



# The Case for Mandatory Joint Ethnicity and Gender Pay Gap Reporting Legislation in Ireland

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## **Executive Summary**

Baroness Ruby McGregor-Smith OBE was commissioned by the UK government to review race in the workplace in the UK. Her findings were, in her own words, “diabolical”. In Ireland, research by The Equality Authority and European Network Against Racism Ireland (ENAR Ireland), have found similar concerning statistics. ENAR Ireland believes that Afrophobia, in particular, has been ignored by the state without actions to deal with the problems that in some cases relate to the public discourse around the 2004 referendum.

The EU agrees. In March 2019, the EU passed a resolution, with an overwhelming majority, on EU countries addressing Afrophobia in their own countries. Research by Irish Human Rights and Equality Commission (IHREC) and the Economic and Social Research Institute (ESRI), recently published, has found clear evidence of discrimination on recruitment for people with foreign-sounding names and/or people of colour who live in Ireland.

This report makes the case for joint mandatory ethnic and gender diversity pay gap reporting using data analysis and research. In the UK some companies, such as PwC, EY, KPMG and Deloitte are already voluntarily disclosing both pay gaps. UK legislation on mandating ethnic diversity pay gap is expected and was called for in Baroness Ruby McGregor-Smith OBE’s report.

The potential tax losses as a result of inaction, in particular, are examined in this report. McGregor-Smith found addressing the issue of discrimination in the workplace is expected to add billions to the UK economy.

This report proposes that the same rules for gender pay gap reporting are applied for ethnicity pay gap reporting. The report also includes details of a suggested methodology and suggestions for methods of data gathering.

In making this amendment, to the current gender legislation bill, the government will address the EU resolution, increase tax revenue and encourage organisations to tackle bias in the workplace. This will have a positive effect in Ireland overall, with more tax revenues and hopefully less racism/bias-related incidents socially, as a result of the government and workplaces appropriately addressing this issue.

## **Introduction**

Baroness Ruby McGregor-Smith OBE was commissioned by the UK government to review race in the workplace in the UK. Her findings were, in her own words, "diabolical". In Ireland, research by The Equality Authority and European Network Against Racism Ireland (ENAR Ireland), have found similar concerning statistics. ENAR Ireland believes that Afrophobia, in particular, has been ignored by the state without actions to deal with the problems that in some cases relate to the public discourse around the 2004 referendum.

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## **Section i: Loss of Billions of Euro in potential Income Tax Revenue**

**1 in 7 workers in Ireland<sup>i</sup>** (approximately 316,000 workers) are Non-Irish however, some non-Irish workers have significant issues securing employment. This has been proven to, in part at least, be because of discrimination in recruitment where applicants have foreign sounding names (please see research in section iii, Discrimination in Recruitment). Research, outlined in section iii and iv of this report, indicates people of colour in Ireland, particularly African's, are facing significant levels of racism and discrimination socially and in recruitment.

The UK has the same problem. 12.5% of the UK labour force come from a black or minority ethnic background, but, they make up only 10% of the workforce. However, in comparison to Ireland<sup>ii</sup>, the UK has taken significant steps to address this inequality. This was mainly due to a report commissioned by the UK government titled "race in the workplace in Britain". In Ruby McGregor-Smith's review, she estimates "the potential benefit to the UK economy from full representation of BAME individuals is £24bn a year."<sup>iii</sup> It is also estimated that the Black, Asian and ethnic minority employees (BAME) pay gap is around £3.2bn a year. The resulting impact of this is billions lost in income tax revenues for the U.K. government.

***“I thought things had improved since I was a kid. But everyone I met basically said it’s diabolical.”<sup>iv</sup>***

<b>Figure 1: Total Workforce 2006 vs 2016 (In Thousands). Source - CSO</b>	<b>2006</b>		<b>2016</b>		
Irish	1,789	85.53%	1732	84.55%	
Non-Irish	303	14.47%	316	15.45%	
<b>Total</b>	<b>2,091</b>	<b>100.00%</b>	<b>2048</b>	<b>100.00%</b>	

McGregor-Smith's review goes on to state, "we argue about skills shortages [and productivity] but actually we don't look at what we've got," she says. "[There are] over-qualified people who don't get enough opportunity in the UK because it goes to a small number ... these are really critical, big issues for organisations that can really help drive performance. Almost a third (32.1%) of children of primary school age in the UK are BAME [best estimate in Ireland, 12.73%<sup>v</sup>]. They're all hitting the workplace in the next 15 years. And by the time they hit the workplace, you're going to have a real issue on skills [and innovation due to a lack of diversity of thought at decision-making levels] if you don't promote them."<sup>vi</sup>

<b>Pupils enrolled in 2016/2017</b>	<b>Mainstream</b>	<b>Special</b>	<b>Total</b>
Total (Table 4e)	550,304	8,116	558,420
White Irish (Table 4e)	316,075	4,698	320,773
Less White Irish (Table 4e)	234,229	3,418	237,647
Less No Consent (Table 4e)	64,187	393	64,580
Less Not Provided (Table 4e)	96,506	1,983	98,489
Less UK (4a)	3,444	56	3,500
<b>Total estimated BAME children in primary school in Ireland</b>	<b>70,092</b>	<b>986</b>	<b>71,078</b>
			<b>12.73%</b>

## **Section ii: Multi-National Companies Relocating To Ireland Post-Brexit**

As a result of Brexit, Ireland hopes to position itself as the country of choice for corporations looking to maintain a presence in the EU market. There are currently a number of reasons Ireland is not at a natural and easy choice for companies relocating, mainly relating to concerns for employees.

### **(i) *Housing***

In a report by the Joint Committee on Housing, Planning & Local Government, titled *Examining the Potential Impacts of Brexit on Ireland's Housing Market* - "The PII [Property Industry Ireland] explained that the housing crisis has become an issue when attempting to encourage companies to locate in Ireland as housing options for staff is a crucial component for companies looking to locate here."<sup>viii</sup>.

### **(ii) *Fears relating to employees ability to integrate***

The anti-immigration wave sweeping over Europe has unfortunately affected Ireland. Employers are alarmed by articles of refugee centres being set on fire, as it highlights issues their employees may have when attempting to integrate in Ireland.

Recent articles in Irish Press:

#### **1. DONEGAL HOTEL EARMARKED FOR ASYLUM SEEKERS SET ON FIRE**

<https://www.irishtimes.com/news/crime-and-law/donegal-hotel-earmarked-for-asylum-seekers-set-on-fire-1.3709782?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fnews%2Fcrime-and-law%2Fdonegal-hotel-earmarked-for-asylum-seekers-set-on-fire-1.3709782>

#### **2. GARDAI INVESTIGATING FIRE AT ROOSKEY ASYLUM SEEKER HOTEL - JUST WEEKS AFTER ARSON ATTACK**

<https://www.independent.ie/irish-news/news/gardai-investigating-fire-at-rooskey-asylum-seeker-hotel-just-weeks-after-arson-attack-37806931.html>

### **(iii) Afrophobia**

In relation to Afrophobia, in particular, a report by ENAR Ireland ( European Network Against Racism Ireland ) found "Racism against people of African descent is not a new phenomenon at all, but one which has failed to be recognised by the State and wider society, even as it has evolved from colonial times".<sup>ix</sup>

***What is Afrophobia? "Afrophobia describes the hostility, antipathy, contempt and aversion expressed directly and through institutional and legal means, towards people with a background in sub-Saharan Africa or who belong to the African diaspora".<sup>x</sup>***







The report stated “Since 2013, the highest number of any single group targeted in the incidents reported to ENAR Ireland has been from people of African descent, including African migrants, their children, Europeans and mixed-race Irish. Incidents have included political hate speech, racist crimes, racist violence, intimidation, racist bullying, illegal practices and discriminatory treatment in housing, education and service provision, poor policing practices and poor responses by Gardaí to racist crimes, lack of access to healthcare and employment and persistent and repeated racial harassment. This report describes and explores the range of incidents and types of discrimination and exclusion that reflect Afrophobia in order to illuminate the experiences of racism faced by people of African descent in Ireland today and inform public debates and policy change.”

“Finally, there is significant work to be done to address the way in which people of African descent experience multiple or aggravated discrimination and violence which arises from the intersection of sex, language, religion, political or other opinion, social origin, property, birth, and disability with their ethnicity.

***In relation to gender in particular, as a focus of the UN agenda, it is clear from the iReport.ie data that the debates around the 2004 Constitutional Referendum on citizenship have produced particular local discourses around African women in Ireland which have been long-lasting and continue to influence the perception of African-Irish citizens as illegitimate participants in Irish society.***

Women of African descent are subject to greater surveillance, deprived of their dignity and privacy and exposed to much greater risks of harassment, violence and resulting health problems and isolation. That they and their children are subject to such risks must be of particular concern, and point to a need address these grounds for social exclusion with urgency. Strong future social cohesion and a truly inclusive social agenda both require a serious assessment of these risks to individuals and to the wider Irish society as a result of their isolation.”<sup>xii</sup>

Other relevant articles and research on Afrophobia in Ireland:

**1. WARNING SIGNS ON RACISM – IRISH TIMES, APRIL 2018**

<https://www.irishtimes.com/opinion/editorial/warning-signs-on-racism-1.3448199?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fopinion%2Feditorial%2Fwarning-signs-on-racism-1.3448199>

**2. DISCRIMINATION AT WORK: ‘YOU SEE AFRICANS WITH PHDS DRIVING TAXIS’ – IRISH TIMES, NOVEMBER 2018**

<https://www.irishtimes.com/news/social-affairs/discrimination-at-work-you-see-africans-with-phds-driving-taxis-1.3692510>

**3. BLACK IRISH CITIZENS TWICE AS LIKELY TO EXPERIENCE DISCRIMINATION – IRISH TIMES, DECEMBER 2018**

<https://www.irishtimes.com/news/social-affairs/black-irish-citizens-twice-as-likely-to-experience-discrimination-1.3734589>

**4. RACIAL BIAS, IRISH-STYLE: ‘EVERYWHERE I TURNED WAS LIKE A BRICK WALL’ - – IRISH TIMES, DECEMBER 2018**

<https://www.irishtimes.com/news/social-affairs/racial-bias-irish-style-everywhere-i-turned-was-like-a-brick-wall-1.3734631>

## 5. LIAM NEESON'S INTERVIEW SHOWS THAT FOR SOME, BLACK PEOPLE ARE STILL NOT FULLY HUMAN – GUARDIAN, FEBRUARY 2019

<https://www.theguardian.com/commentisfree/2019/feb/05/liam-neeson-interview-black-people-actor-racism>

### (iv) EU Afrophobia Resolution

"The European Parliament has called for action to tackle the "structural racism" facing millions of Europeans of African descent in an unprecedented resolution that was overwhelmingly approved by MEPs. The resolution calls on European Union member states to develop national anti-racism strategies to deal with discrimination in education, health, housing, policing, the justice system and politics... it was the first time the parliament has focused specifically on the discrimination facing by an estimated 15 million people of African descent...

Histories of injustices against Africans and people of African Descent – including enslavement, forced labour, racial apartheid, massacre, and genocides in the context of European colonialism and the transatlantic slave trade – remain largely unrecognised and unaccounted for at an institutional level in EU member states," the text states.

### **It also calls for the EU institutions to adopt “a workforce diversity and inclusion strategy” to redress the underrepresentation of black and minority ethnic officials...**

The resolution comes after the EU's fundamental rights agency warned last year that black Europeans faced “a dire picture” of discrimination in housing, the workplace and everyday life. Black people in the UK were among the least likely in the EU to report racial harassment, according to the survey, with the highest level of offensive gestures, comments and threats reported in Finland.

Amel Yacef, the chair of the European Network Against Racism, said the vote was "a historic, watershed moment for the recognition of people of African descent in Europe". She added: "The European parliament is leading the way and sending a signal to EU member states to tackle structural racism that prevents black people from being included in European society. The ball is now in their court: we need concrete action plans and specific measures now."<sup>xiii</sup>

In summary, the above articles, research, EU resolution, and government committee report indicate that if Ireland is to remain competitive in attracting multi-national companies to Ireland, our government needs to take concrete action. Our government needs to create transparency in recruitment and employment that should lead to an improvement in how people view foreigners socially in Ireland and their ability to ingrate successfully into Irish Society.

### **Section iii: Discrimination in Recruitment and in the Workplace**

In 2009, a report was published by the Equality Authority in Ireland called *Discrimination in Recruitment: Evidence from a field experiment*. This is an excerpt from the report, "The key finding of this study is that job applicants with Irish names are over twice as likely to be invited to interview as candidates with identifiably non-Irish names, even though both submit equivalent CVs. This finding, which is statistically robust, is consistent across the three occupations tested – lower administration, lower accountancy and retail sales positions – and across different sectors of the Irish labour market. While international studies suggest that rates of discrimination in recruitment vary across different minority ethnic groups, this experiment does not find significant differences between African, Asian or German applicants. All three are around half as likely to be invited to interview as Irish candidates. Overall, the rate of discrimination found is high by international standards."

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<b>Figure 2: Total Workforce in Finance, Insurance and Real Estate Industry (In Thousands). Source - CSO</b>	<b>2006</b>		<b>2016</b>	
Irish	91	89.85%	89	87.88%
Non-Irish	10	10.15%	12	12.12%
<b>Total</b>	<b>102</b>	<b>100.00%</b>	<b>102</b>	<b>100.00%</b>

<b>Figure 3: Total Labour Force 2006 Q4 VS 2016 Q4 (In Thousands). Source - CSO</b>	<b>2006</b>		<b>2016</b>	
Irish	1,858	85.21%	1,854	84.42%
Non- Irish	323	14.79%	342	15.58%
<b>Total</b>	<b>2,181</b>	<b>100.00%</b>	<b>2,196</b>	<b>100.00%</b>

This research can reasonably be relied upon today. As shown above, there haven't been any major movements in the proportion of non-Irish people in the work or labour force in Ireland, over a 10 year period, from 2006 to 2016. Furthermore, the recent news articles, in section ii, highlight that this is still an issue we are facing, in Ireland, today.

***As a leader, if you truly want to measure how culturally and ethnically diverse your organisation is, the number of different nationalities you have working there paints a misleading picture.***

**TABLE 6.1 SUMMARY OF MODEL FINDINGS ON LABOUR MARKET OUTCOMES AND THE EXPERIENCE OF DISCRIMINATION FOR EACH ETHNIC/NATIONAL GROUP**

Group	Employment (Table 4.1)	Occupation (Managerial /professional jobs) (Table 4.2)	Experience of Discrimination Seeking Work (Table 5.1)	Experience of Discrimination in the Workplace (Table 5.2)
White Irish	Reference group	Reference group	Reference group	Reference group
White UK	No difference	No difference	No difference	No difference
White EU-West	More likely to be employed	No difference	No difference	No difference
White EU-East	No difference	Much, much less likely (0.2)	No difference	Higher – 1.5 times
White non-EU	No difference	No difference	Higher – 2 times as high	Higher – 1.6 times
Black Irish	No difference	Much less likely (0.35)	Higher – 2 times as high	Higher – 3.4 times
Black non-Irish	Much less likely to be employed (0.4)	Much less likely (0.3)	V high – 5 times as high	Higher – 2.7 times
Asian Irish	More likely but not significant	More likely to be in top jobs than Irish (1.9 times)	Higher but not significantly different	Higher – 1.9 times
Asian non-Irish	No difference	Less likely to be in top jobs (0.5)	No difference	Borderline – 1.5 times but not significantly different
Other Irish	Much less likely to be employed	No significant difference	Higher but not significantly different	Higher
Other non-Irish	No difference	Less likely to be in top jobs (0.5)	High – 2.8 times as high	No difference
Change over time?	Gap smaller for Black non-Irish in 2014	Gaps narrower in 2014 (except for White non-EU)	Gaps narrowing (a little)	Gap increased for Minorities Irish.

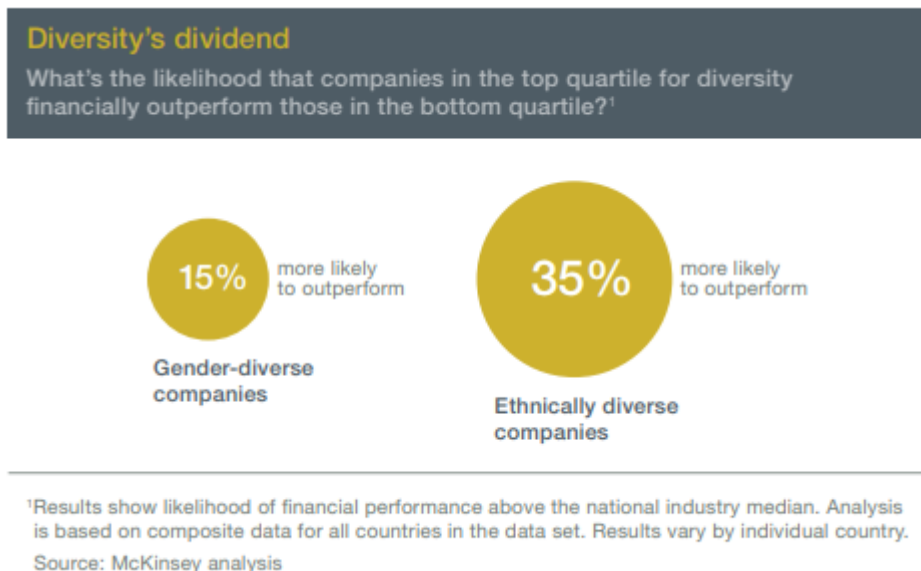
Note: All findings are after controls for education, age, sex, family composition, region and length of residence in Ireland. See Tables 4.1, 4.2, 5.1 and 5.2 for more details. In each case the group is compared to the White Irish group.

According to the last census, Non-Irish people made up 15.45% of the workforce in 2016 in comparison with 14.45% in 2006 (approximately 1 in 7 people in the workforce) (Figure 1). For reference, the total proportion of the labour force that is non-Irish was 15.58% in 2016 and 14.79% in 2006. However, employment rates, appear to differ based on race, according to the research referenced above, census data and research completed by a UCD professor<sup>xv</sup>. Using data analysis, we can effectively & efficiently identify and reduce the problems relating to discrimination in recruitment and in the workplace. As highlighted in section i, this is expected to result in higher income tax revenue for the Irish Government. *(Please note: the workforce refers to the total population of people in employment. The labour force refers to the total population of people available to work including unemployed people).*

## **Section iv: Benefits of Diversity In The Workplace**

‘McKinsey has been examining diversity in the workplace for several years. [Their] 2015 report, Diversity Matters, examined proprietary data sets for 366 public companies across a range of industries in Canada, Latin America, the United Kingdom, and the United States. In this research, [they] looked at metrics such as financial results and the composition of top management and boards. The findings were clear:

***Companies in the top quartile for racial and ethnic diversity are 35 per cent more likely to have financial returns above their respective national industry medians.***



[In 2018], new analysis expands on [McKinsey's] 2015 report, Why diversity matters, by drawing on an enlarged data set of more than 1,000 companies covering 12 countries, measuring not only profitability (in terms of earnings before interest and taxes, or EBIT) but also longer-term value creation (or economic profit), exploring diversity at different levels of the organization, considering a broader understanding of diversity (beyond gender and ethnicity), and providing insight into best practices..

***[They] found that companies with the most ethnically diverse executive teams—not only with respect to absolute representation but also of variety or mix of ethnicities — are 33 per cent more likely to outperform their peers on profitability.***

That's comparable to the 35 per cent out performance reported in 2014, with both figures being statistically significant.



<sup>1</sup>Average earnings-before-interest-and-taxes (EBIT) margin, 2010–13 in Diversity Matters I and 2011–15 in Diversity Matters II.

<sup>2</sup>Results are statistically significant at p-value <0.10.

<sup>3</sup>Results are statistically significant at p-value <0.05.

McKinsey&Company

The penalty for not being diverse on both measures persists. Now, as previously, companies in the fourth quartile on both gender and ethnic diversity are more likely to underperform their industry peers on profitability: 29 percent in our 2017 data set.<sup>xvi</sup>



## **Section v: Ethic Diversity Pay Gap Reporting**

‘When Ruby McGregor-Smith was asked by the government to author a review on race in the workplace in Britain, she admits she didn't want to do it. "I never wanted to talk about race because it's so complicated. When you've lived here most of your life ... you're not actually comfortable with it yourself. "But it was a real eye-opener for me," she continues. "I thought things had improved since I was a kid. But everyone I met basically said it's diabolical."

Lady McGregor-Smith was born in India but moved to the UK with her parents when she was two. In writing her review, she found evidence of discrimination and bias that can exist at every stage of an individual's career. While one in eight(pdf) of the working-age population in the UK come from a black or minority ethnic (BME) – also sometimes described as black, Asian or minority ethnic (BAME) – background, they make up only 10% of the workforce (pdf) and are mostly clustered in the lowest-paid positions. Only 6% hold top management positions (pdf). *According to research by the Chartered Institute for Personnel Development (pdf), almost one in three (29%) black employees say their career progression has not met their expectations because of discrimination.* That bias often begins even before someone is hired: “Organisations and individuals tend to hire in their own image, whether consciously or not,” she adds. At a time when companies with more than 250 employees have had to publish their gender pay gaps, McGregor-Smith says doing the same for diversity would help them talk about their own figures and make changes to redress the balance.

***“We’ve shown there’s a problem. Companies now need to step up and improve on this.”***

In 2017, PwC became one of the first organisations to publish its BAME pay gap (12.8%)<sup>xvii</sup>, EY<sup>xviii</sup> and KPMG<sup>xix</sup> soon followed suit. Laura Hinton, chief people officer at PwC, says she was initially nervous about the report's publication, but that the feedback has been overwhelmingly positive. “I got many, many notes from our people who are from a BAME background saying they were proud of the firm for putting its head above the parapet and shining a spotlight on the issue.”

“While companies are doing all this work and auditing their gender pay gap, why not include other areas where we know there's a massive disparity, especially around ethnicity,” says', Diversity and Inclusion expert Sarah Garrett.<sup>xx</sup>

## **Section vi: The Right Approach For Joint Gender And Ethnicity Pay Gap Reporting**



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***In Ruby McGregor-Smith’s review of “race in the workplace in Britain”, commissioned by the U.K. government, “she estimates the potential benefit to the UK economy from full representation of BAME individuals is £24bn a year”<sup>xxii</sup>.***

### ***Step 1: Defining the approach***

In line with the UK, the legislation should apply to employers with 250 or more employees initially. This threshold will reduce to 150 employees or more within 2 years, and finally those with 50 or more within a further year. It will apply to the public as well as the private sector.

The approach for measuring the ethnicity pay gap is the same as that for the gender pay gap in the UK. This will aid data comparability and analysis. It is recommended that BAME pay gap data and Gender pay gap data is measured and reported in the same publicly publishes a report titled the “Diversity Pay Gap” report. Please see an example below.

### ***Step 2: Planning for Data Collection***

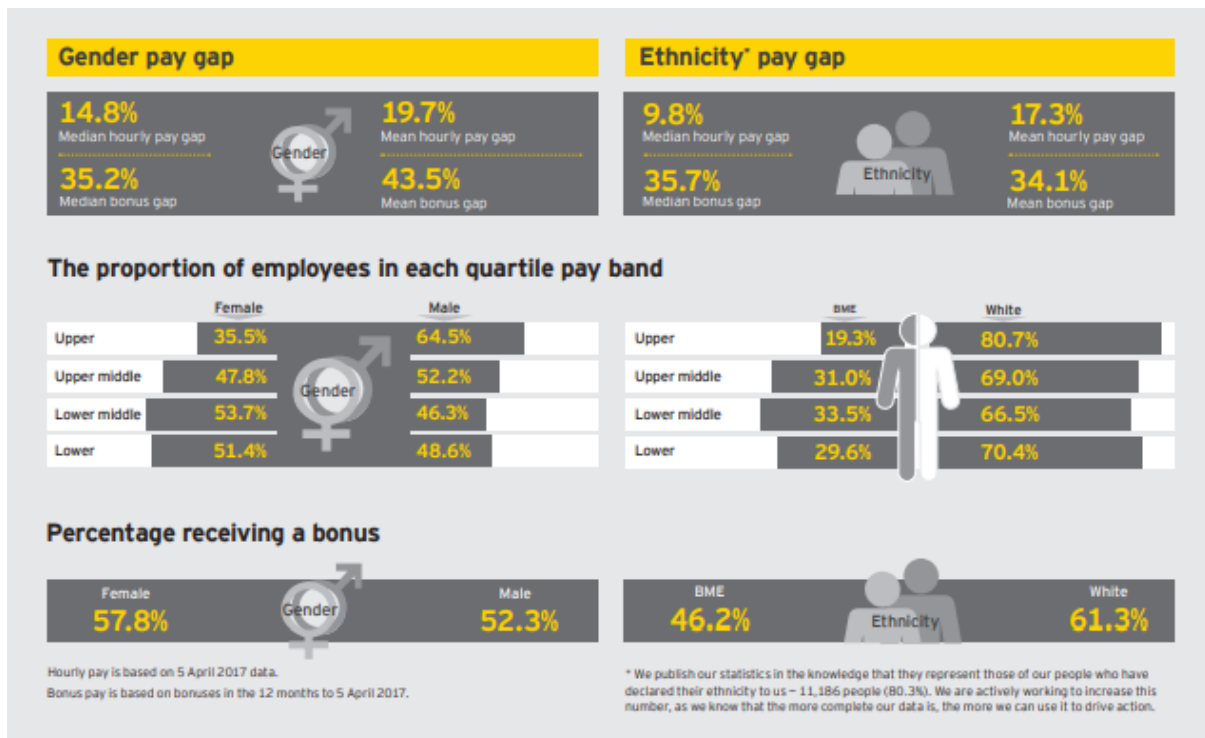
At the recruitment stage, the number of non-Irish staff you have is legally required to be identified to ensure they have the relevant work permits. It also helps to gather data on how many nationalities you have working in your organisation.

Separately, if your organisation engages in an annual employee survey to measure employee satisfaction, you should be able to extract this data from that survey. If not, I recommend including an optional question on this in your next survey with an explanation on why you want to collect this data. (The explanation is required to ensure people don't feel scared to give answers and understand it's for theirs and the organisation's benefit).

***In the U.K. they have found the most appropriate way to measure this data is actually BAME vs Non-BAME staff. What does BAME mean? Black, Asian, Mixed or Other ethnic group.***

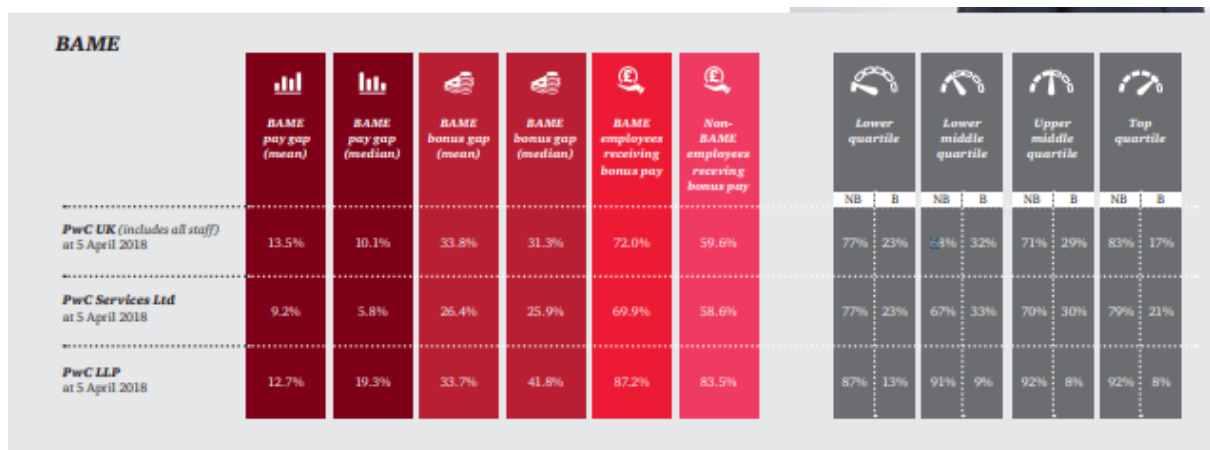
For more information on the U.K. and BAME employees, visit: <https://www.ethnicity-facts-figures.service.gov.uk/>

***Step 3: Calculation of the pay gap***



In line with the UK, the following metrics are recommended to used to calculate and disclose pay gap information in an easily comparable manner:

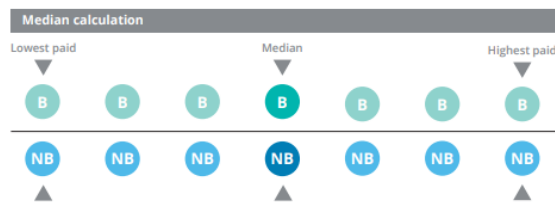
- ✓ Mean BAME pay gap
- ✓ Median BAME pay gap
- ✓ Mean BAME bonus gap
- ✓ Median BAME bonus gap
- ✓ % of BAME employees receiving bonus pay
- ✓ % of Non-BAME employees receiving bonus pay
- ✓ % of BAME and Non-BAME employees at low-senior levels of the organisation using quartiles as the metric. Please see the example below.



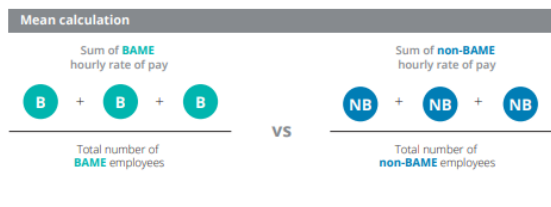
xxiv

We have chosen to use the same [calculation methodology](#) set out by the Government Equalities Office ("GEO") for gender pay gap reporting, for our mean and median ethnicity pay gap, bonus gap, and distribution across pay quartiles. However unlike gender, our ethnicity disclosure rate is not at 100% (currently it stands at 75.4%); thus, any individuals with undisclosed ethnicities (around a quarter of our firm) are excluded from our calculations.

**Distinguishing between median and mean**



The median is the figure that falls in the middle of a range when the wages of all relevant employees are lined up from smallest to largest. The median gap is calculated based on the difference between the employee in the middle of the range of BAME wages and the middle employee in the range of non-BAME wages.



The mean is calculated by adding up the wages of all relevant employees and dividing the figure by the number of employees.

The mean ethnicity pay gap is calculated based on the difference between mean BAME pay and mean non-BAME pay.

Since the GEO methodology excludes equity partners (who do not receive a salary or bonus) we have also published an important additional mean and median calculation to further increase transparency, namely our total ethnicity earnings gap. Our total ethnicity earnings gap accounts for the average difference in the total remuneration of BAME and non-BAME individuals in our organisation - including both employees and equity partners.

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**Step 4: Implement An Action Plan, Monitor And Refine**

‘The numbers are not the end – they are just the beginning. [The next step is] to create and roll out an action plan for addressing whatever situations the numbers have presented and consider how to communicate this to employees. This may form part of a wider inclusion strategy and action plan or may sit alongside it. [Organisation's also] need to think about future reporting and how [they] will refine and improve their data collection, analysis and reporting over time.’<sup>xxvi</sup>

### ***Step 5 & 6: Communications And Engagement***

'Communication and engagement are essential to all parts of this process. Before starting to collect the data, engaging stakeholders to agree how the reporting process will be positioned and how it can support other key people initiatives is critical. Carrying out engagement initiatives such as focus groups at this stage can help address or understand any gaps in the data and supplement the data collection process.

Once the data has been gathered, communicating the findings will also be critical to driving change. [Organisation's then need to] agree the format and the timing for how and when they disclose their numbers. Put in place a plan for communicating clearly and consistently both internally and externally, including the narrative they want to put in place around the numbers and importantly the way they intend to address them. [They need to] ensure they have clear messaging and responses in place to handle internal and external questions about their numbers. This is a great opportunity to build stronger relationships with colleagues.'<sup>xxvii</sup>

## **Conclusion**

If the government is serious about tackling the gender pay gap for all women in Ireland, the research outlined in this report makes it clear that it needs to be joint mandatory ethnic and gender pay gap reporting.

This report proposes that the same rules for gender pay gap reporting are applied for ethnicity pay gap reporting. The report also includes details of a suggested methodology and suggestions for methods of data gathering.

In making this amendment, to the current gender legislation bill, the government will address the EU resolution, increase tax revenue and encourage organisations to tackle bias in the workplace. This will have a positive effect in Ireland overall, with more tax revenues and hopefully less racism/bias-related incidents socially, as a result of the government and workplaces appropriately addressing this issue.

## References

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- i CSO census data, 2016
- ii <https://static.rasset.ie/documents/news/afrophobia-in-ireland.pdf>
- iii <https://www.pwc.co.uk/careers/guardian/diversity-pay-gap.html>
- iv <https://www.pwc.co.uk/careers/guardian/diversity-pay-gap.html>
- v <https://www.education.ie/en/Publications/Statistics/Primary-Online-Database-POD-/POD-Interesting-Facts-First-Look-at-Data-from-POD-2016-2017.pdf>
- vi <https://www.pwc.co.uk/careers/guardian/diversity-pay-gap.html>
- vii <https://www.education.ie/en/Publications/Statistics/Primary-Online-Database-POD-/POD-Interesting-Facts-First-Look-at-Data-from-POD-2016-2017.pdf>
- viii [https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint\\_committee\\_on\\_housing\\_planning\\_and\\_local\\_government/reports/2019/2019-02-07\\_examining-the-potential-impacts-of-brex-it-on-ireland-s-housing-market\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_housing_planning_and_local_government/reports/2019/2019-02-07_examining-the-potential-impacts-of-brex-it-on-ireland-s-housing-market_en.pdf)
- ix <https://static.rasset.ie/documents/news/afrophobia-in-ireland.pdf>
- x <https://static.rasset.ie/documents/news/afrophobia-in-ireland.pdf>
- xi <https://static.rasset.ie/documents/news/afrophobia-in-ireland.pdf>
- xii <https://static.rasset.ie/documents/news/afrophobia-in-ireland.pdf>
- xiii <https://www.theguardian.com/world/2019/mar/26/meps-pass-watershed-resolution-action-against-structural-racism-people-african-descent>
- xiv [https://www.esri.ie/system/files/media/file-uploads/2018-12/BKMNEXT369\\_o.pdf](https://www.esri.ie/system/files/media/file-uploads/2018-12/BKMNEXT369_o.pdf)
- xv [https://researchrepository.ucd.ie/bitstream/10197/9022/1/Whiteness\\_and\\_Racism-Exploring\\_the\\_racial\\_order\\_in\\_Ireland\\_-\\_Peer\\_reviewed\\_copy.pdf](https://researchrepository.ucd.ie/bitstream/10197/9022/1/Whiteness_and_Racism-Exploring_the_racial_order_in_Ireland_-_Peer_reviewed_copy.pdf)
- xvi 2015 McKinsey report:  
[https://www.mckinsey.com/~/\\_/media/McKinsey/Business%20Functions/Organization/Our%20Insights/Why%20diversity%20matters/Why%20diversity%20matters.ashx](https://www.mckinsey.com/~/_/media/McKinsey/Business%20Functions/Organization/Our%20Insights/Why%20diversity%20matters/Why%20diversity%20matters.ashx)
- 2018 McKinsey report: <https://www.mckinsey.com/business-functions/organization/our-insights/delivering-through-diversity>
- xvii <https://www.pwc.co.uk/annualreport/assets/2018/pdf/annual-report-18-diversity-pay-report.pdf>
- xviii <https://www.ey.com/Publication/vwLUAssets/ey-pay-gap-report-2017/%24File/ey-pay-gap-report-2017.pdf>
- xix <https://assets.kpmg/content/dam/kpmg/uk/pdf/2017/12/pay-gap-report-2017.pdf>
- xx <https://www.pwc.co.uk/careers/guardian/diversity-pay-gap.html>
- xxi <https://www.pwc.co.uk/services/human-resource-services/ethnicity-pay-reporting.html>
- xxii <https://www.pwc.co.uk/careers/guardian/diversity-pay-gap.html>
- xxiii <https://www.ey.com/Publication/vwLUAssets/ey-pay-gap-report-2017/%24File/ey-pay-gap-report-2017.pdf>
- xxiv <https://www.pwc.co.uk/annualreport/assets/2018/pdf/annual-report-18-diversity-pay-report.pdf>
- xxv <https://www.google.com/search?q=deloitte+ethnicity+pay+gap&oq=del&aqs=chrome.o.69i59j69i60j69i61j69i60j69i57j69i59.2130j0j7&sourceid=chrome&ie=UTF-8>
- xxvi <https://www.pwc.co.uk/human-resource-services/assets/pdfs/ethnicity-pay-gap-report.pdf>
- xxvii <https://www.pwc.co.uk/human-resource-services/assets/pdfs/ethnicity-pay-gap-report.pdf>