

ENAR'S NINTH EUROPEAN
EQUAL@WORK SEMINAR

TOOLKIT

WOMEN OF COLOUR IN THE WORKPLACE



european network against racism

Published by the European Network Against Racism (ENAR) in December 2017 in Brussels, with the support of the Rights, Equality and Citizenship Programme of the European Union, the Open Society Foundations, the Sigrid Rausing Trust, the Joseph Rowntree Charitable Trust, the ENAR Foundation and ENAR's business partners: Adecco Group, Coca-Cola European Partners and Sodexo.



SIGRID RAUSING TRUST



The contents of this publication can in no way be taken to reflect the views or opinions of any of the European Union, the Open Society Foundations, the Sigrid Rausing Trust, the Joseph Rowntree Charitable Trust, the ENAR Foundation, Adecco Group, Coca-Cola European Partners, or Sodexo.

Acknowledgements

This toolkit was drafted by Sarah Chander, and copy-edited by Georgina Siklossy.

Design and layout: Crossmark

ENAR – European Network Against Racism aisbl
67 Rue Ducale, B-1000 Brussels
Tel +32 2 229 35 70
Email: info@enar-eu.org
www.enar-eu.org

Table of contents

- Introduction..... 2

- 1. Barriers for women of colour in employment..... 5
 - 1.1. Context: Women of colour in the labour market..... 6
 - a. Structural barriers for women of colour in the labour market6
 - 1.2. Women of colour in the workplace: within organisations 8
 - a. Individual instances 8
 - b. Organisational structure..... 10
 - c. Systems: Whiteness and patriarchy in the workplace12

- 2. Solutions: Toward an intersectional approach to diversity management 13
 - 2.1. A conceptual guide: principles to inform an intersectional approach 14
 - a. What is an intersectional approach to diversity management?14
 - 2. 2. Guide for employers: inclusion, transformation, empowerment of women of colour .. 14
 - a. Stage One: Understanding the issues at the intersections.....15
 - b. Stage Two: Transforming the organisation18
 - c. Stage Three: Empowerment of women of colour21

- Checklist 24

- Resources 25

Introduction

“If we aren’t intersectional, some of us, the most vulnerable, are going to fall through the cracks.”

Kimberle Crenshaw

The **Equal@work Platform** is a space for employers, trade unions, public authorities and NGOs to collaborate for innovative solutions to diversity management. Members of the platform explore how to integrate an anti-racist approach; ensuring improved access to the workplace for people of colour and an end to structural discrimination in the labour market. This toolkit was produced as a follow-up to the Equal@work seminar on women of colour at work, organised by the European Network Against Racism in December 2017.

There has been great progress in institutional and corporate diversity policies relating to the recruitment and advancement of women in the workplace. **Gender equality** has become a priority of diversity management, with employers across Europe making progressive leaps to counter discrimination against women, improving representation in leadership, and moving toward equal pay and conditions for women.

How far do these numerous gender equality and diversity initiatives benefit all women? An emerging critique of diversity policies is that they fail to address the specific barriers faced by **women of colour** in the workplace. In other words, diversity policies are not **intersectional**; they do not address how discrimination and inequality on the basis of gender is experienced with other forms of discrimination, such as racism and religious discrimination.

Women of colour experience heightened discrimination and exclusion, and yet are under-served by policies, legal frameworks and initiatives designed to combat these trends. The 9th Equal@work toolkit aims to fill these gaps, exploring workplace inclusion at the intersection of race and gender with a focus on women of colour in Europe.

This toolkit is part of a wider body of work produced by the European Network Against Racism (ENAR) exploring racism, discrimination and exclusion as experienced by women of colour through an intersectional lens. The content of the toolkit is informed by ENAR’s *Forgotten*

*Women*¹ project and *Shadow Report: Racism and Discrimination in Employment in Europe*.² Besides these publications, discourse on experiences of women of colour in the labour market and diversity management field in Europe is scarce. As such, this report draws on a range of experiential evidence, resources from the United States, the field of academia, and more informal knowledge sites, such as blogs, where there is a plethora of material on the experiences of women of colour. The content was also developed through consultation with an expert group of women of colour working to advance equality in employment.

This toolkit aims to challenge dominant diversity management practices to move beyond gender as a singular category and shift toward an intersectional approach to diversity management.³ It calls for an approach to diversity management that interrogates power structures within organisations and creates new styles of organisational management. The **barriers** section provides a non-exhaustive summary of available evidence of the discrimination, exclusion and inequality experienced by women of colour, at an individual level, drawing on direct experiences of women of colour, and at a structural level, based on trends in the European labour market. The **solutions** section serves as a guide for employers in the form of: a conceptual guide to inform an improved approach to the inclusion of women of colour; a step-by-step guide and checklist; and resources for employers on adopting an intersectional approach.

Who should use this toolkit?

This toolkit is intended for organisations and companies looking to:

- 1) Understand and dismantle the barriers facing women of colour;
- 2) Challenge dominant power structures in their workplace;

1 European Network Against Racism. 2016. *Forgotten Women: the Impact of Islamophobia on Muslim Women*.

2 European Network Against Racism. 2018. *Shadow Report: Racism and Discrimination in Employment in Europe 2013-2017*.

3 It is noted that a true intersectional approach would look at the intersection of race and gender with other social identity categories, such as sexual orientation, gender identity, class, age and disability status. Whilst this toolkit does not delve into these categories, the framework proposed is in theory applicable to other intersectionally defined groups.

3) Adopt an intersectional approach to diversity management and organisational change.

Within organisations, the toolkit may be specifically useful for senior leadership, human resource managers, and members of diversity and inclusion departments.

ENAR considers that the best way to achieve equality as an ultimate goal is through collaboration and dialogue between different actors - private companies, public administrations, trade unions, NGOs, employees - to find proper solutions and share good practices.

Terminology and concepts

Who are 'women of colour'?

Women of colour is a term used to describe women of racial, ethnic and religious minority backgrounds; women who are not white; or women who experience racism. The term 'woman' is used here to include all those self-identifying as women and is deliberately inclusive of members of the non-binary and transgender communities.

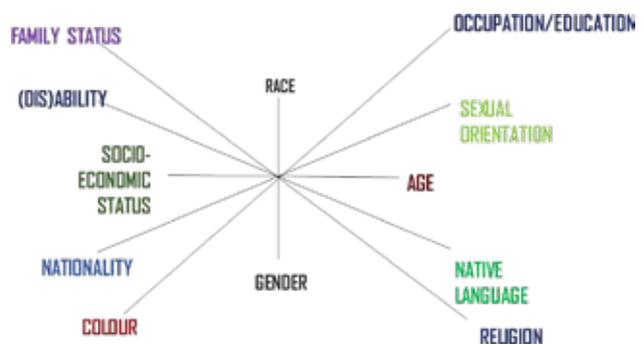
An ongoing challenge is how to use language which does not reinforce discrimination and invisibility of women of colour. In policy and diversity management discourses there is a tendency to construe 'ethnic minority women' solely in the context of migration. Although women who have recently migrated are women of colour and often face extreme barriers in the labour market, the term should also reflect that European citizens still experience discrimination and inequality aligned to race.

What is 'intersectionality'?

Intersectionality is a concept with roots in Black feminism that considers the interconnected nature of a number of systems of oppression, such as racism, sexism, homophobia, and classism. The theory highlights that social identities, such as race, gender, sexuality, class, marital status and age, overlap and intersect in dynamic ways that shape each individual. Almost any socially constructed category can shape identity; the theory of intersectionality has focused specifically on the intersection of those

categories which have been definitive for the allocation of economic, social and political rights and privileges.

In 1989, Professor Kimberlé Crenshaw coined the term 'intersectionality' to explain the situation of an individual experiencing discrimination at the intersection of two or more grounds of discrimination. Intersectionality shows how two or more forms of discrimination co-constitute and shape each other. The concept demands that we examine the various and intertwined power structures of our world, including racism, patriarchy, economic exploitation, and more.⁴



Source: The Winters Group Inc

Data collection and research on women of colour

The available research on women of colour is limited in that in many countries in Europe there is insufficient collection of racial, ethnic and religious equality data. This hinders the ability to understand (a) the position of women of colour according to many economic and social indicators, but also (b) the experiences and relative positions of women of colour in individual workplaces.

⁴ See <https://www.communitybusiness.org/latest-news-publications/intersectionality-and-multiple-identities>.

Introduction

Language and terminology

Other commonly used terms include:⁵

Cisgender: A person whose sense of gender identity is aligned with the sex they were assigned at birth.

Heteronormative: Refers to the assumption that all human beings are either male or female in both sex and gender, and that sexual and/or romantic attraction and activity only occurs, or is only normal, between heterosexual cis men and heterosexual cis women.

Patriarchy: Patriarchy is a social system in which men hold power and predominate in roles of economic and political leadership, moral authority, and social privilege.

Race: The socially constructed classification of humans into groups based on physical traits (such as skin colour), ancestry, religion, genetics or social relations, or the relations between them.

Racism: The prejudice, discrimination or antagonism directed toward someone of a different race, based on the belief that one's own race is superior. Racism, as an ideology, exists in a society at both the individual and the institutional level. Consequently, the systemic nature of racism, as well as who holds the power to perpetuate it, is becoming more popular in mainstream discourses of the term.

Structural discrimination: Refers to a range of laws, policies, rules, attitudes, and behaviours in institutions and society which cause barriers and prevent equal access to rights and opportunities for minority groups. Structural discrimination is often aligned with privilege and disadvantage aligned with societal norms, power and dominance related to race, gender, religion, sexuality, and other social, economic and cultural power relations.

Whiteness: The cultural and sociological aspects of people identified as white, which has historically been tied to social status and constructed as the norm and embodiment of dominant culture and ideologies.

⁵ Many of these definitions are based on those outlined in the glossary of the Purple Rain Collective, available at: <https://purpleraincollective.com/glossary/>.

1. BARRIERS FOR WOMEN OF COLOUR IN EMPLOYMENT

Numerous publications and studies with a focus on achieving gender equality outline the barriers facing women in the workplace generally, however they often fail to investigate fully the specific or additional issues faced by women of colour. This section provides a non-exhaustive overview of the barriers facing women of colour in employment, including (a) the structural barriers facing women of colour in the European labour market, and (b) barriers facing women of colour in individual workplaces.



Barriers for women of colour in employment

1.1. Context: Women of colour in the labour market

A range of legal, institutional, economic, social and cultural dynamics impact the labour market position of women of colour in Europe. Due to the diversity of the category 'women of colour' and the lack of systematic collection of data disaggregated by race,⁶ it is difficult to provide a concrete picture of their relative position in the European labour market. However, a number of trends can be identified which point to the existence of a highly stratified labour market in which women of colour experience systematic discrimination, exclusion and inequality.

Structural barriers for women of colour in the labour market

A range of factors influence the heightened disadvantage experienced by women of colour in the labour market. These are discussed as 'structural barriers' because they are persistent and not attributable to the actions of one individual, but rather a combination of mutually reinforcing factors, ranging from direct or structural (and intersectional) discrimination, to social exclusion and inequality in access to education and training, housing, healthcare and social benefits.

TRENDS AFFECTING WOMEN OF COLOUR IN EUROPEAN LABOUR MARKETS

Unequal access to the labour market

Women of colour are more likely to face barriers accessing employment when compared to the men of their communities and 'ethnic majority' women. In countries with equality data disaggregated by race or origin it is evident that migrant women have significantly lower employment rates than native majority women. For ethnic minority women data are scarce, however often show disparities in employment rates with women of the ethnic majority, for both migrant and non-migrant (but of colour) women.

Over-representation in exploitative and precarious work

Women of colour (and migrant women in particular) are likely to be over-represented in precarious, low-paid employment in sectors that present a higher risk of exploitation and abuse. According to the European Institute for Gender Equality (EIGE), nearly one in three non-EU born women (35 %) work in precarious employment, as compared with 25 % of native-born women and 24

% of non-EU born men. 'Exploitative and precarious work' may include formal occupations that are characterised by low-pay, part-time, insecure employment contracts, such as cleaning, care, hospitality, retail and manufacturing. It could also include occupations in the informal economy, such as domestic work, au pairing, and sex work.

Over-qualification

There is evidence over-qualification for migrants and ethnic minorities in a number of European countries. Women of colour in particular experience high rates of over-qualification, working in roles and sectors with lower requirements than their credentials, often perpetuating a cycle of precarious, low-paid employment.

Intersectional pay gap

Women of colour in employment experience an intensified pay gap, with men but also with white women. However, this is rarely reflected in analyses of the gender pay gap which do not take an intersectional approach. A recent report in the United Kingdom highlighted that ethnic minority women have not benefitted from progress on the closing of the gender pay gap in Britain.

⁶ European Commission. 2016. *European Handbook on Equality Data*. Available at: http://ec.europa.eu/newsroom/just/document.cfm?action=display&doc_id=43205.

Racism, sexism and discrimination in access to employment

Discrimination in access to employment is a key barrier for women of colour, often based on a combination of race, ethnicity, nationality, religion and gender.⁷ There are numerous examples of discrimination against women of colour from various backgrounds in the course of applying for jobs, and in many countries this has become a structural phenomenon.⁸ For example, in France, an experiment showed that a woman with a Senegalese sounding name had only an 8.4% chance of being called for a job interview, as compared to a 22.6 % chance for women with a French-sounding name.⁹ For Muslim women across Europe, discrimination based on race, ethnicity, gender and religion has hindered access to the labour market, demonstrated by numerous CV testings and surveys with employers.¹⁰ The risk of discrimination is heightened for women wearing the headscarf. In Belgium, 44% of employers agreed that wearing a headscarf could negatively influence the selection of candidates.¹¹

Wider societal exclusion

A range of broader issues impact the ability of women of colour to access the labour market, compounding and reinforcing the exclusion caused by discrimination. According to the European Commission expert group on gender equality, social inclusion, health and long-term care (EGGSI), it is important to consider barriers outside the field of employment to explain the labour market position of women of colour, including unequal access to education, healthcare, social and welfare services. This is due to a combination of “the interaction between the unequal power relations within their communities, and the unequal power relations in relation to the dominant community.”¹²

Institutions, laws and policies

It is important to consider the role of institutions, laws and policy in exacerbating disadvantages experienced by women of colour. Firstly, legal institutions in Europe insufficiently acknowledge or address intersectional discrimination. In a study of intersectionality from the point of view of equality bodies in Europe, the European Network of Equality Bodies (Equinet) discovered that the majority of European countries do not account for multiple discrimination in their legal system.¹³ Evidential barriers further complicate the litigation of cases of intersectional discrimination in practice.

The approach of European Union institutions in the field of non-discrimination has failed to adequately respond to structural and intersectional discrimination. European Union anti-discrimination law is focused on an individualised, incident based understanding of discrimination. This approach fails to address structural discrimination based on power imbalances beyond simple cases of unequal treatment. In specific cases, the European Union institutions did not provide sufficient protection of women of colour in cases of intersectional discrimination. In two recent rulings,¹⁴ the Court of Justice of the EU maintained that although restrictions on the wearing of headscarves in the workplace could constitute discrimination, such bans could be justified in certain limited circumstances, especially for front office jobs. Not only did this ruling fail to recognise a wider context of intersectional discrimination against Muslim women in Europe as a matter of gendered, racial and religious discrimination, it failed to prioritise the protection of women of colour against discrimination, exacerbating a wider structural issue of unequal access to employment and career progression for women of colour.

The interaction of gender, non-discrimination, migration and employment policies in Europe significantly impacts the structure of the labour market and working conditions for women of colour. European policy makers have generally taken a blanket, ‘race and class-blind’ approach to gender equality,¹⁵ which disregards

7 Report of the High Level Advisory Group of Experts on the Social Integration of Ethnic Minorities and their Full Participation in the Labour Market. 2007. *Ethnic Minorities in the Labour Market: An Urgent Call for Better Social Inclusion*.

8 European Network Against Racism. 2018. *Shadow Report: Racism and Discrimination in Employment in Europe 2013-2017*.

9 Petit P., Duguet E., L'Horty Y., du Parquet L. and Sari F. 2013. 'Discrimination à l'embauche: les effets du genre et de l'origine se cumulent-ils systématiquement?'. *Economie et Statistiques* 464-465-466: 141-153.

10 European Network Against Racism. 2016. *Forgotten Women: the Impact of Islamophobia on Muslim Women*.

11 European Network Against Racism. 2016. *Forgotten Women: the Impact of Islamophobia on Muslim Women – National Report for Belgium*.

12 EGGSI. 2008. *Ethnic Minority and Roma Women in Europe: A Case for Gender Equality?*; Fredman S. 2016. *Intersectional Discrimination in EU Gender Equality and Non-discrimination Law*. European Network of Legal Experts in Gender Equality and Non-Discrimination, European Commission, DG Justice and Consumers.

13 Equinet. 2016. *Innovating at the Intersections: Equality Bodies Tackling Intersectional Discrimination*.

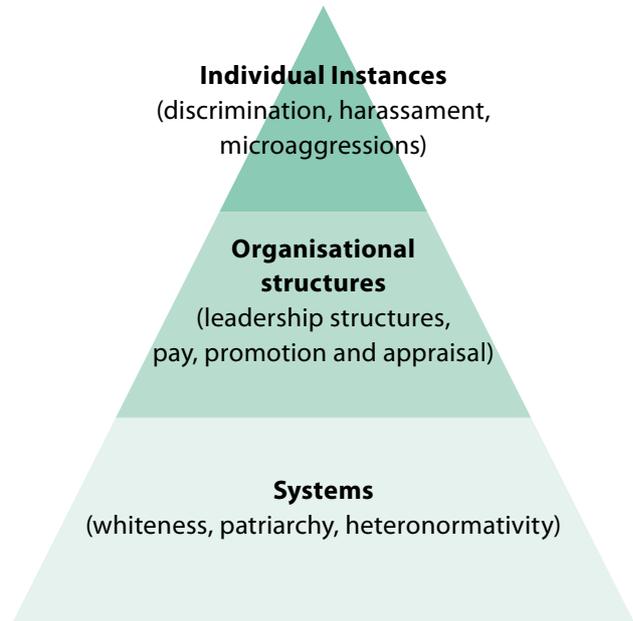
14 Samira Achbita and Centrum voor gelijkheid van kansen en voor racismebestrijding v. G4S Secure Solutions NV (Case C 157/15; 2017); and Asma Bougnaoui Association de défense des droits de l'homme (ADDH) v. Micropole SA (Case C-188/15; 2017).

15 Examples include the EU Action Plan 2017-19 Tackling the gender pay gap - COM (2017) 678 final; and European Commission. 2016. *Strategic Engagement for Gender Equality*.

the varied economic, social, and legal positions of different women in Europe. In practice, policies designed to facilitate entry of women into the workforce have resulted in an increased demand for workers in the domestic care, cleaning and informal sectors. The workers who fill these posts are overwhelmingly working class women of colour or migrant women, who due to structural disadvantages have less access to high-skilled employment in other sectors. At the same time, European migration policy has generally overlooked gender specific dynamics of migration. As such, policies that restrict low-skilled migration into Europe have disproportionately affected migrant women, thus exacerbating a cycle of vulnerability.¹⁶

1.2. Women of colour in the workplace: within organisations

A number of barriers persist for women of colour in the workplace, affecting their potential as individual employees and the productivity of the organisation as a whole. The issues described here demonstrate oppressive patterns replicated in many different workplaces, companies and organisations, including those branded as 'progressive', 'modern' or 'diverse'. The below provides a frame to understand the different dynamics impacting women of colour inside workplaces, from individual instances of gendered, racial discrimination and violence, to the underpinning organisational structures that produce those instances, to the general societal oppressions that support them.



Individual instances

Many women of colour experience instances of mistreatment relating to their gender, race, ethnicity, religion, or all of the above in the workplace. These incidents differ widely by workplace context, however there are a number of common experiences, including of discrimination, harassment (in many forms), stereotypes and micro-aggressions.

Discrimination and stereotypes

Vast experiential evidence demonstrates a high risk of discrimination for women of colour in the workplace. The combination of racialised and gendered processes has caused over-scrutiny of women of colour in the workplace. Many Muslim women experience discrimination in the workplace, in many cases leading to dismissal or being overlooked for progression opportunities.¹⁷ Some Black women have raised parallel experiences of discrimination due to their hair, with some employers explicitly imposing uniform codes that restrict certain black hairstyles due to claims they are unprofessional.¹⁸ For some religious minority women, discriminatory stereotypes surrounding their religion affect how they are perceived in the workplace, with tropes such as being 'docile' or 'religiously conservative'.

¹⁶ International Labour Organisation. 2003. *Preventing Discrimination, Exploitation and Abuse of Women Migrant Workers – An Information Guide*; European Network Against Racism. 2017. *Racism and Discrimination in the Context of Migration – Shadow Report 2015-16*.

¹⁷ European Network Against Racism. 2016. *Forgotten Women: the Impact of Islamophobia on Muslim Women*.

¹⁸ Sini Rozina. 2016. 'Wear a weave at work - your afro hair is unprofessional'. BBC, 18 July. Available at: <https://www.bbc.co.uk/news/uk-36279845>.

COMPARATIVE CASE STUDY

Discriminatory dismissals of Black and Muslim women

These two cases highlight comparable examples of discrimination against women of colour based on racialised aspects of their dress or appearance.

In France, Ms Bougnaoui¹⁹ worked for the company Micropole Univers SA as a design engineer. As part of the role she made on-site visits to customers. After one particular visit, a customer complained to the employer that Ms Bougnaoui's wearing of the headscarf had upset a number of its employees. The customer requested that there should be "no veil next time". Micropole requested Ms Bougnaoui to remove her headscarf, citing the need to "apply a principle of neutrality" to its customers. When Ms Bougnaoui refused, she was dismissed.

In the United Kingdom, Ms Arnold, a Black woman²⁰ was turned away from a job with a temporary events staffing agency. The company told her that her dreadlocked hairstyle was unprofessional and did not meet the company's uniform standards. These standards banned a number of hairstyles specifically worn by black women, including braids.

Here we see a commonality of how women of colour from different backgrounds and employment situations experienced intersectional discrimination. The issues of the headscarf and black women's hairstyles demonstrate a specific form of exclusion in workplaces across Europe. Wider organisational and structural dynamics have exacerbated the barriers experienced by both women, relating to both their relative positions of subordination within the organisation, and a wider societal climate of hostility upon which employers sought to base their decisions (i.e. in these cases the perceptions of customers.)

Violence and harassment

Instances of harassment and violence remain prevalent for women of colour in the workplace. This may take the form of racialised physical, verbal and sexual harassment. The mental health effects of harassment in the workplace are highly under-explored, in particular for women of colour who are likely to experience racialised and gendered oppression and discrimination. In a study of experiences of Black and Minority Ethnic (BME) women in the workplace, the Trades Union Congress in the UK found that 37 % of BME women had left a job as a result of assault or physical violence, and 57 % of BME women polled reported that the bullying and harassment they experienced at work affected their mental health.²¹

Micro-aggressions

It is important to recognise the potentially damaging impact of a culture of hostility against minorities, which can also manifest in 'subtle' forms of racism and sexism in the workplace. The term 'micro-aggressions' describes commonplace encounters which convey insult, negative sentiments or indignity towards a member of a marginalised group.²² Often, micro-aggressions are indirect and flippant statements, and as such difficult to identify or challenge. Micro-aggressions may accompany a denial of problem, or serve to override the negative experiences of those affected by the issue, such as racism or sexism. Women of colour experience both sexist and racial micro-aggressions, which maintains a hostile culture for women of colour and reinforces their subordinate position in the hierarchy.

19 Asma Bougnaoui Association de défense des droits de l'homme (ADDH) v. Micropole SA (Case C-188/15; 2017).

20 Gray Jasmin. 2018. 'Temp Agency Says No to Dreadlocks, Braids and Beards in 'Discriminatory' Policy'. *Huffington Post*, 3 July. Available at: https://www.huffingtonpost.co.uk/entry/temp-tribe-policy_uk_5b3a653ee4b07b827cb98712.

21 Trades Union Congress. 2017. *Is Racism Real? A Report about the Experiences of Black and Minority Ethnic Workers – Polling Results*. Available at: <https://www.tuc.org.uk/sites/default/files/Is%20Racism%20Real.pdf>.

22 Holder A.M. B., Jackson M.A. and Ponterotto J.G. 2015. 'Racial Microaggression Experiences and Coping Strategies of Black Women in Corporate Leadership'. *Qualitative Psychology*, Vol 2(2), Aug 2015: 164-180.

Common micro-aggressions against women of colour at work:

Example	Explanation
“Sorry, I mistook you for [insert colleague name here]”	Many people of colour have been confused with another colleague of the same race. Mistakes like this suggest that the person believes all members of that racial group look alike or simply that they do not pay much attention to the colleagues in question beyond their race identity.
“Is that your real hair?”	For many black women, a focus on their hair at work is a source of discomfort. Questions and comments about black women’s hair convey numerous suggestions; that the person is conscious of the ‘difference’ of this hairstyle, that the person views certain hairstyles as unprofessional or otherwise worthy of comment. Attention of this kind is not given to the hairstyles of white people, which are perceived as the norm, and can make women feel scrutinised.
“Sorry – I was waiting to speak with management.”	Women of colour in particular are assumed to be in junior positions. While there is a lack of representation of women of colour in leadership, the result of this assumption is to undermine those that do reach management levels. Similar micro-aggressions include assuming the woman of colour is an intern or automatically assuming the male or white female colleague is senior. This carries a suggestion that women of colour are less likely to be competent or authoritative.
“Where are you really from?”	A common micro-aggression against people of colour generally is an interrogation into their racial origins. This question can be frustrating because it is based on a premise that people of colour do not generally belong in that given context, whether it be in that organisation, field, or country. It is also a frequently asked question and can be a daily task for people of colour to have to explain their presence.
[Interruption]	Interruptions of women of colour are a frequent occurrence in most workplaces, often by men and white women. This situation is frustrating, unproductive and indicative of a power imbalance causing men or white women to believe their thoughts are more valid and important.
“We don’t see colour, race is not relevant in this organisation.”	Complaints by people of colour relating to race are frequently met with denial or defensiveness. The idea that race is not relevant is dismissive of very real concerns relating to inequality or discrimination, and reinforces a dynamic by which white people decide whether there are racial issues in the organisation, rather than those directly affected.
“Women have the same opportunities to reach management as men here – they choose not to.”	This statement also denies that there are any systemic issues within the organisation relating to the progression of women. Underpinning this is the idea that the organisation is a meritocracy and therefore all issues of representation and inequity are explained by individual failings or willingness.

Source: Adapted from Business Insider. 2018. ‘9 Things People Think Are Fine to Say at Work — but Are Actually Racist, Sexist, or Offensive’. Available at: <http://uk.businessinsider.com/microaggression-unconscious-bias-at-work-2018-6?r=US&IR=T/#are-you-an-intern-you-look-so-young-7>, and the Women of Colour steering group meeting.

Organisational structure

Often the instances outlined above cannot be characterised as isolated events; rather they are demonstrative of deeper structural issues within the organisation. Employers must understand the structural barriers to equality in their organisations in order to implement systematic and meaningful change.

Leadership, representation and organisational culture

One example of structural discrimination linked to race and gender is the unequal distribution of power in the institution’s hierarchy. Companies across Europe have struggled to ensure racial and gendered representation in their management structures. For women, figures of representation in companies remain lacking.

Women business owners make up only 33.2 % of self-employed people, and women are still over-represented in lower-paid roles in organisations across the EU. Men dominate management boards. Figures from the European Commission show that on average, only 23.3 % of board members of the largest companies in the EU are women.²³ For women of colour, the issue of representation in leadership becomes more acute although data on women in board and management positions are generally absent in most company statistics. Catalyst described this as not a glass but a ‘concrete ceiling’ for women of colour.²⁴ When women of colour do enter leadership positions, they are subject to negative stereotypes and micro-aggressions, or a general pressure to conform to the culture of the organisation.²⁵

Discriminatory staff policies

In some cases, discriminatory treatment forms part of official company policy. Often such policies are neutral on the surface (for example a ban on religious symbols, or a ban on particular hairstyles for *all* employees) however often unduly impact certain racial, ethnic or religious minority groups. Further, a societal tendency to over-scrutinise the appearance of women means that in practice such policies target women of colour more. In practice this limits the progression of women of colour who fail to meet these discriminatory standards.

Value and recognition

Internal structures of value and recognition such as remuneration, promotion and appraisal structures, and the expectation of additional work also indicate the extent of inclusion for women of colour. On a micro-level, very few employers publish pay statistics disaggregated by both race and gender. However, macro-level trends suggest that as women of colour are over-represented in low-paid sectors and occupations, and under-represented in senior leadership, there is likely to be an inter-sectional pay gap in many workplaces across Europe.

Beyond pay, many women of colour describe processes of devaluation in their organisation; and that regardless of their seniority they receive a lack of respect and credit

for their work.²⁶ Others highlighted that they felt more scrutinised than white or male colleagues, leading to worse performance reviews and barriers to promotions. Some women highlighted feeling a greater vulnerability to sanction than other colleagues.

Another oft-raised issue amongst women of colour is a duty to perform uncompensated, extra work. Some terminology already exists to describe this additional labour, such as ‘emotional labour’; and ‘educational’ or ‘diversity work’.²⁷ These terms refer to the extra effort required to navigate spaces where racism, sexism, and other prejudices are present and normalised. This extra effort includes managing the negative emotional or psychological effects of oppressive environments, but also the labour of doing so in a manner that abides with other dominant norms, including maintaining professionalism, politeness, and avoiding existing stereotypes, i.e. not portraying the ‘angry black woman’; the ‘emotional woman of colour’. Another form of additional labour is the work of changing or transforming organisations and institutions. In many cases, simply existing as ‘different’ in an organisation can be taxing work. Often those employees find themselves in positions in which they must confront or complain of barriers that impede them in the workplace. Professor Sara Ahmed describes this:

“Being in an institution can be hard work especially when institutions are not built for us. It might be the work you have to do to get here or to enter a room because you do not have the right background or the right body... So much feminist and anti-racist work is the work of trying to transform institutions so they are more accommodating. That work includes the work we have to do to show what we already know; how difficult and hostile institutions are or can be; how white, how male-dominated; how racist, how sexist and so on.”²⁸

23 European Commission. 2016. *Fact Sheet – Gender Balance on Corporate Boards: Europe is Cracking the Glass Ceiling*.

24 Catalyst. 2016. *Women of Color in Corporate Management: Opportunities and Barriers*. Available at: <https://www.catalyst.org/knowledge/women-color-corporate-management-opportunities-and-barriers>.

25 Showunmi V., Atewologun D., & Bebbington D. 2015. ‘Ethnic, Gender and Class Intersections in British Women’s Leadership Experiences’. *Educational Management Administration & Leadership*.

26 Holder A.M.B. 2016. ‘Black Women Suffer Microaggressions at Work’. *London School of Economics Business Review Blog*. Available at: <http://blogs.lse.ac.uk/businessreview/2016/02/25/black-women-often-suffer-from-microaggressions-at-work/>.

27 Ahmed S. 2012. *On Being Included: Racism and Diversity in Institutional Life*. Durham: Duke University Press.

28 Ahmed S. 2018. ‘Confrontation’. *Feminist Killjoy Blog*. Available at: <https://feministkilljoys.com/2018/05/04/confrontation/>.

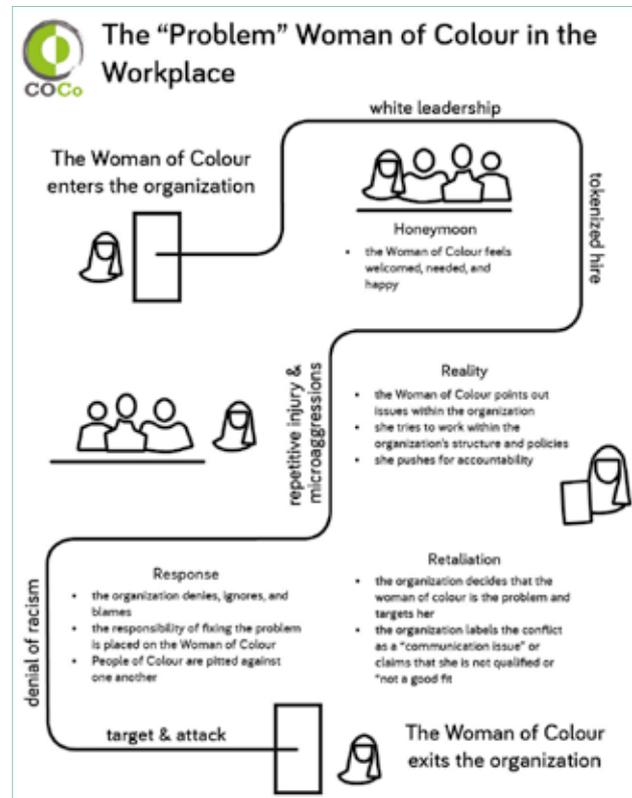
Women of colour often have to perform 'diversity work' to confront the dominant sexism and racism in their working environments and organisations. Work of this kind is additional, unforeseen, it brings value to the employer (bringing progressive development toward a more inclusive workplace), and yet is unremunerated. In some situations, diversity work is not only uncompensated but discouraged and even punished, with many women of colour facing negative consequences and sanctions for highlighting pervasive problems within the organisation. The diagram on this page highlights this negative cycle.

Systems: Whiteness and patriarchy in the workplace

Often a deeper structural analysis of workplace dynamics shows links between individual instances of discrimination, structural inequalities within the organisation and the broader societal oppression.

Many of the barriers for women of colour discussed in this section result from the operation of racist and sexist systems in labour markets and in workplaces across Europe. In other words, the functioning of organisations and institutions are based on a combination of whiteness, patriarchy, heteronormativity and ableism.²⁹ Both systems are constructed - explicitly or implicitly - around the notion that those mostly closely aligning with a white, male, and straight standard are more worthy, intelligent, authoritative, and in general, represent the norm. Those furthest from these standards, including women of colour, are less valued, less likely to succeed, and more likely to be exploited.

These standards are maintained implicitly, and other arguments are utilised to uphold hierarchies based on whiteness, patriarchy, heteronormativity and ableism. For example, a workplace culture of 'neutrality' is used to impose a norm of secularism and whiteness, and often results in discrimination against women of colour manifesting their religion, often disproportionately against non-white and Muslim women. Insistence on 'meritocracy' is often used as a basis to deny structural disadvantages experienced by many groups and reject the need to implement positive action to correct this.



Source: Coco – The Center for Community Organisations, Canada. Available at: <https://coco-net.org/problem-woman-colour-nonprofit-organizations/>.

Employers with a more profound understanding of systems such as whiteness and patriarchy are better placed to respond to structural issues within their organisation. Understanding incidents as part of wider systems of discrimination and oppression will increase accountability and encourage a structural change in organisational practice.

²⁹ See terminology note for definitions of these terms.

2. SOLUTIONS: TOWARD AN INTERSECTIONAL APPROACH TO DIVERSITY MANAGEMENT



2.1. A conceptual guide: principles to inform an intersectional approach

The barriers facing women of colour in employment are both numerous and structural. This section outlines a framework for employers looking to move toward an intersectional approach in their diversity work.

What is an intersectional approach to diversity management?

'Intersectionality' is a tool which brings us to a deeper understanding of the realities of discrimination and inequality insofar as it calls for an acknowledgement of (a) interconnected and overlapping forms of oppression and (b) the need to address racist and sexist structures to achieve true equality and inclusion. Incorporating these points into organisational diversity policies requires a more substantial and nuanced approach

which goes beyond superficial, single category and identity focused diversity initiatives. The box below outlines some cross-cutting principles to underpin an intersectional approach to diversity management.

2.2. Guide for employers: inclusion, transformation, empowerment of women of colour

With these principles in mind, this section provides some practical suggestions and tools to eradicate the barriers facing women of colour in the workplace. The below outlines a three stage process by which employers may apply an intersectional approach to their human resources and diversity management work:

- 1) Understanding the issues at the intersections
- 2) Transforming the organisation
- 3) Empowering women of colour

PRINCIPLES FOR AN INTERSECTIONAL APPROACH TO DIVERSITY MANAGEMENT

1. Diversity is not one-dimensional

Generally, employers manage diversity with reference to distinct categories, such as 'ethnicity' and 'gender'. This may fail to uncover the specific experiences of those belonging to two or more minority groups. The intersectional approach moves beyond the rigidity of these categories to understand and address the position of the most marginalised within these groups.

2. The intersectional approach addresses structures, not identity

Intersectionality as a framework focuses on the forces that limit equality, rather than on the inclusion of specific identity groups per se. Employers can apply this by seeking to acknowledge the operation of power relations in their workplace, and take steps to rectify the imbalances created. As opposed to asking 'how can I employ more minorities?', this approach is concerned with 'what about this organisation places barriers for minority groups?'. This shifts the focus from considering minorities as a homogenous identity group, to addressing the unequal structures in the organisation.

3. Foregrounding the experience of marginalised groups

Intersectionality as a framework for understanding discrimination is grounded in the autonomy and expertise of those most affected. Employers can apply this principle by centering the experience of the under-represented groups, placing weight on their subjective experience and truly valuing their skills, talents and contributions as individuals.

4. The intersectional approach concerns outcomes not opportunities

The intersectional approach differs from the focus on 'equal opportunities'. While the latter is concerned with treating like alike, intersectionality calls for the achievement of substantive equality. Substantive equality may call for different treatment of certain groups or individuals, in order to remove barriers and to redress disadvantages not experienced by others.

5. Measuring intersectionality

Data collection and self-assessment is necessary to measure structural change within the organisation.

This framework recommends an organic process by which employers invest in a full understanding of the organisation's performance from an intersectional perspective, make steps to address the existing barriers, and focus on empowerment of marginalised employee groups within the organisation. How to use this approach *vis-à-vis* women of colour specifically will remain the case in point, however this general approach may be applied to other groups facing intersectional disadvantage.

Stage One: Understanding the issues at the intersections

The first step toward an intersectional approach to diversity management is gathering a firm understanding of the dynamics within the organisation. This understanding may come from numerous sources, such as attitudinal measures and more concrete quantitative data. In any case, what is most important is that this information stimulates ongoing, self-critical and earnest reflections about diversity, inclusion and equality within the organisation.

A. Conduct consultations with affected groups

One key way to understand the most pressing issues within the workplace is through consultation with employees. This could take various forms, from staff surveys, to the development of staff diversity committees, or women of colour consultation groups. Although the most appropriate form of consultation will depend on the size and type of organisation, it is vital to ensure employees feel respected when sharing views, that constructive action will be taken, and that there will not be negative implications. One way to ensure this is to provide avenues for online consultation, or to make feedback anonymous.

Consultations on diversity in the workplace are also a way to find potential advisers within the organisation or 'diversity champions' to work to improve the situation. However, it is important that the voices of those directly affected by the issue at hand are given weight. Employers should also consider the extra workload involved in diversity work. Women of colour and other minorities make substantial contributions to the organisation by providing insight and recommendations for improvement. Employers should recognise this as work and compensate it accordingly.

B. Carry out an intersectional audit

Employers should aim to support substantial change in organisational diversity practice with quantitative data as far as possible; this will help the employer examine the extent of the issues, which employees are affected, and chart the ongoing position of minorities in the organisation.

Which data to collect?

Issues and indicators: To determine the relevant issues to examine, employers should look to the main issues highlighted through employee consultations and otherwise raised. Although the diversity issues in each organisation may differ, the majority of organisations could look to track:

- Overall representation in the organisation
- Representation in management and leadership
- Representation in junior roles
- Type of contract: temporary/permanent; full-time/part-time
- Pay
- Other systems of reward: bonuses, benefits
- Recruitment stage: applications, interviews, relative success rates
- Promotions
- Discrimination or harassment complaints
- Warnings and sanctions

Intersectional data: To capture information on these indicators from an intersectional perspective, employers should collect sufficient data on various identity categories of employees.

A key contribution of intersectionality has been the revelation that a focus on 'gender' alone will not uncover the extent of discrimination and inequality in any context. A fully intersectional approach would collect data on various grounds as is relevant to the employee base. This could include categories such as:

- Race/ethnicity
- Religion
- Sexual orientation
- Gender identity
- Disability status
- Age
- Educational background
- Class/Socio-economic status
- Immigration status

DATA COLLECTION PRINCIPLES:

ENAR proposes a data collection model based on six key principles to ensure that personal data protection standards are met in the respect of EU and national legislation and to clearly rule out any kind of ethnic profiling.

1. Self-identification: Identification should be based on the individual data subject's perception of her/his ethnic or racial origin.

2. Voluntary participation: Every individual has the right to opt into data collection (there is therefore no need to reach a consensus among all communities/individuals), and no one can be forced to provide sensitive data. Individuals will be informed that non-participation will not cause any negative consequences.

3. Confidentiality of personal data: Sensitive data should always be treated confidentially; this implies anonymisation of all information linked to sensitive data.

4. Informed consent: Every individual shall receive clear, transparent information regarding the purpose of the data collection and the benefits and risks of their participation. They shall then be asked if they are willing to consent or not.

5. Community participation: Groups at risk of discrimination should actively participate throughout the process, directly or through the intermediary of representative organisations, in particular for the definition of categories, the analysis and evaluation of the data collected, and the dissemination of the data.

6. Multiple grounds/identities: Data subjects should have the right to choose multiple and intersectional identities and it should be possible to combine grounds when analysing the data.

Source: European Network against Racism. 2015. Fact sheet: Combating Inequality and Discrimination in Employment. Available at: http://www.enar-eu.org/IMG/pdf/edc-business_factsheet_final.pdf.

The simplest way to gather data on the employee base is to have a standardised diversity questionnaire distributed to candidates at the recruitment stage. It is important to stress that the collection and retention of this data is anonymous and for the purposes of diversity monitoring. As per the General Data Protection Regulation³⁰ data processing on 'special categories of personal data' (such as on race, gender, sexual orientation, trade union membership) is only valid if the data subject has given consent for those purposes.³¹ It is important to stress that the data are collected and processed anonymously, and that answers are optional.

Intersectional analysis: The data gathered is then analysed in conjunction with the indicators above to assess the position of intersectional employee groups against certain indicators.³² For instance, exploring for an intersectional pay gap for women of colour would require cross-referencing the data on pay grades of employees who had selected particular racial backgrounds and woman on the diversity questionnaire. This should then be measured against various standards as are most relevant to the organisation, including the average pay, the pay of white men, or that of white women or men of colour.

Indicators	Diversity ground 1	Diversity ground 2
Proportion of employees	Race/ethnicity	Race/ethnicity
Occupation/role/position	Gender	Gender
Type of contract	Religion	Religion
Pay grade	Sexual orientation	Sexual orientation
Bonus	Gender identity	Gender identity
Benefits package	Disability status	Disability status
Recruitment trajectory	Age	Age
Promotions	Educational background	Educational background
Discrimination complaints	Class/Socio-economic status	Class/Socio-economic status
Harassment complaints	Immigration status	Immigration status
Sanctions and warnings		

³⁰ Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. This text includes the corrigendum published in the OJEU of 23 May 2018.

³¹ For other justifications, see Article 9 of the EU General Data Protection Regulation.

³² For more information, see: Qlearsite. 2018. 'Moving from Gender Pay Reporting to Intersectionality'. Available at: <https://www.qlearsite.com/blog/moving-from-gender-pay-reporting-to-intersectionality>.

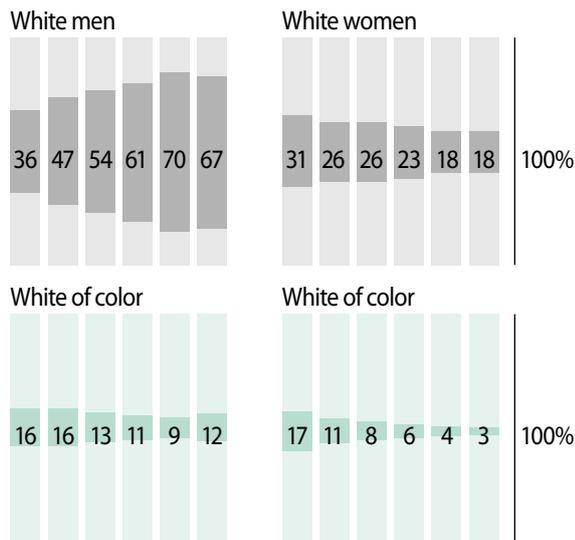


McKinsey & Company Women in the Workplace Study (2017)

One example of a successful intersectional audit is the 2017 Women in the Workplace study by McKinsey. Exploring the representation of women of colour at all levels of the corporate ladder, the study was able to show that the disparities in representation were systemic in many organisations, with women of colour consistently disadvantaged as compared to white men, white women and men of colour:

Representation by corporate role, by gender and race in 2017, % of employees

1= Entry level 4= Vice president
2= Manager 5= Senior vice president
3= Senior manager/director 6= C-suite



C. Reflection on internal structures

Using the information collected is the next step to assess the importance of existing disparities between intersectional employee groups. It is important to decide whether the disparities highlighted in the audit may be attributed to the structures, culture or practices of the organisation, and if so, determine the extent to which the organisation will make it a priority to address this. It is vital to include employee steering groups and members of under-represented groups in this process. Relevant to this self-reflection are considerations of power within the organisation. The employer should question: should factors such as race and gender be influencing value and success in this organisation?

REFLECTIVE QUESTIONS FOR LEADERS:

- Why is leadership in the organisation dominated by X group?
- Who represents this organisation externally?
- How do we measure value in this organisation? Are certain social groups advantaged or disadvantaged in these processes?
- Are certain groups problematised in the organisation? Are there specific issues related to one group? Why? On which ground?
- Which values characterise the working culture? Do certain groups dominate this culture?
- Have leadership made explicit sentiments against racism, sexism and other forms of discrimination?
- What do these disparities suggest about meritocracy in the organisation?
- How may the organisation's composition appear to an outsider or a new recruit?
- How may these structures be affecting the operation of the organisation?



AORTA 'Approaches to Power Inequity in Organisations'

The Anti-Oppression Resource and Training Alliance has produced a useful resource categorising different approaches to this process of reflection on organisational power relations.

Social Justice Approach

- Acknowledges systems of oppression and structural and institutional barriers based on racial, ethnic, gender, class, sexuality, ability, age, immigration status, and other differences
- Understands race, gender, and other aspects of identity to play significant roles in how resources and power are distributed
- Acknowledges the existence of privilege and the opportunity to challenge oppression from a place of privilege—as an ally
- Committed to an ongoing process of self-education in order to create open and supportive environments and take collective, collaborative action for systemic change.

Cultural Competency Approach

- Focuses attention on valuing unique world-views of different communities
- Advocates that people and groups develop their capacity or ability to work effectively across difference by growing culture-specific awareness, knowledge, and skills
- May rely on generalizations around cultural identity

Multiculturalist Approach

- Encourages tolerance and conflict-free diversity, often highlights achievements as a way to downplay systemic or structural barriers and inequalities
- Downplays race in favor of talking about and celebrating culture

Neutrality Approach

- Dismisses significance of race, ethnicity, gender, sexual orientation, class, immigration status, ability, age
- Thinks that not seeing race, ethnicity, or “color” is equivalent to not being racist
- Asserts that everyone is “on the same playing field,” and has equal access to opportunity

Exclusionary Approach

- Either proactively or inadvertently reinforces exclusion, disempowerment, or discrimination of people of color, LGBTQ* people, women, or other marginalized groups of people
- Requires those groups to assimilate to norms defined by dominant groups
- Tries to maintain the status quo for the dominant group

Adapted from: Anti Oppression Resource and Training Alliance. Available at: http://aorta.coop/portfolio_page/approaches-to-power-inequity-within-organizations/.

Stage Two: Transforming the organisation

After gaining a fuller understanding of the issues facing women of colour and other groups at the intersections, stage two is making the necessary changes in organisational structures, policies and culture toward a more equal organisation. This stage refers to what the organisation in its current state can do to initiate a transformation.

A. Develop an intersectional diversity strategy

Using the results of the intersectional audit and analysis, employers committed to real organisational change should develop, in conjunction with affected groups, a strategy with clear goals, measurable targets and timelines. This will portray the commitment of leadership, invite collaboration and provide for accountability of management to its staff.

The content of the strategy should directly address the main issues prevalent in the organisation. For example, an organisation experiencing (a) low representation of women of colour in leadership and (b) poor retention figures for women of colour should put in place concrete, time-defined goals in its strategy to work toward. This could include targets for women of colour in management by a certain deadline. It is crucial that such goals are accompanied by practical measures designed to help reach those goals, for example, as described below, support for employees facing discrimination and other barriers, and access to empowerment schemes.

**Slack’s announcement on intersectional diversity**

Tech company Slack is one of very few global companies to report its diversity figures through an intersectional lens.

On the company blog, it reported;

“Often not reported among tech companies is the intersection of race and gender. Looking at women within underrepresented people of color (Native, Black, Hispanic/Latina, also frequently referred to as underrepresented minorities or “URMs”) we found that 9% of our engineering organization in the US report in these categories. We recognize that we still have a long way to go... One way we are starting to address this gap is by introducing the Rooney Rule into our recruiting process as we hire for more senior-level leadership roles. We also recognize that we do not yet have a woman or person of color from an underrepresented group on our board of directors. When we begin to add outside directors, addressing this will be an important priority.”

Source: <https://slackhq.com/diversity-and-inclusion-an-update-on-our-data>.

B. Take steps to eradicate structural inequalities and disparities in the organisation

Addressing the deeper, structural disparities highlighted in the audit is likely to require far-reaching changes to the governing structures of the organisation. Measures should be tailored to each organisation according to the main issues highlighted.

Dismantling discriminatory policies

Employers should review their internal processes, regulations and employee restrictions. In particular, questioning which conduct is restricted may reveal cultural bias. Often policies may appear neutral *prima facie* but have a disproportionate negative impact on certain employee groups with less capacity to conform to workplace standards.³³ Potential areas for review include uniform policies, sanctions on late arrivals, which may unjustly disadvantage certain groups (e.g. Muslim women and religious dress restrictions; minorities with caring responsibilities) when viewed through an intersectional lens. One particular area for scrutiny are HR policies for complaints, reward and the application of disciplinary measures. Often, without clear structures here, the operation of a 'case-by-case' approach may leave room for subjective and potentially discriminatory application of regulations, disadvantaging women of colour.

Employee support measures

Employers should consider putting in place internal processes and structures for employees to raise grievances about wrongful treatment, discrimination or harassment, such as 'employee points of contact' or 'safety officers'. Employers must clearly communicate the existence of these positions to all employees, along with the modes of access. Employers must provide for some degree of independence to the employee point of contact, ensure confidentiality, and provide the point of contact modes of communication with management to deal with serious cases, and offer training for people in these roles. It is also important to consider the profile and background of the individuals working as points of contacts, in particular whether they will be perceived as approachable and relatable to staff.

Implementing positive action measures at all levels

It is difficult to break a cycle of inequality within an insti-

tution or organisation. Organisations should explore appropriate positive action measures to halt systemic disadvantages and disrupt unearned privilege.³⁴

Employers should review recruitment procedures to reach out to under-represented groups. This includes widening outreach programmes with a focus on specific target groups. Employers should also think creatively about the framing of their recruitment criteria and modify to increase the likelihood that qualified members of under-represented groups will score well. For example, the IKEA Group modified its ideal candidate profiles in certain roles to improve diversity by including fluency in a non-European language as a desired criterion. Guaranteed interview schemes for under-represented groups are another way to diversify the selection process. In terms of leadership and management, employers should explore a range of measures, including the setting of targets and quotas for management, to increase the minimal representation of women of colour. Very few examples exist of European organisations setting targets to increase representation of an intersectional group, rather targets are often limited to the category of gender alone. Learning can be drawn from these examples and applied to efforts focused on women of colour.

Targets and quotas can take many forms. However, considering the general lack of measures specifically for women of colour in Europe, employers should be ready with evidence to make the case for such provisions. Employers should pre-empt answers to expected challenges to quotas, such as the perceived compromises on quality and allegations of 'reverse discrimination'. Referring to support for quotas in other areas (such as quotas for women more broadly) is one effective way to challenge opposition.

It is important to recognise that changes may not be immediate. Often, members of under-represented groups within the organisation may not yet be in a position to lead, whether it be due to a general lack of support, the culture of the organisation, or other individual reasons. On transforming organisations, social justice campaigner Guppi Bola, writes:³⁵

³³ See European Network Against Racism. 2015. *Equal@work Toolkit - Managing Religious Diversity in the Workplace: A Good Practice Guide*.

³⁴ For more information on positive action within organisations, see European Network Against Racism. 2007. *Understanding Positive Action: From Theory to Practice*.

³⁵ Bola G. 2017. 'But Wait, I'm Woke! The Trials of a White Male Manager'. *Civil Society Futures*. Available at: <https://civilsocietyfutures.org/but-wait-im-woke-the-trials-of-the-white-male-manager/>.

“Recognise that women/people of colour/LGBTQ+/disabled/working class people may not be ready to take on leadership roles, not because they don’t have the skills or knowledge, but because they are not supported to have the confidence in themselves to do so. Affirm them, their skills and their leadership.”

Targets and quotas alone are insufficient; employers must supplement them with measures and opportunities for under-represented groups to gain experience and support.

Access to progression opportunities

Companies must address head on the numerous barriers to the progression of women of colour. To overcome these barriers, employers should create additional pathways to progression which sit outside formal promotion procedures. Often, this must include opportunities for women of colour to enter the organisation, through paid traineeships and other access schemes.

Also management should be cognisant of bias in internal review procedures. If all senior or line managers are from a certain group, there is a danger that line managers favour employees they can better relate to. Distributing line management responsibilities and setting pilot line management phases for junior team members may counteract the concentration of management responsibilities in the hands of select groups.

Intersectional equal pay and value allocation

Employers must be transparent about the enduring issues with equal pay. While some employers have taken steps to address pay disparity on the basis of gender alone, there are very few publicly communicated figures of pay disparities on the basis of race and gender.

Employers can put in place alternative rewards systems to counteract women of colour being overlooked for their extra work. Managers should ask themselves how they place value on the contributions of their team. Are certain personality types more often recognised and rewarded? Does the organisational culture favour more outgoing, aggressive forms of interaction? How does the team reward patience and respect? How can we compensate the work of transforming organisations?



The Bias Interrupters Model – Identifying and Interrupting Bias in Performance Evaluations

The Centre for Worklife Law has developed a guide for employers and managers to prevent the operation of bias in performance reviews, noting that people of colour, women, and other groups under-represented in leadership are often disadvantaged in evaluations, halting their progression. They formulate seven tips for managers in performance evaluations to counteract bias:

Seven powerful Bias Interrupters:

1. Give evidence (from the evaluation period) to explain and back up your rating.
2. Make sure to give everyone - or no one - the benefit of the doubt.
3. If you waive objective rules, do so consistently.
4. Don't insist on likeability, modesty, or deference from some but not others.
5. Don't make assumptions about what mothers - or fathers - want or are able to do.
6. If you comment on “culture fit”, “executive presence”, or other vague concepts, start with a clear definition and keep track to ensure such concepts are applied consistently.
7. Give honest feedback to everyone who is evaluated - otherwise some groups won't get notice of problems in time to correct them.

Source: Centre for WorkLife Law. Available at: <https://biasinterrupters.org/toolkits/orgtools/>.

C. Transforming the workplace culture

Often, the barriers to progression for under-represented groups lie within the workplace culture rather than with the individuals themselves. Transforming and building an open and equal workplace culture is just as important as the development of initiatives for progression.

Reflecting on how to move away from a culture based on whiteness and toxic masculinity, employers should consider whether the actions or standards set by leadership create a hostile environment for minorities. Often, organisations lacking diversity, particularly in senior or influential roles, foster an implicit demand for conformity which simultaneously invalidates those perceived as ‘different’ and legitimises harmful treatment towards them.

Revising codes of conduct

Employers must address this by setting new standards. This should include zero tolerance for all forms of harassment, discrimination for all colleagues, but also address more subtle forms of disrespect. One way to do this is a revision of the organisation's code of conduct. Codes of conduct can apply to all internal or external activities related to the organisation. A code of conduct may outline a general set of values regarding the interaction of employee, listing unacceptable behaviour, and specify the consequences for breach of the code.



Internet Freedom Festival's Code of Conduct

The Internet Freedom Festival's code of conduct sends a clear message with its thorough list of unacceptable behaviours, including a range of harmful conduct on a number of grounds:

"Harassment may occur online or in person.

Examples of unacceptable behaviors include:

1. Verbal comments that reinforce oppression related to gender, gender identity and expression, sexual orientation, disability, physical appearance, body size, race, ethnicity, age or religion (or lack thereof);
2. Imitating or making fun of accents or grammatical errors, or giving unsolicited grammar corrections (but clarifying questions are fine);
3. Verbal threats or demands;
4. Sexualised images in public spaces;
5. Intimidation;
6. Stalking;
7. Harassing photography or recording;
8. Sustained disruption of sessions or events;
9. Unwelcome physical contact or sexual attention;
10. Drugging food or drink;
11. Violating the conference privacy policy in order to attract negative attention to an attendee;
12. Enlisting the help of others, whether in person or online, in order to target an attendee;
13. Gender assumptions and policing;
14. Advocating for or encouraging any of the above behavior."

The full Code of Conduct is available at:

https://internetfreedomfestival.org/wiki/index.php/Code_of_Conduct.

Codes of conduct can be adapted to address common issues in the organisation. For example, if there has been a persistent issue of sexual misconduct, include detailed provisions on this. If there is a problem of interruptions of women by men in meetings, implement a no-interruptions rule.

Structures of accountability

Employers should ensure a clear process of accountability for harmful conduct. Inaction from leadership is endorsement of such conduct and only contributes to the hostile workplace environment. Employers should consider drafting a formal system of sanctioning and disciplinary measures for serious breaches of the code of conduct and follow through when cases occur, regardless of the seniority of perpetrators.

D. Reassess past diversity policies from an intersectional perspective

As stated above, a key shortcoming of many approaches to diversity is that they operate using one-dimensional identity categories. The intersectional approach calls for equality policies to address the most marginalised within groups. Organisations should look deeper into previous initiatives designed for the inclusion of minorities and consider who were the main beneficiaries. Were white women the main group elevated in the leadership target for women? Were gay men the main participants of a mentoring programme for LGBT+ employees? These are important considerations in the drafting of new policies.

Stage Three: Empowerment of women of colour

Unfortunately, women of colour face some of the greatest barriers in the workplace yet receive the least support. The last stage highlights how employers can facilitate empowerment for their employees, and ensure that under-represented groups themselves lead transformation.

A. Make resources available to those dealing with oppression at work

Alongside the changes made to the organisation's structures and culture, employers can make resources available to employees to challenge these barriers as individuals.

Support structures: Employers should aspire to provide access to internal or external support from trained individuals. This could include a range of services from psychological, psychiatric, social, legal support and coaching. Smaller organisations could explore possibilities to pool resources with others to access such services for lower costs.

Information tools and guides: Employers should proactively research existing informational resources for minorities dealing with discrimination in the workplace. They should communicate these to all staff and train managers to refer employees to these resources. They should read them and understand the tools and techniques suggested.



Information tools for dealing with workplace discrimination

1. Whiteness at Work Formulation – Guilaine Kinouani

The whiteness at work formulation is a basic tool anyone experiencing racism at work may use. In the form of a series of questions, this formulation aims to assist individuals navigating and making sense of whiteness at work. The framework is not designed to promote any particular course of action but aims to encourage reflection and self-care.

Available at: <https://racereflexions.co.uk/2018/04/15/whiteness-at-work-formulation/>

2. Harassment Toolkit - Amplify Women

Designed by an umbrella of women's organisations in Ireland, this toolkit outlines a range of steps to be taken by women experiencing harassment in the workplace.

Available at: http://www.wakingthefeminists.org/harassment_toolkit/

3. Feminist Killjoys Blog – Sara Ahmed

A blog discussing the difficulties existing in oppressive work environments, from an intersectional perspective. Provides ideas and suggestions for reforming and coping.

Available at: <https://feministkilljoys.com/>

B. Support employees to access empowerment programmes

Employers should also strive to make resources available for employees to pursue development opportunities outside the organisation. Employers should encourage employees to join programmes designed to overcome the barriers they face. Unfortunately, few empowerment initiatives exist which are designed with an intersectional perspective. Awareness of the need for such initiatives is growing, with some initiatives in development providing mentoring professional networks and more holistic empowerment programmes.



WOOP - Working on Our Power Programme for womxn of colour in Europe

WOOP is designed to deepen our inner knowing, empower womxn and non-binary people of colour and support personal transformation as well as provide concrete leadership practices and methods for organisational development. It puts aside the need to justify our lived experience in the face of multiple oppressions, and will give us the space to enter the deep work of personal, collective and cultural liberation. They hope to strengthen the existing movement infrastructure for racial and gender justice in Europe by creating a space to recognise and celebrate our differences.

The program will focus on the experience of womxn and non-binary people. While they recognise no one word captures how 'we' define ourselves, they have chosen to use 'x' in Womxn as an inclusive term that welcomes trans* and ciswomen ("cis" meaning people who identify with the gender they were assigned at birth) who all suffer under patriarchy.

More information is available at: <https://www.ubele.org/woop>.



Le Club XXI^e Siècle Mentoring Programme

With the acknowledgement that women of diverse backgrounds face a 'double glass ceiling' in the workplace, the '21st Century Club' in France designed a mentoring programme open to young women of diverse backgrounds, offering professional support in various fields. Partnering with a variety of companies operating in France, including Eversheds, Professional Women's Network Paris and Adecco, the programme pairs mentees with senior executives in companies to provide support and advice on how to progress within their companies.

More information is available at:

<http://club21siecle.org/action-club/mentoring-de-jeunes-femmes/>

C. Encourage and support networks and affinity groups

One aspect of empowerment can include the opportunity to exchange, vent and feel understood with people who share your experiences. Affinity groups for women, ethnic minorities, LGBTI+ staff have existed in numerous organisations for this purpose. Such groups provide a 'safe space' for employees to raise issues they may not feel comfortable addressing in broader spaces for fear of having their experiences undermined.³⁶ Affinity groups are a place of affirmation and access point for support from peers. In some cases, affinity groups are the starting places for collective action and may initiate change on a particular issue, such as acting as a source of knowledge on how to recruit and retain employees from minority backgrounds. Employers should support the development of these groups financially and otherwise.

However, as learnt from affinity groups arranged on the basis of gender, we cannot assume similar experiences of treatment in the workplace. Generally, groups are by default centred around the most dominant and powerful in that group. To combat this, employers should encourage the establishment of intersectional affinity groups. For example, affinity groups designed for women of colour could form a sub-group to an affinity

group for women, providing a space for specific discussions and support amongst women of colour.

Employees not belonging to under-represented groups may also have an interest in promoting equality and diversity, and they should be empowered to do so through the creation of non-identity defined networks.



ENAR People of Colour Affinity Group

In response to persistence of discrimination and lack of representation of people of colour in the European Union institutions and surrounding organisations in Brussels, ENAR established an affinity group for people of colour. This group serves a number of functions, including a discussion and support group for people of colour, and as a strategic body to advocate for more inclusive policies within Brussels-based institutions.

³⁶ See <https://qz.com/work/1160644/if-you-really-want-a-diverse-workplace-you-have-to-build-safe-spaces/>.

Checklist

Principles	Practices	Implementation			Notes
					
Understanding the issues at the intersections	A. Conduct consultations with affected groups				
	B. Carry out an intersectional audit				
	I. Determine issues and indicators				
	II. Intersectional data collection				
	III. Intersectional analysis				
	C. Reflection on internal structures				
Transforming the organisation	A. Develop an intersectional diversity strategy				
	B. Take steps to eradicate structural inequalities and disparities				
	I. Dismantle discriminatory policies				
	II. Employee support measures				
	III. Implement positive action measures				
	IV. Access to progression opportunities				
	V. Intersectional equal pay and value allocation				
	C. Transforming workplace culture				
	I. Revise codes of conduct				
	II. Structures of accountability				
D. Reassess diversity policies from an intersectional perspective					
Empowering women of colour	A. Make resources available to those dealing with oppression at work				
	I. Create internal or external support structures				
	II. Information tools and guides				
	B. Support employees to access empowerment programmes				
	C. Encourage and support networks and affinity groups				

Resources

Policy reports

European Commission, European Network of Legal Experts in Gender Equality and Non-discrimination. 2016. *Intersectional Discrimination in EU Gender Equality and Non-discrimination Law*.

European Network Against Racism. 2016. *Forgotten Women: the Impact of Islamophobia on Muslim Women*. Available at: <http://www.enar-eu.org/Forgotten-Women-the-impact-of-Islamophobia-on-Muslim-women>.

European Network Against Racism. 2017. *Racism and Discrimination in Employment in Europe – ENAR Shadow Report 2013-17*. Available at: http://www.enar-eu.org/IMG/pdf/shadowreport_2016x2017_long_final_lowres.pdf.

European Network Against Racism. 2018. *Racism and Discrimination in the Context of Migration – ENAR Shadow Report 2015-16*. Available at: http://www.enar-eu.org/IMG/pdf/shadowreport_2015x2016_long_low_res.pdf.

McKinsey & Company. 2017. *Women in the Workplace Study*. Available at: <https://womenintheworkplace.com/>.

Open Society Justice Initiative. 2018. *Briefing Paper: Restrictions on Muslim Women's Dress in the 28 EU Member States: Current Law, Recent Legal Developments, and the State of Play*. Available at: <https://www.opensocietyfoundations.org/sites/default/files/restrictions-on-women%27s-dress-in-the-28-eu-member-states-20180425.pdf>.

Blogs

Ahmed Sara. *Feminist Killjoy*. Available at: <https://feministkilljoys.com/2018/05/04/confrontation/>.

Kinouani Guilaine. *Race Reflections*. Available at: <https://racereflections.co.uk/>.

Toolkits and Guides

Bias Interrupters - Tools for Organisations toward a Diverse Workplace. Available at: <https://biasinterrupters.org/toolkits/orgtools/>.

Catalyst. 2016. *Engaging in Conversations about Gender, Race and Ethnicity in the Labour Market*. Available at:

http://www.catalyst.org/system/files/engaging_in_conversations_about_gender_race_and_ethnicity_in_the_workplace.pdf.

Coco – The Center for Community Organisations, Canada. Available at: <https://coco-net.org/problem-woman-colour-nonprofit-organizations/>.

Choudrey S. 2016. *Inclusivity: Supporting BAME Trans People*. Available at: <https://sabahchoudrey.com/28-page-guide-inclusivity-supporting-bame-trans-people/>.

European Network Against Racism. 2015. *Equal@work toolkit: Managing Religious Diversity in the Workplace: A Good Practice Guide*. Available at: http://www.enar-eu.org/IMG/pdf/equalatwork_2016_lr.pdf.

International Labour Organisation. 2003. *Preventing Discrimination, Exploitation and Abuse of Women Migrant Workers – An Information Guide*. Available at: http://www.ilo.org/employment/Whatwedo/Instructionmaterials/WCMS_116358/lang--en/index.htm.

Amplify Women. 2017. *Harassment Toolkit*. Available at: http://www.wakingthefeminists.org/harassment_toolkit/.

University of Southern California. 2017. *Diversity Toolkit – A Guide to discussing Identity, Power and Privilege*. Available at: <https://msw.usc.edu/mswusc-blog/diversity-workshop-guide-to-discussing-identity-power-and-privilege/>.

Academic work

Holder A. M. B., Jackson M.A. and Ponterotto J.G. 2015. 'Racial Microaggression Experiences and Coping Strategies of Black Women in Corporate Leadership'. *Qualitative Psychology*, Vol 2(2), Aug 2015: 164-180.

Ahmed S. 2012. *On Being Included: Racism and Diversity in Institutional Life*. Durham: Duke University Press.

Crenshaw K. 1989. 'Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics'. *University of Chicago Legal Forum*.

Showunmi V., Atewologun D., & Bebbington D. 2015. 'Ethnic, gender and class intersections in British women's leadership experiences'. *Educational Management Administration & Leadership*.

european network against racism aisbl



67 Rue Ducale • B-1000 Brussels
Tel: +32-2-229.35.70
E-mail: info@enar-eu.org

The European Network Against Racism (ENAR) stands against racism and discrimination and advocates equality, solidarity and well-being for all in Europe. We connect local and national anti-racism NGOs throughout Europe and act as an interface between our member organisations and the European institutions. We voice the concerns of ethnic and religious minorities in European and national policy debates.

Visit ENAR's website: www.enar-eu.org



This report was supported by ENAR Foundation. You can support its work towards achieving a racism-free Europe by donating online: www.enarfoundation.eu