



Employer Guide to
**Encouraging Employees
to Share Diversity Data**

Introduction

This guide explains how employers can encourage individuals to share their personal data, which should always be done on a voluntary basis. Some organisations require suppliers (as well as employees and job applicants) to take a similar approach, and others also ask customers to share their diversity data too.

Every organisation is different, and this guide does not provide definitive solutions for every situation. It also does not offer legal guidance; you should seek authoritative advice when introducing new policies or changing old ones. Instead, it shares suggestions that could help you decide what suits your organisation best.

What is diversity monitoring?

Diversity monitoring is the process employers use to collect, store, and analyse data of job applicants and employees. Monitoring is primarily associated with protected characteristics defined by the [Equality Act 2010](#) in England, Scotland, and Wales, or social categories defined in various pieces of legislation in Northern Ireland. Guidance on Northern Ireland's equality and discrimination law is available from the [Equality Commission for Northern Ireland's pages on Legislation](#).

Diversity monitoring can be a sensitive matter. Several barriers can affect participation rates, including employee trust and confidence in how the data will be used. Initially, low engagement rates are not unusual. However, there are some simple things employers can do to improve engagement.

The enei [Employer Guide: Diversity Monitoring](#) explains why employers should monitor the diversity of their workforce. This is supplemented with enei's [Quick Guide: Diversity Monitoring Questions](#), which is designed to help UK employers develop an appropriate set of questions to monitor diversity of both applicants and employees.

Encouraging data sharing

If a substantial proportion of the population state for many or all of the categories that they 'prefer not to say', the analysis will be less reliable. However, that could suggest individuals have some concerns about the process.

It is important, therefore, that employee communications are focused on encouraging the meaningful sharing of data. Employers should aim to:

- Increase the proportion of individuals participating in monitoring; and
- Decrease the proportion of individuals selecting 'prefer not to say'.

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How to improve participation rates

Employers should work on making data sharing as easy as possible. There are practical steps employers can take to improve the process so it is secure and simple to use.

Step 1. Speak to employees to understand their concerns

Many employers assume that employees' attitudes are the biggest barrier to disclosure. Commonly cited concerns include mistrust of data privacy (in particular, a concern that line managers will have access to personal data); fear of negative consequences; and employees not seeing the value or purpose of sharing their information. In these instances, it can be helpful to explain who can see the data and what it's used for.

However, the relationship between employees' attitudes and their participation rates is not always so straightforward. Employers may wish to speak to employees to understand their main concerns and take the necessary measures to address these matters. Employers should recognise that attitudes may be a smaller barrier to disclosure than they assume. Still, they should work on removing any friction or obstacles from the process.

Step 2. Be clear when explaining why data is being collected and how it will be used

How you communicate your request for data will have an impact on your success, which is why it should be considered in advance. The process should be transparent and clear, and employers should proactively address any worries employees might have about sharing data. It is important to clarify:

- Why the data is being collected;
- How it will be used (it can be helpful to point towards any organisational activities the data will support, such as diversity and inclusion programmes or wellbeing initiatives); and
- Who will have access to the data.

Explanations can help mitigate these requests for personal information from being seen as intrusive or unnecessary. However, it is important to be succinct. In trying to be transparent, employers can be tempted to provide too much information, which can overwhelm employees and make it harder for them to understand the key messages.

Step 3. Make it easy by explaining what is expected

It is helpful to include a clear call to action in communications. Some employers may send lengthy messages explaining the purpose of the exercise, and it may not be clear to the employees what is expected and when.

If employees are submitting their details through a self-serve system, it can be helpful to provide a direct link to the relevant webpage to ensure this is highlighted. Some systems have multiple steps; in these cases, minimising the number of steps can help to increase participation levels.

If you have used a paper form in the past, you may wish to consider using an online survey to reduce unnecessary administration. Some employers may still be using paper forms and inputting data centrally; in this case, ensure employees know how to access and submit the information.

Step 4. Use a variety of communication channels and target communications

Make use of multiple channels (including e-mail, intranet, internal communication platforms, posters, word of mouth, and so on) to communicate the data gathering exercise. Many of these channels may reach the full organisation, but there could be times when it is more important to target employees who have not yet provided their data. If possible, employers should track which employees have and have not disclosed and send targeted messages to those who have not.

One factor that may affect participation levels is if individuals can't recall if (or when) they last provided the information. If the functionality is available, it is advisable to target employees whose data is incomplete and make this clear in the e-mail subject line. For example, you could title an e-mail "Your personal information is incomplete" and personalise the content by addressing the individual employee.

Step 5. Send visible reminders and follow-ups

Employees may not take immediate action when they first receive an e-mail. It is important to follow up. It is important to send regular reminders--ideally targeting only those who have yet to participate. Employers should also consider sending calendar reminders or invitations to update the data as a visual prompt.

Step 6. Set a deadline

Employers should clearly state a deadline for employees to provide or update their personal data. Any follow ups and reminders should be timed accordingly.

Step 7. Set a target

Setting targets or aspirations for employee participation rates may help. Some organisations

choose to be transparent about the target and progress towards it, with others publishing completion rates for different departments to encourage some friendly competition. Since the provision of personal data is voluntary, this approach is not recommended (unless you are confident that competition will not drive inappropriate behaviours—such as bullying—that could result in employees feeling pressured to participate).

Step 8. Ensure you collect the right data through the appropriate questions and potential answers

Some questions around certain categories (such as disability and sexual orientation) tend to receive lower response rates. Seemingly minor changes to how information is collected can affect participation levels.

Questions and answers should be phrased in a way that reflects the reality of participants' lived identities. The enei [Quick Guide: Diversity Monitoring Questions](#) suggests some of the categories of data to collect, and, for each of these, includes question and response options based on pre-existing, user-tested standards and evidence that aligns with categories used in the Census or by the Office for National Statistics (ONS).

It is important to always include a 'prefer not to say' option. It can also be helpful to provide free-form boxes where employees can self-describe. There are some instances where ordering matters. For example, you may decide to ask about sexual orientation before asking about religion or belief and to ask about nationality before asking about ethnic group. You may also want to engage with relevant employee resource groups (ERGs) or representatives to finalise the questions and response options in advance.

Step 9. Using incentives

Some organisations try to encourage data sharing by offering donations to charity to those who participate. Others feel that if they have managed to communicate effectively this should not be necessary (or that providing external incentives may counter people's intrinsic motivation for participating and could send the wrong signal to employees).

If there are low participation levels, it may be more appropriate to focus on identifying and addressing any barriers – incentives alone may not improve performance.

Step 10. Determine the best time to ask for the data

There may be times in the calendar that are more conducive to data collection. For example, if the information is gathered through a self-serve system that has to be accessed to complete

appraisal documentation, that might be a good time to ask employees to input or update their diversity data.

It may be preferable to collect data from applicants and new joiners before (or at the very start of) their employment. Completing data collection exercises can be time consuming and may be viewed as an unnecessary chore, especially when employees are balancing on-boarding with their day-to-day work. Implementing monitoring as a standard part of the recruitment and on-boarding process is much less resource intensive and should ensure the process is more sustainable in the long term.

Employers need to consider how frequently they want employees to review and update their data to ensure that the information they have access to remains up-to-date. This is particularly important in the case of disability when an individual's status can change during their working life.

It is not unusual for organisations to ask employees to review or update their monitoring information on an annual basis.

Step 11. Explain the process for handling personal information

UK General Data Protection Regulation (GDPR) outlines seven principles that organisations must follow when dealing with personal data. For further information, see enei's [Employer Guide: Diversity Monitoring](#).

You should provide details of the processes you have in place (for example, processes for gathering, storing, and using information) to help reassure employees that you will not use their personal data to discriminate against them.

To keep communication succinct, rather than include the full detail within any diversity monitoring communication, employers may wish to provide links to separate policies on how they collect and use personal information and other data that is gathered. They should also let employees know who to contact if they have any questions.

Step 12. Consider the messenger and use of champions

Employers should consider who within the organisation would be a trusted messenger and, if possible, have communications sent from that person. Where they feel comfortable, managers should lead by example. This could come with them leading discussions with individuals and groups on the importance of inclusive workplaces and reiterating the need for data to identify areas for action and to track progress.

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ERGs can act as champions for the process, explaining how the data can benefit the organisation and their colleagues. If you are going to use others to champion the process, it can be helpful to brief them in advance.

Conclusion

Diversity monitoring is an important tool for the objective measurement of performance. It can influence and track your organisation's progress towards a fully inclusive working environment. For the analysis of diversity data to be meaningful, there must be high participation rates. It is important, therefore, for employers to work with employees to build trust and confidence in the process.

The information contained within this resource was accurate at the time of its publication and subsequent revisions. It was created in November 2012 and revised in August 2018 and June 2022.

Additional enei resources

- [Employer Guide: Employee Resource Groups.](#)
- [Employer Guide: Diversity Monitoring.](#)
- [Employer Guide: Equality Act 2010.](#)
- [Employer Guide: Positive Action in Recruitment.](#)
- [Quick Guide: Diversity Monitoring Questions.](#)

External resources

- Equality Commission for Northern Ireland, [Legislation.](#)
- Gov.uk, [Public Sector Equality Duty.](#)
- Legislation.gov.uk, [Equality Act 2010.](#)

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