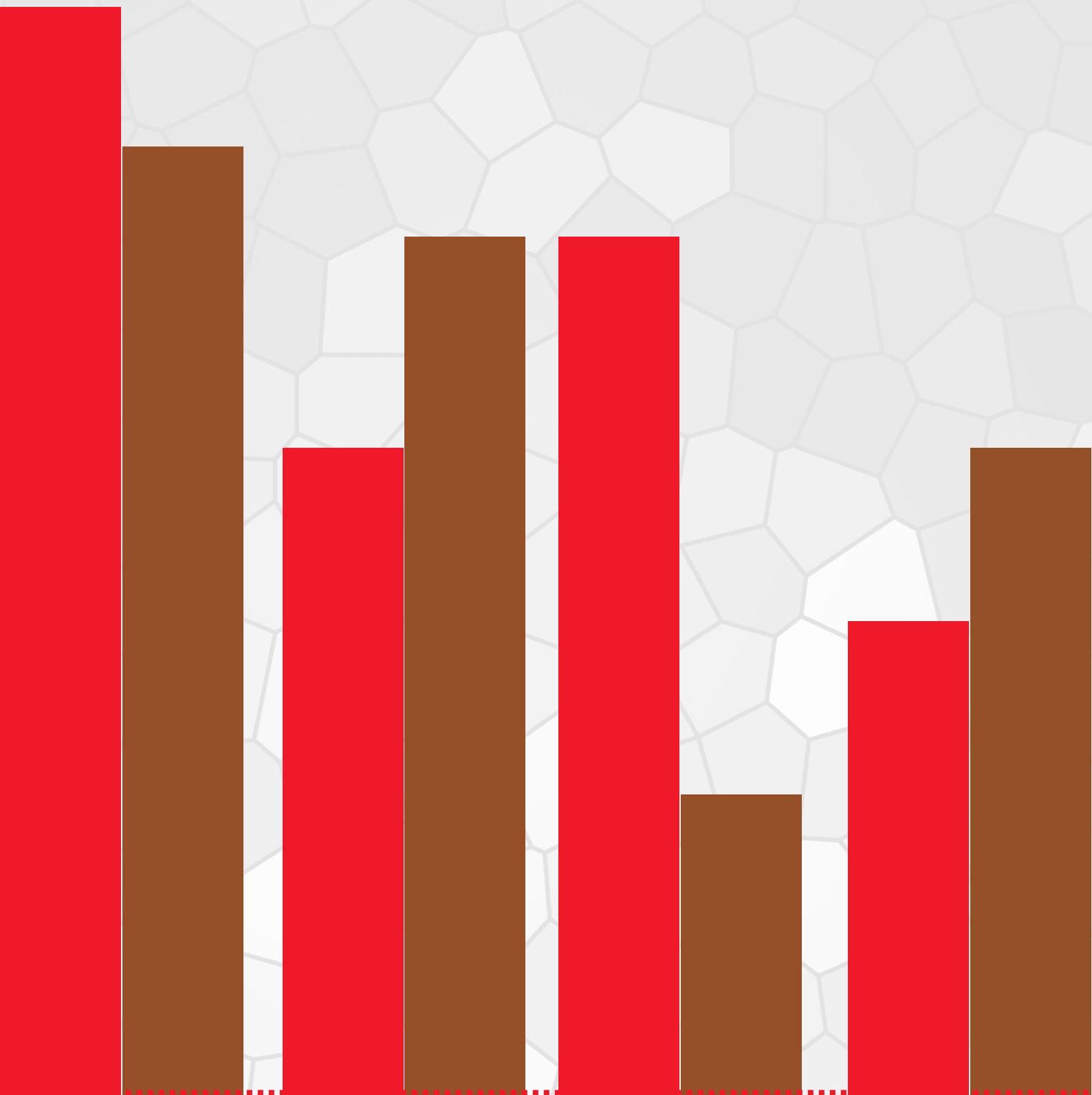


# DIVERSITY DATA COLLECTION & ANALYSIS TOOLKIT



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## Introduction

CEMVO Scotland is a national intermediary organisation and a strategic partner of the Scottish Government Equality Unit. Our aim is to build the capacity of the ethnic minority voluntary sector and its communities. We have an established network of ethnic minority (EM), public and third sector organisations throughout Scotland to which we deliver a wide range of capacity building support programmes. Our current programmes of work include:

- Providing social enterprise development support to EM groups and social entrepreneurs;
- Providing race equality and human rights mainstreaming support to public, statutory and third sector organisations;
- Increasing EM representation on public boards;
- Supporting the Scottish Minority Ethnic Women's Network (SMEWN) for peer support and influencing social policy;
- Developing and supporting an EM Environmental Network to engage in climate change policy;
- Providing employability support to EM young people.

Through all our areas of work we engage extensively with the EM sector and gather evidence of the needs and concerns affecting EM communities which help to inform our response to the development of national and local policies, and to public consultations.

The purpose of this toolkit is to provide a four-fold step-by-step guide of good practice when collecting and analysing diversity data in an organisational setting. It is aimed at organisations, both public and third sector, wishing to improve their data collection and analysis processes to take meaningful equality diversity and inclusion ('EDI') action.

This toolkit has been developed by the [Race Equality Environmental Programme](#) and [Race for Human Rights Programme](#). We receive funding from the Esmée Fairbairn Foundation and the Inspiring Scotland Equality and Human Rights Fund respectfully, and are grateful for their support in our work.



## 1. STAGE ONE: THE CONTEXT OF DATA COLLECTION

Data is key for organisations wishing to take **meaningful EDI (equality, diversity and inclusion) action** but can oftentimes be **challenging to collect**. A variety of reasons exist for this including apathy, concerns over lack of anonymity and historical mistrust. This can have potential negative consequences, for example lack of career progression. In essence, this boils down to a **lack of trust** of individuals in an organisation. Thus, the onus is on an organisation to **build trust** and **create a safe environment** where applicants and employees feel comfortable enough to share their sensitive information.

### 1.1. Why collect data?

It is important to collect diversity data as this provides a **detailed snapshot** of the make-up of your organisation and allows you to **evaluate internal organisational processes**. Whilst it provides a detailed account of your current workforce and job applicants, it will also reveal which demographics of people you are not engaging with. For example, you may have been successful in achieving a gender balance in your workforce but have failed to recruit anyone from an ethnic minority background.



Diversity data also provides a **benchmark** from which you can **report** on progress and **inform** EDI strategy at present and in future. It will allow you to **measure** whether EDI initiatives have been successful or whether more **targeted actions** are needed to meet your short-, medium- and long-term EDI goals. This data will also form your **evidence base** if any positive action measures are required.

Whilst there is no legal obligation on third and private sector organisations to collect data, it is highly recommended for the purpose of reducing inequalities. However, there is a legal duty to collect data for Scottish public authorities which will help meet the general duty under the Equality Act 2010 and also inform their equality mainstreaming report under the Scotland Specific Duties.

### 1.2. When to ask for data?

Diversity data can and should be collected at various stages of an employee lifecycle. It is recommended to collect diversity data during the recruitment process at application stage via an **'equal opportunities monitoring form'**. This should be **separate** from an individual's application form to remove bias and maintain confidentiality of their identity characteristics,

but there should be a process in place to **rematch** the two at the end of the hiring process. For example, by use of a simple numbering system.

An employee's diversity data should be **continuously monitored** to consider career progression opportunities from a diversity perspective. Capturing data, both quantitative and qualitative, via an annual staff survey for example can highlight if there are certain groups that face barriers to progression and can be used to assess whether all groups have equal access to development opportunities.

Collecting diversity data at different stages of an employee's lifecycle will also allow you to **measure and evaluate** your internal organisational processes. This includes identifying any 'blockages' that exist and taking **focused actions** to remove those blockages. For example, you may attract a variety of ethnic minority applicants for a job vacancy but find that none make it past the selection stage. Here you can conduct a **root cause analysis** of this, such as whether a skills gap exists or whether further unconscious bias training is required for hiring staff. The diagram below lists different stages of an employee's lifecycle that you can collect diversity data to measure and evaluate your internal organisational processes:

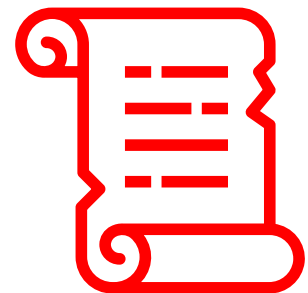


## 2. STAGE TWO: HOW TO COLLECT DATA

When collecting diversity data, it is important to bear in mind that you are asking individuals to voluntarily share **sensitive information** about their identity. Whilst diversity data may provide organisations with a quantifiable set of information, you should remember that there are **real people behind the statistics** and any information sought from respondents should be done in a way that is **dignified and person-centered**.

### 2.1. How to ask for data?

It is important to ask questions correctly as if phrased incorrectly, this may lead to **high non-disclosure rates**. Remember, the onus is on an organisation to create a safe environment for people to share their sensitive information that is built on a relationship of **trust**. Diversity data should be collected consistently because one-off exercises are not as effective in providing aggregating information over time to spot trends and patterns.



The most common way to collect diversity data is via an **equal opportunities monitoring form**. It is good practice to develop a standardised form that is used both in recruitment and for current staff members to collect data **consistently** and in a way that allows you to make detailed **comparisons** during the data analysis stage. Using standardised questions means you can also benchmark your organisation's progress against other organisations in a given sector and against the population census results more broadly. If during the data analysis stage it is uncovered that you are below the sector or census average percentage in any given identity category, this will be your evidence base to take more **focused actions** to engage with that demographic.



It is important to have an **end goal** in mind: what data do we want to collect? This will help you to devise an equal opportunities monitoring form. All data that is collected should be used to inform meaningful EDI action. Data that is not required or intended to be used should not be collected.

At CEMVO Scotland, we advocate using a **human rights-based approach** to data collection to ensure the process is person centred, dignified and grounded in human rights values and principles. To do this, we endorse the use of the **PANEL principles** (utilised by the UN accredited Scottish Human Rights Commission): participation; accountability; non-discrimination and equality; empowerment; and legality. For more information, see **APPENDIX A**.

## 2.2. What data to ask for?

Diversity data is usually collected around the 9 **protected characteristics** in the Equality Act 2010. These are: age; gender reassignment; marital or civil partnership status; pregnancy or maternity status; race including colour, nationality, ethnic or national origin; disability; sex; religion or belief; and sexual orientation. Data relating to the protected characteristics cannot be used in a way that discriminates (directly or indirectly), harasses or victimises employees, but should be used to take meaningful EDI action.

However, organisations are increasingly collecting other types of data as well, including **socio-economic background** and **care experience**, to better inform their EDI goals and remove barriers for people with other lived experience in society.



It is advised that organisations should follow the most up to date **Scottish Census** when disaggregating individual identity categories in an equal opportunities monitoring form.<sup>1</sup> Characteristics should be **disaggregated fully** to allow you to sufficiently monitor and inform your EDI actions. For example, only providing ethnicity options of 'White', 'Black', or 'Mixed Race' on an equal opportunities monitoring form during recruitment does not give you sufficient information to pinpoint exactly which ethnicities are applying for roles in your organisation. For an example equal opportunities form, see **APPENDIX B**.

Remember, respondents have no obligation to share sensitive information about their identity and if they do, this is voluntary. Thus, each characteristic should contain the option of a box detailed '**prefer not to say**' should a respondent not wish to share this information.

It is also recommended to avoid using '**other**' as an option within characteristics as this has three main drawbacks. Firstly, 'other' is not an identity in itself. That is to say it is not recognised as an ethnicity, a sexual orientation or a gender etc. Secondly, 'other' is vague and unhelpful during the disaggregation and analysis stage as it does not provide you with sufficient information. Thirdly, it physically others respondents by communicating a message that if they do not fit a specific category or tick a box, they are different and do not belong.

Instead, it is advised to provide a '**self-describe**' option accompanied by a space for respondents to detail their identity in their own words under each characteristic (except from age). This avoids the aforementioned three drawbacks of using 'other' as an identity category.

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<sup>1</sup> For more info, see: [Ethnic group classifications for data collection paper - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/ethnic-group-classifications-for-data-collection/paper/pages/10.aspx)

### 2.3. Where to store data?

Data may be stored internally as a snapshot for monitoring purposes or via an HR system.

If data is stored in your **internal organisation files**, this must only be accessed by the individual(s) listed as per the GDPR policy of your organisation. This information should be in a secure, confidential place and where possible, password protected. This information can be updated or removed any time at the request of an employee. Remember, diversity data should only be used to inform meaningful EDI action, for example to make reasonable adjustments for a disability, and cannot be used to an employee's detriment, for example failure to be eligible for career progression due to a disability.

If stored in an **HR system**, there are various things to consider. Some HR management systems enable employees to update their own information directly into the system. This is potentially a quick way to encourage people to share their diversity data. Often an HR system will have a diversity monitoring form available as a default. If not, you will need to request the facility from your provider and/or customise the questions that you want to ask. If you are planning a new HR system, do not assume that it will work for your needs. Get involved in the initial scoping conversations to let the provider know what your organisation needs in terms of data storage and analysis. Other benefits of collecting data via an HR system include removing a person from viewing the data then inputting this into the system and it is often easier to generate reports.

### 2.4. GDPR consent for data collection

When collecting diversity data, you must clearly explain what the data will be used for, who has access to it and how it will be kept confidential. You also need to obtain active **consent** regarding the personal data you are collecting, such as having a tick box on the form to confirm that the entrant is happy with the terms you have stated. This should be encapsulated in a **data statement** at the start.



Collecting and storing diversity data is covered by the Data Protection Act 2018 (the legislation implementing GDPR into UK law), which allows the collection and processing of diversity data with the aim of monitoring equal treatment and the protection of equality of opportunities. It also gives people rights, such as access to the information, the right to amend information that is incorrect, and remedies if things go wrong.

However, GDPR should not be used as an excuse **not** to collect diversity data as the regulation expressly allows for the collection of data in this way. If you have concerns over this, you may wish to conduct a 'Data Protection Impact Assessment' to help you consider how any data will be kept secure, how long it will be kept for and who it will be shared with. As people build trust in how you store and use their data, you should find that disclosure rates increase.



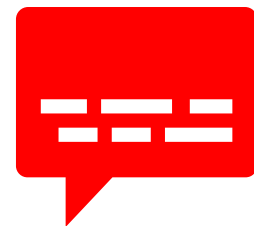
### 3. STAGE THREE: COMMUNICATION

Clear communication around diversity data is key to building a relationship of trust where individuals feel comfortable enough to share sensitive information about their identity. This can help to overcome barriers for respondents from participating like apathy, lack of empowerment and lack of trust.

#### 3.1. Data statements

A **data statement** should be included in a diversity data collection form. This is your chance to build trust with a respondent by detailing how their data will be handled and stored in line with GDPR and protection rules. Be prepared to answer the following questions:

- Why is data needed?
- What will it be used for? What are my rights?
- How will it be stored?
- Who has access to it?
- When can I update this?



#### 3.2. Disclosure rates

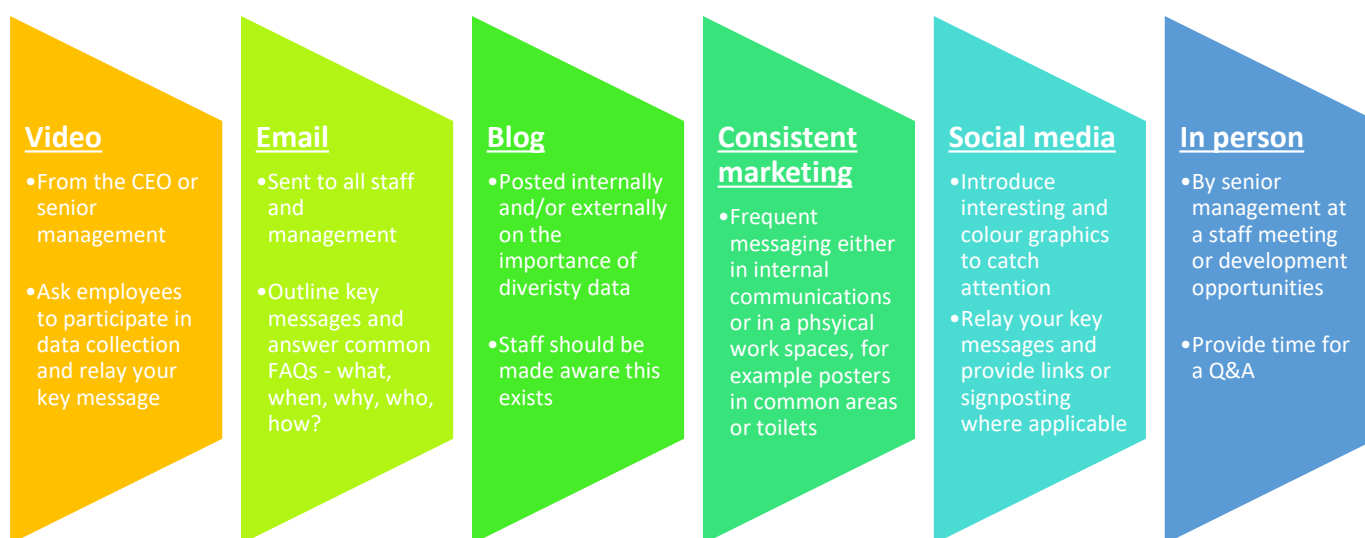
For organisations to better understand their workforce and evaluate internal processes through the collection of diversity data, good disclosure rates are essential. **The aim for this should be 100%.** If high non-disclosure rates are common, respondents do not feel empowered to share their sensitive information or there is a lack of trust. Clear communication is one way of overcoming this. Here are **5 top tips** for increasing disclosure rates:

- 1 •State the purpose**  
What is the purpose for collecting diversity data and how is this mutually beneficial?
- 2 •List the actions diversity data will be used for**  
Make respondents aware what their data will be used for and relay that their contribution is an investment to a fairer, more equitable workplace
- 3 •Provide information on your privacy policy**  
Detail who has access to diversity data, state that it will be kept anonymous and provide information about how this can be updated
- 4 •Highlight storage policy**  
It is important to provide information that will address employees concerns such as clarifying how information is going to be handled, who has access and note that information is stored in line with GDPR
- 5 •Psychological safety**  
The onus is on the organisation to create a safe environment for individuals to share their sensitive information and build a relationship of trust. Employees should feel they can bring their full selves to work and be comfortable sharing details of their identity. This will build confidence in the data process and increase disclosure rates.

### 3.3. Communication campaigns

In addition to your written data statement, you may wish to roll out a **communications campaign**. These are effective ways to reinforce the purpose of diversity data collection, why it is important for a more inclusive and equitable workplace, and to build trust. Depending on which communication method you choose, this is also a chance to be more personable, make diversity data relatable to your organisation and highlight lived experience.

There are a variety of communication methods which you may wish to use, such as:



Communication should be delivered either by a CEO or senior management, and all line managers should be aware and prepared to answer questions about diversity data collection. It is important to plan your communications carefully and where possible, consult external partners or consultants on how to frame this to ensure maximum engagement from your campaign.

It is also worth thinking strategically about when your communication campaign will take place. Will this be consistent throughout the year or is it ahead of an annual staff survey being sent? If the latter, ensure there is adequate time allocated to ensure maximum engagement from your campaign.

You should also think about when the actual data collection will take place. For example, is this during the on-boarding process, an annual event or do you have a staff development day coming up where it is convenient to capture data? Calendar events like Black History Month or LGBTQ+ Pride may also be opportunities to update staff diversity data.

## 4. STAGE FOUR: REPORTING, ANALYSIS AND ACTION

Whilst it is essential to collect diversity data in a way that builds trust with respondents, of utmost importance is the final stage: what we do with the data we have collected. If participants provide their data but there has been no action to improve EDI in the workplace or this has not led to any meaningful change, this may result in apathy, may break the relationship of trust that has been built and lead to higher non-disclosure rates in future.

### 4.1. Reporting

It is important to report internally on the results of the data collection. This could be **reporting to senior leaders and/or a board of trustees**. This will provide them with the opportunity to endorse any follow-up actions from the data collection exercise, for example making reasonable workplace adjustments or positive action measures to level the playing field in the recruitment process.

As part of building a relationship of trust with employees and in the interests of accountability and transparency, organisations should **report back to staff** with the results of the data collection, let them know what changes you are going to make and thank them for participating. This will encourage and empower staff to provide their data in future if they know that it has actually been used by the organisation and not just collected for the sake of it.

Remember, if you use an external HR system or choose to collect data using an online tool like Google Forms or Microsoft Forms, this will probably have a built-in reporting function that will present you with a set of results faster than manually inputting them.

### 4.2. Analysis

There are several ways in which you can analyse the diversity data you have collected. The collected set of diversity data can be **compared** with:

- Previous workforce diversity data;
- Your short-, medium- and long-term EDI goals to measure progress;
- National demographic statistics from the census;
- Regional demographic statistics from the census; and
- Other organisations working in the sector.



Drawing these comparisons will allow you to **benchmark** your organisation and examine whether your organisational workforce is representative or not. For example, it may be the case that your organisation is outperforming other organisations in your sector with a higher average percentage when it comes to gender, but you may lag behind other organisations in the sector when it comes to the average percentage of persons with a disability. This will better inform your EDI strategy and will allow you to take more strategic, focused decisions to reach your short-, medium- and long-term EDI goals.

Remember, using a **standardised equal opportunities monitoring form** for both recruitment and for your existing workforce will allow you to make comparisons and draw conclusions between the two. If it is uncovered that there is a discrepancy in the data or if you discover a 'blockage' in recruitment, for example a repeatedly high percentage of ethnic minority applicants but few ethnic minority staff, this will allow you to conduct a **root cause analysis** to examine firstly, why that is the case, and secondly, to devise a plan of action to challenge the status quo.

### 4.3. Action

Once you have collected your data, analysed this and reported back internally, the next stage is to **take action** based on your diversity data results. There are a variety of actions that can be taken, such as:

<b>Inform an EDI strategy</b>	<p>Diversity data is an important part of any EDI strategy as this allows you to set targets, monitor progress, review whether any actions have been successful and focus efforts.</p> <p>If you already have an EDI strategy, compare the data you have collected to your strategy/targets to check whether you are on track or whether more focused actions may be needed. For example, if you have set a target to improve racial diversity and recruit more ethnic minorities but are not attracting a pool of racially diverse applicants, you may wish to focus your efforts on inclusive recruitment or targeted community engagement.</p> <p>If you do not have an EDI strategy but your diversity data is telling you that your workforce is below the average percentage in one or more identity characteristics, it may be time to devise a strategy to improve this. This will include setting short-, medium- and long-term goals that are measurable through targets.</p>
<b>Set targets</b>	<p>Targets are one way of demonstrating an organisation's commitment to improving the status quo and taking meaningful action as part of an EDI strategy. However, setting targets in itself</p>

	<p>is not enough, this should be backed with action to try and reach those targets.</p> <p>For example, if your workforce has a 50/50 split when it comes to gender but the senior management team is a 30/70 split in favour of men, you can set yourself short, medium and long term targets to try and close this gender gap. This could be the introduction of a mentoring scheme for women employees or more staff training and development opportunities.</p> <p>Establishing a baseline of diversity data is crucial to measuring success as this will allow you to monitor progress and take more focused action if required. Any targets set should be SMART: specific, measurable, accountable, realistic and time sensitive. Designated individuals should be aware of what targets they are working towards, and there should be a monitoring and reporting mechanism in place to update senior leadership on progress. If an employee leaves your organisation who has responsibility of a target, this should be redesignated and efforts should not cease because one given individual has left.</p>
<b>Review policies and procedures</b>	<p>Whilst the analysis of diversity data may tell you what you think you already know, it may also reveal information about your workforce that you did not know. If this is the case, it is recommended to review organisational policies and procedures to make sure they are appropriate for all staff. For example, if you find that a certain percentage of staff are reporting that they have dyslexia, you may wish to update working practices and invest in a simplified tech solution to aid them.</p> <p>This may also include reviewing branding and website design, and the use of diverse imagery in external communications.</p>
<b>Staff training &amp; development</b>	<p>The results of your data, both quantitative and qualitative, may reveal that staff training and development is necessary. This could be general EDI training or more specifically around one of the identity characteristics. This can be for all staff within the organisation, those actively involved in community engagement, HR managers or senior leadership.</p> <p>For example, if data uncovers a blockage in the recruitment process whereby individuals from a certain identity characteristic, such as ethnic minorities, repeatedly do not make it past interview stage, then a targeted unconscious bias</p>

	<p>refresher training or anti-racism training for interview panellists may be necessary.</p> <p>Another key subject is building the racial literacy of staff to increase awareness of the barriers faced by ethnic minorities, challenge inherited mindsets and be empowered to identify these so that they can challenge and make changes.</p>
<b>Seek external consultancy support</b>	<p>If data reveals that your organisation is below average on certain identity characteristics, you may wish to seek external consultancy support or partner with an organisation working specifically in that field, i.e., race, gender, sexual orientation etc, to seek assistance when trying to remedy this. Conduct research to find out what advice and support is available to your organisation, including any mainstreaming support.</p> <p>For example, CEMVO Scotland offers mainstreaming support to public, statutory and third sector organisations in Scotland.</p>
<b>Open dialogue with staff</b>	<p>Analysis of data can also lead to further discussions and open a dialogue between senior management and staff. For example, if staff report that working times do not allow a reasonable amount of flexibility that hinders them from taking part in religious prayer time, you may wish to consult staff on flexible working arrangements.</p> <p>If you find you have a disproportionately high percentage of people leaving the organisation from a certain identity characteristic, seek qualitative feedback in exit interviews and ask existing staff about their experiences to try to uncover if there is an underlying issue within the organisation causing this. The key part here is to listen, take on board any feedback and take action to remedy any issues. For example, if staff report they have experienced racial microaggressions at work then it may be necessary to organise staff training, introduce a zero-tolerance policy and empower employees from an ethnic minority background by celebrating cultural events or notable months of the year, for example Black History Month and platforming ethnic minority role models within the organisation.</p>

## Summary

The purpose of this toolkit is to provide a four-fold step-by-step guide of good practice when collecting and analysing diversity data in an organisational setting. It is aimed at organisations, both public and third sector, wishing to improve their data collection and analysis processes to take meaningful equality diversity and inclusion ('EDI') and anti-racist action.

## APPENDIX A: A HUMAN RIGHTS-BASED APPROACH

A human rights-based approach can be applied to a variety of different policies and service provisions, including data collection. This ensures that the process is dignified, person-centred and puts human rights principles and values into practice. At CEMVO Scotland we are guided by the UN endorsed Scottish Human Rights Commission's **PANEL principles**: participation; accountability; non-discrimination and equality; empowerment; and legality. The diagram below highlights what each of the principles looks like in practice and provides guiding questions for organisations when taking a human rights-based approach.





## **APPENDIX B: EQUAL OPPORTUNITIES MONITORING FORM (EXAMPLE)**

[Insert your organizational data statement here, for reference see section 2.4 and 3.1]

**1. What is your age?**

- ☐ Up to and including 24 years
- ☐ 25 – 34 years
- ☐ 35 – 44 years
- ☐ 45 – 54 years
- ☐ 55 – 64 years
- ☐ 65 – 74 years
- ☐ 75+ years
- ☐ Prefer not to say

**2. Do you have a disability or long-term health condition?**

- ☐ Yes
- ☐ No
- ☐ Prefer not to say

If so, please provide details:

**3. What is your ethnicity?**

- ☐ White Scottish
- ☐ White British
- ☐ Irish
- ☐ Indian
- ☐ Pakistani
- ☐ Bangladeshi
- ☐ Chinese
- ☐ Black Caribbean
- ☐ Black African
- ☐ Polish
- ☐ Arab
- ☐ Gypsy / Traveller
- ☐ Roma
- ☐ Show man/Show woman
- ☐ White and Black Caribbean

- ☐ White and Black African
- ☐ White and Asian
- ☐ White European
- ☐ Prefer not to say
- ☐ Self-describe

**4. What is your sexual orientation?**

- ☐ Asexual
- ☐ Bisexual
- ☐ Gay man
- ☐ Gay woman/lesbian
- ☐ Straight/heterosexual
- ☐ Pansexual
- ☐ Prefer not to say
- ☐ Self-describe

**5. What is your gender?**

(Cisgender means that your gender identity matches the biological sex you were assigned at birth)

- ☐ Cisgender man
- ☐ Cisgender woman
- ☐ Transgender man
- ☐ Transgender woman
- ☐ Non-binary
- ☐ Genderfluid
- ☐ Prefer not to say
- ☐ Self-describe

**6. What is your religion / beliefs?**

- ☐ No religion or belief
- ☐ Buddhist
- ☐ Roman Catholic
- ☐ Church of Scotland
- ☐ Christian
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Pagan
- ☐ Sikh
- ☐ Prefer not to say
- ☐ Self-describe

## Find out more

More details of the Environmental Race Equality Programme can be found here:  
<https://cemvoscotland.org.uk/race-equality-environmental-programme/>

More details of the Race for Human Rights Programme can be found here:  
<https://cemvoscotland.org.uk/programmes/r4hr/>

For more information or if you have any questions, please do not hesitate to get in touch and contact Christopher Clannachan, Environmental Race Equality Officer, at [christopher.clannachan@cemvoscotland.org.uk](mailto:christopher.clannachan@cemvoscotland.org.uk)



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