

Improving Race Equality in Employment and Income

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Summary

- This report is one of a series of six that provides independent evidence to inform the development of the Welsh Government's Race Equality Action Plan.
- It focuses on improving racial equality in employment and income which is frequently identified as an area in which inequalities manifest, with serious consequences for the lives of people from racial and ethnic minority backgrounds.
- The report analyses academic research and policy reports to identify actions that experts recommend to tackle racial inequality. The evidence about the effectiveness of many of these actions is often patchy, but there are five potential areas for action that emerge strongly from our analysis.
- Actions that experts recommend to increase representation and progression in the workplace include: de-biasing recruitment and progression processes; mandated targets and positive action; mentoring/reverse-mentoring, sponsorship, and leadership programmes; and the creation of staff networks.
- Recommendations to tackle discrimination in the workplace

include: diversity and unconscious bias training; fostering an inclusive organisational culture; and adopting explicitly anti-racist and action-oriented approaches.

- It is vital that senior leaders and middle managers buy-in to actions to reduce racial disparities in employment experience and outcomes and we identify ways in which this can be encouraged.
- Embedding social value in procurement processes can help encourage employers to tackle inequality and increase pay at the bottom end of the income distribution.
- Inequalities in employment and income inequalities are linked to other forms of inequalities and cannot be tackled in isolation or top down. The Welsh Government's Action Plan needs to facilitate the development of multi-level strategies which include sustained action targeting institutions, organisations, workplaces, teams, and individuals. There is also a need for effective implementation mechanisms, visible support from leaders, and better data collection, analysis, and reporting.

Background

The Welsh Government has made a commitment to publish a Race Equality Action Plan designed to tackle structural racial inequalities in Wales (Welsh Government, 2020a). This report is one of six produced by the Wales Centre for Public Policy to provide independent evidence to inform the development of the Action Plan (see Annex 1). It focuses on evidence and recommendations for action related to race equality in employment and income.

Introduction

This report identifies actions to tackle racial inequality in employment and income which feature strongly in academic studies and policy reports. They include:

- Increasing representation and progression among employees;
- Tackling workplace discrimination;
- Securing senior leader and middle management buy-in;
- Embedding a social value approach to procurement; and
- Increasing pay at the bottom end of the income distribution.

These actions were identified through four phases of analysis:

- First, we analysed the best available evidence, policy reports and reviews which make recommendations for reducing race inequality in Wales and the UK to identify recurring recommendations or 'types' of interventions (see Annex 2).
- We then tested and refined these with academic experts.
- Next, we conducted a further review of academic and grey literature evidence related to each of these interventions with the aim of establishing which of these recommendations are likely to have the greatest impact if they are included in the Race Equality Action Plan.
- Finally, the report was peer reviewed by two experts in the field: Professor Nelarine Cornelius (Queen Mary University) and Dr Victoria Showunmi (University College London).

The causes, consequences and solutions to race inequality are interconnected and require change across a range of policy areas and public services. So this report should be read in conjunction with five related reports that focus on **leadership and**

representation, education, health and social care, crime and justice and **housing and accommodation** (see Annex 1), and an overarching report (forthcoming) which pulls together cross-cutting findings and recommendations.

Welsh Context

Racial and ethnic minority communities in Wales have a history which long pre-dates the Windrush era, exemplified by one the UK's oldest multi-ethnic communities, in Tiger Bay (Butetown), as well as a centuries-long history of Gypsy, Roma and Traveller migration to Wales (Marsh, 2020). From the 1919 Race Riots to ongoing racialised miscarriages of justice¹, Welsh history and experiences of racism are distinct from elsewhere in the UK, although some UK Government policies, such as the 'hostile environment', have inevitably had an impact in Wales, adversely disadvantaging migrants in accessing healthcare, education and accommodation despite a devolved focus on integration² (Parker 2017).

This report provides a synthesis of research, policy recommendations and examples from practice relevant to reducing racial disparities in employment and income. While much of the available data and research evidence comes from UK-wide studies, studies covering both England and Wales, as well as international studies, we recognise the importance of situating this within the Welsh policy context. This includes the broader legal context of the Equality Act 2010, the Public Sector Equality duty in the Act and the specific duties for Wales as well as the Welsh Government's Strategic Equality Plan (2020-2024)³ and the 2018 Equality and Human Rights Commission (EHRC) report 'Is Wales Fairer?' (EHRC 2018), which underpin an ongoing commitment to tackling racial inequalities in Wales exemplified by the development of the forthcoming Race Equality Action Plan.

In Wales, 5.9% of the population identify as Black, Asian, 'Mixed/Multiple' or 'Other' ethnic groups but there are wide variations between local authority areas – from 1.7% to 19.8% (Welsh Government, 2020b). There are persistent racial inequalities in employment and income, including under-representation at more senior levels, lower rates of pay progression, and over-representation in lower paid and more precarious jobs for some racial and ethnic minority groups (EHRC, 2018). As in the UK as a whole, the Coronavirus pandemic has added fresh urgency to actions to

¹ https://www.theguardian.com/uk/2012/sep/17/cardiff-three-five-wait-justice

² http://www.docsnotcops.co.uk/newresearch-hostileenvironment-wales/

³ https://gov.wales/equality-plan-and-objectives-2020-2024

eliminate racial disparities and highlighted action on employment and income as a key way to address inequalities (Equality, Local Government and Communities Committee (ELGC), 2020; Ogbonna, 2020).

The pandemic has disproportionately impacted racial and ethnic minority groups in relation to infection and mortality rates as well as social and economic impacts in Wales (Office for National Statistics (ONS), 2020) and elsewhere (Hu, 2020; Thakur et al., 2020). Because racial and ethnic minority groups are employed in precarious jobs and sectors affected by the lockdowns, they are more likely to have lost income, become unemployed, and to be disadvantaged in relation to government measures to support employees during the pandemic (ONS, 2020; Institute for Fiscal Studies (IFS), 2020; Khan, 2020; Rodriguez, 2020). There are also important variations within racial and ethnic minority groups that reflect the intersectional nature of disadvantage and discrimination. For example, women make up the majority of the health and social care workforce in Wales and are over-represented in low-paid work (Ogbonna, 2020); while racial and ethnic minority men (particularly Pakistani, Bangladeshi, Black African and Black Caribbean men) are at particularly high risk of job and income loss as a result of the pandemic (IFS, 2020).

In response to evidence of inequalities faced by racial and ethnic minority groups at risk of COVID-19 related morbidity and mortality, the First Minister convened the Black, Asian and Minority Ethnic group COVID-19 Advisory Group. The Socioeconomic Sub-Group was set up specifically to identify socioeconomic factors contributing to racial inequalities in health and social outcomes, as well as immediate and longer-term actions to reduce such disparities, for which Professor Ogbonna's report was commissioned (Ogbonna, 2020).

The Welsh Government has responded to the Ogbonna recommendations with measures specifically targeting racial and ethnic minority people (Welsh Government, 2020c). These include, for example, working with DWP Job Centres and Working Wales to organise job fairs in areas with a greater concentration of Black, Asian and minority ethnic group people; supporting initiatives to increase access to apprenticeships; and establishing Regional Employment Response Groups which will incorporate a focus on employability issues for racial and ethnic minorities.

Many of the actions to improve workforce representation and racial equality at work that are discussed in this report are likely to also have a positive impact on mitigating the disproportionate impact of the Coronavirus pandemic on racial and ethnic minorities over time. For instance, Business in the Community (2020) emphasises that actions to minimise the impact of the pandemic should focus on supporting career and pay progression and on increasing representation of racial and ethnic minority people at all workplace levels.

Key concepts and review scope

It is important to acknowledge that **both race and ethnicity are social constructs not biological distinctions**, and to **recognise differences in needs and experiences within and between different racial and ethnic groups**. We actively avoid using the terms 'BAME' or 'BME' except where this describes the name of an organisation or network. These terms can be experienced as stigmatising, depersonalising and 'othering', as well as reflecting an unwillingness and discomfort among White people to discuss specific experiences of racial and ethnic minority groups (e.g. Bunglawala, 2019). This is exemplified by the 'Is Wales fairer?' report, finding differences in employment and income experiences between, for example, Indian and Black people in Wales (EHRC, 2018).

Our review focuses on race and ethnicity, but it is important not to examine these aspects of people's social identities in isolation. Workplace and labour force experiences and needs differ according to gender, class, socio-economic and employment status, sexual orientation, disability, and migration status – among other things. The Welsh Government's Action Plan also needs to acknowledge that approaches to increasing racial and ethnic equity cannot just rely on 'top down' policy and strategic initiatives but must also incorporate 'bottom up' approaches. Alongside visible senior leadership commitment, sustained action is needed to tackle three levels of racism – institutionalised, personally mediated, and internalised racism (Jones, 2000). It also means that racial and ethnic minority individuals and organisations must be actively engaged and involved in all decisions about race equity, while acknowledging that it is everybody's responsibility to address it.

Representation and progression in the workplace

Recommendations

- Utilise a combination of approaches to de-bias all stages of recruitment processes.
- Involve racial and ethnic minorities in the design and implementation of these approaches.
- Address specific barriers to accessing employment faced by migrant workers - for example, support to access education/adult education, with

language proficiency (in Welsh and English), support with translation and help gaining recognition of qualifications gained abroad.

 Collect recruitment and workforce data by ethnicity and migration status to understand where disadvantage manifests and monitor and evaluate the impact of actions to de-bias recruitment processes.

The 'Is Wales Fairer?' (EHRC, 2018) and Ogbonna (2020) reports both highlight inequalities in workforce representation among racial and ethnic (and religious) minorities in Wales. For instance, Muslims have lower employment rates and Black, Asian and minority ethnic groups are under-represented in the judiciary and public appointments. There have been previous attempts to address racial and ethnic inequalities in labour market access and status, notably the Ethnic Minority Employment Task Force (EMETF, 2003) and the McGregor-Smith Review (2017). However, based on trends in labour market statistics and a recent large scale 'State of the Nation' review, Clark and Shankley (2020) suggest that the EMETF had little success in reducing such disadvantage, and it is too soon to assess the impact of the McGregor-Smith review.

The main recruitment practices recommended in academic studies and policy reports as ways to increase representation in the workplace include initiatives to:

- Increase the numerical representation of racial and ethnic minorities in the workplace and at higher levels of seniority (e.g. positive action, quotas and targets);
- De-bias recruitment and career progression processes (e.g. representation on interview panels, anonymised job applications, mentoring and training opportunities); and
- Create more inclusive (and psychologically safe⁴) workplace environments (e.g. reducing bias, increasing cultural competence).

De-biasing recruitment processes

The 2017 McGregor-Smith review recommends that organisations implement several practices to de-bias recruitment processes. These include:

⁴ Psychological safety refers to the perceived risk of speaking up, voicing concerns and making mistakes at work (Edmondson and Lei, 2014).

- Mitigating against school and university bias in recruitment to enable a focus on potential achievement over and above which educational institution candidates attended;
- Rejecting shortlists that are inadequately racially diverse;
- Holding third parties or recruitment agencies to account for ensuring adequate representation on lists and making this a condition of contracts;
- Critical appraisal of job specifications; and
- Inclusive interview processes.

Several of these recommendations mirror those developed from findings from the landmark 2015 UK-wide 'Race at Work' survey (Ashe and Nazroo, 2015), and outlined in the 'Our manifesto for an anti-racist Wales' report (Race Alliance Wales, 2020).

Examples of these practices include the 'Recruiting for Difference' approach in higher education, which removes candidates' names and where they studied from applications (Morgan, 2019). Similarly, online recruitment support platforms can support blind applications,⁵ the development of inclusive job specifications and also the development of work-related questions to better assess candidates' suitability for the role. Address-blind applications provide a further way of reducing bias and inequality, based on consultation with Gypsies, Roma and Travellers in Wales which suggested applicants can face discrimination when applying for jobs based on their address (Welsh Government, 2018). While evaluation of the effectiveness of such initiatives is lacking, strong and consistent evidence that employers bias against 'foreign-sounding' names in applications (e.g. Krause et al., 2012; Ahmad, 2019) suggest that blinded applications should help reduce inequality.

The 2020 London NHS Workforce Race Equality Strategy for the health sector recommends the use of anonymised job applications. It suggests that recruiting managers consider 'the ability and expertise of the individual to demonstrate and encourage an inclusive culture when in role' (NHS England and NHS Improvement 2020, p.52). This means looking for candidates that 'add value to' rather than fit the pre-existing workplace culture. A focus on inclusion is outlined for each stage of the recruitment process from job design (e.g. skills to match the role rather than those of the person previously in post); job specifications (e.g. written in plain English and including positive action statements); through to interview (e.g. ensuring Black, Asian and minority ethnic staff representation on the panel with equal scoring weight and

⁵ E.g. https://www.beapplied.com/

that work-related tasks do not inadvertently discriminate against racial and ethnic minority applicants).

There are additional barriers to migrants in the recruitment process linked to language proficiency and a lack of recognition of qualifications obtained abroad, which both disproportionately disadvantage racial and ethnic minority groups (Acas, 2018). A lack of understanding among recruiting staff of how overseas qualifications equate to those available in the UK may lead to decisions not to interview or hire personnel based on erroneous assumptions about whether they are appropriately qualified or skilled. Overseas qualifications are often equivalent or comparable to UK qualifications and this should be acknowledged in hiring practice (Acas, 2018). Brentnall's (2017) report on racial and ethnic parity in learning in Wales highlights non-recognition of qualifications as a barrier to adult learners and employment which could prevent some families from leaving poverty as well as undermining confidence in themselves and the system.

Moreover, even if appointed, staff whose qualifications were obtained overseas may experience discrimination, being treated as though their skills are 'second class' (Oikelome, 2007). For refugees and asylum seekers in Wales, this misalignment between their aspirations and their skills and the expectations of employers has been shown to a be a particular barrier for to employment, as well as good quality employment, with more generic barriers related to enforced migration presenting further difficulties (Holtom and Iqbal, 2020).

The Bevan Foundation (2020) recommends that the Welsh Government examines and improves the existing qualification framework (the Credit and Qualifications Framework for Wales⁶) as well as improving Job Centre support to ensure migrants have equal access to the job market. Race Alliance Wales (2020) highlights accessible and appropriate language classes in both Welsh and English, opportunities for candidates to translate qualifications gained overseas, and also offering training in and advice about UK Employee Rights. These recommendations align with those made in the Welsh Government's 'Refugees employment and skills support study', which cover strengthening education and training provision refugees and asylum seekers, and improving employer engagement with refugees. The latter could be achieved through the work of employment advisors, and including a focus on refugees within Employability Plan actions related to up-skilling workers, supporting staff and providing fair work (Holtom and Iqbal, 2020).

⁶ https://gov.wales/credit-and-qualifications-framework-cqfw

Targets and positive action

Recommendations

- Implement a combination of targets and positive action at individual, workplace and institutional levels which are sustained and visibly supported by management.
- Publish locally meaningful targets for representation and sector-specific targets for progression for racial and ethnic minorities which are underpinned by sustained positive action.
- Provide specific support and guidance for public, private and third sector employers to implement positive action and to collect data to support and monitor targeted action.
- Take a system-wide and intersectional perspective to avoid unintentionally creating new or exacerbating existing inequalities.

Two of the key recommendations from the McGregor-Smith Review (2017) related to targets for racial and ethnic minority workforce representation. It recommended that public and private sector medium-sized and large organisations create five-year targets broken down by ethnicity (among other demographic information) which are published in annual reports and online. The review specifies that targets should be locally meaningful and relate to the organisation as a whole, as well as to each organisational level, to support career progression. To implement such targets, organisations could use routinely available data (e.g. from the ONS) to identify underrepresentation relative to local context. If current plans to develop a Welsh Race Disparity Unit are taken forward (Welsh Government, 2020c) this would be a key local data set to support benchmarking and targeted action in Wales. Such data could also help future-proof targets, enabling targets to be set which reflect predicted demographic trends in racial and ethnic minority representation.

Importantly, target-setting can be effectively used to inform positive action, another key recommendation of the McGregor-Smith review. Positive action can (in principle) in turn be used to identify and target racial inequalities in access to career development, including education and training and opportunities for racial and ethnic minority staff (Gifford et al., 2019).

As in other areas covered by the report, the evidence about effectiveness of targets and positive action is weak. Findings from a large study assessing the impact of three diversity policies to increase ethnic minority representation implemented in Dutch organisations (Verbeek and Groeneveld, 2012) found no impact of tie-break positive action⁷ processes (tie-break refers to use of a person's protective characteristic to decide between two equally qualified candidates to benefit the more disadvantaged candidate); assigning responsibility for diversity policy; or for the implementation of target figures over a single year period. However, the researchers attribute this to implementation failure, specifically a failure to assign responsibility for increasing racial and ethnic diversity and implementing targets. They suggest that the former lacks 'content' (an instrument with no goal) while the latter lacks 'form' (a goal with no structure for how to achieve it).

In the UK, there has been limited use of positive action in recruitment, in part due to lack of confidence in relation to when and how to implement it; when positive action differs from positive discrimination; and fears about tokenism and 'reverse discrimination'⁸ (Davies and Robison, 2016; EHRC, 2019). Because of this, the UK also lacks evaluations of the impact of positive action to produce more racially and ethnically equal workforces (EHRC, 2019). However, evidence from analyses of over 850 US companies suggests that combining policies on accountability and targets is effective in increasing representation of racial and ethnic minority staff (Dobbin and Kalev, 2016). The McGregor-Smith Review (2017) also explicitly recommended accountability for delivery of recruitment and progression targets be embedded in all medium to large sized organisations through executive sponsorship for racial diversity issues.

Gifford et al. (2019) recommend that employers are assertive in their use of recruitment targets and positive action while directly addressing misconceptions and reducing resistance. This can be achieved by clarifying how their approach differs from positive discrimination:

 Having a clear rationale and targets for positive action informed by robust organisational data;

⁷ Positive action refers to specific actions taken to increase workplace equality for people with protected characteristics under the 2010 Equality Act. For example, addressing the under-representation of racial and ethnic minority personnel in more senior roles by encouraging applicants from those backgrounds and/or more favourably recruiting a racial and ethnic minority candidate over a White candidate but only **where the two are equally qualified**. Positive action is voluntary but may support organisations to meet their Public Sector Equality Duties. Positive Action is distinguished from positive discrimination which is illegal and involves treating a disadvantaged group more favourably than an advantaged group when the conditions for positive action are not met. See section 159 of the Equality Act 2020: https://www.legislation.gov.uk/ukpga/2010/15/section/159. Accessed 23rd October 2020.

⁸ Reverse discrimination is a contested term used to refer to when a majority group is discriminated against in favour of a traditionally disadvantaged or minority group.

- Highlighting how any positive action strategy links to other organisational practices to promote buy-in;
- Incorporating targets for racial and ethnic minority representation within organisational and departmental objectives; and
- Allowing managers flexibility in how they contribute towards targets.

They also suggest that positive action be used in combination with targeted employee support networks as well as learning and development initiatives (e.g. mentoring schemes) which are both described further below. This recommendation is supported by research which compared the effectiveness of diversity policies aimed at racial and ethnic minority representation implemented in public and private sector organisations over a four-year period. The policies included those designed to increase numerical representation (e.g. quotas, monitoring representation, targets, and positive action), and those designed to improve management of diversity (Groeneveld and Verbeek, 2011).

They found that only the latter type of policy improved representation year-on-year in both the private and public sector. The researchers suggest that this is because, unlike equal opportunity/positive action policies which were externally enforced and based in anti-discrimination law, policies about managing diversity were designed to improve organisational performance with a business, rather than moral, case. They concerned organisational culture and behaviour, incorporating efforts to reduce discrimination and bias and support training and development for racial and ethnic minority employees. Initiatives to reduce workplace discrimination are further discussed later in the report.

Recommendations specifically for Government to encourage better employment practices have been identified based on analysis of 24,457 racial and ethnic minority and White British employees responding to the 2015 'Race at Work' survey (Ashe and Nazroo, 2015; Business in the Community, 2015). These included setting up an annual review to measure progress in creating an equitable labour market for racial and ethnic minority groups, which includes markers of change in salary, recruitment and promotion, and legislation in relation to publishing recruitment and progression data.

We outline specific recommendations for improvements to data collection and reporting by ethnicity and other protected characteristics in a separate report on health and social care (see Annex 1) but they apply equally to employment. Such data are needed to inform targeted positive action (e.g. tie-break processes, encouraging applications from under-represented staff groups) at organisational levels where racial and ethnic minority groups are under-represented.

Mentoring, reverse-mentoring,

sponsorship and leadership programmes

Recommendations

- Implement a contextually and organisationally relevant package of mentoring, reverse-mentoring, sponsorship, leadership programmes and networks.
- Importantly, involve racial and ethnic minority communities in the design of such initiatives to mitigate against unintended consequences.
- In mentoring/reverse-mentoring, encourage relationships in which both parties are able to have open discussions about race, racism, and white privilege.
- In sponsorship relationships, be mindful of creating new or perpetuating existing inequalities faced by racial and ethnic minority staff without a sponsor.
- Champion Black, Asian and minority ethnic group senior leaders but be careful to avoid tokenism.
- Take a critical approach to senior leadership programmes to ensure that they do not serve to reproduce structures of institutional racism, for example, relying on or assuming that racial and ethnic minority staff should adhere to norms of whiteness and relinquish their own cultural identity.
- Ensure that staff networks have clear lines of communication to and are visibly supported by senior leadership – including allocation of sufficient resources and enabling a climate in which they are able to challenge corporate agendas. Clear lines of accountability and continuous dialogue with the staff members they represent is also essential.
- In organisations of appropriate size, encourage the development of crossstrand networks to ensure an intersectional approach.

Mentoring and reverse-mentoring

Learning from practices in the UK Higher Education sector increasingly emphasises the importance of promoting a sense of belonging among racial and ethnic minority students and staff members to reduce gaps in attainment and career progression (UK Universities, 2019). Initiatives which foster inclusion⁹ aim to promote racial and ethnic diversity (but are also relevant to gender, sexual orientation, disability etc.), by providing a more supportive environment (Shore et al., 2018), and may help foster effective organisational commitment for all (majority and minority group) staff (Ashikali and Groeneveld, 2015).

The McGregor-Smith Review (2017) recommends that mentoring and reversementoring¹⁰ schemes be put in place to improve career support for staff from Black, Asian and minority ethnic backgrounds, a recommendation supported by Race Alliance Wales (2020). Mentoring, reverse-mentoring and sponsorship can positively impact recruitment practices, career progression and foster inclusive work environments, for example, by helping to counteract and confront biases and stereotypes; develop professional skills; share knowledge about workplace practices; increase access to role-models; and increase employee social capital (Robinson, 2018; Clarke et al., 2019). When the junior counterpart is from a racial or ethnic minority (as in reverse-mentoring), there may be particular potential to positively impact career progression and recruitment (Robinson, 2018).

Researchers propose several ways in which mentoring schemes can affect career progression and job satisfaction. They suggest that they work by increasing contact between racial and ethnic minority and majority group staff. By encouraging a reflective interpersonal dynamic which encourages openness to feedback and learning, mentoring can promote 'cultural competence' (Jongen et al., 2018). Similar mechanisms have been proposed for reciprocal (where mentees and mentors turn-take in role) and reverse-mentoring (Business in the Community, 2015; Dobbin and Kalev, 2016).

Evidence cited by Dobbin and Kalev (2016) indicates that mentoring in over 850 US companies increased racial and ethnic (and gender) diversity among management levels. They suggest that mentoring can be a helpful mechanism through which leaders can confront their implicit and explicit biases, and that through time investment, leaders come to see their mentees as more deserving of progression opportunities.

⁹ Inclusion refers to feeling valued at work, being treated equitably, and the extent to which people feel that they are contributing and are encouraged to contribute to a team or group's effectiveness (Shore et al., 2018).

¹⁰ Reverse mentoring refers to situations when a more junior employee is paired with and mentors a senior colleague, e.g. to share knowledge about generational perspectives or updated expertise. Reverse mentoring can also refer to specific situations in which a racial or ethnic minority employee is paired with and mentors a colleague who is more senior or from the majority racial and ethnic group.

Reverse-mentoring may enable greater awareness about white mentor attitudes and behaviours around Black, Asian and minority staff, exploration of organisational culture, and of the mentors' engagement with organisational diversity and inclusion initiatives, as well as symbolising willingness to disrupt power structures (Raza and Onyesoh, 2020). This suggests that benefits for majority group mentees can also serve to promote an organisational culture of inclusivity and provide impetus for senior management support for diversity initiatives such as positive action (McGregor-Smith, 2017).

Finally, some evidence suggests that the impact of mentoring (and reverse mentoring) on diversity can be strengthened when the relationship includes open discussion about race, racism, and privilege, helping to establish rapport and trust (Chan, 2008). We discuss this issue in more detail in our report on increasing racial equality in health and social care.

An example of a reverse mentoring initiative in the healthcare sector is the 'Reverse Mentoring for Equality, Diversity and Inclusion (ReMEDI) programme'. Here, senior staff or staff from majority racial/ethnic groups are mentored by more junior racial/ ethnic minority staff (Raza and Onyesoh, 2020). Beyond healthcare, the Bar Standards Board (BSB) for England and Wales, which regulates barristers and specialised legal services, has recently launched a reverse-mentoring scheme as part of their Race Equality Taskforce.¹¹

Sponsorship

While mentors can be anyone able to offer advice and support to a colleague, sponsors refer specifically to senior staff members who are invested in their 'protégé's' career advancement. Where racial and ethnic minority groups are underrepresented in the workplace, some argue that access to a sponsor is important (Business in the Community, 2015). This is because senior leaders can leverage their influence to champion and promote the names of those that they sponsor in situations where professional development and opportunities for progression are being discussed.

Analysis of the UK-wide 2015 'Race at Work' survey (Business in the Community, 2015) suggests that Black, Asian and minority ethnic staff respond well to sponsorship relationships and that these initiatives increase their sense of feeling actively supported and valued. However, Gifford et al. (2019) warn of the need to ensure that it does not perpetuate cultures in which progression relies on 'exclusive

¹¹ https://www.barstandardsboard.org.uk/about-us/equality-and-diversity/race-equality-taskforce/race-equality-taskforce-reverse-mentoring-scheme.html

relationships' with senior staff leading to other equally talented staff being overlooked. To support good practice, Advance HE has developed a 'Sponsor Toolkit' which focuses on race equality (Advance HE, 2020).

Role models

Role models are thought to encourage (or discourage) racial and ethnic minority groups from perceiving that they are able to progress in the workplace and that ambition will be rewarded (McGregor-Smith, 2017).

The UK-wide 'Race at Work' survey suggests that such role modelling may be particularly important for Black (particularly Black British, Black Caribbean and Black Other) employees for whom role models are lacking (Business in the Community, 2015). Actively showcasing racial and ethnic diversity in senior management levels, while carefully avoiding tokenism, would enhance the visibility of role models (NHS England and NHS Improvement, 2020). Similarly, based on findings from nearly 200 interviews with Black, Asian and minority ethnic Civil Service staff and key stakeholders, Ethnic Dimension (2014) recommends that a 'critical mass' of racial and ethnic minority role models at senior levels are needed to avoid tokenism and to send a message to staff at all levels about the organisation's commitment to reducing inequalities.

An example of intervention in this area includes Legal & General Investment Management's (LGIM) diversity plan (LGIM, 2020). LGIM is a fund manager that holds a 2-3% stake in every FTSE 100 listed company, and specified in October 2020 that companies which do not meet its ethnic diversity targets will, from January 2022, face votes against the chair of their nomination committee or the chair of their board. The targets cover ethnicity pay gaps, inclusive hiring policies, and representation – with a particular focus on board level representation.

Whilst there is widespread advocacy of mentoring and sponsorship, there is only limited evidence about its impact in increasing representation of racial and ethnic minority groups in workplaces, particularly in the UK (Gifford et al., 2019; Guyan and Oloyede, 2019). This is an important evidence gap and evaluations are needed which follow up staff members over time and incorporate measures of job satisfaction, as well as job retention, career, and pay progression.

Leadership programmes

Race Alliance Wales (2020) states that support for racial and ethnic minority staff members should include mentoring/reverse-mentoring but should also go beyond these initiatives to better support progression into management/more senior roles. In their response to the Ogbonna report (2020), and as part of their Diversity and Inclusion Strategy for Public Appointments, the Welsh Government is supporting senior leadership programmes for Black, Asian and ethnic minority people in public appointments, and has its own year-long racial and ethnic minority staff development programme (Welsh Government, 2020c). See Box 1 for a case study of a racial and ethnic minority professional development programme.

While there may be proximal benefits of participation in such programmes in terms of networking opportunities, mentoring, and coaching, and overcoming barriers to progression (Ogunbawo, 2012), they have been criticised for enabling maintenance of the status quo. Bhopal (2020) argues that in higher education institutions, racial and ethnic minority leadership programmes emerge from an assumption of deficit and that they serve to benefit the institution without challenging white privilege and structural inequalities. As a result, Black, Asian and minority ethnic leaders continue to face racism, and leadership programmes place the emphasis on minority staff to change, rather than challenging the institutional structures which create the inequality in the first place. As evidence of institutional stasis, Bhopal's views repeat cautions made by academics over a decade ago (Kalra et al., 2009) and demonstrate that it is vital that, at the very least, any such leadership programmes are combined with changes to institutional structures.

Box 1: Aditi Professional development programme case study

Aditi is an evidence-based example of a professional development programme for racial and ethnic minority staff (Yelkin, 2018). Aditi was piloted as a sixmonth programme at the University of Birmingham to support Black, Asian and minority ethnic aspiring leaders. The programme involved learning sessions, a personal project, and a coach offering bespoke feedback. Programme participants reported short-term outcomes of increased confidence and competence, improvements to their managerial skills, and a perception of greater involvement in their university's strategy and culture. Longer term outcomes are yet to be evaluated (Guyan and Oloyede, 2019).

Informal networks and external support

The McGregor-Smith Review (2017) recommended establishing both formal and informal staff networks¹² to support racial and ethnic minority groups in the workplace. Such networks can (in principle) help with career progression; for example, offering support with job applications or progression opportunities. Evidence from extensive interviews in the Civil Service indicates that they can also enhance job satisfaction by creating a space and a channel through which racial and ethnic minority staff experiences and opinions can be heard (Ethnic Dimension, 2014).

To be effective, the McGregor-Smith Review suggests that the objectives of networks should be aligned with and incorporated into organisational aims, and that they influence organisational practice in a way that supports their business or corporate mission. The review argues that such networks can support efforts to enhance good practice by offering insights into how staff experience the workplace, or how they experience policies or strategies designed to enhance diversity or reduce discrimination. However, based on our research and extensive engagement work as part of the TIDES study¹³, we suggest that to be effective in reducing racial inequalities, networks must be allowed to diverge from corporate agendas and be a vehicle for 'speaking truth to power'.

Findings from a survey of Black, Asian and minority ethnic group staff networks in the NHS highlighted other elements of effective networks which may be relevant in Wales and suggest ways of avoiding tokenism (NHS England, 2017). These include:

- Strong working relationships with other staff networks (which would support an intersectional approach) as well as diversity and inclusion teams, unions, human resources, and board members;
- Encouraging the development of strategic relationships within and outside of the organisation with groups who can support their aims;
- Appropriate time allocated to network chairs and vice chairs to run and conduct network activities;

¹² Staff networks are staff-led groups which aim to address workplace/organisational problems experienced by under-represented and disadvantaged staff members or groups. Commonly found networks focus on LGBTQ+, women, disabled, and racial and ethnic minority groups. They aim to create a space where people can share experiences, opinions and support career progression, as well as being a source for organisational consultation on equality and diversity issues.

¹³ http://www.tidestudy.com/

- Ensuring network representation at board level with mutual expectations for accountability; ensuring access to workplace diversity and inclusion data;
- Developing and promoting access to a network leaders programme; and
- Ensuring visibility to and dialogue with staff members who they represent and with senior management.

However, more research is needed to better evidence the influence and characteristics of staff networks which do or do not promote racial equality. Williams and Yarker (2017) reviewed the academic and practitioner literature for different types of network, finding some support for their impact on job satisfaction and optimism about career progression, but mixed support for their impact on workplace discrimination. However, they note that much evidence is US-based and methodologically limited. Future research is needed in the whole of the UK and specifically in Wales to explore the prevalence of staff networks; the impact of belonging to staff networks on individuals and organisations over time; and the attributes of staff networks which are associated with employee and organisational outcomes for racial and ethnic minority staff.

Tackling workplace discrimination

Recommendations

- Combine training with a broader institutional and workplace commitment to psychological safety and inclusivity, with a clear focus on covert, everyday microaggressions, and encourage allyship and bystander intervention which is visibly supported by senior leadership.
- Scrutinise and transform existing approaches to diversity training, mindful of existing critique and actively pre-empting unintended effects.
- Actively involve racial and ethnic minority staff in training development but ensure it is mandatory for all staff at all levels.
- Provide on-going training which incorporates experiential, perspectivetaking and reflective approaches and focuses on action and behaviour change with an explicitly anti-racist lens that includes acknowledging the role of – and challenging – whiteness as the institutional norm, white privilege and white fragility.

- Outline expectations for and support all staff at all levels to encourage open discussions about race and racism in the workplace and beyond.
- Implement organisational anti-racist strategies and make them public.
- Create multiple channels through which staff can share experiences, raise concerns, and have their opinions heard, with clear and transparent channels of communication and accountability to middle and senior management.
- Support research and evaluation (including the collection of appropriate data) to identify what works in what contexts to change behaviour in a sustained way.
- Commission research and a review into whether employers fulfil equality duties, particularly on access to senior level posts and responses to workplace racism.
- Develop a race policy framework with commitments on recruitment and a focus on leadership, increasing transparency of career progression, and establishment of role models.
- Adequately resource the Equality and Human Rights Commission (EHRC) to support compliance with legislation.
- Remove financial legal costs of challenging workplace racism in employment tribunals and ensure representation amongst tribunal committees.
- Consult on the impact of language proficiency on the experience of workplace racism.

Race was the motivating factor in 65% of recorded hate crimes in Wales in 2019/20, and has increased in recent years (Home Office, 2020). Findings from the 2018 All Wales Survey for Ethnic Minority People indicated that half of respondents had experienced racial abuse and 60% of respondents felt they had been unfairly treated at work (Ethnic Minorities and Youth Support Team (EYST), 2019).

Racism is a 'wicked' problem (Came and Griffith, 2018) which is deeply embedded in every aspect of daily life, including in workplaces:

"an organized system, rooted in an ideology of inferiority that categorizes, ranks, and differentially allocates societal resources to human population groups." (Williams and Rucker, 2000, p.76) Our review of the evidence highlighted three broad foci for tackling workplace discrimination within organisations:

- Implementing workplace training initiatives aiming to increase awareness of cultural differences and to tackle prejudice and bias;
- Addressing organisational culture; and
- Enacting anti-discrimination policies.

We address each of these in turn below and caution that to reduce institutional racism, initiatives must be context specific, targeted, and have the goal of changing behaviour over and above just changing people's prejudicial and biased beliefs and attitudes (Pederson et al., 2005). Moreover, each of these initiatives is unlikely to be effective in isolation – sustained action at multiple levels is needed (Jones, 2000). Based on a review of international evidence covering a variety of organisation types and contexts, Priest et al. (2015) suggest that a combination of diversity training; developing skills, accountability and ownership; leader buy-in and political pressure; and targeted processes and policies are required. Moreover, to eliminate institutional racism, the engrained policies, processes, procedures, norms, and attitudes which maintain and perpetuate it must be systematically unpicked. Thus, an explicitly antiracist approach needs to underpin any combination of initiatives, with a focus on action at all levels (McGregor-Smith, 2017; Came and Griffith, 2018; CIPD, 2020).

As with recruitment practices, efforts at reducing racial discrimination require data and analysis. We outline specific recommendations for improvements to data collection and reporting by ethnicity relevant to reducing workplace discrimination (including the importance of involving racial and ethnic minorities in deciding what data is collected and how to interpret findings) in our health and social care report.

Diversity and unconscious bias training

Despite their popularity, both diversity training and 'unconscious bias' training as commonly delivered have limited impact on reducing workplace discrimination as standalone initiatives, beyond increasing individual knowledge (Priest et al., 2015; West et al., 2015; Noon, 2017; Gifford et al., 2019). The evidence indicates that to be more effective, they require a stronger focus on action and behaviour change, active mitigation against potential unintended consequences, inclusion of reflective practice and perspective-taking, and to form part of a package of anti-racist initiatives targeting institutions not just individuals (Williamson and Foley, 2018; Khan (in Byrne, 2020). We outline specific ways to enhance training in Box 2.

A review of unconscious bias training conducted on behalf of the Equality and Human Rights Commission (Atewologun et al., 2018) also argues for caution. Their findings suggest that unconscious bias training can have some effect on reducing, but not eliminating, implicit bias and is unlikely to affect explicit bias. They found limited evidence for any impact on behavioural change, and in some circumstances, such training can have negative effects. Negative consequences may arise from 'normalising' such bias, dampening motivation for individuals to challenge their own attitudes and behaviours (West et al., 2015); by situating such discrimination as an 'unconscious, inevitable' problem within individuals not institutions and organisations (Bourne, 2019, p.71); and by laying the responsibility for equality with individual employees and not with institutions and organisations (Noon, 2017; Bourne, 2019).

Box 2: Strategies to enhance anti-discrimination training

Specific strategies to enhance the impact of diversity training (including but not limited to unconscious bias) on workplace discrimination include:

- Integrate goal setting that focuses on changing behaviours and attitudes, and support the development of practical strategies to mitigate against bias over and above simply educating about or discussing unconscious bias (West et al., 2015; Atewologun et al., 2018).
- Incorporate a focus on more covert, subtle bias and discrimination that can be harder to identify but which has pervasive effects on the wellbeing and job satisfaction of those affected (West et al., 2015); avoid 'normalising' bias; and, clearly distinguish prejudice from racism (Ashe and Nazroo, 2015; Bourne, 2019).
- Implement interventions which encourage perspective-taking and 'walking in the shoes of', including both experiential and reflective elements. These are more effective than those focused on educating alone (Loya and Cuevas, 2010; Gifford et al., 2019).
- Incorporate education about the history of race and racism in Wales in line with 2016 United Nation's Committee on the Elimination of Racial Discrimination report (Ashe and Nazroo, 2015). This includes a recognition of the role of Wales in slavery and the British Empire.
- Support all staff at all levels to openly communicate about race to share the emotional burden of educating colleagues and to increase confidence in raising issues about racism without fear of negative consequences (Taffel, 2020).

- Show that senior managers take anti-racism and workplace discrimination training seriously by openly promoting training to their colleagues and employees. Targeting bespoke training for senior management may support this goal (Gifford et al., 2019).
- Ensure training is part of a package of initiatives which lays responsibility for change with institutions, not just individuals (Priest et al., 2015).

Organisational culture

Based on a review of the organisational literature, West et al. (2015) identify key components of inclusive organisational climates which discourage and resist discrimination and harassment. They highlight the need to actively counteract the organisational and interpersonal contexts which are likely to enable, elicit and encourage stereotyping and prejudice, and to lead to discrimination. For example, they suggest that lack of clarity about and feedback on working goals leads to a sense of ambiguity and confusion among staff and that this in turn evokes stereotyping and discriminatory behaviours.

Similarly, when staff members are under stress, overworked, feel unsupported and marginalised by leaders, and where there is a culture of blame, this limits staff engagement levels, reinforces in/out-group behaviours and creates a climate which fosters stereotyping, psychological distance, and discrimination. Thus, West and his colleagues recommend positive workplace environments and good people management to limit discrimination. Similarly, encouraging cooperation and teamwork, and increasing contact between diverse staff members, for example through cross-training (see also Dobbin and Kalev, 2016), would help to counteract and disconfirm biases and reduce in/out group dynamics.

Other aspects of organisational climate conducive to reducing discrimination include a focus on quality improvement and innovation grounded in initiatives which demonstrate that organisations value racial and ethnic diversity. These types of initiatives should encourage people to be able to speak up and for their opinion be heard, and openly welcome constructive debate even if controversial. We describe evidence for how to achieve this in more detail in our report on increasing racial equality in health and social care. For instance, one example of anti-racist practice is the promotion of workplace allyship¹⁴ to alleviate the burden of education and action often borne by ethnic and racial minority staff alone (Sue et al., 2019). 'White Allies' programmes involve supporting White staff through learning, reflective practice and mentoring, so that they in turn can utilise their white privilege to actively resist bias and racism (e.g. NHS England and NHS Improvement, 2020). To be effective, such programmes must be developed in concert with people affected by racism and must actively avoid paternalism (Spanierman and Smith, 2017).

Ogbonna (2020) emphasises the importance of engaging with, documenting, and validating the lived experiences of racism by racial and ethnic minority communities in Wales to understand and eliminate racism, and to help build trust. Such action would be supported by sustained community engagement, which actively counteracts prevailing power differentials (O'Mara-Eves et al., 2013). For example, 'listening campaigns'¹⁵ are a way of establishing the needs of Black, Asian and ethnic minority people and the organisations in which they work, and embedding race discussions at all levels of organisations as a way to start this process.

Anti-racist policy and procedures

Fundamental to eliminating institutional racism is unpicking the structures which maintain and perpetuate it. This involves systematically scrutinising institutional and organisational processes, policies, and procedures (Came and Griffith, 2018; CIPD, 2020). The Welsh Government's response to the Ogbonna report goes part way to acknowledging this by committing to 'renewed attention on anti-oppressive practices, diversity competences and the introduction of ethnicity specific Equality Impact Assessments' and to addressing the report's recommendations about the establishment of 'safe spaces' and channels for Black, Asian and minority employees to share ideas and raise concerns. We outline relevant recommendations and evidence to support this commitment above. These are aligned with and would usefully be read in conjunction with the CIPD's recently published six principles for organisational anti-racist strategy (CIPD, 2020). These are not prescriptive and would be best adapted to context and organisational size.

Organisations should develop structures and processes which make it clear that racism will be sensitively acted upon and taken seriously (Ashe and Nazroo, 2015; Unite, 2016). This includes clear publicly visible policies including zero-tolerance

¹⁴ Allyship refers to when people from advantaged or more privileged groups proactively work to eliminate prejudice and discrimination in themselves and when observed in their daily lives.

¹⁵ https://www.corganisers.org.uk/training/our-courses/listening-skills/

statements on racial discrimination, harassment, bullying and abuse for which senior leaders with appropriate experience and understanding are accountable for. McGregor-Smith (2017) recommends that to ensure lasting change, governments ask institutional funds with holdings in FTSE companies to disclose their diversity policies, while CIPD recommends that all organisations at least publicly state their anti-racist positions (CIPD, 2020). To be effective and to avoid negative or unintended consequences, it is important that these policies and targets are coproduced with people from racial and ethnic minority groups to avoid 'paternalistic racism' (Hall, 2005; Spanierman and Smith, 2017).

Within organisations it is important that visible processes and procedures are in place so that staff know how to report discrimination, reporting channels are accessible and transparent, and all reports about racial discrimination, harassment, bullying or abuse are recorded – describing what action was taken and the outcome. Based on findings from the 2015 'Race at Work' survey, it is recommended that organisations regularly review and analyse this data against targets and implement targeted improvement strategies accordingly (Ashe and Nazroo, 2015; Unite, 2016). In addition, collection and reporting of data on racist incidents and employer responses to them would help to nurture transparency and trust (Unite, 2016; Clark and Shankley, 2020).

To support reporting, recording and acting on racism, and to ensure proper implementation of organisational anti-racist strategies, it has been highlighted that diversity and inclusion practitioners within organisations require sufficient resources in terms of time, space and material resources. Moreover, such efforts would be supported by enabling cooperative working relationships between human resources, senior management, diversity and inclusion teams, staff networks, and unions where relevant (Ashe and Nazroo, 2015; Unite, 2016).

Finally, based on findings from the UK-wide 'Race at Work' survey, recommendations for Government actions to support a reduction in workplace discrimination have been made (Ashe and Nazroo, 2015; Business in the Community, 2015). These support the organisational approaches identified above and also promote leader buy-in which are discussed further below. As with the recommendations from the McGregor-Smith review, it is important that policy evaluation is embedded in order to assess the impact of change and to allow sufficient time for their implementation and impact (Clark and Shankley, 2020).

Securing senior leader and middle management buy-in

Recommendations

 Proactively encourage buy-in among both senior leadership and middlemanagement by empowering and engaging them in solving racial inequalities in the workplace, encouraging contact between management and racial and ethnic minority staff, and implementing processes which establish social accountability for change.

Research indicates that diversity and inclusion-related management interventions are only likely to succeed when actively and sustainably supported by senior management (Priest et al., 2015; Gifford et al., 2019). Evidence suggests that most diversity and inclusion practices fail because they impose restrictions on managers in terms of their autonomy and decision-making, which leads to resistance or avoidance (Kalev et al., 2006; Dobbin et al., 2015; Dobbin and Kalev, 2016). Dobbin and Kalev (2016) identified three basic successful principles for securing leader buy-in for promoting diversity in the workplace that emphasise management empowerment over prescription (Table 1). An additional principle (targeting middle managers) is added based on findings from a series of engagement activities with diversity and inclusion professionals, and a review of the practice and academic literature (Gifford et al., 2019).

Principle	Example practice
Engagement: Engage managers in solving the problem	Mentoring, leaders taking an active interest in supporting mentees.
	Recruitment programmes targeting racial and ethnic minority groups at colleges and universities, particularly where this involves outreach by leaders.
	Developing a clear business case for diversity interventions.

Table 1: Principles for securing leader buy-in

Principle	Example practice
Contact: Expose managers to people from different racial and ethnic groups	Self-managed teams, which allow people in different roles and functions to work together as equals on projects and increase contact among different groups. Cross-training – rotating through departments to increase
	exposure to diversity.
Social accountability: Encourage social accountability for change	Publication of within-workplace data by race and ethnicity such as pay, progression, representation at different levels, and incidents of racial discrimination, bullying, harassment, or abuse.
	Development and measurement of diversity and inclusion key performance indicators.
	Calling out racist behaviour.
	Establishing diversity task forces.
Target middle managers	Ensuring that all employees understand diversity and inclusion as a priority, through senior leader role-modelling and messaging about its ethical principles, strategic and operational importance.
	Recognising and appropriately resourcing diversity and inclusion initiatives, including time, materials, and money.
	Reduce resistance by allowing control for people managers in decision-making, emphasising management agency.
	Supporting people managers, e.g. training about issues affecting ethnic and racial minorities, and skills training to promote inclusive environments.

Source: Adapted from Dobbin & Kalev (2016) and Gifford et al. (2019).

Social value provisions in procurement

Recommendations

 Incorporate research, monitoring and evaluation in the implementation of social value provisions in procurement to assess impact on increasing equity for racial and ethnic minority employees and businesses.

The inclusion of social value provisions in procurement to promote race equity was highlighted in the Ogbonna (2020) report, the Manifesto for an Anti-Racist Wales (Race Alliance Wales, 2020) and the McGregor-Smith review (2017). Similarly, recommendations for the Welsh Government from the All Wales Survey for Ethnic Minority people (EYST, 2019) include use of its procurement power to require all public funding recipients to provide senior and public facing staff with training in equality and diversity. Finally, recommendations based on UK-wide data have further argued that procurement of government and public sector contracts involve a Race Equality Impact Assessment of tenders (Ashe and Nazroo, 2015; Business in the Community, 2015).

Updates to the Wales Socio-economic Duty, which aims to improve outcomes for socially disadvantaged people, are due to be enforced in Spring 2021 and go some way to addressing these recommendations (Welsh Government, 2020d). This outlines requirements for due regard to the need to reduce inequalities linked to socio-economic disadvantage to be taken in all strategic decisions. While these will be statutory only for listed public bodies, they outline an expectation that all public bodies will act in line with the principles of this duty. This includes due regard in major procurement and commissioning decisions, as well as the use of impact assessments (linked to race but also other protected characteristics) in decision-making.

The Public Services (Social Value) Act 2012 requires contracting authorities to consider economic, environmental and well-being impacts. Following consultation, the UK government extended this in September 2020¹⁶ to require contracting

¹⁶ https://www.gov.uk/government/news/new-measures-to-deliver-value-to-society-through-public-procurement

authorities to account for social impact within award criteria where proportionate to what is being procured and the subject matter. Extensions to the social value model outlined in the Public Services (Social Value) Act 2012 include criteria to assess contracts on supporting local community recovery from the Coronavirus pandemic, as well as tackling workforce inequalities (including racial inequality). For instance, ensuring supply chains are accessible to businesses owned or led by under-represented groups; and ensuring supply chain businesses promote increased workforce representation of racial and ethnic minority groups. In Wales, the 'Social Value Wales' model¹⁷ is driven by the Public Services (Social Value) Act 2012 and the Well-being of Future Generations Act (Wales) 2015. It offers a framework and guidance for public, private, and third sector organisations in commissioning and procurement to deliver social value.

As with many of the other measures recommended by experts which we have identified in this report, there is a lack of research on the effectiveness of using social procurement as a means of promoting racial equality. LePage (2014) and Moon (2017) advocate for social value procurement to increase employment among racial/ethnic minorities, though evidence for their impact on the labour market is as yet limited (Denny-Smith et al., 2019). Rigorous research in light of the recent changes to social value procurement is needed to help determine whether it does work and in what contexts.

Increasing pay at the bottom end of the income distribution

Recommendations

- Addressing ethnicity pay gaps and increasing pay at the bottom end of the income distribution requires multiple, multi-sectoral initiatives and are beyond the scope of this review. We recommend that Welsh Government looks to existing evidence-based recommendations published by the Social Market Foundation.
- Eliminating discrimination from recruitment and career progression processes is likely to underpin any such efforts. We recommend that Black, Asian and ethnic minority communities in Wales are actively engaged in

¹⁷ http://socialvaluewales.co.uk/social-value-wales/

developing strategies to reduce pay gaps to ensure that they are grounded in the realities of their lived workplace experiences.

 To support the development, evaluation, and improvement of actions, and to trigger mechanisms of social accountability, we support recommendations for medium to large sized organisations to publish data on pay, progression, and hiring by ethnicity and migration status; and the development of sector-specific targets for pay and progression, all underpinned by collection of standardised data.

The ethnicity pay gap is smaller overall in Wales than in England, though there are variations between ethnic groups and by migration status (ONS, 2019). While people from an Indian background have higher average hourly earnings, Black people have lower average earnings than White British people (EHRC, 2018). Non-UK born racial and ethnic minority people experience a greater pay gap than UK-born people in Wales, particularly among Black and Other ethnic migrant groups (ONS, 2019).

Whilst UK data suggest Black, Asian and minority ethnic individuals are overall not more likely to be self-employed than White counterparts, some groups are over-represented e.g. Pakistani and Bangladeshi men and Gypsy, Irish and Traveller groups (IFS, 2020; Haque, 2020). Furthermore, Black, Asian and minority ethnic workers are more likely to be self-employed in poorer paid, more precarious, 'gig economy' work. As outlined in the introduction, both England and Wales and Wales-only analyses indicate that they are more likely to have lost income, become unemployed, and to be in receipt of government employee support measures during the pandemic (ONS, 2020; Institute for Fiscal Studies, 2020; Khan, 2020; Rodriguez, 2020).

Kirkup et al. (2019) recommend actions to increase pay for low paid workers in general including:

- Developing guidance about and tailoring expectations for pay progression to different sectors;
- Requiring companies to publish wage and progression data, which may be particularly effective for companies concerned about public reputation; and
- Accreditation schemes for showcasing employers who offer progression training and progression opportunities equally across their workforce, including lower paid workers.

Brown et al.'s (2017) review on tackling gender, disability, and ethnicity pay gaps found limited evidence for the effectiveness of interventions to close such gaps,

partly due to lack of evaluation. But on the basis of the evidence that is available, they suggest that de-biasing and eliminating discrimination from recruitment processes may be particularly important to closing the race and ethnicity pay gap.

Brown et al. also identify a need for more research to better understand how to reduce pay gaps for other protected characteristics including race and ethnicity. This is consistent with recommendations made by the Fair Work Commission (Workforce Partnership Council, 2019) to extend pay gap monitoring and reporting by public bodies to include ethnicity and with recommendations by Clark and Shankley (2020), who believe that all medium to large sized employees should publish data on hiring, promotion and pay decisions by ethnicity and that reporting ethnicity pay gaps be mandatory for large organisations. Race Alliance Wales (2020) suggest that Government should set national targets for closing gaps in pay (as well as employment and economic inactivity). Given the importance of securing leader buy-in to effective strategies to reduce workplace discrimination, it is likely that requirements for pay and progression reporting would help to foster social accountability and promote change.

Finally, some researchers identify indirect approaches which they believe would support a reduction in the pay gap. These include:

- Reducing digital exclusion (Fortuna, 2020; Majeed et al., 2020);
- Increasing access to welfare, credit, employment, and skills advice (Citizens Advice, 2020);
- Increasing support to people who have lost or are at risk of losing their job (Citizens Advice, 2020); and
- Increasing support to people who are unemployed (e.g. supporting income maximisation through uptake of under-utilised benefits).

In terms of those in low paid self-employment, the Joseph Rowntree Foundation have recommended increasing support to progress into higher pay, which includes advice on alternative employment; training and support to access higher paid employment; and accompanying incentives for support providers (Broughton, 2015).

These approaches and recommendations highlight the need for sustainable support for community organisations and Citizens Advice which offer such advice and support.

Conclusion

The imperative to eliminate racial and ethnic disparities could not be clearer. In the context of the death of George Floyd and the Black Lives Matter movement, the Coronavirus pandemic has laid bare the impact of such disparities in income and employment in Wales as well as the UK more widely. Welsh people from Black, Asian and minority ethnic groups are more likely to die from Coronavirus, including health and social care workers. Anxiety about the impact of Coronavirus is highest amongst racial and ethnic minority healthcare professionals, and the adverse economic and social impacts of Coronavirus-related social distancing measures is and will be disproportionately felt among racial and ethnic minority groups. These disparities are not new. Rather they reflect and exacerbate existing entrenched inequalities which emerge from structural and institutional racism across generations.

The Welsh Government has demonstrated a clear commitment to reducing racial disparities, both prior to and in response to the pandemic, and has started to act upon the recommendations outlined in the Ogbonna report (Welsh Government, 2020a; 2020c). Relevant to the employment and income policy area, this includes (among other initiatives):

- Developing a leadership training programme for Black, Asian and minority ethnic and disabled people to increase representation in public appointments;
- Collaborating with DWP Job Centres and Working Wales to support recruitment in areas with higher density of racial and ethnic minorities;
- Actions to increase representation of Black, Asian and ethnic minority people in apprenticeships;
- Bringing forward the development of a Race Equality Action Plan underpinned by a Race Equality Strategy; and
- The scoping of a Welsh Race Disparity Unit as part of efforts to improve the quality of ethnicity data recording and reporting.

Our review indicates that these are all key proximal actions to help address extant disparities faced by racial and ethnic minorities in Wales. However, each action will be insufficient in isolation unless they form part of a sustained effort (over years and decades) that consistently receives high level and visible support from Welsh Government and from senior leaders in the public, private and third sectors. As a significant employer in Wales, the Welsh Government also has a responsibility to lead by example. Learning from existing diversity initiatives indicates that such action must embed accountability and transparency as standard and be informed by robust, standardised recording and sharing of data. These data are essential for research, evaluation, and quality improvement initiatives, which is currently lacking.

The evidence shows the need for a combination of policies to reduce workplace inequalities for racial and ethnic minority employees, including those focused on increasing numerical representation; managing diversity; and inclusive practices. The evidence also shows that organisations may need support to implement these in practice. Underpinning all of these factors is the need to **systematically unpick the policies, processes, procedures, norms and attitudes operating within and across institutions that systematically disadvantage people from Black, Asian and minority ethnic backgrounds.** This is essential for building trust and to avoid returning to the status quo.

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Annex 1:

References to the report series

This is one report of six, each focusing on a particular policy area to inform the Race Equality Action Plan. The series of report includes:

Arday, J. (2020). **Improving Race Equality in Education**. Cardiff: Wales Centre for Public Policy.

Hatch, S., Woodhead, C., Moriarty, J., Rhead, R., and Connor, L. (2020). **Improving Race Equality in Health and Social Care.** Cardiff: Wales Centre for Public Policy.

Hatch, S., Woodhead, C., Rhead, R., and Connor, L. (2020). **Improving Race** Equality in Employment and Income. Cardiff: Wales Centre for Public Policy.

Price, J. (2020). **Improving Race Equality in Housing and Accommodation.** Cardiff: Wales Centre for Public Policy.

Roberts, M. (2020). **Improving Race Equality in Crime and Justice.** Cardiff: Wales Centre for Public Policy.

Showunmi, V., and Price, J. (2020). **Improving Race Equality in Leadership and Representation**. Cardiff: Wales Centre for Public Policy.

Annex 2: Recurring recommendations

Recurring recommendation	Area of focus
New or better recruitment practices to increase employment of Black, Asian and minority ethnic people and representation within companies / public sector, particularly 'name blind' recruitment processes.	How can recruitment be used to increase Black, Asian and minority ethnic representation? What can government do to encourage employers to adopt better employment practices? <i>n.b. the question of better recruitment</i> <i>practices was considered in Park et al.</i> <i>'Increasing diversity in public</i> <i>appointments through recruitment.'</i> <i>WCPP, forthcoming.</i>
Improved collection of ethnicity data, including monitoring of ethnicity pay gaps and employment rates.	How can data be better collected to support race equality in employment and income experiences and outcomes?
Use of public and private sector procurement to increase Black, Asian and Minority Ethnic participation rates.	Can social value provisions in procurement be leveraged to support Black, Asian and minority ethnic participation, employment and opportunity?
Mentoring and sponsorship opportunities for Black, Asian and minority ethnic staff	How do formal mentoring, reverse mentoring and sponsorship affect career progression and job satisfaction for people from a Black, Asian and minority ethnic background?
Challenging prejudice in the workplace including through better complaints procedures or mechanisms to address workplace discrimination	What works in tackling workplace discrimination?

Recurring recommendation	Area of focus
Support networks / helplines for Black, Asian and minority ethnic staff	What informal networks and external support helps in supporting Black, Asian and minority ethnic staff wellbeing and employment outcomes?
Leadership-level buy-in for increasing diversity and representation in organisations.	How can leaders best support Black, Asian and minority ethnic representation and opportunity within their organisation? What works to secure leaders' buy-in?
Leadership from business organisations and government in target setting.	How can organisations set effective targets for workforce representation?
Increasing Black, Asian and minority ethnic participation through apprenticeships, paid work experience and skills development.	How can educational interventions best support Black, Asian and minority ethnic workforce participation?
Mutual recognition of qualifications gained abroad.	What criteria should be in place to recognise qualifications obtained abroad?
Ensuring that the employment and income needs of Black, Asian and minority ethnic and vulnerable people are prioritised in addressing and recovering from the Coronavirus pandemic	How can government minimise the negative impact of the Coronavirus pandemic on the employment and income of Black, Asian and minority ethnic people?
Increasing pay levels for the lowest-paid workers who are disproportionately Black, Asian and minority ethnic	How can pay be increased at the bottom end of the income distribution?

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