

The smoothest way to manage members' data, for them and for us, is to use each of the key events in their professional journey to update the personal and I&D data we hold about them. Initial data collection happens early, with subsequent transition events designed to encourage members to review and update their own data.

**Table 4: Level 3 of the maturity model**

Data collection event	Student enrolling	Member joining	Member renewing	Member upgrading	Member lapsing or leaving
<b>Purpose</b>	Attributable data captured early and tracked throughout the member's professional journey Ideally includes data from student enrollment, depending on the professional body's role at this event				
<b>Opportunities</b>	Insight into variations between the professional journeys of different groups, for example: Do some groups progress quicker? Do some reach higher membership levels? do some leave earlier?				
<b>Challenges</b>	Requires care in the collection, retention, access rights and analysis of sensitive personal data				

### CASE STUDY

#### Which groups within our membership are experiencing barriers with us?

Organisation C collected demographic data from members at joining. This data was retained and used for ongoing analysis.

One analyst spotted that disabled members were returning more negative Net Promotor Scores and cancelling membership in higher numbers than other groups. A listening exercise highlighted concerns with the inaccessibility of digital platforms and events.

Working with a disability agency, the organisation conducted a full access audit to identify and fix multiple issues. The organisation was able to track the difference this made through ongoing analysis.



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### Level 3+ data management

#### Tracking members' more complex professional journeys

The membership journey we've shown for level 3 is based on simple, linear transition events. However, we may want to explore potential exclusion or under-representation across other non-linear events our members experience during their professional journey. These might include:

- participating in our training
- receiving or giving mentoring support
- applying for our awards
- submitting articles to us
- attending or speaking at our events
- chairing or running one of our subcommittees.

Taking our I&D efforts to this level requires us to explore and capture our members' more complex professional journeys with us in more detail:

- Can we define all the events or activities open to our members?
- Which parts of the journey are linear and sequential? Which happen in parallel?
- Can we identify key milestones within each part of the journey? And an overall timeline?
- Can we identify and map potential issues or problems to each part of the journey?
- Can we define each potential problem as a question to be explored?
- Can we test these questions through the experiences of different member groups?
- Can we gather the data we need to better understand each part of the journey and remove barriers?

#### Looking beyond our membership

Many professional bodies are focusing their inclusion and diversity efforts on the processes within their organisations as well as on their members' experiences. Many of us are overtly aiming to achieve greater diversity in our governance, our leadership and across our committee structures. We're working to become inclusive and diverse employers. We're embedding I&D training and measures at all levels in our organisations and at all stages in our employees' experiences.

We're doing this because we believe it will strengthen and sustain our professions. And we're keen to collaborate on this important agenda to share our learning, develop common approaches and – together – to influence our governments, other organisations and our wider communities.

## 6 How do we use the data we gather?

*'Are you making decisions from a real understanding of my experience?'*

#### Using data within our evidence-based practice

As leaders of our professions, we set out to make high-quality decisions on behalf of our members, our standards, our reputations, and the individuals and communities we serve. We endeavour to base our decisions and actions on sound evidence, including scientific findings, professional expertise, our stakeholders' values and concerns, and the data we gather from our members.

Our work to enhance the equality, inclusion and diversity of our membership is no different. However, data-gathering is only one part of this process. Evidence-based practice helps us use data – explicitly, conscientiously and judiciously – by following a number of steps.<sup>5</sup>



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- **Asking:** translate a practical issue or problem into an answerable question.
- **Acquiring:** systematically search for and retrieve the evidence.
- **Appraising:** critically judge the trustworthiness and relevance of the evidence.
- **Aggregating:** weigh and pull together the evidence.
- **Applying:** incorporate the evidence into the decision-making process.
- **Assessing:** increase the likelihood of a favourable outcome by evaluating each potential decision.

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These discrete steps remind us that we secure the effectiveness of our I&D efforts – within our resources and capabilities – by consulting, clarifying, testing and negotiating.

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Evidence-based practice requires that we put our instincts to one side and trust the process. We resist the pressure to take action, quickly and publicly. We notice and challenge our assumptions. We consult to properly understand our members' experiences. We design data-gathering methods that engage our members. We're honest about the level of analysis we're capable of undertaking. We test potential solutions and evaluate their impact with our members.

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What does this look like in practice, step by step? And what questions can guide our practice?

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### **Asking**

How do we spot unidentified inequities in our members' professional journeys, or catch missed opportunities for greater inclusion?

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Who defines the I&D issues we set out to address? Who do we involve in problem definition?

7

How can we frame the problem as an answerable question with a measurable outcome?

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### **Acquiring**

What method of data-gathering best fits the question we're trying to answer?

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What method best fits our members' professional journey, their time and their engagement?

How do we acquire and manage members' data explicitly, conscientiously, judiciously and legally?

### **Appraising**

How do we involve our members in checking the accuracy of the data we've gathered about them?

How do we involve members in confirming its relevance to the problem we've identified together?

### **Aggregating**

How do we involve our members in making sense of the data we've gathered?

How do we balance and interpret different data from different sources?

### **Applying**

How do we use the data to shed light on the problem we've set out to address?

How do we use the data to design, test and implement a solution?

### **Assessing**

What new questions emerge as we act on the problem we've identified?

How do we gather members' feedback on the effectiveness and impact of our solution?

What does the data tell us about the next issue or problem that we need to address?

Does the data lead us to clearer problem definition?

What else do we need to consider?



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## 7 What else do we need to consider?

*‘Are you handling my data conscientiously and judiciously?’*

### **Guiding principles**

Within the UK and across Europe, data protection legislation sets out seven principles. Compliance with these principles is fundamental to good data protection practice. We offer a summary here, along with key questions for each principle.

#### **Lawfulness, fairness and transparency**

Are we acting lawfully in our processing of members’ data? Do we have a clear justification for processing special categories of personal data? Have we considered any adverse impact that might result? Do we inform our members, openly and honestly, about how we process their data? And are we processing personal data in a way our members expect us to?

#### **Purpose limitation**

Have we clearly identified, documented and communicated why we are processing personal data? Do we use personal data only for the reasons we have collected it, and not for extra or unrelated activities?

#### **Data minimisation**

Do we collect only the data we need to fulfil our purpose? Do we review and delete data we no longer need?

#### **Accuracy**

Do we have processes in place to check and maintain the accuracy and currency of the data we collect? Do we enable our members to challenge, rectify and update their personal data?

#### **Storage limitation**

Do we consider and justify how long we keep personal data? Do we erase or anonymise personal data when a member requests it, or we no longer need it? Can we identify data that we need to keep for public interest archiving, scientific or historical research, or statistical purposes?

#### **Integrity and confidentiality**

Do we understand the requirements of confidentiality, integrity and security for our members’ data? Have we assessed the risks presented by our processing? Do we review and implement our information security policy and measures? Have we put appropriate technical measures in place?

#### **Accountability**

Do we take responsibility for complying with legislative requirements and keep evidence of the steps we take? Do we put in place appropriate measures, including data protection policies, roles, contracts, documentation and codes of conduct?

### **Legal considerations**

We recommend working with your own legal team to understand how your local legislation relates to your organisation and membership, and to anticipate and manage risks. We offer a few considerations here that we’ve found useful.





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### Clarity of purpose and intention

It's tempting to gather as much data as we can, especially if our members are engaged and responsive to our requests. However, data protection legislation requires us to collect and process data only for **specified, explicit** and **legitimate** purposes.

Due to its sensitivity, special category data needs more protection than other types. Within GDPR UK legislation, we need to identify a 'lawful basis' for collecting it under article 6 and fulfil a separate condition for processing it under article 9.

Collection usually requires explicit consent. 'Legitimate interest' may be considered a lawful basis for some kinds of processing, but only if three tests are met:

- 1 Purpose test:** are we pursuing a legitimate interest?
- 2 Necessity test:** is the processing necessary for that purpose?
- 3 Balancing test:** do the individuals' interests override the legitimate interest?

A wide range of interests may be legitimate, including our own commercial interests, our members' interests or wider societal interests. Carrying out a legitimate interest assessment (an expanded form of the three-part test), and keeping a record of it, is necessary to support our intention and justification.

### Setting limitations

As well as being clear about the limits of our purpose and intention, other limitations can help us work within data protection principles. Time-based limitations discipline us to review and delete data we no longer need. Storage limitations encourage us to anonymise personal data when appropriate. And accountability obligations ensure we adopt and implement data protection policies and measures, appoint staff to data protection roles, and sign up to codes of conduct and certification schemes.

### Data management in other countries and regions

Professional bodies have to comply with local data protection legislation according to their geographies. For international bodies, this can make the comparison of ethnicity data,<sup>6</sup> especially across different countries,<sup>7</sup> complex and challenging.

We also need to be aware that the protection offered to all by UK and European legislation, regardless of personal characteristics, is not universal. In some countries, an individual member's I&D data may put them at risk or even in danger. We need to understand our own contexts and carry out appropriate risk assessment before we collect, use, attribute, share, transfer, retain or delete personal data.

### Technical considerations

We fulfil legal requirements through the practical steps we put in place. These include our data protection policies, procedures, roles and codes of conduct. They also include the technical solutions we adopt. We recommend working closely with your IT team to understand the technical implications for gathering and using members' data within legal principles. We offer a few considerations here that we've found useful.

### Data management levels

In the earlier section 'How do we collect our members' data?' we offered three levels of data management, suited to different levels of technical capability, and with different implications for the connection between our members' identities and their I&D data.

Regardless of the level we operate at, we can reduce technical challenges and minimise security risks to our members' I&D data by setting limitations through the following steps:



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- 1 Give each member record a unique identifier.
- 2 Delete or merge duplicate member records.
- 3 Review and update every member's I&D data.
- 4 Store each member's I&D data in a protected database, separate from the member's personal details.
- 5 Only use a member's unique identifier to link their personal details to their I&D data.
- 6 Allocate a unique identifier to each event or activity you offer within your members' professional journeys.
- 7 Capture and retain a member's unique identifier against every event or activity they engage in during their journey.

#### **Data management roles**

We can also set limits by defining specific data management roles, for example data collector, data administrator, data analyst, data protection officer and data manager. We can then set technical limits, restricting access to specific employee roles, specific types or fields of data, specific databases and specific analytical tasks.

#### **Data warehousing**

Members' sensitive data may be managed in a data warehouse – internal or external – separate from membership records. Data can then be cross-referenced using a unique identifier. If our members' data is hosted or backed up in third party data warehouses, we need to make sure our contracts include adequate measures for data security.

#### **Member communication and engagement**

Our members have a growing understanding of the value of their personal data and expectations about how we gather, use and secure it. However, we cannot assume that every member understands the critical role their I&D data can play in helping us tackle potential exclusion or under-representation within our professions. Neither can we assume their consent to how we gather, retain, analyse, use, report or publish their data. The responsibility is on us to be clear and compelling in our communications with members, so that we invite their engagement in our I&D efforts and reassure them in our approach.

- **Our purpose** – why we need the data we're asking for and why we can't fulfil our purpose without it.
- **Our intentions** – the relationship between their data and our broader I&D goals and efforts.
- **The benefits** – how the use of their data will enhance their professional journey, their broader progression, the effectiveness of our organisations, and the vitality of our professions.
- **Our approach** – how we will collect, retain, analyse, use, report and publish their data.
- **Our controls** – the safeguards we will put in place to protect the privacy and security of their data, the length of time we will retain their data, and their opportunity to check and revise their data.
- **Our impact** – what we are learning from their data, what we're doing differently as a result, and the difference we're making for members and our professions.

In clarifying these things, we can begin to build a trust between the professional body and its members that enables the further collection and use to this data, thus making the whole exercise more impactful over time.

We need to communicate confidently and regularly, using our organisation's membership survey cycles and annual reporting, to give our members the clarity, education or reassurance they need to understand our I&D agenda. And, as our experience grows, we can illustrate our communications with consented examples, case studies and answers to our members' frequently asked questions.



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### Our guiding purpose

Our organisations are the bridges between our professions and the public. We work hard to strengthen our professional practice and standards. And our goals fulfil a deeper purpose.

We build public trust. We enhance our communities. We define ethical practice. We use our standards, network, education, expertise and charters for public good. We use our expertise to do things differently and better.

We cannot achieve our purpose without putting equality, diversity and inclusion at the heart of our work. And by gathering and using I&D data, we can bring capability and creativity through to the top of our professions, ensure that our professionals represent the communities they serve, and work towards greater fairness and equity in an often unfair world.

## 8 Appendix

The following is not intended as a prescriptive list of questions for every professional body to ask. Different professional bodies, in different geographies, will collect personal data for different purposes.

In choosing what I&D categories and questions to include, we must first consider what information we intend, and might reasonably expect, to act upon. We can then consider whether there have been any recent developments that might influence how our surveys and questions are worded, recognising the continuous and rapid changes taking place.

The following example questions and responses are drawn from a number of sources. These include the approaches used in the UK's 2021 ONS Census, the UK Government Statistical Service's standards, the Social Mobility Commission and some questions used by the professional bodies within our network.

### Example questions for gathering I&D data

<b>AGE</b>	<p><b>Which age category are you currently in?</b></p> <ul style="list-style-type: none"> <li>16–24</li> <li>25–34</li> <li>35–44</li> <li>45–54</li> <li>55–64</li> <li>65–74</li> <li>75+</li> <li>Prefer not to say</li> </ul>
<b>CARING RESPONSIBILITIES</b>	<p><b>Are you a primary carer for a child or children under 18?</b></p> <ul style="list-style-type: none"> <li>Yes</li> <li>No</li> <li>Prefer not to say</li> </ul> <p><b>Do you look after or give any help or support to family members, friends, neighbours or others?</b></p> <ul style="list-style-type: none"> <li>No</li> <li>Yes, 1–19 hours a week</li> <li>Yes, 20–49 hours a week</li> <li>Yes, 50 or more hours a week</li> <li>Prefer not to say</li> </ul>



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<p><b>DISABILITY</b></p> <p>Disability is defined by the Equality Act 2010 as someone who has a mental or physical impairment that has a substantial and long-term adverse effect on the person's ability.</p>	<p><b>Do you consider yourself disabled?</b></p> <p>Yes No Prefer not to say</p> <p><b>Do you have any health conditions or illnesses that affect you in any of the following areas?</b></p> <p>Vision (for example blindness or partial sight) Hearing (for example deafness or partial hearing) Mobility (for example walking short distances or climbing stairs) Dexterity (for example lifting and carrying objects, using a keyboard) Learning, understanding or concentrating Memory Mental health Nuerodivergent Stamina, breathing or fatigue Socially or behaviourally (for example associated with autism spectrum disorder (ASD), which in-cludes Asperger's, or attention deficit hyperactivity disorder (ADHD)) Other (please specify) None of the above Prefer not to say</p>
<p><b>ETHNICITY</b></p>	<p><b>What is your ethnic groupbackground?</b> (Please select the most appropriate option)</p> <p>Asian or Asian British Bangladeshi Chinese Indian Pakistani Any other Asian background (please specify)</p> <p>Black or black British African Caribbean Any other black background (please specify)</p> <p>Mixed or multiple ethnicity groups White and Asian White and black African White and black Caribbean White and Chinese Any other mixed or multiple ethnic background (please specify)</p> <p>White British English Gypsy or Irish Traveller Irish Northern Irish Scottish Roma Welsh Any other white background (please specify)</p> <p>Other ethnic group Arab Any other ethnic background (please specify) Prefer not to say</p>



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<b>ETHNICITY</b>	<b>What is your religion or belief?</b> No religion or belief Buddhist Christian (all denominations) Hindu Jewish Muslim Sikh Other (please specify) Prefer not to say
<b>MARITAL STATUS</b>	<b>What is your marital or civil partnership status?</b> Single Married Civil partnership (CP) Separated Divorced / CP legally ended Widowed or surviving partner Prefer not to say
<b>GENDER</b>	<b>What is your gender?</b> Female Male Prefer to self-describe Prefer not to say
<b>SEXUALITY</b>  Only to be asked of people aged 16 years and over.	<b>Which of the following best describes your sexual orientation?</b> Straight / heterosexual Gay or lesbian Bisexual Other (please specify) Prefer not to say
<b>SOCIAL MOBILITY</b>  See the Social Mobility Commission for examples of each occupation category.	<b>What was the occupation of your main household earner when you were about aged 14?</b> Modern professional and traditional professional occupations Senior, middle or junior managers or administrators Clerical and intermediate occupations Technical and craft occupations Routine, semi-routine manual and service occupations Long-term unemployed Small business owners Other (please specify) Prefer not to say  <b>Which type of school did you attend for the most time between the ages of 11 and 16?</b> A state-run or state-funded school Independent or fee-paying school Independent or fee-paying school, where I received a means-tested bursary covering 90% or more of the total cost of attending throughout my time there Attended school outside the UK Don't know Other (please specify) Prefer not to say



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**SOCIAL MOBILITY  
(continued)**

Ask this additional question to your graduate recruits only

**If you finished school after 1980, were you eligible for free school meals at any point during your school years?**

Yes

No

Not applicable (finished school before 1980 or went to school overseas)

Don't know

Prefer not to say

**Did either of your parents attend university and gain a degree (for example BA/BSc or equiva-lent) 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

## 9 Endnotes

<sup>1</sup> Research by Design for Salesforce. (2021) *Equality, diversity and inclusion research report: progressing the agenda in professional membership organisations.*

<sup>2</sup> *Guide to the UK General Data Protection Regulation* (UK GDPR).

<sup>3</sup> *General Data Protection Regulation.*

<sup>4</sup> Social Mobility Foundation. (2021) *Employer index report.*

<sup>5</sup> Adapted from the Sicily statement of evidence-based practice: Dawes, M., Summerskill, W., Glasziou, P., Cartabellotta, A., Martin, J., Hopayian, K., Porzsolt, F., Burls, A. and Osborne, J. (2005) Sicily statement on evidence-based practice. *BMC Medical Education*. Vol 5, No 1.

<sup>6</sup> Data in government blog. (2019) *Making ethnicity data more coherent and comparable.*

<sup>7</sup> Data in government blog. (2022) *Comparing ethnicity data for different countries.*



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