



# An tSeirbhís um Cheapacháin Phoiblí Public Appointments Service

## Towards a National Action Plan Against Racism for Ireland Public Consultation 2021

### Consultation response

**Submitted by:** Public Appointments Service

**Section:** Theme Three: *Employment, education, health, and accommodation*

**Date:** 14<sup>th</sup> July 2021

#### Introduction

The Public Appointments Service are the centralised provider of recruitment, assessment and selection services across the civil and public service. We are committed to providing a premier recruitment facility to our clients who include government departments, state agencies, the HSE and local authorities in order to successfully employ suitable candidates. Additionally, we deliver an effective gateway to identify suitable individuals for consideration by Ministers for appointment to State Boards.

We provide an open and transparent recruitment process to identify top-quality candidates for public sector roles, with a strong reputation for independent and merit-based selection. We are privileged to support the Irish government and our clients to deliver high-quality public services through the recruitment of a diverse, highly talented and committed workforce that truly reflects the society that it serves.

As recruiters we are committed to equality of opportunity for all, ensuring that no unnecessary barriers are imposed on those who wish to pursue a career in the public service because of their gender, race, disability, sexual orientation or any other grounds covered by current Irish equality legislation. The Public Appointments Service has a key role to play in ensuring that routes to career opportunities are accessible to all potential candidates who are interested.

Further, we fully understand that attracting and retaining a diverse and engaged workforce is a key factor in delivering on the reforms required to meet the challenges ahead. We also understand that a civil and public service energised by the contribution of employees from all sectors of society will lead to more innovative, productive workplaces and more responsive and inclusive public policies, programmes and services.

To build on the good work underway already in the organisation, the Public Appointment Service launched its first **Equality, Diversity & Inclusion Strategy** (2021-2023) in March. The strategy is a key outcome in our corporate strategy Nua (2020-2023). It takes a planned, systematic approach to creating a more diverse and inclusive workforce for the public service through the recruitment and assignment process, ensuring also that we deliver on the statutory commitments embodied in equality and human rights legislation and ED&I-related national strategies.

Our strategy supports our commitment to delivering an inclusive recruitment service that attracts and engages diverse cohorts of talent. The three **strategic change areas** identified in our ED&I strategy are:

**1. Greater knowledge and understanding of diversity in the recruitment market and the Irish public sector**

Work in this area is focused on developing a data driven, holistic understanding of the recruitment and employment profile of the civil and public service to enable us to build strategies and initiatives to attract and engage more diverse potential candidates.

**2. Develop recruitment and selection processes that encourage and enable access for candidates from diverse backgrounds**

The Public Appointment Service is reviewing the various aspects of our recruitment model and practices through an ED&I lens to identify both barriers and good practice in our processes, policies and activity. Lack of visible diversity, role modelling and awareness of sector opportunities amongst underrepresented groups inhibit the attraction of diverse candidates.

We also aim to ensure a visible focus on ED&I in our communication and engagement with stakeholders, clients and candidates whilst also developing clarity with around mutual expectations and standards for an inclusive civil service.

**3. Our culture models best practice in ED&I and we support our clients in building inclusive workplaces**

Modelling ED&I best practice will foster an inclusive public service work culture, which is crucial to attracting and retaining diverse talent.

The Public Appointments Service plan to explore the potential for positive action in recruitment, actively engage with networks to enhance awareness of opportunities for under-represented groups and create platforms to highlight ED&I-related themes in recruitment and onboarding, while amplifying the personal, lived experience of candidates and employees.

The Public Appointments Service is an organisation that values the contribution of all individuals, and we aim to have robust, relevant policies and processes in place to minimise the impact of discrimination, prejudice or bias that, as referenced in the *Interim report of the Anti-Racism Committee* (Nov 2020), exist in Irish workplaces and wider Irish society.

A national anti-racism plan is key for a nation that wishes to embrace difference and fight racism in all its forms, and we are pleased to contribute to this public consultation on the formation of a national anti-racism plan for Ireland.

## Consultation response

### THEME THREE: Employment, education, health, and accommodation

Given the nature of our business this consultation response has focused on responding to the questions on employment *only* under Theme Three. Please find our response in the following section.

#### 1. What initiatives and actions would you like to see undertaken to combat racism in access to employment?

##### 1.1 Workforce Equality Data Collection and Monitoring

In line with Recommendation 2 of the *Interim report of the Anti-Racism Committee* to 'Take steps to put in place ethnic equality monitoring across all public services', the Public Appointment Service strongly believes that all employers in all sectors of the Irish labour force should collect robust and comprehensive workforce equality data. There is a particular onus on public sector organisations to collect this data and report on it under the Public Sector Equality and Human Rights Duty of current Irish equality legislation. This needs to be better enforced, ensuring reporting is undertaken and published to drive accountability as too few organisations are honouring this obligation at present.

This workforce data is essential to understanding the make-up of individual businesses and organisations, specific sectors and the Irish labour force as a whole. Without this data it is impossible to measure the extent to which people from, not only minority ethnic and migrant backgrounds, but all underrepresented groups, experience the labour force differently (entry into it, progress through it, remuneration, discrimination and success) from the majority group.

It will also be an essential tool to understand the employee experience beyond recruitment (See Section 2, *Approaches to reduce bias in recruitment and hiring*). Collecting and analysing data at regular intervals will also create a link to ED&I teams or D&I leads across departments to gain insights and grow their understanding of data as a tool for change.

In the absence of robust data, it is impossible to identify, understand or address the structural or institutional-based issues that may further perpetuate inequality or prejudice in an organisation, service or business.

The deficit of data is a civil service-wide issue. In order to develop a robust evidence base the Public Appointment Service believe the following actions would be most useful to undertake for all organisations intent on gathering and analysing the equality data they require

##### 1.1.1 Regular and systematic collection and analysis of:

- **Quantitative data:** Strong statements of support for the collection of this hard numerical data by public sector bodies, senior civil servants and Ministers would highlight the necessity of it to deliver a civil and public sector that is both diverse and well prepared for the challenges ahead.
- **Qualitative data:** Adoption of workplace engagement tools e.g. Inclusio, Peakon, Workvivo, Lattice or Culture Amp to promote D&I and collect data on workplace culture and environment

1.1.2 Establish a high level and targeted cross-departmental/sector working group on promoting, collecting, analysing and reporting of data, to help identify current and future trends.

1.1.3 Encourage and support the use of ED&I Audit/Reviews and systemic diagnostic tools to

- Understand better the demographics and culture of an organisation
- Establish a greater understanding of employees' experience of engagement, inclusion and awareness of ED&I themed issues
- Understand better an organisation's processes through the ED&I lens and help identify the challenges, the good practice and what needs to change in an organisation to foster diversity and inclusion
- Identify the specific evidence-based factors and actions that can help create a more diverse organisation with more inclusive operational processes.

1.1.4 For the civil and public sector organisations, encourage the practical application of the [OPS ED&I Maturity Model](#) developed by Action 16 which aims to support organisations in progressing on their EDI journey. The model identifies the specific, interrelated components of a comprehensive approach to EDI: Inclusive Leadership; Diversity Data; Recruitment & Selection: Training & Professional Development and Structures & Culture.

1.1.5 It would also be beneficial to develop a community or centre of expertise/excellence in the civil and public sectors to drive policy and accountability in this ED&I space. This team or unit could support organisations and government departments with their ED&I policy and plans whilst disseminating best practice in all aspects of D&I.

## 1.2 Work based Cultural Education and Anti-racism Training

Both cultural awareness raising and practical training including, but not limited to, unconscious bias training are essential to ensure that all employees understand and respect different cultures, faiths and backgrounds in both the workplace and wider society and are properly equipped to deal with diversity and inclusion in the workplace of modern Ireland.

We would suggest the implementation of both an anti-racism and a cultural awareness training programme for all public and civil service staff. Emphasis should be placed on the recruitment and hiring processes and staff to ensure no additional attitudinal or structural barriers are in place for candidates from diverse ethnic backgrounds, the Traveller community or other underrepresented groups.

Inclusive leadership is now a critical skill for managers and leaders alike, one that is essential to helping governments, business and organisations manage and harness the diversity of their employees to drive the innovation and creativity that is needed to solve current challenges in all sectors. Training in this area should become standard to raise awareness and develop inclusive leadership capability and capacity.

## 1.3 Approaches to reduce bias in recruitment and hiring

### ○ *Anonymous recruitment*

This involves removing information that could potentially identify and therefore lead to making a conscious or unconscious determination about a person's ethnicity or nationality (or gender or socio-economic background) based on a name.

When shortlisting candidates only their work history and their responses to specific competency questions should be used by the assessment panel in an effort to reduce the inherent human biases that we all carry. The ability to implement these techniques continuously becomes easier as

technology advances. We would recommend that the feasibility of anonymous recruitment be assessed and piloted in the civil and public service.

○ *Recruitment and Selection tools*

To meet best practice in fair recruitment, organisations should use tools and techniques to assess candidates that are proven to have no or minimum adverse impact on particular groups. Tests and assessments that are designed and used should be trialled as part of the development process. There could be scope (in the civil or public sector) to involve underrepresented groups in the development and trialling of new assessments to ensure that the exercises are fair and valid and that the instructions and familiarisation material provide sufficient information to allow all candidates to perform to the best of their ability.

○ *Monitoring of Underrepresented Group Performance in Recruitment Processes*

All candidates applying for employment should be asked to provide information on their status within the different protected groups under the Employment Equality Acts, which allows monitoring of candidate performance across the different stages of the selection process.

Currently the provision of this information is voluntary, and many candidates may choose not to complete the different fields. Encouraging all candidates to engage with this process will provide the employer with better data on candidate across all the elements in the recruitment process used, it will also identify barriers to employment opportunities for some groups.

○ *Diverse interview panels*

Both the evidence base and our experience of engaging people from diverse backgrounds highlight the diversity of interview panels as an important element in the recruitment process. Diverse panels guard against group think – or ‘bandwagon bias’ - and send a clear message to candidates about the values of an organisation and the importance they place on ED&I. Public Sector organisations should be directed to proactively ensure that their interview panels better reflect the diversity of the communities they serve.

○ *Neutral and inclusive job advertisements*

To develop guidelines to provide advice and tips on how organisations can ensure the language they use is neutral and inclusive to engage potential candidates from all backgrounds. Further, encouraging job advertisements in different languages across various channels, publications and platforms, could promote employment opportunities for various diverse communities.

#### **1.4 Representation matters**

- Increase the visibility of existing public servants from different ethnic background, or from a migrant background to help connect with and attract interest from new audiences / communities.
- Initiate and support the use of proactive bespoke supports for different underrepresented groups so they can familiarise themselves with the recruitment process and optimise their performance.
- Introduce centralised internship or full apprenticeship programmes for key entry level grades into civil and public service with transition protocols for successful placements on completion of programmes.

#### **1.5 Sectoral D&I Attraction Strategy Working Group**

Support the establishment of a new *Sectoral ED&I Attraction Strategy Working Group* to review current sectoral attraction plans – identify areas for improvement and develop new attraction plans to encourage interest from underrepresented groups. ED&I should be a central element to any workforce attraction plan to ensure it is mainstreamed into all aspects of recruitment and selection.

In any robust future-facing attraction plan new communities (and established diverse communities), new partnerships (e.g. with schools and educational institutions) and new opportunities should be developed to widen the potential pool of candidates to ensure the employee pipeline is diverse.

## **1.6 Commitments in Irish Human Rights and Equality Commission Act 2014**

The Public Sector Equality and Human Rights Duty ('the Duty') places a statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work. It puts equality and human rights in the mainstream of how public bodies execute their functions.

All public bodies should be encouraged to fully meet the commitments outlined in section 42 'Public Bodies' of the Irish Human Rights and Equality Commission Act 2014, this includes fully funding their budget to specifically target people from diverse backgrounds, embed ED&I in their services, departments and workplaces and create an inclusive workplace for all.

In the Public Appointments Service we are currently examining ways to improve our reporting under this duty by creating a template through which both our internal and external data (on candidates who apply and campaigns we undertake for the civil and public sectors) will be filtered and analysed. As a trusted partner to many government departments and public sector organisations who look to us for advice and guidance on best practice in recruitment and assessment, we will encourage our stakeholders and clients to take a similarly robust and aligned approach to data collection, monitoring and reporting.

### **2. Are there particular sectors of the labour force where action needs to be prioritised to combat racism?**

#### **2.1 Irish Labour Force**

The Public Appointments Service plays a central role in recruiting diverse talent to take up public and civil service employment opportunities, as such we can only speak to these sectors with any authority.

However, as other responses will no doubt highlight sections of the labour force where work is insecure, low paid, low skilled, often seasonal or precarious with low level of workers organising and an absence of employment rights are likely to be where bad practice and potentially hostile environments may exist.

Racism exists in all sections of society and therefore likely in all sections of the Irish workforce. Whether it is explicit, implicit, structural, organisational or at an individual level will depend on the sector, business type and workplace culture. Racism should be tackled in all its forms wherever it exists.

#### **2.2 Public Sector**

The Public Appointments Service derives its mandate and was established under the Public Service Management (Recruitment and Appointments) Acts 2004 to 2013. Most Public Appointments Service recruitment campaigns are carried out under the Commission for Public Service Appointments (CPSA) Codes of Practice. These Codes of Practice set out guidelines and standards for internal and external recruitment in the public service. The five core principles of probity, merit, best practice, fairness and transparency are applied to all recruitment processes that we run.

Our aim is to ensure we provide a recruitment process that is fair and transparent and that also is conscious of the barriers faced by people from diverse backgrounds. Our goal is to prove a recruitment process that considers those issues and provides solutions to overcome those issues and to ensure the public sector is made up of a diverse workforce that is representative of the diverse make-up of Irish society. To achieve this, we will proactively look at implementing actions to facilitate delivering on these objectives. Positive Action, alternative recruitment models and different paths to employment are all areas we will be focusing on.

### **3. What training and additional supports could help to combat racism in the workplace?**

#### **3.1 Work based Cultural Education and Anti-racism Training**

As mentioned in Section 2; *Question 1 (above)*: Both cultural awareness raising, and practical training should be provided as routine to all staff in civil and public sector.

#### **3.2 Common Language & difficult conversations**

Discussions on racism and all kinds of prejudice and bias are often challenging conversations to have in the workplace. Particularly if you are lacking the language and vocabulary need to have constructive and honest conversations about this subject. Every effort should be made by employers to equip staff with the language tools and training to have these conversations to prevent culture clashes, misunderstandings and unacceptable comments and behaviour in the workplace.

#### **3.3 Inclusive leadership training**

Inclusive leadership, considering the impact of the COVID 19 pandemic has had on the world of work in general, is now essential for the current and future leaders of the civil and public sector. All staff at a senior management grade (or aspiring to it) should have the chance to undertake inclusive leadership training, where strategies and tools for conscious inclusion in leadership are shared and discussed. This will provide senior managers with the skills to lead and manage in a rapidly changing work environment and to have equality, diversity and inclusion as a key pillar of their delivery.

#### **3.4 Cultural awareness programmes**

Key to an inclusive workplace is respecting and valuing all staff in the workplace. The evidence is increasingly clear that a workplace that embraces and harnesses the different cultures, perspectives and skills of their staff benefits hugely in terms of innovation and productivity. Cultural awareness programmes provide an opportunity to educate staff on different cultures, to break down cultural barriers, avoid misunderstandings and foster better cultural awareness and appreciation between staff.

#### **3.5 Equality, Diversity and Inclusion Liaison Officer**

Consideration should be given to a dedicated Equality, Diversity and Inclusion Officer role for the Public Sector, similar to the current Disability Liaison Officer role that is mandatory in all civil service Departments/organisations.

#### **3.6 Equality, Diversity and Inclusion Champion/Advocate**

Consideration should also be given to creating ED&I champions/advocates within organisations. While every effort should be made to mainstream ED&I, and all employees need to understand that ED&I is

relevant to their roles and that it is everyone's business, it can be useful to have clearly identified champions/advocates in a workplace who have in-house expertise/training and can act as a point of contact and collaboration for internal and external stakeholders.

### **3.7 Employee Resource Groups (ERGs) / Staff Networks**

A stronger emphasis should be placed on the importance of ERGs/Staff Networks within organisations and across the civil service as a channel for the employee voice. LGBTI+ staff networks within the public sector have shown to have had very positive impact in their organisations. These fora should be supported within and across departments and organisations, empowering staff to help shape their own workplace culture and practice, particularly with the backdrop of the emerging post-pandemic hybrid working model.

### **3.8 Ally networks**

Ally networks could also be encouraged as a way of embedding the understanding that ED&I, tackling racism and/or discrimination is everyone's business in the workplace. An allies network can be a useful support for other individuals and networks who are keen to help shape the workplace of the future. However, real allyship requires more than good intent and should come with training and supports to avoid the allyship becoming performative.

## **4. What measures could be introduced to promote employment and labour market inclusion, as well as addressing the underlying causes of discrimination?**

### **4.1 ED&I Strategies and Action plans**

Public sector duties stipulate how public sector organisations need to be report on actions and initiatives they have undertaken to eliminate discrimination and ensure staff and service users human rights are protected. Organisations and departments should be encouraged to create their own ED&I plans and strategies.

### **4.2 Pay gap auditing**

Pay Gap auditing is one way of measuring how different groups are faring within an organisation or sector – using pay as an indicator. Essential to this process is the robust collection and analysis of equality and pay data (see Section 2, 1.1: Workforce Equality Data Collection and Monitoring).

### **4.3 Better understanding of Positive Action**

If public sector organisations had a better understanding of positive action measures, permissible when the representation of certain demographics falls below a certain threshold (which can be established through labour force data), organisations might feel more comfortable using positive action as a tool to address diversity deficits. Currently there is confusion and there is a perception that positive action is not permitted under Irish equality legislation. Further positive action is often used interchangeably with positive discrimination (not permitted under Irish law) so more education on this may be an effective action for those looking to take a more proactive approach to diversity. A clear statement from the Minister of Children, Equality, Disability, Integration and Youth would send a strong message to those who are proactively trying to develop a diverse and inclusive workplace.

A recent good example of a positive action programme in the public sector is the [Senior Academic Leadership Initiative](#) (SALI) which is a new initiative run by the Higher Education Authority (HEA) funded by the Department of Further and Higher Education, Research, Innovation and Science

(DFHERIS) aimed at taking positive action to accelerate gender equality goals and objectives in higher education institutions (HEIs) in Ireland.

#### **4.4 Quotas or targets**

Current targets and quotas that exist within the public sector should be updated to be more realistically aligned with the make-up of Irish society. For example, the Migrant Integration Strategy has 1% target for public servants to be from an ethnic minority. This figure should be updated and aligned to statistics from the most recent census. Most importantly this target should be monitored, and progress tracked. It is currently not being monitored so it will be very difficult to know if it has been achieved without the monitoring data (again see Section 2; 1.1). This would give the clearest possible message that real change is expected.

#### **Equality budgeting**

Public sector organisation and civil service departments should be urged to consider trialling '[Equality Budgeting](#)'. This involves looking at an organisation's, a departmental or thematic budget through the equality lens and trying to identify and assess the impact of that budget on a particular group(s) or community covered by equality legislation. This approach to budgeting can help policy-makers and service providers to better anticipate potential impacts of the budgetary process on these groups.

#### **Alternative pathways to employment**

Acknowledgment that groups further away from the labour market or who are most marginalised may not have the traditional educational and career experience to enter the workforce via the mainstream route. Alternative methods and routes for candidates/employees to demonstrate their skills, learn on the job and have access to entry and progression opportunities - will need to be developed.

In the Public Appointments Service we have successfully rolled out two '[alternative pathways](#)' to employment for disabled people:

- *Oireachtas Work Learning (OWL)*  
the Oireachtas Work Learning (OWL) programme which is an 11-month applied learning, development and socialisation programme for adults with an intellectual disability.
- *Willing Able Mentoring (WAM) Programme*  
The Civil Service Equality Unit works in partnership with the Association for Higher Education Access and Disability (AHEAD) to create a six-month paid programme aimed at graduates with disabilities.

#### **Conclusion**

We hope you find some of the detailed actions, approaches and suggestions contained in this response of some use as you develop the national anti-racism action plan.

Should you require further information or wish to discuss any of the contents of this response, please do not hesitate to contact the Public Appointment Service's ED&I team [edi@publicjobs.ie](mailto:edi@publicjobs.ie).

[END]